MEMO

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From: The Alliance to Transform CalFresh
       California Association of Food Banks
       California Coalition of Welfare Rights Organizations
       California Food Policy Advocates
       Community Health Councils
       National Health Law Program
       Neighborhood Legal Services of Los Angeles County
       San Francisco-Marin Food Bank
       Western Center on Law and Poverty

Date: April 8, 2019

Re: Advocate Recommendations for User Centered Design in the Development of the CalSAWS System

Hello,

Our coalition, comprised of anti-hunger, health, and youth rights advocates, appreciates the opportunity to engage in the SAWS migration planning efforts through the CalSAWS Stakeholder Engagement Meetings. As part of our engagement, we welcome the efforts to
include User Centered Design (UCD) as part of the procurement processes. We are particularly encouraged that advocate feedback is being incorporated into a number of ancillary systems beyond the portal/web app: lobby management, document imaging, and contact center technologies.

This document intends to communicate advocate interest in the integration of user centered culture throughout the CalSAWS and ancillary system development, to identify opportunities for user engagement that may allow for meaningful involvement from a diversity of users, and to relay actionable recommendations to prioritize and incorporate UCD in procurement, design, development and implementation processes.

Among our eight recommendations are consistent themes to incorporate user centered culture in order to meaningfully prioritize the needs and expertise of users through each step of the development of CalSAWS and its ancillary systems.

While the CalSAWS development is an ongoing process with a set time constraint, its ultimate success depends on its ability to meet the needs of actual users: consumers seeking critical benefits; eligibility workers serving their communities; application assisters supporting their clients; and the county and state administrators and analysts that need reliable data to improve processes and comply with state and federal reporting requirements.

Advocates share with our partner stakeholders the goal of a successful CalSAWS. We, therefore, encourage the decision makers tasked with implementing the CalSAWS plans to prioritize the opportunities to cultivate user centered culture and implement User Centered Design throughout the development and enhancement of the system and beyond.

We look forward to feedback on these recommendations and future opportunities to engage in these efforts.

Sincerely,

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User Centered Design in the Development of the CalSAWS System:

Recommendations from Consumer Advocates

April 2019
Acknowledgements

We are grateful for the generosity of many people who shared their time and expertise, and helped develop the vision for a user centered system that can truly benefit low income Californians and help eliminate poverty. This report would not be possible without you.

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About Us

We are advocates and entities who envision a CalSAWS development and implementation that (1) maximizes ease of use for program applicants, participants, and workers, (2) protects consumer rights; and (3) promotes continuous program improvement. The CalSAWS Advocates Group meets regularly to develop recommendations and strategies for CalSAWS.

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Background on CalSAWS

Thirteen million Californians depend on one of three software systems, managed at the county level through consortia, to handle eligibility determinations and enrollment for social safety net programs including CalFresh, CalWORKS, Medi-Cal, and General Relief. The software systems are called Statewide Automated Welfare Systems (SAWS). The federal government recently announced that California must migrate to a single system, now referred to as CalSAWS, by 2023.¹

CalSAWS is being developed from the existing Los Angeles system, called LRS, but a number of ancillary systems and business processes will need to be created or enhanced, including technologies for contact centers, document management, lobby management, workflow management, the online portal and mobile app. Additionally, the ongoing CalSAWS maintenance and operations will include changes to policy and usability that will benefit from User Centered Design (UCD).

This document intends to communicate advocate interest in developing a strong and functioning CalSAWS and ancillary systems through the integration of UCD and user centered culture, to encourage exploration of alternative means for user engagement that may allow for a broader inclusion of users with less burden on each individual², and to relay actionable recommendations to prioritize and incorporate UCD in the procurement, design, development and implementation processes.

Why User Centered Design Matters

Government and even para-governmental organizations often get a bad rap for the technology solutions they develop. Costly yet cumbersome, government technology has often struggled to meet the needs of users; common deficits include limited capacity and a clunky interface. Sometimes these systems are siloed, creating extra work for government employees who must implement work-arounds in order to use them in an integrated way. But there are exceptions where an interface and design have been considered successful, either outright, or in comparison to its peers. In these instances, user feedback has played a key role in the development and improvement of technology (see page 6 for case studies).

