EXHIBIT 3  (part 4)
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, was it 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.

(Exhibit 6 marked.)
MS. CHAPMAN: I'm handing the deponent the
exhibit, and counsel a copy.
Q. (By Ms. Chapman) This is entitled "Income
Support Division, interdepartmental memorandum, ISD
GI 08-37, dated September 5 of 2008.
Ms. Salazar, do you recognize this
document?
A. Yes.
Q. Okay. When did you receive this?
A. I'm going to say probably the day after it
was issued, or that day.
Q. Well, let me go back to the January 2008
one. After you got the January 2008 one, did you
send it out to all the county directors?
A. That comes to everyone via e-mail. I
don't have to send it.
Q. Okay. Did you ever convene any kind of
conference call or meeting with the county directors
to talk about it?
A. I'd have to look at my notes.
Q. If you did, would you give those to your
attorney and he'll produce them?
A. Okay.
Q. What about when you got this September 5,
2008, GI? Did you set up any kind of conference
call or meeting with your county directors to talk
about the duties specified in here?
A. I'd have to look at the notes also.
Q. Okay. So do you know why this policy was
reissued in September of 2008?
A. No.
Q. At any point while you were regional
manager after having received evidence of these two
GIs, did you ever get any pushback from any of the
county directors about this voter registration
requirement?
A. No.
Q. What actions, if any, did you take after
getting this GI?
A. Well, I'm certain we reviewed it, because
we make a list of everything. Every GI that comes
out, I try to put them on my agenda, and I'm certain
we reviewed it. It probably got the same attention
that -- you know, "Make sure you, you know, review
all applications on a timely basis," you know. Same
thing. A GI has directives.
Q. This policy, if you look at the second
bullet point on the first page where it says -- and
I'm looking now at the last sentence of that bullet.
"In other words, make sure you ask if the client
wishes to register to vote in addition to providing
the declination/preference form."
A. Is that still policy, to verbally ask?
Q. A. Yes. Yes. I'm trying to figure out --
makes sure I answer the right thing. But yes, it is.
Q. And then since this -- okay. From
September 5 of 2008 until December of 2009 when the
benefits forms were changed to include the
declaration question, were offices doing anything in
response to this September 5, 2008, GI to ensure
that all clients were getting the declination
question in some way or another?
A. That is, in written --
Q. In written, yes.
A. No, other than what's here.
Q. All right. Did you ever receive a manual
from the Secretary of State's office on voter
registration services?
A. You know, I'm going to say yes. I do
believe you get one.
Q. Did your 11 offices get those manuals?
A. I don't know. That I don't know. Because
I do believe you get one, but it's a long time ago.
Q. Did you ever reissue it after you became
A. We have general assistance, but it falls under the TANF policy.
Q. So TANF is sort of run the way general assistance is run?
A. Yes.
Q. So the benefits that you listed, voter registration services is provided for all those?
A. Yes, through the mail.
Q. Do you have a separate policy about voter registration?
A. No, we don't.
Q. We have Medicaid, we have energy assistance. Those are the main programs. Everything else should be included in those.
Q. Okay.
Q. And when did you get that e-mail?
A. Late December.
Q. Of--
A. 2009. Because we started using the new
form on January 2nd.
Q. Of 2010.
A. Uh-huh.
Q. But before January 22, you're not sure
that everybody was using declination forms if they
were using the forms that didn't have the
declination question inserted?
A. That's correct.
Q. Okay. So the benefits application process
for TANF and general assistance -- how is it
different? You don't have to run through the
process again, but just tell me where it's
different.
A. Different types of requirements. TANF has
forms that we fill out because you have to do a work
requirement. And general assistance has forms that
you fill out because we need to request medical
records.
Q. Okay. But insofar as how a caseworker
would provide voter registration services --
A. No difference than SNAP.
Q. Let's talk about Medicaid applications,
then. You don't need to have a face-to-face
interview for Medicaid; right?
A. No. You don't.
Q. So how are most interviews conducted for
Medicaid applications?
A. If they provide everything that we need,
we just process it. If we need anything, we send
them a form saying, "Well, we need your check stub
from -- check stubs for the last 30 days."
Q. So I mean, do you have a ballpark
percentage on how many people would just mail in or
drop off a Medicaid application without waiting to
see anybody?
A. Probably 75 percent.
Q. Seventy-five percent? And I'm talking
before January 2010, dating back to when you first
became regional manager. Did the Medicaid
application include a question about voter
registration services?
A. I can't remember. I'd have to see a form.
Q. So for the around 25 percent who were
having face-to-face interviews, did the process work
much like the SNAP application process?
A. It should have, yes.
Case 1:09-cv-00668-JCH-DJS Document 88-13 Filed 07/09/10 Page 5 of 5

