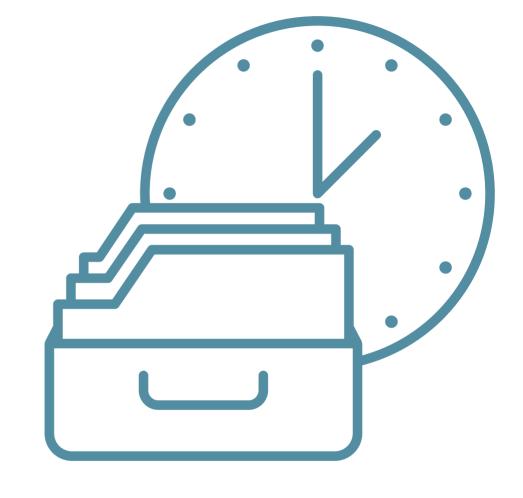
Reduced Staff and Increased Caseloads Negatively Impact Delivery of Essential Benefits to Low-Income New Yorkers



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Introduction and Context

The City provides multiple benefits to low-income New Yorkers, including Supplemental Nutrition Assistance Program (SNAP) food stamps and Cash Assistance (CA). CA consists of two programs, Family Assistance (FA) and Safety Net Assistance (SN).*

The Federal and State governments determine the program requirements, and it is up to City employees at the Human Resources Administration (HRA) division of the Department of Social Services (DSS) to process applications, determine eligibility, and ensure benefit delivery. SNAP benefits are 100% Federally funded, while CA benefits are a mix of City, Federal, and State dollars.

Applicants must complete a multi-step application process, as well as periodic recertification, to receive benefits—and these benefits must be delivered in a timely manner, as mandated by the State and Federal government. In recent years, however, HRA failed to deliver benefits on time, leading to <u>litigation</u> against the City in January 2023. As a result of the litigation, HRA agreed to process the backlog of overdue applications by <u>April 2024</u>.

Although timeliness has improved since 2023, it remains <u>significantly</u> below target, o indicating that HRA is still facing challenges in delivering benefits on time. To understand the factors contributing to benefits processing delays, IBO examined changes in HRA's staff levels, using citywide payroll data (CHRMS) and information provided by HRA. IBO's analysis focused on specific work units and titles most directly involved in processing benefits.

IBO also examined the numerous process changes caused by the pandemic starting in 2020, as well as changes requested by HRA to expedite processing and clear the backlog. Some of these changes were only temporary, but some are still ongoing as of October 2024.

*For this report, Cash Assistance refers to both Family Assistance and Safety Net Assistance. For more program information, see Appendix.



Key Findings



SNAP and CA applications have surged since 2020, accelerating with the end of pandemic-era safety programs. At the same time, staff levels declined during the pandemic and did not begin to recover until 2023 and 2024, resulting in a higher proportion of new staff and increased turnover. These factors contributed to significant drops in timeliness rate--the speed at which SNAP and CA applications are processed within their mandated timeframes. (All years refer to City fiscal years.)



Timeliness has improved since 2023, but remains a challenge, especially for CA. Almost one third of new CA applications were still overdue as of June 2024, according to the most recent data provided by HRA. To expedite the application process for SNAP and CA, HRA requested multiple new State waivers that are ongoing as of October 2024. It also switched to on-demand calling for interviews to process CA applications, which has reduced missed connections.



Timeliness for both CA and SNAP reached their lowest levels in 2022 and 2023, coinciding with a reduced workforce managing an increasing caseload and adapting to complex rule changes. From 2020 to 2022, SNAP and CA cases rose by 13%, while relevant staff levels decreased by 9%.



Process and technology changes have streamlined some tasks, reducing the workload for staff by minimizing the need to handle paper documents and making it easier for applicants to apply for benefits. While these improvements have simplified the process for staff and applicants alike, they have also resulted in more cases for staff to manage.



HRA has since increased staff levels in both CA and SNAP areas, resulting in a higher share of new staff than the full agency. There is also a much higher proportion of CA cases than in prior periods, leading to higher ratios of cases per employee.



^{*}See Appendix for more detail.

Timeline of Changes Since March 2020

March 2020

Benefits caseloads begin to increase, OTDA begins to extend recertifications, and the size of HRA staff begins to fall. Eviction moratorium and Pandemic Unemployment Assistance (PUA) program start. OTDA allows online CA applications.

