

Chapter 7

Local Food Stamp Office Policies and Practices that May Affect Participation Decisions

The survey results presented in Chapters 3-6 show that household participation in the food stamp program depends on a complicated set of perceptions, such as believing that the household may be eligible for benefits, and actions, such as filing an initial application or appearing for recertification. The data further suggest that people's perceptions and actions are influenced by aspects of their own situation, such as whether they are employed, and by factors that may be related to policies and practices in place at the local food stamp office, such as the convenience of office hours.

To learn about office practices that might influence participation, the study design included surveys of supervisors and caseworkers in the same 109 local offices where nonparticipants and participants were surveyed. The supervisor and caseworker surveys asked about a very large number of practices that were expected to affect some household perception or action related to food stamp participation. A previous report (Gabor et al., 2003) presented a comprehensive description of these policies and practices. It showed very substantial variation in practices: in practically every area examined, some offices employed practices that would be hypothesized to promote or facilitate participation, while others chose practices that seemed less likely to encourage participation.

This chapter summarizes the previous report's findings regarding variations in local practice that may affect participation. This information sets the stage for analyses presented in Chapter 8 and Appendix D, which examined the extent to which local practices are associated with the likelihood that households will perceive themselves eligible for benefits, successfully complete the application process, and continue receiving benefits once they have been approved.

The surveys and the analysis were guided by a broad set of hypotheses about what kinds of local office practices might influence each of five key household perceptions or decisions:

- Whether a household thinks it might be eligible for food stamps;
- Whether, thinking it might be eligible, a household contacts the local food stamp office;
- Whether, having contacted the food stamp office, a household files an application and completes all the necessary steps for approval;
- Whether, having been approved for benefits, a household continues to participate throughout the certification period; and
- Whether, having participated throughout the certification period, a household completes all the necessary steps for recertification.

Chapter 8 presents two multivariate models, which examine the first three decision points. One model focuses on factors affecting the likelihood that an apparently circumstantially eligible household will be aware that it is eligible. The second analyzes the likelihood that, once a circumstantially eligible

household believes it is eligible and contacts the food stamp office, it will file an application and successfully complete the application process.¹

Ideally we would estimate a parallel model of the likelihood that households who are approved for benefits and remain circumstantially eligible will continue participate through their recertification period and then be approved for continued benefits at recertification. Because the data do not indicate circumstantial eligibility for some groups of households who left the FSP, we estimated models of the factors affecting the likelihood that a participating household will exit the program, including eligible and ineligible exiters indistinguishably. This analysis is presented in Appendix D.

The local office practices and policies that might influence participation were grouped into seven categories:

- ***Outreach to nonparticipants*** in the community;
- ***Availability of information*** about the FSP to nonparticipants who are interested;
- ***Office accessibility***, such as the flexibility of office hours or availability of child care;
- ***Subjective office features*** that could influence the household's in-office experience, such as waiting lines or staff attitudes;
- ***Certification requirements*** that an applicant must meet to be approved for benefits, including factors such as the number of required office visits or a requirement for pre-approval job search;
- ***Interim month requirements***, such as periodic reporting or participation in employment-related activities; and
- ***Recertification requirements***, such as the required frequency of recertification and practices for rescheduling missed recertification appointments.

Many office practices might influence more than one of the household decisions, and therefore to have multiple types of influence on participation. Most practices, however, are expected mainly to affect one or two actions, and the principal hypotheses are summarized in table 7.1 below.

The sections below consider in turn each of the seven groups of office practices that are hypothesized to affect participation. For each group, we describe the general hypothesis, summarize the prevalence of office practices (from Gabor et al., 2003), and indicate how the relevant office practices are represented in the multivariate analysis.

¹ The sample for this second analysis combines respondents to the applicant survey with those respondents to the nonparticipant survey who said they had contacted the agency recently.

Table 7.1—Characteristics of the office sample

	Awareness of eligibility	Contact office and completion of application	Interim month participation	Recertification
Outreach to nonparticipants	✓			
Availability of Information		✓		
Office accessibility		✓		✓
Subjective office features		✓	✓	✓
Certification requirements		✓		
Interim month requirements		✓	✓	✓
Recertification requirements		✓		✓

Outreach to Nonparticipants

Nearly all nonparticipant households that appear to be eligible for FSP benefits had heard of the Stamp Program (96 percent). Nonetheless, 55 percent of those who knew about the program reported that they did not think they were eligible for food stamps, or did not know if they are eligible. Outreach to nonparticipant households might increase participation by increasing these households' awareness of the program and their potential eligibility. The USDA encourages outreach and supports it through special demonstration grants as well as general administrative funding sources.