User Centered Design, which is intended to be incorporated throughout the solution design and development process, is different than User Acceptance Testing (UAT), which confirms primarily the technology aspects of a product near the end of the development, and does

² The memo is in response to and offers alternative perspectives to the “Approaches to Design” presented by CWDA at the CalSAWS Stakeholder Engagement check in meeting. November 2018.
not ensure functional policy implementation. UAT without ongoing user engagement is not an acceptable substitute for including users in the design process.

Incorporating the value of user feedback into the culture of the work means, “government agencies hold themselves to a higher standard by making sure that users can access, understand, and use the information provided. It also means that users can accomplish their tasks, give input, and know that their feedback is taken into consideration and acted upon.³

UCD and user testing should be incorporated early, before findings are too late to implement or too costly to address; and they should be incorporated widely, not limited to “front-facing” aspects of the system.⁴

Advocate’s Interest in CalSAWS and User Centered Design

Consumer advocates see the development of a successful CalSAWS as a high priority due to the considerable impact the technology has on the implementation of policy, the ability to track client outcomes, the user experience, and most importantly, the ability for economically-vulnerable consumers to access and maintain the benefits to which they are entitled (See Box 1). As consumer advocates we are engaged in the SAWS Stakeholder process; we also intend to participate directly and support user engagement in the CalSAWS development.

At the November 2018 meeting for the CalSAWS Stakeholder workgroup, the presentation included ideas for developing feedback from stakeholders. Possible approaches included focus groups, design sessions, user labs and testing⁵, and relied on somewhat time-intensive models and a core set of participants. This document intends to expand upon these recommendations with a vision for UCD and user feedback that can successfully and positively impact the CalSAWS and ancillary system development.

UCD is “an explicit understanding of users, tasks, and environments; driven and refined by user centered evaluation; and that addresses the whole user experience.”⁶ In this regard, UCD should be part of the culture of the CalSAWS development⁷ (including ancillary

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⁵ “Approaches to Design” presented by CWDA at the CalSAWS Stakeholder Engagement check in meeting. November 2018.


systems), migration, and beyond, as evidenced by the inclusion of procurement and planning language focused on engaging users at reasonable intervals through each crucial step of the procurement, design, implementation and ongoing maintenance processes.

Organizational culture, as described by organizational theorists Hill and Jones, is “a specific collection of values and norms that are shared by people and groups in an organization and that control the way they interact with each other and with stakeholders outside the organization.” In this way, user centered culture would be the cultivation of values and norms throughout an organization that prioritize the needs of users and seeks to maximize opportunities for feedback from users throughout the course of product development and implementation.

Box 1: Consumers at the Heart of Design

The vignettes below are examples from real people that highlight the ways that CalSAWS and its ancillary systems must be able to meet a variety of needs and abilities of consumers attempting to access benefits and engage with County Welfare Departments.

Lual came to the US two decades ago as a refugee with five children, three of whom are now in college. He has worked as a security guard for many years, but was recently laid off. He does not want to ask for help from the government, but he has decided to apply until he can find another job so he can feed his kids. Lual is trying to reserve the funds he has for gas and phone minutes for job interviews; waiting on hold and getting to the office is a burden.

Jessica is 45 years old. She has worked as a chef, children’s cookbook author, teacher, and has run several of her own businesses. She survived four cancers, the most recent of which required extensive surgery, with the unintended consequence that her body struggles to process nutrition and keep her hydrated. She is now disabled and lives with her parents. She struggles to do simple tasks without severe exhaustion and cognitive limitations. Jessica relies on Medi-Cal for her medical needs and plans to apply for CalFresh when the SSI expansion is implemented. Sometimes the reality of how much her life has changed in the last few years is too much for her and she breaks down in tears when she has to explain her story over and over again to benefits providers. When she applies for CalFresh this summer she needs a simple process and support from eligibility workers to mitigate her reduced cognitive abilities.

Oliver is a senior on a fixed income. On the weekdays he eats lunch at the senior center. His social security check only goes so far, sometimes he skips dinner or goes through the weekend with only one or two meals. He can’t afford medical expenses and the food he needs. He has considered applying for help like CalFresh but feels embarrassed, isn’t sure if it would be worth it, and mostly doesn’t know how to find out where to start. He needs a process that is designed for his needs and respects his dignity and abilities.

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Case Studies on User Centered Design in California Technology Developments

The experiences shared below show the ways that user engagement has made a difference for the CalHEERS, Los Angeles’ YourBenefitsNow!, and Code for America’s GetCalFresh. Engaging users improves system design and can reduce overall costs if it is implemented in a timely and ongoing basis. We know from the research and from experience that successful technology depends on the engagement of users and the elevation of their needs in the development process.

