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Food Stamp Program Access Study

Local Office Policies and Practices

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Abstract

A survey of State food stamp offices shows that many policies and practices recommended by USDA in 1999 to improve accessibility to the Food Stamp Program (FSP) were widely operational by the year 2000. For example, in the surveyed areas, food stamp outreach campaigns were fairly widespread, food stamp applications were accessible, and some accommodations for the elderly and disabled were common. Other recommended practices, however, were less common, notably practices to encourage participation by working families and former recipients of Temporary Assistance for Needy Families. The survey also found barriers to participation prevalent for some segments of the food stamp population and opportunities for conducting food stamp business after regular office hours limited. The dramatic decline in FSP participation in the late 1990s led policymakers and analysts to focus on local food stamp office policies and practices as possible barriers to participation. The Food Stamp Program Access Study is examining the relationship between these practices and the decision by eligible households to participate in the FSP. This report presents a detailed analysis of FSP operations that may affect accessibility.

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Executive Summary

The Food Stamp Program (FSP) Access Study examines the relationships between the food stamp participation decisions of eligible households and local food stamp office policies and practices that potentially affect access to the program. This report presents a detailed descriptive analysis of the operational aspects of the FSP that may affect accessibility, from outreach practices to the structure of the application process and requirements to maintain continued program eligibility.

The dramatic declines in the food stamp caseload that occurred in the late 1990s led policymakers and analysts to focus on local office policies and practices as possible barriers to participation. The Economic Research Service of the U.S. Department of Agriculture funded Abt Associates Inc. and Health Systems Research, Inc. to conduct a study to systematically examine accessibility at the local office level using a nationally representative sample. The key issue concerned the extent to which policies implemented at the local level, as well as local office practices, affected households' decisions to apply for food stamps and their decisions to continue participating once they were approved for food stamp benefits. To address that issue it was necessary to collect information to describe the policies and practices in local food stamp offices, the characteristics of participant and nonparticipant households, and the reasons why some eligible households do not participate in the FSP.

This report, one of three reports prepared for the study, presents findings from a detailed descriptive analysis of local office policies and practices covering a variety of operational aspects of the FSP. The findings are based on in-depth surveys of local office staff and office observations in a nationally representative sample of 109 local food stamp offices. Telephone interviews were conducted with 509 caseworkers and 201 of their supervisors between January and June 2001. The analyses are weighted to reflect the percent of the national food stamp caseload in offices with specific policies or practices.

Report findings are organized chronologically, according to when particular policies or practices are most likely to influence individuals' decisions to apply for food stamp benefits, to complete the application process, or to continue receiving benefits once they have been approved.

Local Office Policies and Practices That May Affect the Decision to Apply for Food Stamps

Policies and practices that potentially may affect a household's decision to *apply* for food stamp benefits include those related to program outreach and information, the availability of food stamp application forms, the accessibility of food stamp offices, and practices that can assist population groups with special difficulties in navigating the process.

- **Outreach**—Public education campaigns increase awareness of the program and its eligibility criteria. Outreach efforts to educate the public about the FSP occurred in offices serving three-quarters of the national caseload. Smaller offices were somewhat more likely than larger offices to conduct outreach activities. Most often, outreach provided general information and was not targeted to specific groups. Less than one-third of the caseload was in offices that directed specific outreach campaigns to groups with historically low participation rates—elderly and disabled—or to groups directly affected by welfare reform—immigrants, Temporary Assistance

for Needy Families (TANF) program recipients, and ABAWDs (able-bodied adults between the ages of 18 and 50 without dependent children).

- **Informational Materials**—General information about the Food Stamp Program was available in virtually all offices. Information to clarify program eligibility rules for immigrants and TANF recipients was less widely available. Among offices with immigrant populations, information concerning the special eligibility rules for immigrants and their children was available in offices serving two-thirds of the caseload.
- **Application Availability**—Food stamp application forms were nearly always easily accessible—either by mail or in reception areas—to those who were interested in obtaining them. However, 10 percent of the caseload was served by offices that required applicants to see a caseworker before obtaining an application form. Two-thirds of the national caseload was served by offices that distributed food stamp application forms at community sites. Larger offices were more likely than smaller offices to distribute forms at these sites.
- **Extended Office Hours**—Approximately half the caseload was served by offices that allowed applicants to file their applications and have certification interviews outside normal business hours, though offices generally offered only very limited extended hours. Larger offices were more likely than smaller offices to be open outside normal business hours. Drop boxes for applicants to leave applications and other documents when the office was closed were not widely available to the food stamp caseload.
- **Office Accessibility**—Nearly all food stamp office buildings were physically accessible, as required by Federal law. Approximately 60 percent of the caseload was served by offices that were accessible by public transportation. Transportation assistance, either in the form of vouchers or rides directly to the office, was available in offices serving about a quarter of the caseload. In offices serving about three-quarters of the caseload, caseworkers were allowed to complete certification interviews by telephone or at home for elderly and/or disabled households, waiving the requirement that they come to the office.
- **Accommodation for non-English Speakers**—Among food stamp offices that routinely provided services to non-English speakers, virtually all had bilingual caseworkers on staff or had interpreters available during at least half the hours the office was open. Most local offices had made efforts to ensure that caseworkers understood the complicated rules for immigrant eligibility. Among offices that routinely saw immigrants, almost 90 percent of the caseload was served in offices that had developed specialized training for staff, as USDA recommends.