Local Office Outreach Practices

The survey of local office supervisors found that outreach campaigns were quite prevalent, existing in 76 percent of offices nationwide (weighted by office caseload size).² Nonetheless, substantial variations were observed in outreach practices:

- Outreach was conducted by the FSP agency in 57 percent of offices. Other community agencies conducted outreach in the same proportion of offices, and 38 percent of the areas were served by outreach from both sources.
- Nine distinct outreach modes were used, with multiple modes in many areas. The modes and the proportion of areas in which they were used were:
 - Community presentations—70 percent of the areas
 - Flyers, posters, and brochures—69 percent
 - Toll-free number or hotline—54 percent
 - Newspaper articles—37 percent
 - Public service announcements—33 percent
 - Internet—28 percent
 - Direct mailing—24 percent
 - Calls or home visits to former participants—14 percent

² Throughout this chapter, we describe the distribution of office practices in terms of the weighted percent of offices engaging in the practice, where the weighting factor is the number of active cases in the office in June 2000. Thus, “x percent of the offices” is equivalent to “offices serving x percent of the national caseload.”

- Billboards or advertisements on buses—10 percent
- Some outreach was targeted to particular types of nonparticipants, with 63 percent of offices reporting some targeted outreach. About 37 percent of offices targeted elderly households, which was the most commonly targeted group. Other groups targeted in more than 10 percent of the offices include immigrant and refugee populations, persons with disabilities, homeless persons, working families, and former TANF recipients.
- Food stamp outreach was coordinated with outreach for Medicaid or State Child Health Insurance (SCHIP) in 59 percent of the offices.

Approach to Multivariate Analysis

The first analysis presented in Chapter 8 explores the possibility that these variations in outreach influence eligible nonparticipants' perceptions of their own eligibility for food stamp benefits. Six measures of outreach policy are used. These include indicators of whether outreach is performed by the food stamp agency and/or community agencies and whether it is coordinated with Medicaid/SCHIP. Other measures indicate the number of population groups to which outreach is targeted and, for each respondent to the nonapplicant survey, whether the household is in a group that is targeted in that area. Finally, the model includes a count of the total number of outreach modes used, which is intended to reflect the intensity and breadth of coverage of outreach.

It seems quite possible that these measures will not fully capture the effect of variations in local outreach strategies. Given the nonparticipant survey results reported in Chapter 3, it would have been desirable to have more information on the content of outreach, such as whether outreach emphasized that earnings are not an automatic barrier to eligibility. It would also be desirable to know more about the intensity of outreach (e.g., the number of flyers or brochures distributed relative to the size of the nonparticipant population). These limitations should be borne in mind in interpreting the analysis.

Availability of Information for Potential Applicants

Many nonparticipants said in the survey that they would not apply for food stamp benefits even if they were sure they were eligible, typically because they did not want to depend on government assistance. But other nonparticipants were not opposed to applying, and a few (4.6 percent of nonparticipants) said they had recently contacted the FSP office but had not applied. Households who might wish to apply, and especially those who visit the office, may be influenced by whether they can easily obtain program information and application forms.

Information Available in Local Offices

Observers visited the food stamp offices in the local office survey and found general program information to be readily available in nearly all offices (91 percent). Potential applicants could obtain application forms in the reception area of most offices (90 percent), though 10 percent required the individual to see a caseworker to request the form; 87 percent would mail an application form to anyone who requested it.

Other practices varied in ways that might affect participation, as summarized below.

- Some reception areas offered general program information only on posters, but others used material that might communicate better, such as take-away brochures (64 percent) or videotapes (21 percent).
- Some offices made information available for special groups or issues. Sixty-two percent presented information in at least one non-English language, and 49 percent had information for people who were not applying for or already receiving TANF.
- About three quarters of offices reported that they routinely served immigrants. Among those offices, about two-thirds provided specific information on eligibility rules for those households, and almost all of those provided information in at least one non-English language.
- Two thirds of offices made application forms available at other locations in the community besides the food stamp office. Common locations included hospitals and clinics, community action agencies, and senior centers.