**CalHEERS**

The California Health Eligibility, Enrollment and Retention System (CalHEERS), is an example of an iterative process which included agencies, counties, advocates, and consumers and has led to consistent improvement and performance. CalHEERS serves as the Single Streamlined Application (SSApp), for Covered California and MAGI Medi-Cal, backend case management, and health plan enrollment technology. It is jointly owned by Covered California and the Department of Health Care Services (DHCS).

Although CalHEERS was seen as an initial success compared to the Federal Healthcare Exchange website and many other state-based marketplaces, the rollout brought significant challenges from a consumer perspective. These included a lack of programming for users to retrieve forgotten passwords, manual processing to cull multiple accounts created for a single user, and problematic interfacing with county eligibility systems, among others. This resulted in a backlog of applications that ballooned to 900,000, multiple conflicting notices, incorrect and inconsistent eligibility results, and an impossible volume of “trouble tickets” for system errors that needed manual intervention.

Given the AB 1296 mandate to work closely with consumers, advocates, and county stakeholders, Covered California and DHCS allowed consumer advocates to run test scenarios in user-acceptance testing. As a testimony to the success of this process, to this day, a core group of advocates still engage in on-site user testing before the deployment of each major CalHEERS release. In addition, they created a number of workgroups to address overlapping issues of policy and technology such as notices, transitions between programs, income counting, and immigration, as well as user experience. In each of these workgroups, advocates emphasized that if the application and user experience does not elicit the correct information, the system will give wrong information and incorrect eligibility results.

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DHCS later employed a contractor to incorporate UCD principles in the application process.\textsuperscript{11} The Department sought to simplify the application visually and to optimize user experience. For example, part of the improved design reduced the amount of text on each page and incorporated dynamic questions whereby the application expanded or hid questions depending on an applicant’s answer.

The Department consulted with advocates for feedback on consumer impact and experience in each round of drafts of the UCD improvements. The Department also conducted a number of consumer-user testing sessions and studied how individuals interacted with both the improved UCD pages and the mobile app. The Departments continue to engage in user centered design initiatives and improvements.\textsuperscript{12} For example, before every CalHEERS feature release that changes the consumer-facing application, Covered California or DHCS provides advocates with screenshots and an opportunity to provide feedback.

The user-engagement processes that have been created through AB 1296 show that effective user engagement is possible, and can have significant positive impacts that result in technology that is more functional and accessible for users, including both consumers and eligibility workers.

\textit{Los Angeles County and YourBenefitsNow!}

In another example, LA County engaged consumers and their advocates to give user feedback on their call center ancillary operations and the Your Benefits Now! online portal. Through this process, users and advocates have identified design obstacles (such as IVR menu options, authentication barriers, and streamlining of the document submission interface.), and worked closely with LA County officials to develop solutions that improve ancillary operations.

\textit{Code for America and GetCalFresh}

GetCalFresh, developed by Code for America, has been a successful solution with a clean and simple interface for online CalFresh applications. Code for America routinely analyzes data from users on their site, and engages users directly, to inform their design decisions. Code for America incorporates this user feedback on an ongoing basis to ensure that GetCalFresh is continually improving. When developing new features, Code for America starts by conducting interviews with users in the target population.

\textsuperscript{12} California DHCS, \textit{User centered design Updates.} https://www.dhcs.ca.gov/services/medical/eligibility/Documents/AB1296/UCD.pdf
Getting it Right

For government and other entities creating technology to serve the public, especially to serve people in need of social safety net supports, “getting it right” is strongly correlated with the focus on users\textsuperscript{13} and the incorporation of UCD.\textsuperscript{14} Errors in development and design are costly for government agencies to deal with, take up precious staff time, and are expensive to repair.\textsuperscript{15} These errors are compounded when eligibility workers must correct errors that result in erroneous eligibility results.

Conversely, UCD can help developers identify problems or avoid them altogether. User engagement gives technology vendors and decision-makers the necessary information to develop products and processes that will actually be successful when they are launched. Procurements that include explicit language for early and ongoing user engagement will have significant return on investment as the solution is more able to meet the true needs of the intended users, and saves agency time in developing a product that doesn’t require costly “out of scope” reworks after launch.\textsuperscript{16} The CalSAWS and ancillary systems have significant time barriers due to FNS requirements, but the engagement of users is a key component for success; without sufficient user feedback along the way, the risk of designing flawed systems is too great to be ignored.