December 2022

Mayor's Management Report (MMR) timeliness rates plunge, reflecting backlog of late new applications and recertifications. OTDA <u>initially</u> refuses to extend recertifications until HRA staffs up.

April 2020

Pandemic Emergency Unemployment Compensation Program (PEUC) begins.

January 2023

Legal Aid files <u>class action lawsuit</u> against the City for failing to timely process applications and recertifications.

September 2021

All pandemic unemployment programs that expand or extend UI end.

July 2023

Litigation is resolved through entry of <u>negotiated order</u> requiring City to process the backlog of overdue applications by April 2024.

January 2022

Eviction moratorium ends.

September 2023

MMR announces record-low timeliness rates for SNAP and CA.

March 2022

HRA rolls out a new technology system called ANGIE to manage SNAP, since updated to ANGIE 2.0.

March 4, 2024

City <u>announces</u> it has nearly cleared the backlog.

- In New York State, the Office of Temporary Disability Assistance (OTDA) regulates the process HRA must follow for CA and SNAP applications and recertifications.
- Multiple pandemic support programs impacted households that received CA and SNAP. Expanded unemployment benefits and the eviction moratorium helped households with additional support, temporarily alleviating the need for CA and/or SNAP for some households. Pandemic unemployment insurance included the Pandemic Emergency Unemployment Compensation Program (PEUC), which provided an additional 26 weeks of benefits to individuals who exhausted their regular unemployment insurance (UI), and Pandemic Unemployment Assistance (PUA), which expanded UI to individuals whose jobs would not otherwise qualify.

Numerous Process Changes Since 2020

Beginning with the onset of the pandemic in 2020, there have been numerous changes to the application and recertification process for both clients and HRA employees. There were also process changes in the period 2013-2019, but this report focuses on the increase in number and complexity since the pandemic began.

Select Process Changes*

In March 2020, phone interviews replaced in-person interviews for CA and the State began to allow online CA applications. However, phone interviews were not available on-demand, meaning clients had to wait for a call rather than being able to call in themselves. On-demand calling began for SNAP in 2017, but did not begin for CA until April 2023. After the implementation of on-demand calling, rejections due to missed interviews for non-emergency CA applications fell 72% in 2024, from 43,329 in the first quarter to 11,967 in the last quarter.

In March 2022, after an initial pilot, HRA launched ANGIE, a new system for staff to manage the SNAP workload. However, staff must still use the State's preexisting older system for record of eligibility, WMS. After staff <u>testified</u> at City Council about challenges and provided feedback, HRA <u>testified</u> it had been updated to ANGIE 2.0 by May 2024.

From March 2020 to June 2023, OTDA granted waivers to extend the interim reporting and recertification period for SNAP and CA. This allowed HRA to extend the period clients could receive benefits without contact with HRA, but it also changed the distribution of recertifications due at each deadline, leading to a backlog as the waivers expired.

In 2023, OTDA also issued waivers to allow HRA to reduce managerial case review for some CA cases (approved July 2023, implemented January 2024) and recertification requirements for CA clients without earned income (approved September 2023, implemented October 2023).

*For more information on process changes and waivers, see the Appendix.

Current Process

New Applications

Submit documentation through HRA's online portal, by mail, fax, or in person

HRA scans and indexes documents to show up in case record

Eligibility interview: now on-demand M-F from 8:30 AM-5:00 PM, allowing applicants to call in directly instead of waiting for a call from HRA

Follow up may be needed for missing documentation, other issues

Eligibility determination within 30 days for both CA and SNAP

Recertifications



SNAP: at the end of a given certification period, which can be 6-36 months depending on household details. (For most households, SNAP requires recertification every 12 months)



CA: recertification takes place every 6-24 months depending on presence of earned income



Recertifications also require an interview, which can be done in person or by phone