Approach to the Multivariate Analysis

The multivariate analysis examines whether informational materials influence the probability that a household that contacts the food stamp office will apply for benefits and complete the application process. The analysis includes two items measuring the availability of information. One measure indicates whether brochures and pamphlets were available to potential applicants and the other represents whether information about the FSP was shown on video in the reception area. These items, which showed substantial variation among offices, were selected to represent policies that might potentially be particularly effective means of communicating basic information about the FSP and its eligibility requirements.

Office Accessibility

Applicants who were certified for food stamp benefits reported making an average of 2.4 visits to the local food stamp office. Making those visits always requires some time and effort, and may entail taking time off from work, paying for transportation, or paying for child or elder care. The survey of applicants and applicant dropouts (see Chapter 4) indicated that getting to the office, travel costs, taking time off from work, paying for care, and the convenience of office hours are factors that affect people's assessment of the feasibility of an office visit.

Local office practices may determine how accessible the office is—i.e., how much time, effort, and financial expense the potential applicant has to spend on the visit. Practices that make the office more accessible are expected to make would-be applicants more likely to complete the application process and receive benefits.

Local Office Practices

The local office survey examined five dimensions of office accessibility: hours of operation, transportation options, physical accessibility, adaptations for non-English speakers, and child friendliness. Results are summarized below.

- About two-fifths of offices (43 percent) conducted some eligibility interviews outside the standard business hours of Monday-Friday, 8:00 AM to 5:00 PM. Pre-8:00 interviews were conducted in 39 percent of offices, post-5:00 interviews in 16 percent, and Saturday interviews in 2 percent. Late-hour interviews were significantly more common in offices with more than 2,000 cases.
- About one-quarter of offices provided a secure after-hours drop box which could be used for application materials.
- Although 63 percent of offices had some clients who lived 10 miles or more from the office, public transit routes came within half a mile of 76 percent of offices.
- Just over one-quarter of offices offered transportation assistance in the form of cash, vouchers or transit tokens (15 percent) or van or car service (11 percent).
- Nearly all offices provided free parking, signage outside the building with the office name, handicapped parking, and wheelchair accessibility. Each of these features was available in 88 to 95 percent of offices.
- Bilingual caseworkers or interpreters were available during most office hours in virtually all offices that routinely saw non-English speaking clients.
- Local practices regarding child-friendliness varied considerably: 88 percent of offices had some space where children could play; 47 percent had diaper changing areas; 41 percent had some toys or materials for children; and 15 percent made child care available at the office. Clients in 6 percent of offices were asked not to bring children.

Approach to the Multivariate Analysis

Chapter 8 presents a multivariate model examining the likelihood that an eligible nonparticipant who contacts the food stamp office will successfully complete the application process. The model includes predictor variables representing all of the local office practices described above that show meaningful variation across offices. No measures are included for physical accessibility (parking, etc.) or for non-English language accessibility because nearly all offices met each of these criteria. Child-friendliness is represented by three variables: indicators of whether child care is provided and whether parents are asked not to bring children, and an index combining the remaining three practices.

Subjective Office Features

Subjective aspects of clients' experience in the food stamp office may encourage or discourage them from persisting in the application process. For example, 6 percent of applicants who failed to complete the application process said that one reason was the long wait in the office. Many of the nonparticipants who said they would not apply for benefits even if they were eligible cited a previous "bad experience." In general, we expect that local practices that tend to provide a more subjectively pleasant in-office experience will encourage a higher proportion of applicants to complete the process.

Local Office Practices

The local office surveys focused on three factors that seemed likely to reflect the extent to which a client would find an office visit pleasant: the adequacy of seating in the reception area, the presence

of waiting lines, and the attitudes of office staff. The first two factors were assessed by observers who visited the offices. To address staff attitudes, the supervisor survey asked whether the supervisor agreed or disagreed with three judgmental statements related to food stamp participation. The results are summarized below.

- Over a third of offices (37 percent) were observed to have no waiting lines at any time, while 52 percent sometimes had lines and 11 percent always did. Lines were much more common in large offices than smaller ones.
- The vast majority (87 percent) always had enough seats for everyone in the reception area, and the remaining 13 percent had insufficient seating at some times.
- At least 80 percent of supervisors expressed pro-participation positions on each of the following three attitude items:
 - Being on food stamps encourages dependency (81 percent chose “disagree” or “strongly disagree”).
 - People who leave TANF and are potentially eligible for food stamps should be actively encouraged to apply for food stamps (95 percent agreed or strongly agreed).
 - Immigrants should not get food stamps until they become citizens (81 percent disagreed or strongly disagreed).

