## **Chapter 5**

## Promoting and Hindering Food Stamp Participation: Best Practices and Continuing Barriers

Previous chapters presented a detailed description of local food stamp office policies and practices that may affect accessibility of the Food Stamp Program (FSP). The analysis, the first national, indepth examination of FSP operations at the local level, focused on those policies and practices that may encourage or impede program participation by affecting whether eligible households decide to apply for food stamp benefits, whether they choose to complete the application process once they have started it, and whether they continue to participate in the program once they have been approved for benefits. The findings indicate that substantial variability exists at the local level in the way the Food Stamp Program has been implemented.

This chapter summarizes the findings by examining what might be considered "best practices" for improving access to the Food Stamp Program. The chapter also examines the prevalence of policies that might make the FSP less accessible to eligible households.

### "Best Practices" for Improving Access to the FSP

A recently published guide to State "best practices" for improving program access presents policies and practices that States and local agencies have developed to encourage eligible households to participate (FNS, 2002). In addition, best practices have been highlighted in guides, designed to help policymakers, advocates, and other stakeholders improve access to the FSP for hard-to-serve groups, including working families and the elderly and disabled (FNS 2003a, 2003b). In this study, supervisor and caseworker surveys collected information on many, though not all, of the "best practices" presented in these publications. This section discusses the prevalence of policies that USDA believes should help make the FSP more accessible to its intended beneficiaries.<sup>1</sup>

Outreach activities—providing education and information about the FSP and its eligibility requirements—are key to reaching eligible households who are not currently participating in the program.

General outreach campaigns were fairly widespread—three-quarters of the national food stamp caseload was served by offices that reported that some type of outreach or public education campaigns were ongoing in their areas. Small offices (those serving fewer than 2,000 cases) were less likely than larger offices to report that no outreach campaign occurred in their areas. Outreach targeted to specific groups with historically low participation rates was, however, much less widespread. Less than half of offices (weighted) reported special efforts designed to provide information to households with elderly members and only one-quarter of offices (weighted) specifically targeted disabled individuals. Few offices have developed educational materials designed for working families, a group whose FSP participation declined most dramatically after

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There are undoubtedly additional practices that would improve program access. This discussion is restricted to those practices discussed in the USDA publications referenced here.

implementation of welfare reform. Less than one-fifth of offices (weighted) directed specific efforts to these households.

Video displays capture clients' attention and are an effective technique for providing basic FSP information to potential applicants.

Most offices (91 percent, weighted) in this study provided general material to clients concerning food stamps, though only one-fifth of offices (weighed) reported using video techniques to present the information.

Food stamp regulations require local offices to give households an opportunity to apply for benefits without delay, which means that applications must be available immediately upon request.

One way to ensure the accessibility of application forms is to have them readily available in the reception area, a practice that occurred in almost all (90 percent, weighted) food stamp offices.

Providing transportation assistance can help elderly and disabled applicant households get to the food stamp office.

Only about one-quarter of offices (weighted) provided direct transportation assistance, either in the form of vouchers for public transit or van service to the office. Some offices targeted this assistance to elderly and disabled households. Others provided the assistance to all who requested it.

Reduce the number of trips elderly and disabled applicants need to make to the office.

Offering telephone or in-home certification interviews to all of these applicants, not just those that request it, may make it easier for elderly and disabled applicants to fulfill all application requirements. Three-quarters of offices (weighted) reported that they routinely offered households with hardships the option of telephone or in-home certification interviews.

Waive or modify fraud prevention procedures for elderly and disabled applicants.

Aggressive fraud prevention procedures, such as fingerprinting applicants and conducting front-end investigations, may be particularly intimidating to elderly and disabled applicants. One-quarter of offices (weighted) fingerprinted some or all food stamp applicants, as part of the application process.<sup>2</sup> One-half of offices (weighted) conducted unscheduled home visits to some applicant households. Elderly and disabled households were likely less affected by this requirement, given the stability of their circumstances. <sup>3</sup> Larger offices were more likely than smaller offices to fingerprint applicants (28 percent, weighted versus 10 percent, weighted) and also more likely to conduct home visits (54 percent, weighted versus 33 percent, weighted).

<sup>&</sup>lt;sup>2</sup> Offices generally fingerprinted all applicants, though some targeted TANF and GA applicants.

Households most likely to receive a home visit included: households whose expenses exceeded income; households with earnings; those with a work history; and households whose composition was in doubt.

