

EXHIBIT 3 (part 4)

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<p>1 monthly data for the previous month of registration 2 forms completed and submitted to the county clerk's 3 office." 4 Do you know what would happen if an office 5 didn't provide that data to the division 6 coordinator? 7 A. Florence would e-mail you. 8 Q. Florence would e-mail you? 9 A. And ask you for that. 10 Q. That was a regular practice? 11 A. Yes. She would ask you for that 12 information. 13 Q. As of 2008, anyway, when this GI was 14 issued, it was her practice, as far as your offices 15 are concerned, to contact anybody who hadn't 16 submitted their data and have them submit it to her? 17 A. Prior to 200- -- before this? 18 Q. No, I'm saying from 2008 on. 19 A. No, she would e-mail the office if she 20 didn't have the information. 21 Q. Okay. Do you know what she was doing 22 before 2008? 23 A. No. 24 Q. Okay. I'm going to have this marked as 25 Exhibit 6.</p>	<p>1 2008, GI? Did you set up any kind of conference 2 call or meeting with your county directors to talk 3 about the duties specified in here? 4 A. I'd have to look at the notes also. 5 Q. Okay. So do you know why this policy was 6 reissued in September of 2008? 7 A. No. 8 Q. At any point while you were regional 9 manager after having received evidence of these two 10 GIs, did you ever get any pushback from any of the 11 county directors about this voter registration 12 requirement? 13 A. No. 14 Q. What actions, if any, did you take after 15 getting this GI? 16 A. Well, I'm certain we reviewed it, because 17 we make a list of everything. Every GI that comes 18 out, I try to put them on my agenda, and I'm certain 19 we reviewed it. It probably got the same attention 20 that -- you know, "Make sure you, you know, review 21 all applications on a timely basis," you know. Same 22 thing. A GI has directives. 23 Q. This policy, if you look at the second 24 bullet point on the first page where it says -- and 25 I'm looking now at the last sentence of that bullet.</p>
<p>Page 70</p> <p>1 (Exhibit 6 marked.) 2 MS. CHAPMAN: I'm handing the deponent the 3 exhibit, and counsel a copy. 4 Q. (By Ms. Chapman) This is entitled "Income 5 Support Division, interdepartmental memorandum, ISD 6 GI 08-37, dated September 5 of 2008. 7 Ms. Salazar, do you recognize this 8 document? 9 A. Yes. 10 Q. Okay. When did you receive this? 11 A. I'm going to say probably the day after it 12 was issued, or that day. 13 Q. Well, let me go back to the January 2008 14 one. After you got the January 2008 one, did you 15 send it out to all the county directors? 16 A. That comes to everyone via e-mail. I 17 don't have to send it. 18 Q. Okay. Did you ever convene any kind of 19 conference call or meeting with the county directors 20 to talk about it? 21 A. I'd have to look at my notes. 22 Q. If you did, would you give those to your 23 attorney and he'll produce them? 24 A. Okay. 25 Q. What about when you got this September 5,</p>	<p>Page 72</p> <p>1 "In other words, make sure you ask if the client 2 wishes to register to vote in addition to providing 3 the declination/preference form." 4 Is that still policy, to verbally ask? 5 A. Yes. Yes. I'm trying to figure out -- 6 make sure I answer the right thing. But yes, it is. 7 Q. And then since this -- okay. From 8 September 5 of 2008 until December of 2009 when the 9 benefits forms were changed to include the 10 declination question, were offices doing anything in 11 response to this September 5, 2008, GI to ensure 12 that all clients were getting the declination 13 question in some way or another? 14 A. That is, in written -- 15 Q. In written, yes. 16 A. No, other than what's here. 17 Q. All right. Did you ever receive a manual 18 from the Secretary of State's office on voter 19 registration services? 20 A. You know, I'm going to say yes. I do 21 believe you get one. 22 Q. Did your 11 offices get those manuals? 23 A. I don't know. That I don't know. Because 24 I do believe you get one, but it's a long time ago. 25 Q. Did you ever reissue it after you became</p>