Approach to the Multivariate Analysis

The local office variations above are represented in two items in the model of the probability of completing the application process. One measure combines the seating and waiting line issues in an indicator that some problem existed—either there were not always enough seats, or the average waiting time was at least 5 minutes, or both. The second measure is a supervisor attitude scale based on a count of the number of pro-participation responses (as defined above) to the three items.

Certification Requirements

The certification process involves multiple steps that place varying requirements on applicants. Some steps require understanding potentially complex rules, such as the distinctions between TANF and food stamp eligibility criteria. Some require applicants to take actions, such as obtaining documentation or carrying out a job search. Some require cooperation with procedures that might seem invasive, such as fingerprinting and home visits. Applicants who dropped out of the process listed among their reasons difficulty with the application form, confusion about the application process, and problems in acquiring necessary documents. A few stated concerns about third party verification and fingerprinting.

Although basic FSP eligibility criteria and requirements are uniform across locations, local offices exercise considerable discretion in structuring the application process. Local office practices that make the application process simpler, shorter, less invasive, and with fewer required applicant actions are expected to increase the proportion of eligible applicants who complete the process.

Local Office Practices

The eligibility interview is the universally central element of the application process, but the local office surveys found substantial variation in the process leading up to the interview.

- Applicants in 55 percent of the offices scheduled appointments in advance. In 47 percent of offices, applicants would visit the office, sign in, and be interviewed as soon as possible. Two percent of the offices used both procedures.
- Some offices required attendance at meetings or group sessions prior to the eligibility interview, usually to discuss employment-related issues and to review program information. Applicants for TANF faced this requirement in 26 percent of offices, and 11 percent of offices also required pre-interview meetings for FSP-only applicants.
- The signing of the application form, which begins the 30-day period within which agencies must determine eligibility, occurred before the eligibility interview in 64 percent of offices, during the interview in 35 percent, and after the interview in 1 percent.
- Supervisors in about half the offices said that applicants usually needed only one visit to the food stamp office during the application process (51 percent reported one meeting for non-TANF applicants, 48 percent for TANF applicants). Only 2 percent of offices reported that more than 2 visits were usually needed. (Note, however, that successful applicants reported an average across all offices of 2.4 visits. This includes visits to complete the interview, provide documents, and receive an EBT card and training.)
- When applicants missed their interview, the interview was automatically rescheduled in 17 percent of offices and the application was automatically denied in 5 percent. Most of the remaining offices either notified the client to reschedule (31 percent) or held the case open for client-initiated rescheduling (45 percent). Two percent had some other procedure.

Some practices in the application process are designed to encourage applicants to move toward employment rather than depend on assistance. In terms of completing the application process, however, these practices constitute additional steps that the client must take and complexities to understand.

- Most offices (80 percent) had some form of “diversion” policy in place for TANF applicants. Policies included a lump sum payment option (55 percent), job search before the application could be approved (38 percent), and a requirement to seek alternative resources before applying (9 percent).³
- TANF applicants were typically informed about the relevant diversion policies during the same interview in which they would sign the food stamp application. Diversion information preceded the point of FSP application signing in 14 percent of all offices for lump sum payments, 9 percent for job search, and 1 percent for alternative resources.
- Some non-TANF applicants were required to conduct up-front job search in 14 percent of offices. The requirement was usually applicable to able-bodied adults without dependents (13 percent) and sometimes to all mandatory work registrants (10 percent).

³ While a large proportion of offices had lump sum diversion policies available, relatively few households received such payments in June 2000.

FSP eligibility rules for the elderly and disabled allow a special deduction from income for the costs of medical care and medications. National statistics show that the deduction is rarely used, perhaps because of the complexity of the rule or the difficulty of documenting medical expenses.

- To ensure that caseworkers understood the special rules, 69 percent of offices had held special training sessions, 47 percent had developed simplified guides for caseworkers, and 8 percent made this issue a topic in staff meetings.
- To help their elderly and disabled clients use the deduction, caseworkers in 92 percent of offices reported providing written or oral information, 48 percent called medical providers or pharmacists directly, and 18 percent helped applicants review medical receipts. Special assistance was more common in offices with fewer than 2,000 cases.