#### Increase use of medical expense deduction

One reason some elderly and disabled households do not apply for food stamp benefits is because they believe they will not receive enough benefits to make it worth the trouble of completing the application process. The benefits for these households may be maximized by correct usage of the medical expense deduction. Providing training to local office staff is one way to help ensure that the deduction is calculated correctly and used to the extent possible. Almost 80 percent of offices (weighted) provided special training to staff on the medical expense deduction, either by conducting training sessions or by supplying simplified written guides.

Another way to encourage use of the medical deduction is to provide assistance to applicants in obtaining the necessary documents and completing the required paperwork. Caseworkers in 48 percent of offices (weighted) called medical providers or pharmacists directly to obtain information on expenses, and workers in 18 percent of offices (weighted) assisted applicants in reviewing their medical receipts. Workers in smaller offices were somewhat more likely than workers in larger offices to call medical providers and pharmacists (63 percent, weighted versus 43 percent, weighted).

## Offer "family friendly" scheduling procedures to allow working families to attend appointments outside work hours.

A major barrier to FSP participation for working families is the need to take time off from work to attend certification interviews and to complete any other business that requires visiting the food stamp office. Family friendly scheduling procedures allow working families to schedule appointments either early in the morning, in the evening, or on weekends. Most food stamp offices offered very limited extended hours. Only about 10 percent of offices (weighted) were open before 8 a.m. and after 5:30 p.m. at least one day a week. More offices were open early in the morning; few stayed open in the evening. Larger offices were somewhat more likely than smaller offices to offer evening interview hours (19 percent, weighted versus 6 percent, weighted). Evening hours would probably be most useful for working households with children, once school and work activities are over for the day.

Providing secure, after-hours drop boxes for clients to leave applications, documentation, and other required forms is another relatively low-cost way to improve accessibility. Only about one-fourth the food stamp caseload was served by offices that provided this service to clients.

#### Provide child care for families visiting the food stamp office.

Providing on-site care makes it easier for clients to conduct their business without being preoccupied or distracted by their children. The practice also results in a quiet waiting area, and allows caseworkers to concentrate on certification interviews and related business without distractions. Only 15 percent of the food stamp caseload was served by offices that provided on-site child care.

Minimize the intrusiveness of verification procedures, without compromising program integrity.

<sup>&</sup>lt;sup>4</sup> Access to the FSP for working individuals would also be improved with extended office hours. This issue was not, however, addressed in the USDA publications cited.

Some working families may be deterred from applying for food stamps for fear that their employers and landlords may find out they have applied for benefits and may use that knowledge in an adverse manner. USDA suggests it is unnecessary to routinely contact third parties to verify information as long as applicants have provided adequate documentation of their circumstances. Routine verification of income, household circumstances, or shelter costs through contacts with employers and landlords was fairly widespread. Just over 60 percent of offices (weighted) reported routinely using collateral contacts to verify household income. Approximately half of all offices (weighted) verified household circumstances and shelter expenses in this manner.<sup>5</sup>

#### Simplify recertification requirements.

Simplifying recertification requirements may improve access for all types of households, particularly working families, the elderly, and disabled. These groups are likely to experience difficulties getting to the food stamp office for required recertification interviews. One way to simplify the procedure is to limit the frequency of required in-person recertification interviews. Households could report changes on recertification forms with follow-up by telephone or mail as required. This could reduce the burden on households without sacrificing program integrity. Approximately three-quarters of offices (weighted) only required in-person interviews for elderly and disabled participants every seven or more months. In contrast, only approximately 40 percent of offices (weighted) gave households with earnings seven or more months between required in-person recertification interviews. The other 60 percent of offices (weighted) required these households to visit the office at least once every six months for recertification interviews.

# Develop procedures to prevent the inappropriate termination of food stamp benefits for households leaving TANF.

Households that leave the Temporary Assistance for Needy Families (TANF) program also often leave the Food Stamp Program, even though many of them are still eligible for food stamp benefits. In many situations, local offices have the information they need to determine food stamp eligibility and to recalculate benefits as necessary. In such circumstances, households need not be required to visit the food stamp office for eligibility redetermination. Between 25 and 40 percent of the caseload was served by offices that either closed the food stamp cases of TANF leavers or required them to visit the office for redetermination of their food stamp benefits.<sup>6</sup>

## **Barriers to FSP Accessibility**

In response to a Congressional request, the General Accounting Office (GAO) examined the factors that led to the decline in food stamp participation in the latter half of the 1990s. Published in July 1999, two years before the current research study was conducted, the report cited a number of

The use of third-party verification may actually increase FSP access for some elderly and disabled applicants who experience difficulty obtaining required documents. This suggests that thoughtful use of collateral contacts is necessary to promote access.