1 regional manager?
 2 A. No.
 3 Q. Okay. During your time as regional
 4 manager, did you ever learn that any of the offices
 5 weren't providing voter registration services to
 6 clients?
 7 A. No.
 8 Q. Did you ever ask any of the county
 9 directors whether any of their employees had not
 10 been providing voter registration?
 11 A. No.
 12 Q. I want to talk a little bit now about the
 13 benefits process in the offices. I just want a
 14 general overview of, you know, how a client would
 15 apply for benefits and then reapply for benefits or
 16 change an address. Just list for me all the
 17 benefits that your offices provide.
 18 A. Well, we provide -- you mean the programs
 19 like food stamps?
 20 Q. Yes, right.
 21 A. We have SNAP, which is food stamps; TANF.
 22 We have Medicaid, we have energy assistance. Those
 23 are the main programs. Everything else should be
 24 included in those.
 25 Q. In those?

1 A. Okay.
 2 Q. Is the application process the same for
 3 SNAP, TANF, and general assistance?
 4 A. Well, yes, I'm going to say yes, the
 5 initial part, yes.
 6 Q. And what do you mean by "initial part"?
 7 A. You know, we get your name, what are you
 8 applying for, the documents that we need to verify.
 9 Some have different requirements than others, you
 10 know. Like some, you fill out a form because you
 11 have to register to vote. General assistance, we
 12 have to know what's your disability so we do another
 13 form to gather doctor reports.
 14 Q. Okay. So let's talk about this SNAP
 15 process. And you know, afterward you can tell me
 16 the ways in which the TANF and general assistance
 17 process differs.
 18 A. Okay.
 19 Q. Okay? So just run me through how a client
 20 would apply for SNAP if he or she comes into the
 21 office.
 22 A. Well, they'll leave their application,
 23 turn in the application, and we encourage -- I know
 24 in this region we encourage, "If you wait, we will
 25 see you now."

1 A. We have general assistance, but it falls
 2 under the TANF policy.
 3 Q. So TANF is sort of run the way general
 4 assistance is run?
 5 A. GA falls under that.
 6 Q. Okay.
 7 A. In this office, SCI.
 8 Q. That's sort of a separate thing that we've
 9 talked about.
 10 A. Uh-huh.
 11 Q. So for the benefits that you listed, voter
 12 registration services is provided for all those?
 13 A. Did I put Medicaid in there?
 14 Q. Yes. You said SNAP, TANF/general
 15 assistance, medicaid and energy assistance.
 16 A. (Witness nods.) Energy assistance -- I
 17 can't answer that question. I don't know if voter
 18 registration is on that application. That just hit
 19 me right now. I don't know.
 20 Q. Do you have a separate policy about
 21 whether voter registration should be provided with
 22 energy assistance?
 23 A. No, we don't. We don't. But I just -- I
 24 have to go see the new application.
 25 Q. We'll leave that out of the discussion.

1 Because you know, it's easier to take care
 2 of them when they're here than to try to make phone
 3 calls or through the mail. So let's just say
 4 ideally the clients -- that they waited, and we get
 5 the application. We're going to run it through our
 6 computer scans. Is this a case we've had before?
 7 Do we have to create a new record? Is it active in
 8 another county? You kind of just do a little bit of
 9 backup information.
 10 So let's say it's someone brand-new, never
 11 been in our office before. Then you know that you
 12 don't have to look for a case record. You then
 13 assign it to a caseworker, and the caseworker will
 14 take the application and they will -- when I was a
 15 county director, when I was a line manager, when I'm
 16 still a regional manager, I say, "You start at the
 17 beginning of this form here of the application, and
 18 you go down and you ask the client every question,
 19 and you end at this point right here and make sure
 20 that everything is signed."
 21 Because once you have reviewed the entire
 22 application, you have covered all aspects of our
 23 eligibility process. So they go back, they take the
 24 application, and they'll interview the client going
 25 through all the portions of the application.