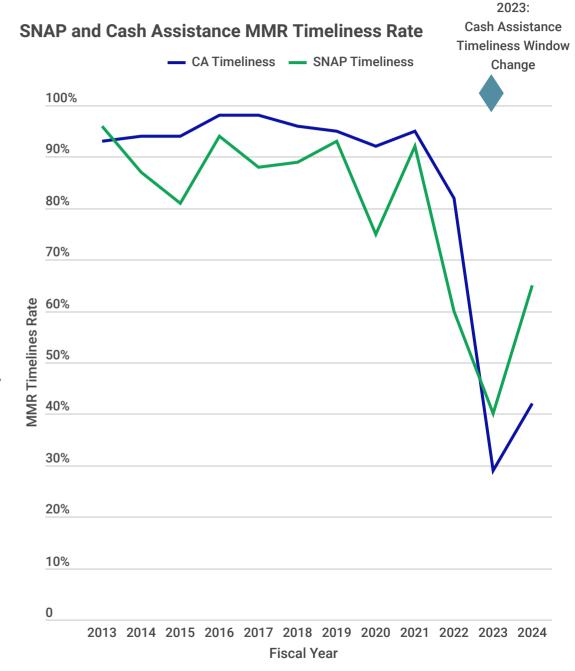


HRA required to terminate benefits when households fail to submit required paperwork

HRA required to screen CA and SNAP for expedited benefits at the time of application submission, and must issue SNAP emergency benefits within 7 days.

As New Applications Increase, Timeliness Hits Record Lows in 2023

- The Mayor's Management Report (MMR) publishes annual timeliness each year, the percentage of applications processed on time (within the required window). It defines timeliness for SNAP as applications processed within 30 days, as required by Federal law. It defined CA timeliness as applications processed within 45 days, but that changed to 30 days in 2023.
- This was a result of a New York State change. Previously the two main CA programs, Family
 Assistance (FA) and Safety Net Assistance (SN), had different timeliness windows. In October 2022
 the State reduced the SN window from 45 to 30 days to match FA.
- Between 2013 and 2020, per the MMR, HRA maintained stable timeliness rates for SNAP and CA, indicating efficient processing of applications for benefits.
- After 2020, timeliness for both programs steeply declined, hitting 10-year lows in 2022 and 2023. In 2023, SNAP timeliness was 50 percentage points below HRA's target timeliness rate of 90.6%, while CA lagged by 67 points below HRA's target timeliness rate of 96%. Some of the decline in CA timeliness may be attributed to the narrower window for meeting the timeliness metric, although HRA reports that most CA cases were processed within 30 days prior to July 2021.
- The <u>2024 MMR</u> indicates that HRA has made progress in improving timeliness but continues to face challenges in meeting the mandated rate, particularly for CA. Between 2023 and 2024, SNAP timeliness improved by 25 percentage points but remained 26 points below its target rate.
 Meanwhile, CA timeliness increased by only 14 percentage points and was still 53 percentage points below its target timeliness rate.



SOURCE: Mayor's Management Report

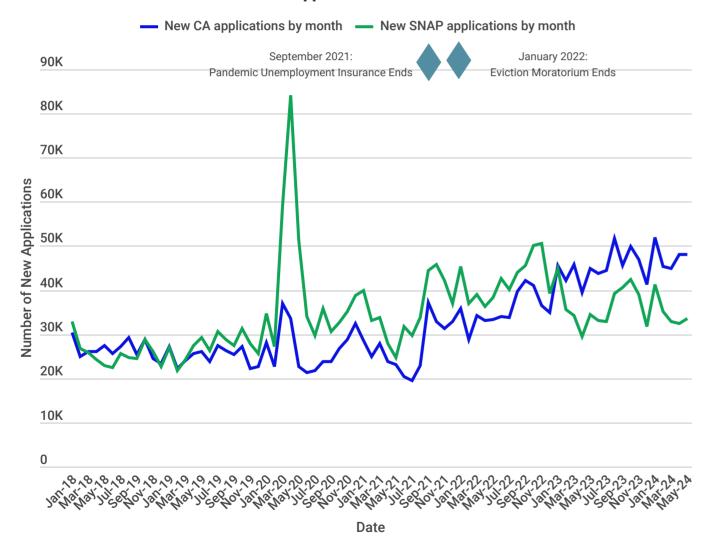


As New Applications Increase, Timeliness Hits Record Lows in 2023 (Continued)