Local Office Policies and Practices That May Affect the Decision to Complete the Food Stamp Application Process

Food stamp office policies and practices that may affect a household's decision to *complete the food stamp application process*, once it has submitted a signed application, include the scheduling of interviews and the steps in the application process, the use of diversion practices for TANF clients and applicant job search for non-TANF clients, practices involving the excess medical expense deduction for the elderly and disabled, verification practices, and anti-fraud procedures.

- **Office Visits and Meetings**—The activities that must be completed to apply for food stamp benefits all impose time and monetary costs on households. Half the national caseload was in offices where applicants generally needed to make two or more visits to the office to complete all necessary requirements. Applicants in the other offices were usually able to complete all activities in one day. One-quarter of the caseload was in offices in which TANF applicants had to attend one or more meetings prior to their food stamp certification interview; approximately 10 percent of the caseload was in offices where non-TANF applicants faced this requirement.
- **Application Submission**—A small, though potentially important, percent of the caseload was served by offices in which applicants usually could not sign the food stamp application form until they attended all meetings required prior to the eligibility interview.
- **TANF Diversion**—Since the passage of welfare reform legislation, many States have instituted policies aimed at diverting TANF applicants from becoming cash assistance recipients. TANF diversion policies such as job search requirements, lump sum cash payments, and requirements to explore alternative sources of assistance could have unintended effects on FSP access.
 - **Job Search Requirements**—Requiring at least some TANF applicants to conduct job search activities prior to approval of their TANF application was fairly widespread, occurring in offices serving approximately 40 percent of the national food stamp caseload. Characteristics of job search programs that are most likely to negatively affect food stamp access include: discussing the requirement before the food stamp application is signed; not mentioning the FSP when the requirement is discussed; and requiring clients to go to another location to meet with employment counselors. These practices were found in offices serving about one-fifth the national caseload.
 - **Lump Sum Payments**—While a majority of the caseload was in offices that had the option of providing TANF applicants lump sum payments in lieu of enrolling in cash assistance, a small percentage of TANF applicants in 2000 actually received diversion payments in any given month.
 - **Alternative Assistance**—Requiring applicants to seek alternative sources of assistance before applying for TANF benefits was fairly uncommon.
- **Job Search**—Some local offices adopted policies that required able-bodied, non-TANF applicants to look for employment as a condition of food stamp eligibility. Approximately 15 percent of the caseload was in offices that required some or all non-TANF food stamp applicants to engage in job search activities prior to eligibility determination.
- **Verification Requirements**—Anecdotal accounts indicate that, in recent years, more local offices have been routinely requiring third-party verification of income, household composition, and shelter costs. The survey showed routine third-party verification to be fairly widespread—almost half the national caseload was served in offices that routinely required food stamp applicants to verify at least two types of information through a third party. In general, applicants must submit verification before the 30-day processing deadline. When asked about flexibility on this requirement, caseworkers in offices serving one-fifth the food stamp caseload reported that

applications were automatically denied, without notice, after 30 days if verification was incomplete.

- **Anti-fraud Practices**—Unannounced home visits to detect applicant fraud were routine practices in offices serving half the caseload. Fingerprinting or finger imaging of food stamp applicants was a fraud investigation technique used in offices serving one-quarter of the caseload. Larger offices were more likely than smaller offices to engage in these anti-fraud practices.

Local Office Policies and Practices That May Affect Whether Participating Households Continue to Receive Food Stamps

These policies and practices cover recertification practices, reporting requirements, food stamp sanctions, employment and training requirements for non-TANF food stamp participants, and practices and procedures for *continuing food stamps* when households leave the TANF program.

