JUNE 23, 2021

AGENDA ITEM 6
INFORMATION ITEM

CALIFORNIA ABLE ACT BOARD

Customer Service Escalation Process

Background:
CalABLE launched the account enrollment program on December 18, 2018 with a Customer Engagement Center (CEC) assigned to assist customers with calls related to opening a CalABLE account. In Q1, 2019 the CEC received 1,452 calls during with a small percentage of these calls being escalated to management. As the program has grown over the last two years the CEC calls have grown as well, with 3,152 CEC calls during Q1, 2021. Despite a growth rate of 51.6% in calls received by the CEC, the percentage of customer escalations received by the CEC is less than 1%. The staff at CalABLE has received a smaller percentage of customer escalation calls. The nature of the escalation calls are related to individuals who are experiencing problems interacting with CalABLE and may be unable or unwilling to comply with the program requirements for resolution.

Analysis:
CalABLE is aware of the program requirement concerns and has taken a proactive approach to resolve the individual concerns and implement procedural enhancements as necessary. Infrequently, individuals may be dissatisfied with the response provided by the CEC, and the CalABLE staff. In certain instances, the individual may expand their complaint to other state agencies, the California State Treasurer's Office and other regulatory agencies with claims of being discriminatory, or "unfriendly to the disability community and not providing accessibility resources".

CalABLE takes each of these concerns seriously and has the sought guidance of the State Treasurer's External Affairs support staff and board members. CalABLE staff and the CEC team members have received additional training from the industry professionals at the World Disability Institute and advocacy groups such as Resources for Independent Living, Sacramento. The trainings addressed identifying the disability accessibility needs and interacting with the disability community, including customer service for individuals with mental health conditions.

Recommendation:
CalABLE Staff would like to engage the board in an informational discussion to identify the appropriate resources to handle the most persistent complaints in an effort to maintain sensitivity to the community served, provide a high level of transparency and

accountability regarding our commitment to our stakeholders, protect program interests from a liability and public relations standpoint, and offer a formal escalation process that allows for a hearing of issues and an offering of a final resolution that provides closure for the complainant, and cover for the program. Each of the solutions staff has identified will require additional resources and CalABLE staff time to formulate a resolution. A discussion deck is included in the board packet that will further outline the issue, explore the research that staff has undertaken, and offer potential solutions for consideration.

CalABLE

Providing greater financial security to Californians living with a disability

Table of Contents

Customer Escalation Statistics by TIAA

Quarter End	CalABLE Program Accounts	Total Calls	Program Escalations	Escalations as a % of Accounts	Escalations as a % of Calls	Program Reqmts Were Not Met by Participant	Program Reqmts Were not Met as a % of Accounts
1st 2021	5,004	3,152	4	0.08%	0.13%	1	0.0002
4th 2020	4,344	2,828	2	0.05%	0.07%	1	0.0002
3rd 2020	3,708	2,524	7	0.19%	0.28%		-
2nd 2020	3,216	2,398	7	0.22%	0.29%		-
1st 2020	2,696	2,079	8	0.30%	0.38%		-
4th 2019	2,224	1,896	0	0.00%	0.00%	1	0.0004
3rd 2019	1,920	1,931	3	0.16%	0.16%		-
2nd 2019	1,438	1,567	2	0.14%	0.13%		-
1st 2019	914	1,452	5	0.55%	0.34%		-

Prepaid Card Escalations by TIAA

Quarter End	CalABLE Program Accounts	Prepaid Card Escalations	Escalations as a % of Accounts	Prepaid Card Reqmts Could Not Be Met by Participant
1st 2021	5,004	25	0.50%	8
4th 2020	4,344	19	0.44%	
3rd 2020	3,708	25	0.67%	1
2nd 2020	3,216	20	0.62%	2
1st 2020	2,696	12	0.45%	1

TIAA Escalation Process

- For both Plan and Pre-Paid Card matters, there is an escalation process in place in which matters are sent to TFI. These items are collaborated on to ensure that all options are exhausted for resolution.
  - TFI is contacted by Intuition, FIS or the State with an escalation
  - TFI consults with Compliance, Risk, Fraud & Legal on these matters
  - Client satisfaction in concert with Regulatory/Program compliance and Risk/Fraud mitigation is paramount

- TFI conducts weekly meetings with Plan and Pre-Paid Card resources to discuss:
  - Open issues
  - Closed matters to identify trends and opportunities for improvements
  - General operation matters and a look ahead at the coming period for preparedness

Customer Service Scenarios

Example 1

A customer would like to open a CalABLE account, but does not have a Social Security card. CalABLE disclosure statement requires the Beneficiary to have a verifiable Social Security number or other taxpayer identification number in order to open a CalABLE account.