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Demand

Demand Increases as Number of New Applications for CA and SNAP Grows



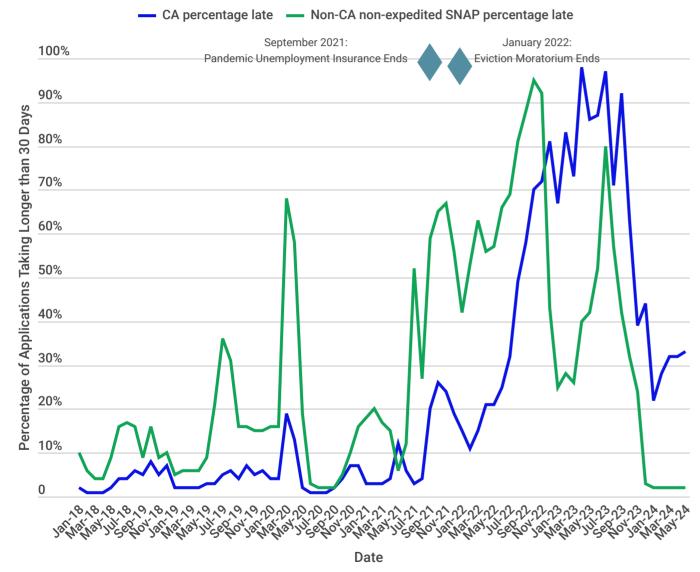
SOURCE: Human Resource Administration

- The number of new applications for SNAP and CA has grown since the pandemic, with a spike in 2020 followed by a steady rise in both programs that accelerated with the expiration of pandemic-era support programs (see timeline). City poverty levels also increased during this period by multiple measures more so than in other large cities.
- From recent lows in 2019 to the end of 2023, the average number of new applications increased by 59% for CA and by 56% for SNAP. Beginning in December 2023, the number of new SNAP applications began to decline, while the number of new CA applications continue to increase.
- Though demand has increased significantly, it does not seem to fully account for the sudden and dramatic increase in late applications. For example, from May 2021 to July 2021, the share of overdue SNAP applications grew by 750%, from 5% to 40%, while the number of new applications only grew by 20%.
- HRA has increased timeliness rates for both SNAP and CA. The MMR timeliness rate for SNAP (see previous slide) also includes CA-SNAP joint cases, but removing those cases indicates that HRA has improved timeliness much more for SNAP-only applications than for CA applications in 2024.



As New Applications Increase, Timeliness Hits Record Lows in 2023 (Continued)

Demand Increases as Number of New Applications for CA and SNAP Grows



SOURCE: Human Resource Administration

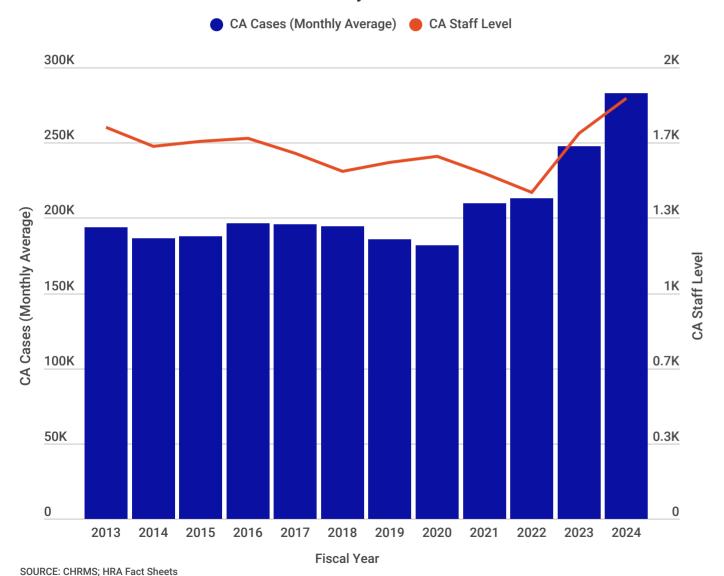


More Cases, Fewer People After Onset of Pandemic

Use the buttons to switch between views.