User Impact throughout CalSAWS

Consumer perspectives must be developed directly from representative consumers themselves. As noted in our \textit{Migration Interest Areas and Planning Priorities} document, there are a number of features of the CalSAWS and ancillary systems that directly impact consumers, and application assisters, even if they are considered “back-end.” For example, the system migration and protocols for consumer information directly impact consumers’ access to services; data warehousing and standards impact the ability to understand consumer outcomes and identify opportunities to create systems improvements; the ability to integrate with future technology determines how government can improve systems over time with reduced cost.

Other users are impacted by both front-facing and back-end design: application assisters and eligibility workers need technology that is easy to navigate, minimizes confusion, and

\textsuperscript{16} “Dr. Susan Weinschenk notes that of those [worldwide] IT investments … at least 50% of a programmers’ time during the project is spent doing rework that is avoidable.” Usability.gov, \textit{Benefits of User centered design}. Accessed March 5, 2019. https://www.usability.gov/what-and-why/benefits-of-ucd.html
allows them to provide a simple and effective experience for consumers. Therefore, engaging those users with CalSAWS and ancillary technology should incorporate core UCD concepts such as accessibility, usability and logical information architecture. For eligibility workers especially, the accuracy of program eligibility determination results and effective case management depends upon a system they understand, can navigate easily, and that minimizes confusion and errors.

We strongly encourage decision makers to consider the ways that a diverse group of users may be impacted by all aspects of the design – be they front-facing or back-end – and prioritize opportunities for feedback early and often throughout the process in order for the feedback to be useful. This type of empathetic engagement, which elevates user experience, is crucial.\textsuperscript{17} As noted in the Design Thinking Bootleg guidance (Box 2) from the Institute of Design at Stanford, “the problems you’re trying to solve are rarely your own, they’re those of particular users. Build empathy for your users by learning their values.”\textsuperscript{18}

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\textbf{Box 2: Design Thinking Bootleg}

The “\textit{Design Thinking Bootleg}” is a resource developed by the Institute of Design at Stanford (d.school) to identify the core elements of User Centered Design, along with ideas for implementation.

The first and most important card in the deck is: “Empathize: Empathy is the foundation of human centered design.”\textsuperscript{11}

According to the d.school, “The best solutions come from the best insights into human behavior.”\textsuperscript{11}

The modules of Empathize, Define, Ideate, Prototype, and Test are all rooted in empathy and iterative processes that engage with real users throughout.

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Recommendations

Social Interest Solutions has developed four documents that summarize important aspects of user engagement. Code for America has similarly created recommendations for the SAWS and ancillary system development. Usability.gov provides overviews of UCD processes, methodologies, and tools. The Alliance to Transform CalFresh has created a Racial Impact Statement detailing the need for focused attention on assessing and mitigating racial and language disparity in the CalFresh eligibility process. These sources inform our recommendations and perspective.

Recommendation 1: "Users" should be defined by actual users of the technology. For the purposes of CalSAWS and ancillary systems, we recommend defining users as:

1. Program applicants and beneficiaries, applying for benefits, renewing them via the online portals, and seeking to find or submit updated information about their case.
2. Eligibility staff who process applications, renewals and other documents or information to make case determinations and updates.
3. Application assisters who use the online portals and other systems to support their customers’ enrollment and case maintenance.
4. County and state administrators, analysts, and managers who leverage data to evaluate program performance.

Recommendation 2: Require that consumer users engaged for their feedback significantly represent populations that are most at risk of poverty and/or least likely to access benefit programs.

1. Population types should include but not be limited to: a diversity of race/ethnicity, marital and family status, income types, income levels, housing status (i.e., housed and houseless people), and non-English language speakers.
2. Usability testing should be conducted for versions of the system (e.g., the portal or mobile app) that use languages other than English.

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Recommendation 3: Include recruiting costs and participant compensation as part of the requirements for each relevant project budget.

1. Identify funding to support community based organizations to engage consumers in developing feedback on various aspects of the SAWS system, including ancillary systems, business processes, migration and implementation expectations.

2. Include funding for stipends for participating consumers who engage in UCD and testing to value their time and expertise.