- CEC advises customer of acceptable documents for verification
- Staff contacts SSA to determine process to receive replacement card during office closures.
- Provide individual with instructions for securing new card and submitting required documents.

Customer Service Scenarios

Example 2

Potential account owner attempts to open CalABLE account. During identity verification it is determined that account owner is listed listed as deceased through background reporting vendor.

- CEC works with individual for additional identifying information
- CEC/CalABLE staff engages with customer and vendor seeking resolution
- CEC advises account holder in order to continue contributing to ABLE account and receive prepaid card, steps would need to be taken with reporting agencies to clear up misinformation

Customer Service Examples

Example 3

Potential CalABLE account holder believes program is not following federal ABLE Act requirements and counting retirement income against benefits programs.

- Customer is provided with copies of program disclosure statement, federal law text, and Social Security Administrations Program Operations Manual which state that income, even when deposited in an ABLE account is still a countable resource under the law.
- Customer is also informed that CalABLE does not track, nor does it make a determination on whether or not an item is a countable resource against benefits.
- Customer is provided with CalABLE identified contacts they may speak with directly in order to receive clarifying information.

CalABLE Resolution Process

- Seek to Understand
  - CalABLE staff receives the customer complaint call and listens to the explanation
  - CalABLE works with customer to facilitate understanding of plan rules as outlined in program disclosure statement
- Research root cause and potential remedies
  - CalABLE works with TIAA/CEC to identify potential resolution
  - If related to other government programs CalABLE identifies external resources to provide customer
- Share resolution and additional resources
  - CalABLE/TIAA/CEC work diligently to provide additional resources for support
  - CalABLE contacted the SSA on instructions to obtain a SSA card
  - CalABLE seeks to identify systemic improvements where applicable

CalABLE Key Findings

- CalABLE, TIAA and CEC go to extraordinary lengths to provide support for current and potential account holders
- Continual learning for cultural competency is needed
- CalABLE staff to partner with State Independent Living Centers to provide soft hand-off to customers who may need additional support in order to operate accounts independently
- CalABLE will engage board in education from the disability community to understand needs/wants related to opening, operating and maintaining a CalABLE Account. Suggest inviting disability community presenters to CalABLE board meetings on a regular basis
- CalABLE to participate in continuous learning to improve accessibility and customer service, particularly for clients with mental health challenges.

Resources to explore

- Develop a formal process notify board on lingering customer issues
  - Board set aside executive sessions to hear of selected customer issues
  - Engaging advisory council as potential advisors in development of additional resources and referrals.
  - Dedicate staffing and/or contracted resources to serve as "client navigator" in order to provide additional care and support to customer

Examples of Contracted Resources in other industries

- Public Guardian - provides mandated conservatorship and estate administration services as specified by the Probate Code and Welfare and Institution's Code. They are involved in all aspects of their clients' lives, including financial management, housing, medical care, placement, and advocacy. The organization of these services varies among counties.

- Ombud - conducts reviews in an independent and impartial manner to ensure that agency policies or practices are consistent with the agency's goals. They seeks to resolve issues in a fair, thorough, and timely manner and to ensure that individuals are treated fairly, respectfully, and with dignity. DCHS, Department of Aging, Covered California, Department of Child, Family and Adult Services and DSS (California Ombudsperson for Foster Care)

- Navigator - An individual or organization that's trained and able to help consumers, small businesses, and their employees look for health coverage options by completing eligibility and enrollment forms. These individuals and organizations are required to be unbiased and provide services are free to consumers. DHCS (Medi-Cal Assistance and Covered California)

Potential benefits of implementing program

- Additional transparency of formal review process
- Expands cultural competency of Board regarding Customer Service/community identified issues
- Provides mechanism to formally "close" persistent issues
- Fosters CalABLE systematic solutions to minimize one-offs
- Engages disability community in improving CalABLE program

Potential Risks

- Most challenging clients may not accept outcomes
- Solutions may be resource intensive (CalABLE staff time, financial)

Next Steps

- Continued discussion at a follow up meeting
- Staff conduct additional research including potential cost of program implementation
- Staff provides recommendations and presents action item at next meeting