Cash Assistance

CA Cases Increased While Staff Level Fell Early in the Pandemic



- To examine the relationship between cases and staff level, IBO look at average monthly SNAP and CA cases, in comparison to staff levels in corresponding work units. Households that receive both CA and SNAP are processed together, so joint CA-SNAP cases are also included in the CA cases in these charts to reflect staff workload.*
- At the start of the pandemic, HRA experienced a surge in caseload alongside a reduction in staffing due to increasing employee exits and slower hiring. From 2020 to 2022, CA cases rose by 17% while staff level dropped by 10%, and SNAP cases rose by 12% while staff level decreased by 7%.
- CA cases have continued to rise after 2022, increasing 32% between 2022 and 2024. On the other hand, SNAP cases fell by 3% in the same period, and more closely resemble pre-pandemic levels.

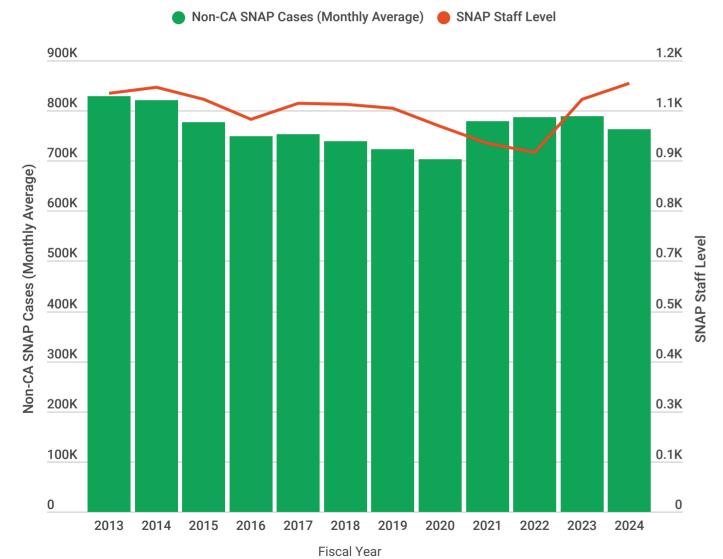
^{*}See Appendix for more detail on positions within HRA that work on SNAP and/or Cash Assistance.

More Cases, Fewer People After Onset of Pandemic

Use the buttons to switch between views.

SNAP

SNAP Cases Increased While Staff Level Fell Early in the Pandemic



SOURCE: CHRMS; HRA Fact Sheets

*See Appendix for more detail on positions within HRA that work on SNAP and/or Cash Assistance.



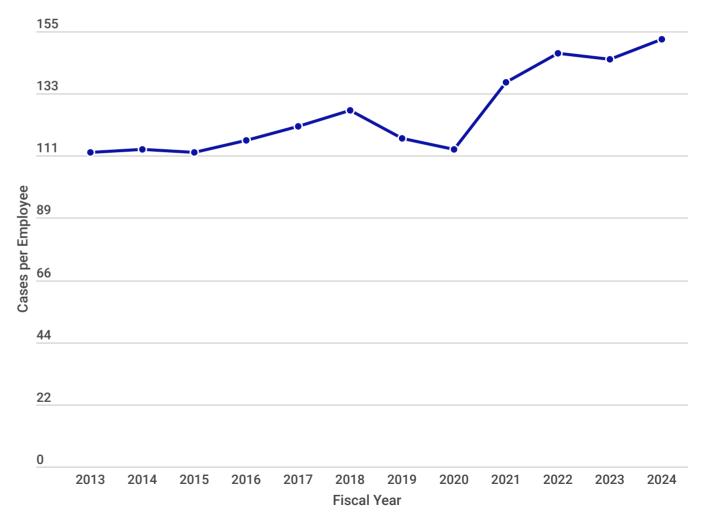
More Cases, Fewer People After Onset of Pandemic (Continued)

- An alternative way of examining the relationship between cases and staff level is to observe the number of cases per employee. IBO estimated the cases per employee as the average monthly cases relative to staff levels within SNAP and CA work units.*
- After the pandemic began—as staffing levels declined and case volume rose—the cases per employee increased by 20% for SNAP and 30% for CA.
- As HRA hired more staff, the number of SNAP cases per employee declined from its 2022 peak, falling 18% by the end of 2024.
- On the other hand, despite hiring efforts, CA cases per employee increased by 3% from 2022 to 2024, demonstrating a significant, sustained increase in cases.