Salazar, Cindy M. 5/5/2010

Page 93

1. A. You know, I think it was just plain common sense, because how do you know, when you gave a form, if they turned it in? I mean, you can't say, "Well, I can take credit for ten," but yet you never know if they were mailed in. I think the way I look at taking credit for an action you have done, you have something to prove for it. And so that's how we always counted them.
2. Q. But as far as you know, there was no instruction about that?
3. A. No.
4. Q. Okay. Do caseworkers review benefits materials to make sure they're complete? You know, when they're meeting with a client and they're going through the application process, are they sort of instructed that they should make sure that each part of the application form is completed?
5. A. No. The application form or the attachments? Is that what you're talking about?
6. The application form has to be completed. But I don't know if they can remember every attachment that should be on it.
7. Q. Like what attachments would there be?
8. A. Well, that's what I thought you were asking.

Page 94

1. Q. Well, you tell me.
2. A. Well, you have like an explanation of all the programs that we offer, and it's mostly for them. Program information for them.
3. (A discussion was held off the record.)
4. (Recess from 2:34 p.m. to 2:46 p.m.)
5. Q. We talked a little bit about voter registration site coordinators before, but I have a few extra questions on that.
6. A. Okay.
7. Q. How does the local coordinator get picked?
8. A. The county director.
9. Q. The county director? And who trains the coordinator on what their responsibilities are for voter registration?
10. A. On the job. I don't believe there's any training. We don't have a specific training for them.
11. Q. Okay. Is the coordinator required to have any kind of like check-in meetings with anyone at HSD about how voter registration services are being provided in offices?
12. A. Well, every month they send out -- there's some type of like a spreadsheet where they write
down how many registrations they have handed out or done for the month, and they submit them to -- used to be Florence. I don't know if it's still Florence. And then she compiles, I guess, all the registrations for an office.
13. Q. Okay. But aside from that monthly requirement, do the coordinators have meetings with anyone at HSD about how the offices are providing voter registration?
14. A. No.
15. Q. Are coordinators responsible for making sure that all employees are providing voter registration?
16. A. No. They wouldn't be the direct supervisor for that.
17. Q. So who would be responsible?
18. A. The line manager. Their direct 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 registration, it has the same value as doing any other portion of the application, you know. It's not going to be, you know, to -- did you give voter registration more importance or did you give the completion of the application more importance? You know, it's just part of the -- all inclusive of everything.
23. Q. But there's no separate instruction on that?
24. A. No, no.
25. Q. All right. On voter registration forms, what's the policy on how an office gets voter registration forms? Blank voter registration forms?
26. A. For one thing, you contact the local county clerk's office, but they have been more proactive in contacting our offices, so like they're the ones who keep us supplied and keep calling us and saying, "We're here. Do you need more? We're doing our rounds. Do you want us to drop off some?"
27. Q. And this is for all Region 5 offices?
28. A. You know, I haven't heard anyone say no, so I'm going to go out and say yes. They have that relationship with their county clerk.
29. Q. So as of when have the county clerks been proactively reaching out to HSD offices to provide them with voter registration forms?
30. A. You know, I'm going to go back to even when I was a county director back in 2002.