Office practices on this issue varied somewhat depending on the household's reason for leaving TANF. Households leaving TANF due to sanctions were most likely to be required to visit the food stamp office.

practices that GAO believed created barriers to FSP accessibility. This section examines the prevalence of those policies that may restrict FSP access for eligible households.<sup>7</sup>

Uncertainty about the eligibility rules for TANF and food stamps has created confusion for both workers and food stamp applicants.

The food stamp directors surveyed by the GAO expressed the view that many households ineligible for TANF also believed that they were automatically ineligible for food stamps. One way to help alleviate the confusion would be to provide written informational materials concerning the differences between the TANF and food stamp eligibility rules. This type of information was readily available in local food stamp offices serving only about half the national caseload.

Offices may inadvertently create confusion among households applying for both TANF and food stamps if workers discuss TANF diversion before the food stamp application is filed. This may cause some applicants to believe they are ineligible for food stamps if they accept a TANF cash payment. Other applicants may view the applicant job search as another requirement that must be completed before they can receive food stamps. Some may decide that the food stamp benefit is not worth the additional work. Among offices that used lump sum diversion payments and/or required TANF/food stamp applicants to search for jobs as a condition of TANF eligibility, 25 percent of offices (weighted) discussed TANF diversion prior to filing the food stamp application. In the majority of offices, diversion was not discussed until after the food stamp application was filed, or during the certification interview in which the application was signed.

Access of the working poor to the FSP is likely to be limited if local food stamp offices are only open during normal business hours.

This is the counter-side to the "family friendly" scheduling procedures, discussed in the previous section.

Assigning short certification periods—three months or less—is also likely to affect accessibility, particularly for working families.

Many households with earnings were assigned short certification periods. In about one-third of offices (weighted), working families also receiving TANF were assigned short food stamp certification periods. Non-TANF working households received short certification periods, as did households containing ABAWDs, in about half of all offices (weighted).

Local offices may create barriers to the continued FSP participation of households leaving TANF.

Various studies have reported that TANF leavers are often confused about their FSP eligibility. Offices that automatically close the food stamp cases of TANF leavers may add to the confusion. Few offices followed this practice. Less than 10 percent of the caseload was served by offices that automatically closed the food stamp case of households that left TANF. Confusion could also be

Not all the barriers GAO cited were included in the surveys conducted as part the current study. A number of the practices discussed in the GAO report violated Federal laws or regulations, topics not covered by the surveys.

created if households are required to visit the office for food stamp redetermination upon leaving TANF, a situation that occurred in 15 to 25 percent of offices (weighted).

### Summary

The dramatic food stamp caseload declines that occurred in the late 1990s led policymakers and analysts to focus on local office policies and practices as possible barriers to participation. The concern was that the FSP may have become less accessible to its intended beneficiaries because of the policy and operational changes in local offices that accompanied welfare reform. Few changes in FSP administration were mandated by PRWORA, but many changes have occurred in local welfare offices, most in response to changing objectives of cash assistance.

In the late 1990s, little information was available on local office changes that affected FSP operations. Nonetheless, beginning in 1999, USDA responded to concerns by recommending the local office policies and practices to promote access to the Food Stamp Program discussed in this chapter.

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. Some 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, including targeted outreach, extended office hours, drop boxes for applications and other documents, on-site child care, and longer certification periods. Additionally, transportation assistance and outreach targeted to elderly and disabled households were not widespread.

Likewise, many of the alleged barriers to participation were found to be prevalent, at least for some segments of the food stamp population. 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 as only about half of all offices (weighted) provided specific printed information on this topic and one-quarter of offices (weighted) that utilized some form of TANF diversion discussed diversion prior to the signing of the food stamp application. Some types of households—those with earnings and those containing ABAWDs—were generally subject to short food stamp certification periods, which may have created barriers to continued FSP participation. The food stamp cases of TANF leavers were generally not closed automatically, but many offices 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, the impact of TANF diversion on food stamp application may have been somewhat minimized as diversion activities were generally not discussed with clients until after the FSP application was signed.

Analyses examining the extent to which documented local office policies and practices affected the likelihood that households applied for food stamp benefits and the likelihood that they continued to participate in the FSP once they are approved for benefits are presented in a separate report.