Cash Assistance

Cases per Employee Increased by 30% From 2020 to 2022

— CA Cases per Employee



SOURCE: CHRMS; HRA Facts Sheet



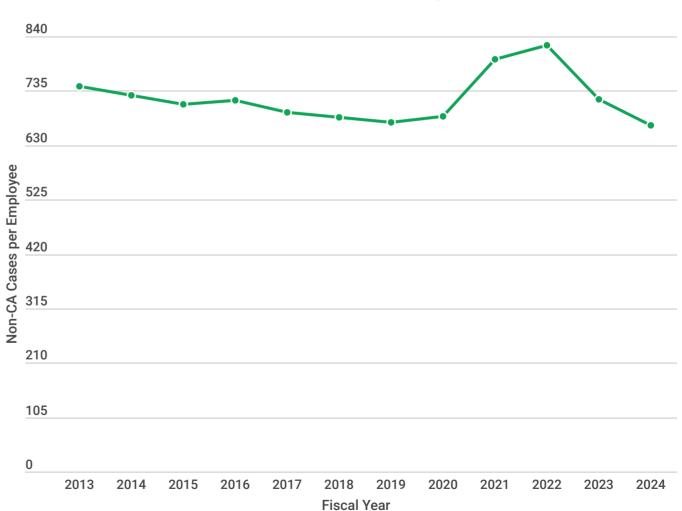
^{*}See Appendix for more detail on positions within DSS that work on SNAP and/or Cash Assistance.

More Cases, Fewer People After Onset of Pandemic (Continued)

SNAP

SNAP Cases per Employee Spiked 20% From 2020 to 2022

Non-CA SNAP Cases per Employee



SOURCE: CHRMS; HRA Facts Sheet



^{*}See Appendix for more detail on positions within DSS that work on SNAP and/or Cash Assistance.

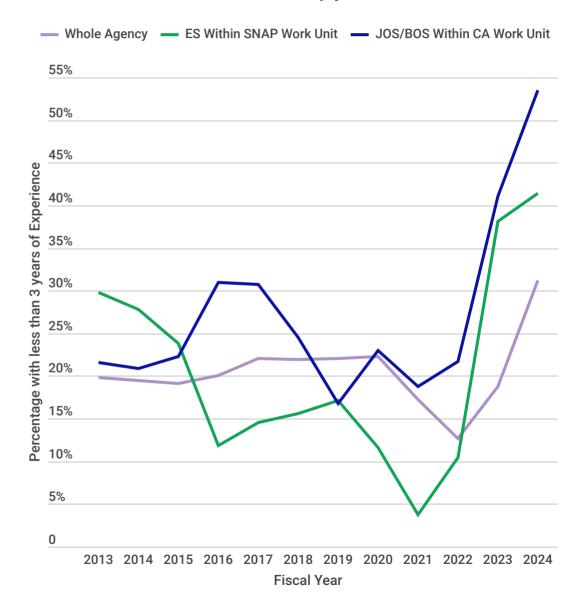
Delayed Staff Departures And Fewer Budgeted Positions After Onset of the Pandemic

- Many City workers did not resign during the pandemic: just 5% of the full agency roster left in 2021 before jumping to 9-10% in each year in 2022 and 2023. Retirements as a share of the full roster doubled, from a yearly average of 3% 2013-2019 to 6% in 2022.
- In addition to staff exits, the total number of budgeted positions within HRA has also decreased over time, with fewer positions <u>as the result of hiring</u> <u>freezes and the 2023 vacancy reduction</u>. Essential positions for benefits were exempt from hiring freezes, but HRA hired many fewer positions in 2021 and 2022. From 2020 to 2024, budgeted positions are HRA fell by 16%.
- Vacancies remain an issue even with fewer budgeted positions. In 2022, 20% of HRA's budgeted positions were unfilled, and 10% were still unfilled at the end of 2024.