Recommendation 4: Understand the users’ “as-is” experience by capturing capabilities and usability of the current system to create a “baseline” of understanding on which to learn and build.2223

1. Conduct user research that includes both existing data (such as website analytics, social media activity, call center activity, and satisfaction surveys) plus new data (such as contextual interviews, focus groups, card sorting, remote testing, and mobile device testing) to develop a baseline understanding of the current system and user needs.

2. Use baseline information to establish criteria to evaluate the new system, identify goals or targets, and inform development of said system.

3. Compile and share this information at the CalSAWS Stakeholder Workgroup and on the Stakeholder Workgroup website.

4. Work with advocates to set the criteria by which to evaluate the new system.

Recommendation 5: New data developed through direct engagement with users should include empathetic approaches24 and numerous opportunities to verify insights and confirm solutions. (See Box 2)

1. Identify opportunities for effective user engagement that are the least onerous for consumers and other users. Participant compensation levels should be tiered for the time and effort it takes for engagement.

2. Evaluate the use of empathetic approaches and include them as criteria for assessing the UCD experience of potential vendors.

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3. Ensure testing conditions recognize the technology needs of the population engaged (e.g., those smartphone dependent for access to the internet will need to test with their smartphone via a mobile app or mobile-responsive website).

4. Ensure testing designs and conditions recognize the fluid nature of consumer user availability and accommodate one-time participation.

5. Compile and share this information at the CalSAWS Stakeholder Workgroup.

6. Identify the ways the findings will be incorporated into the procurements and beyond.

**Box 3: Engage Users during the Design Process**

1. Create an advisory group and call on them periodically to help the design team refine requirements and keep focus on user experience. The advisory group could represent experts and/or a group of representative users.

2. Facilitate focus groups to evaluate high-level concepts.

3. Conduct usability testing on early prototypes to gain feedback on what’s working or not working in the design. Ideally, you would do this more than once in the process.

4. Conduct “participatory” or “co-design” sessions. These are typically hands-on activities where representative users make suggestions for specific design details.

5. Go back into the field for more in-context observation or deep dives into thornier problems.

*Social Interest Solutions – User Engagement Best Practices*

**Recommendation 6:** Procurements should include language for ongoing user research and solution identification to be conducted as part of system maintenance and improvement over time. See Box 3 for examples from Social Interest Solutions.

1. Require a yearly usability review that includes a number of measures with feedback from consumers and application assisters.

2. Require that findings from the usability review be assessed for implementation.

3. Require that findings from the usability review, including assessment conclusions, be shared with consumer advocates in a timely manner.

4. Require that the development and implementation of new features (e.g. those that address policy changes) be evaluated for UCD and user testing.
**Recommendation 7:** Solutions should be readily compatible to meet the needs of different users including:

1. Compatibility with any other software or systems that may be purchased or developed to help with data analysis or visualizations (e.g., Tableau);
2. Functionality on a variety of devices that users have at hand (e.g., Tablets, smartphones, desktop computers).”

**Recommendation 8:** Establish a long term plan and commit to institutionalizing UCD throughout CalSAWS development, implementation, and maintenance. Secure user experience experts to develop a roadmap for integrating UCD and cultivating user centered culture as a core value for CalSAWS and its stakeholders.

1. Hire a UCD expert to oversee and direct User Centered Design throughout the development, migration, and stabilization of the CalSAWS system. This team would:
   a. Identify opportunities to incorporate UCD throughout the process and within the procurements.
   b. Facilitate the partnerships and engagement with various stakeholders.

**Conclusion**

We strongly encourage CalSAWS decision makers to develop a user centered culture, marked by: the regular acknowledgement of consumers, advocates and application assisters as part of the “team” along with counties and eligibility workers who are working to create CalSAWS; inclusion of UCD and direct user engagement expectations in all procurements; and a willingness to partner with consumer advocates to identify opportunities that benefit consumers and ensure programmatic goals can be met.

California could be a leader and a model for valuing the expertise and insights of low-income Californians in developing the technology intended to support and benefit them. The SAWS technology plays a significant role in impacting poverty, and the myriad social issues that are linked to poverty in our state. But in order to have significant positive impact, user-centered culture must be a priority that is integrated throughout the CalSAWS system procurement, development, and design processes.

We look forward to the opportunities to partner to elevate users in the creation of a single CalSAWs for California.

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