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1 Q. And when did you get that e-mail?
 2 A. Late December.
 3 Q. Of --
 4 A. 2009. Because we started using the new
 5 form on January 2nd.
 6 Q. Of 2010.
 7 A. Uh-huh.
 8 Q. But before January 22, you're not sure
 9 that everybody was using declination forms if they
 10 were using the forms that didn't have the
 11 declination question inserted?
 12 A. That's correct.
 13 Q. Okay. So the benefits application process
 14 for TANF and general assistance -- how is it
 15 different? You don't have to run through the
 16 process again, but just tell me where it's
 17 different.
 18 A. Different types of requirements. TANF has
 19 forms that we fill out because you have to do a work
 20 requirement. And general assistance has forms that
 21 you fill out because we need to request medical
 22 records.
 23 Q. Okay. But insofar as how a caseworker
 24 would provide voter registration services --
 25 A. No difference than SNAP.

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1 Q. Let's talk about Medicaid applications,
 2 then. You don't need to have a face-to-face
 3 interview for Medicaid; right?
 4 A. No. You don't.
 5 Q. So how are most interviews conducted for
 6 Medicaid applications?
 7 A. If they provide everything that we need,
 8 we just process it. If we need anything, we send
 9 them a form saying, "Well, we need your check stub
 10 from -- check stubs for the last 30 days."
 11 Q. So I mean, do you have a ballpark
 12 percentage on how many people would just mail in or
 13 drop off a Medicaid application without waiting to
 14 see anybody?
 15 A. Probably 75 percent.
 16 Q. Seventy-five percent? And I'm talking
 17 before January 2010, dating back to when you first
 18 became regional manager. Did the Medicaid
 19 application include a question about voter
 20 registration services?
 21 A. I can't remember. I'd have to see a form.
 22 Q. So for the around 25 percent who were
 23 having face-to-face interviews, did the process work
 24 much like the SNAP application process?
 25 A. It should have, yes.

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1 Q. And so voter registration --
 2 A. Should have been offered.
 3 Q. -- should have been offered the way SNAP
 4 is offered?
 5 A. Should have been offered, yes.
 6 Q. How does an office show that it's
 7 providing benefits in a timely way?
 8 A. We have data systems that -- we enter our
 9 information in our data system, and it starts a
 10 timeline, and if we approve the case, let's say, on
 11 the -- I'm going to give you an example. For SNAP,
 12 on the 30th day, that's untimely. They have to be
 13 approved by the 29th day. So we never try to get
 14 into the 20s, you know. Try to approve your
 15 application when you're in the 16th, 17th day. And
 16 then at the end of the month, we'll get a report
 17 showing, you know -- it shows, we get a list of
 18 every application we process, and it will tell us
 19 whether it was timely or untimely.
 20 Q. So do you review those reports?
 21 A. Yes, I do.
 22 Q. How often do you review those?
 23 A. Every month.
 24 Q. Every month. And you have been doing that
 25 since you were a regional manager?

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1 A. I have been doing that since I was a
 2 county director.
 3 Q. If you see a problem, if you see that one
 4 caseworker is having a problem providing timely
 5 benefits, what do you do?
 6 A. Well, you kind of go do a desk assessment
 7 to see where they have -- what is creating this. Do
 8 they have -- are they getting -- you know, is it
 9 time management? Are they missing a lot of work?
 10 Are they -- you know, just the normal things you
 11 would do when you're going to try to mentor someone
 12 to do their job as they're expected to do it.
 13 Q. Let's quickly talk about the reapplication
 14 process. Are most reapplications done without a
 15 face-to-face interview?
 16 A. Yes.
 17 Q. Like give me a ballpark.
 18 A. Ninety percent.
 19 Q. Ninety percent? So of those who don't --
 20 if you don't have a face-to-face interview, do you
 21 have to have a phone interview?
 22 A. Yes, you do. For a reapplication, yes,
 23 you do.
 24 Q. What about for Medicaid?
 25 A. Medicaid, for renewal?