More New Staff For Benefits Than in Other Areas

- To address the increase in employee exits, HRA has made a significant effort to hire, especially in specialized titles for benefits processing. Hires in relevant work units increased from an average of 131 from 2013 to 2019 to over 700 in 2023 and almost 400 in 2024. Staff in relevant work units now account for 27% of the full agency, up from 21% in 2019.
- These hires include eligibility specialists (ES), who do the bulk of the work for SNAP, and job opportunity specialists (JOS), who do the bulk of the work for CA according to HRA. The median base salaries for these positions are \$47,435 and \$53,266 (\$89,224 for Administrative JOS), respectively. In 2024, DSS began to hire Benefits Opportunity Specialists (BOS), a new title that does the same work as JOS titles, with a median base salary of \$54,864.*
- This has increased new staff at HRA overall, with a higher percentage of new staff in these areas than for the whole agency. From 2022 to 2024, average years of experience fell from 11 to 9.7 years for HRA as a whole and from 11 to 8.5 years within SNAP and CA work units—but within these work units, 40-50% of specialized titles have less than 3 years of experience.
- In May 2024, HRA staff <u>testified</u> at a City Council hearing about a shortage of trainers despite this influx of new staff and surging cases, which had reduced training time from 6 to 3 weeks. According to HRA, training time has returned to 6 weeks.*

Percentage of Staff with Less than 3 Years Experience Fell During Pandemic And Then Increased Sharply



SOURCE: CHRMS



^{*}See Appendix for details.

Summary

Findings

HRA has faced multiple challenges all at the same time, including a surge in SNAP and CA cases, a steep decline in staffing levels, experience, and numerous procedural changes, including the end of pandemic regulation and the introduction of a new data system. With increased turnover, there is now a higher proportion of less-experienced, less-trained staff.

These concurrent challenges have led to significant delays in the processing and delivery of essential benefits. This in turn negatively impacts many New Yorkers, with both staff and recipients delivering public testimony detailing obstacles they faced as recently as <u>May 2024</u>. Staff asked for more support and training and emphasized the emotional toll it takes on them and applicants when benefits cannot be delivered in a timely manner, with applicants in tears. Benefit recipients testified about the impact of delayed benefits on both their physical and mental health.

Conclusions

CA cases may decline in Fall 2024, when HRA must <u>resume work requirements for CA</u> that were suspended during the pandemic.* This may result in more people losing their benefits, potentially leading to reduced caseloads over time. However, it will also require more work for HRA employees for all cases, exacerbating challenges for the understaffed agency.

Given the high number of new applications and ongoing cases in the last couple of years, cases are likely to remain high for the foreseeable future, especially CA cases. To address this elevated caseload, HRA must find ways to improve recruitment, retention, and training, including potentially raising salaries for some of these positions.*

*See Appendix for waiver details





Use the buttons to switch between views.

Program Details

Analysis Details

Program Details

Supplemental Nutrition Assistance Program

This is a **Federal** program for low-income households, formerly known as "food stamps." To be eligible, households must meet gross monthly income of 130% FPL and net monthly income at 100% FPL, among other requirements. More specific requirements are up to the **states**, so New York State determines <u>additional limitations</u>.

Cash Assistance

In New York state, CA consists of Family Assistance (FA) and Safety Net Assistance (SN). In this analysis, IBO is looking at both types of applications together.

FA is a **federal** program and SN is a **State** program. New York State determines the cost-sharing of both programs, as well as the eligibility for SN. As of September 2024, benefits are funded 15% by the City and 85% by the Federal government, while SNA benefits are funded 71% by the City and 29% by the State.

FA is for households with minor children, 19-year olds in college or vocational training, and/or pregnant individuals. It lasts for 60 months.

SN is for adults-only households, children who do not qualify for FA, and households who convert from FA after 60 months. Recipients can receive cash benefits for 24 months, after which some households can continue to receive cash, as well as non-cash benefits such as rental or utility payments.

Both programs have some requirements for income and residency status, though households with undocumented adults can apply if they have minor children with legal status. In May 2023, **New York State** expanded SN for limited coverage to several new groups, including those who could demonstrate they had applied for asylum or Temporary Protected Status. Recipients for SN grew at an average of 1.5% each month from April 2022 through July 2024, and there is no indication that this change had a significant impact on the program.

CA also includes one-time, non-recurring emergency assistance, which can include <u>rental arrears</u>. During the pandemic, applicants for these non-recurring applications had to also apply for the Emergency Rental Assistance Program (ERAP).



Use the buttons to switch between views.

