

REMARKS OF FLORIDA LEGAL SERVICES, INC.

delivered by Valory Greenfield, Staff Attorney  
to the

United States Department of Agriculture, Food and Nutrition Services'  
FARM BILL NUTRITION FORUM  
Miami, FL - 10/19/2005

I am here on behalf of advocates working at the more than 25 Florida legal services and legal aid programs assisting food stamp applicants and participants. Our comments concern privatization of and technological improvement to the eligibility determination components of Florida's Food Stamp program.

In Florida, DCF is implementing its vision for an improved future called Modernization. Modernization moves public assistance program access to technology-based methods supported by a wide variety of private entry points which are not run by the state.

Modernization relies on out-sourced community "partners" to handle most application and re-application aspects of Food Stamps as well as TANF and Medicaid. DCF has tasked the community with: distributing and accepting paper applications; maintaining computer terminals where people can electronically apply or re-certify for benefits; and providing access to equipment such as drop boxes, phones, copiers, digital imagers, and fax machines so that documents can be submitted to DCF mechanically or through intermediaries instead of in-person by clients.

Modernization relies on technology through web-based application sites and delivery of customer service through the Internet as well centralized call centers with automated phone systems and integrated voice response on a 24/7 basis.

For clients who need special assistance in applying or reapplying, in-person assistance might be available through a community partner depending upon what level of service the partner has agreed to take on. Alternatively, individualized assistance might be rendered at a DCF satellite office. Contracting-out this function to private vendors is also a possibility where there is no DCF satellite office and no community partner is involved because of liability, conflict-of-interest, or cost-sharing concerns.

DCF's current plan technically keeps the final eligibility determination in-house, at least for now, at DCF hub centers, which are supposed to be technologically linked with community partners in order to provide instant access as needed.

As part of Modernization, DCF has been systematically closing offices or scaling back to satellite shell offices. At least 30 offices have already been closed or are slated for imminent closure. In other locales, most or all case workers have already been laid off en masse and only a shell office remains as a repository.

In surveys we did in counties where there have been lay offs or office closures, people had some very compelling complaints about Modernization. [speaker reads from surveys].

These folks were using the phone. They did not even try to use DCF's web-based application site which generated this exchange between two legal services attorneys [speaker reads from e-mail exchange].

It is no wonder that DCF's web-based interactive ACCESS application has since been legally challenged by a disabled relative caregiver who was unable to use it to apply for benefits on-line. The case remains pending as the ACCESS program is revised for re-deployment in 2006.

Here is our message today. Florida legal services advocates believe that current waiver authority and policy options must continue to ensure the overall structure of the federal Food Stamp program even while states are asking for flexibility in the way they deliver benefits to applicants and participants.

While improved customer service through the Internet and other emerging technologies are important opportunities, it is also important to ensure that these technologies are fully available to those without access to or the skills to manipulate technology as well as the limited English proficient, the disabled, and the transportation disadvantaged. It is equally important to ensure that all these vulnerable individuals still have access to local offices with trained staff for face-to-face assistance when needed. Florida's Modernization experience aptly demonstrates just how critical an issue this is.

The Food Stamp Program does enormous good. Its national benefit structure and its federal guarantee of benefits to eligible households are crucial to ameliorating hunger and poverty and to responding to economic downturns. It must be preserved.

*vg/FNS Farm Bill Nutrition Forum Remarks.wpd*

### Re-creation of an E-mail Exchange Between Two Legal Services Attorneys

Attorney One: You guys seen this, <http://www.myflorida.com/accessflorida> [the Access Florida web-site to apply electronically for benefits]? I swear it wasn't there yesterday.

Attorney Two: *I could not get it to load. Could you?*

Attorney One: It checked my configuration and then said the page could not load.

Attorney Two: *I really was going to apply in order to test it, but the page would not load. Not sure if that's DCF's fault or my computer's fault.*

Attorney One: Here's a link [<http://www.dcf.state.fl.us/ess/problems.shtml>] to some known errors and how to fix them if your operating system is XP. Good if you know how to work a computer - very complex instructions for someone with

limited reading and computer skills. Anyway, after I downloaded the windows XP service pack and then downloaded Active-X software, I was only able to get to page 3 of the Access application.

*Attorney Two: I'm not even on an XP platform. I use Windows 2000. There's no help information for that. By the way I got the 4/15/05 notice you faxed me announcing the new DCF "telephone system" available this month. Was this notice sent to clients? I observe that this notice contains not a single phone number on it through which to access this new telephone service. Instead the notice simply tells the recipient to continue using the old phone numbers they have been using.*

**Attorney One:** A client brought that notice to me this morning. No, not one phone number on it - but clients should call the number they've been calling, however, it they're in Orlando, the numbers are disconnected. Nice.

*Attorney Two: Disconnected? I thought when you call the old Orlando number it gets automatically routed to the call center (and then maybe does not get answered, but does not really literally get disconnected – do I have that right?). By the way, do the call centers have voice mailboxes? And if so, have you tried to leave a message?*

**Attorney One:** Whoops - not disconnected really. I meant at the old Orlando phone numbers you get the recording saying the number you are trying to reach has been disconnected, please call 407-245-1500. In fact, I got that precise message when I just called, Lake Underhill and Oakridge Service Center. For Apopka I got a busy signal. Pinehills rang with no answer. The Winter Park number went to an automatic message that said please call the Tampa Call center and gave some other number. As a last test, I called one of the few remaining open local satellite offices and got "all operators are busy right now; stay on the line and an operator will assist you shortly." The Tampa Call Center will let you stay on hold forever, or you can leave a message presumably in a general voicemail box that I don't know who checks or how often. The recorded message warns you that if you hang up you'll have to start all over with your call.