22 (Pages 85 to 88)

1 A. You know, I think it was just plain common
2 sense, because how do you know, when you gave a
3 form, if they turned it in? I mean, you can't say,
4 "Well, I can take credit for ten," but yet you never
5 know if they were mailed in. I think the way I look
6 at taking credit for an action you have done, you
7 have something to prove for it. And so that's how
8 we always counted them.

9 Q. But as far as you know, there was no
10 instruction about that?

11 A. No.

12 Q. Okay. Do caseworkers review benefits
13 materials to make sure they're complete? You know,
14 when they're meeting with a client and they're going
15 through the application process, are they sort of
16 instructed that they should make sure that each part
17 of the application form is completed?

18 A. No. The application form or the
19 attachments? Is that what you're talking about?
20 The application form has to be completed. But I
21 don't know if they can remember every attachment
22 that should be on it.

23 Q. Like what attachments would there be?

24 A. Well, that's what I thought you were
25 asking.

1 down how many registrations they have handed out or
2 done for the month, and they submit them to -- used
3 to be Florence. I don't know if it's still
4 Florence. And then she compiles, I guess, all the
5 registrations for an office.

6 Q. Okay. But aside from that monthly
7 requirement, do the coordinators have meetings with
8 anyone at HSD about how the offices are providing
9 voter registration?

10 A. No.

11 Q. Are coordinators responsible for making
12 sure that all employees are providing voter
13 registration?

14 A. No. They wouldn't be the direct
15 supervisor for that.

16 Q. So who would be responsible?

17 A. The line manager. Their direct
18 supervisor.

19 Q. Their direct supervisor?

20 A. Yes.

21 Q. Is that in an instruction anywhere?

22 A. You know, going back to voter
23 registration, it has the same value as doing any
24 other portion of the application, you know. It's
25 not going to be, you know, to -- did you give voter

1 Q. Well, you tell me.

2 A. Well, you have like an explanation of all
3 the programs that we offer, and it's mostly for
4 them. Program information for them.

5 (A discussion was held off the record.)

6 (Recess from 2:34 p.m. to 2:46 p.m.)

7 Q. We talked a little bit about voter
8 registration site coordinators before, but I have a
9 few extra questions on that.

10 A. Okay.

11 Q. How does the local coordinator get picked?
12 Who's responsible for doing that?

13 A. The county director.

14 Q. The county director? And who trains the
15 coordinator on what their responsibilities are for
16 voter registration?

17 A. On the job. I don't believe there's any
18 training. We don't have a specific training for
19 them.

20 Q. Okay. Is the coordinator required to have
21 any kind of like check-in meetings with anyone at
22 HSD about how voter registration services are being
23 provided in offices?

24 A. Well, every month they send out -- there's
25 some type of like a spreadsheet where they write

1 registration more importance or did you give the
2 completion of the application more importance? You
3 know, it's just part of the -- all inclusive of
4 everything.

5 Q. But there's no separate instruction on
6 that?

7 A. No, no.

8 Q. All right. On voter registration forms,
9 what's the policy on how an office gets voter
10 registration forms? Blank voter registration forms?

11 A. For one thing, you contact the local
12 county clerk's office, but they have been more
13 proactive in contacting our offices, so like they're
14 the ones who keep us supplied and keep calling us
15 and saying, "We're here. Do you need more? We're
16 doing our rounds. Do you want us to drop off some?"

17 Q. And this is for all Region 5 offices?

18 A. You know, I haven't heard anyone say no,
19 so I'm going to go out and say yes. They have that
20 relationship with their county clerk.

21 Q. So as of when have the county clerks been
22 proactively reaching out to HSD offices to provide
23 them with voter registration forms?

24 A. You know, I'm going to go back to even
25 when I was a county director back in 2002.