Analysis Details

Households can receive both SNAP and CA, but not all households that receive one necessarily receive the other. According to HRA, these joint CA-SNAP cases are processed once rather than going through separate processes for each program, so IBO removed the joint cases from SNAP case counts when examining cases per person and cases compared with staff level. To determine average monthly number of cases for SNAP and CA, IBO used HRA's Monthly Fact Sheets (CA cases refer to 1-month unduplicated cases, and SNAP cases refer to non-CA households).

For timeliness rates, IBO divided cases into CA and SNAP based on information provided by HRA. CA applications taking longer than 30 days do not include HIV/AIDS Services Administration, which is a small program (6% of all CA cases and 1% of all new applications). For non-CA, non-expedited SNAP applications taking longer than 30 days, IBO estimated the total number of applications based on the proportion of total SNAP households that are non-CA each fiscal year. IBO did not have access to the number of expedited non-CA SNAP households.

IBO uses the term 'staff levels' rather than 'headcount' throughout this report to refer to employees who are on the payroll, as defined below. The term 'headcount' can refer to either budgeted positions or filled positions.

Title and Roster Details

To determine staff levels, IBO used data from CHRMS to identify HRAs full-time, active roster at the beginning of the fiscal year, as well as full-time active employees hired throughout the fiscal year. Employees who separated during the year were excluded (we defined separations as employees whose leave status code was changed to "ceased" (code A) during the year in question). IBO then filtered the roster to include only work units responsible for benefits processing, as provided by HRA, to estimate the number of staff involved in SNAP and CA administration.

Specialized titles include Eligibility Specialist, Benefits Opportunity Specialist, and Job Opportunity Specialist. The Job Opportunity Specialist title includes multiple positions, so IBO defines the position as the following title codes: Job Opportunity Specialist (52314), Administrative Job Opportunity Specialist (1024A and 10248), and Associate Job Opportunity Specialist (56316).

From 2017-2022, personnel costs in the work unit associated with CA have been budgeted, on average, with 30% City, 10% State and 60% Federal dollars. Personnel costs within the work unit associated with SNAP has, on average, been budgeted evenly between HRA and the Federal government government, with a different share in 2022 only. Actual revenue varies.



Appendix

Process and Waiver Details

There have been numerous changes to the application and recertification process for both clients and HRA, including:

March 2020:

Phone interviews replace in-person interviews for CA (SNAP began phone interviews in 2017).

March 2020 - June 2023

The State Office of Temporary Disability Assistance (OTDA) grants waivers to extend the recertification period for SNAP and CA, allowing benefits to continue past 1 year with delayed recertification deadlines.

March 2020-June 2022

The United States Department of Agriculture (USDA) <u>allows states</u> to waive interview requirements for SNAP, pending other verification. The interview adjustment was available <u>through May 2024</u> but HRA resumed interviews in June 2022.

March 2020 - Februaury 2025

Able-Bodied Adults Without Dependents (ABAWD) work requirements suspended for SNAP, first under the Families First Coronavirus Response Act_and then under a State-wide waiver from the USDA.

April 2020 - July 2023

OTDA suspends work requirements for CA recipients in <u>April 2020</u> and permits districts to resume in <u>June 2021</u>. HRA resumed enforcing these requirements in <u>late July 2024</u>.

November 2020 - present*:

OTDA grants waiver for supervisory case review for <u>SNAP</u>, allowing some cases to be exempt from managerial approval.

March 2022:

HRA launches ANGIE, a new system for processing SNAP, after initial pilot program.

June 2022-present*:

On-demand interviews available for SNAP, allowing clients to call in without waiting for a call for a scheduled interview.

October 2022:

OTDA shifts timeliness window for CA changed from 45 days to 30 days, to match SNAP 30-day window.

April 2023:

On-demand interviews begin for CA and CA/SNAP cases, starting with recertifications.

May 2023 - present:

OTDA <u>expands</u> SNA eligibility to individuals who have applied for asylum or Temporary Protected Status

July 2023 - present*:

OTDA grants supervisory case review waiver for CA.

Sept 2023 - present*:

OTDA grants waiver for CA clients with no earned income to send in mailers every 12 months, up from every 6 months.

On 11/4/24 IBO corrected the date for the ABAWD waiver from March 2020-September 2025 to March 2020-February 2025



^{*}According to HRA, these ongoing waivers do not have a durational limitation. For on-demand interviews, there is no duration for CA and DSS has requested a 4-year renewal for SNAP.