- **Recertification and Reporting Requirements**—Recertification for receipt of food stamp benefits can impose time and monetary costs similar to those at application. One or more trips to the food stamp office are generally required and this can be difficult, particularly for households with earners. One-third of the caseload was in offices in which non-TANF cases with earnings had to attend in-office recertification interviews fairly frequently—every one to three months. Almost one-fifth of the caseload was in offices where TANF earners faced similar requirements. Some offices automatically closed food stamp cases if households missed their scheduled recertification interviews. One-third of the caseload was served by offices with such policies. In addition, just over 10 percent of the national caseload was in offices that enforced a similarly strict policy when households did not submit periodic reports by the initial deadline.
- **Sanction Policies**—Welfare reform legislation provided States with new and expanded options for penalizing households for not complying with program requirements. The types of sanctions examined include comparable food stamp sanctions for noncompliance with TANF rules; sanctions on non-TANF households for noncompliance with Employment and Training (E&T) program requirements; and sanctions on non-TANF households for noncompliance with child support.
 - **TANF Rules**—Sanctioning food stamp benefits for noncompliance with TANF rules (work rules, as well as non-work rules, such as child support enforcement and child immunization requirements) was used fairly extensively, occurring in offices serving approximately 60 percent of the national caseload. Offices serving one-fifth the caseload chose the more severe option of disqualifying the whole TANF family when the household head did not comply with TANF work requirements.
 - **Food Stamp E&T Requirements**—Sanctions for noncompliance with food stamp E&T activities were less common. One-third of the caseload was in offices that required some non-TANF food stamp clients to participate in E&T programs and sanctioned their food stamp benefits if they did not comply. Ten percent of the caseload was in offices that disqualified the entire household when the household head did not fulfill the E&T requirement.

- **Child Support Enforcement**—Sanctioning non-TANF households for noncompliance with child support enforcement was not widespread. Approximately one-fifth of the caseload was served by offices implementing this policy.
- **ABAWD Time Limits**—Employment and training services were widely available to help ABAWDs fulfill their work requirements. Among offices that did not have waivers of ABAWD requirements, caseworkers serving four-fifths of the caseload provided some services to this group of food stamp recipients. In addition, caseworkers in offices serving two-fifths of the national caseload reported contacting ABAWDs who had reached the time limit and lost their food stamp benefits about how to regain them.
- **Continuation of Food Stamps when Leaving Cash Welfare**—Many households that leave TANF leave the FSP at the same time, even though numerous studies have suggested that most of these families are likely still eligible for food stamp benefits. Confusion about eligibility as well as local food stamp office policies with regards to disposition of their food stamp cases are possible reasons. Less than half of the food stamp caseload was served by offices that provided households who left TANF with information concerning their FSP eligibility. Offices serving one-quarter of the national caseload did not automatically continue the FSP benefits of households that left TANF due to sanctions. For households voluntarily leaving TANF, this was the case in offices serving one-fifth of the caseload. Households that reached the TANF time limit had to visit the office within the month to recertify or to have their food stamp benefits adjusted in offices serving one-tenth of the national food stamp caseload.

Practices and Policies that May Promote or Hinder FSP Participation

In response to the dramatic food stamp caseload declines that occurred in the late 1990s and the concern that local office policies and practices may have impacted the participation decisions of eligible households, USDA made a number of recommendations to improve program access (FNS, 2002; FNS, 2003a; FNS 2003b). A useful way of summarizing the findings from this study is to examine how they reflect on those recommendations.

This study found that many of the recommended practices were widely operational in 2000. General food stamp outreach campaigns were fairly widespread, and food stamp applications were easily accessible. Accommodations for the elderly and disabled were fairly common—offering telephone or in-home certification interviews, training caseworkers on the use of the medical expense deduction, and setting longer certification periods or requiring fewer in-office visits.

Other recommended practices to improve accessibility were less common, notably, practices to encourage participation of working families and former TANF recipients with targeted outreach, extended office hours, drop boxes for applications and other documents, on-site child care, and longer certification periods. Transportation assistance and outreach targeted to elderly and disabled households was also not widespread.

This study also provides insight into the prevalence of alleged barriers to participation (GAO, 1999). The existence of some of the barriers was supported. For example, it was shown that opportunities for conducting food stamp business after regular office hours were fairly limited. Confusion about the

differences between food stamp and TANF eligibility requirements may have existed because only about half of the national food stamp caseload was served by offices that provided specific printed information on this topic. Some types of households—particularly those with earnings and ABAWDs—were found to be generally subject to short food stamp certification periods. And although the practice of automatic closure of food stamp cases of TANF leavers was not widespread, approximately one-quarter of the food stamp caseload was in offices that required households, particularly those who were sanctioned or reached the TANF time limit, to visit the office to maintain their food stamp eligibility.

On the other hand TANF diversion practices did not appear to be an important factor limiting food stamp application as had been supposed. This study showed that diversion activities were generally not discussed with clients until after the FSP application was signed.