Some elements of the application process are designed to prevent error or fraud in the food stamp benefits awarded. Some of these procedures may require action by the applicant (e.g., obtaining documents), and some may be perceived as embarrassing or harmful to the individual's reputation (e.g., contacts with employers) or as invasive or intimidating (e.g., fingerprinting).

- Special forms usually had to be filled out by third parties to verify TANF applicants' income (56 percent of offices), household circumstances (45 percent), or shelter costs (37 percent). Thirty percent of offices required no third-party forms for TANF applicants, while 22 percent required forms for all three types of verification. Third party income verification was somewhat less common for non-TANF applicants, with 45 percent of offices usually requiring it.
- Caseworkers routinely contacted third parties to verify one or more of these same three topics (income, household circumstances, and shelter costs) for TANF applicants in 45 percent of offices. No third-party contacts were usually made for TANF applicants in 55 percent of offices, while all three topics involved third-party contacts in 12 percent. Third-party contacts for income verification were somewhat less common for non-TANF applicants. No third-party contacts were routinely made for non-TANF applicants in 62 percent of offices; 10 percent of offices used third-party contacts for all three items.
- For clients applying for TANF as well as food stamp benefits, 50 percent of offices required third-party verifications of topics other than income, household circumstances, and shelter costs.
- When some required verification documents are missing at the end of the 30 day processing period, most offices (77 percent) notified the applicant of the missing item before denying the application, but 22 percent proceeded to an automatic denial.
- Fraud investigations involving unscheduled home visits were conducted in 49 percent of offices, with 13 percent reporting such investigations for at least a quarter of all applications. These investigations were much more common in larger than smaller offices and more common for households whose expenses exceeded their income and for households whose household composition or income was questionable.
- Fingerprinting or finger imaging was required for at least some food stamp applicants in 23 percent of offices, and for all food stamp applicants in 18 percent. This practice was significantly more common offices with caseloads over 2,000.

Approach to Multivariate Analysis

The model of the probability of completing the application process needs to take into account variations in local office practice that may affect the applicant's perception of how difficult or burdensome the process is. Because the list of varying practices is so long, however, it is necessary to select among practices or to combine multiple practices in summary index variables. In addition, many practices apply only to some households—such as elderly and disabled, or TANF applicants—and useful measures should interact the practice with household characteristics. For example, an office's job search requirements may be applicable only for households applying for TANF as well as food stamp benefits, so the appropriate measure must distinguish between households that are applying for TANF *and* are in an office requiring TANF job search and households that either are not applying for TANF or are applying in an office with no job search requirement.⁴

For the analysis, we combine information on *required trips and meetings* into a single indicator that clients needed to attend a pre-interview meeting or to visit the office more than once in the course of being certified. This measure is defined separately for TANF and non-TANF applicants. An indicator of whether walk-in appointments were allowed is also included. Regarding *diversion policies*, indicators are included for the presence of a TANF lump sum option, a requirement to seek alternative resources, a TANF job search requirement, and a non-TANF job search requirement (each defined only for the appropriate group). To represent practices regarding the *medical deduction for elderly or disabled applicants*, we use an indicator of whether caseworkers routinely called medical providers or pharmacists directly to get information on medical expenses (defined only for elderly and disabled applicants). *Third party verification* practices are represented by two indices. One indicates how many of the three verification topics (income, household circumstances, and shelter costs) involved getting third parties to submit forms. The other indicates the number of topics involving caseworker contact with third parties. Finally, we include indicators for whether the office conducted any *home visits* or did any *fingerprinting*.

Interim Participation Requirements

Among households who are actively receiving food stamp benefits, it is far more common to end their FSP participation in a recertification month than an interim month. Still, in any given month, 2.4 percent of households in an interim month leave the program. Some exit because their situation changed in a way that would make them ineligible and some for other reasons that may not have changed their circumstantial eligibility. We do not know what proportion fell in each of these categories, and this study did not interview participants who exited in interim months.⁵

⁴ Whether potential TANF applicants (i.e. households with dependent children under age 18 that are not already receiving TANF) actually do file a TANF application could be affected by the office's policies. Potential TANF applicants that decide not to apply for TANF, as well as actual TANF applicants, might be discouraged from applying for food stamps by TANF diversion or job search requirements. Hence, potential rather than actual TANF application was interacted with the relevant policy variables.

⁵ A six-State study of the FSP negative action Quality Control system found that 79 percent of cases terminated in interim months failed to comply with all procedural requirements and 21 percent terminated due to circumstantial ineligibility (Mills et al., 1990). The study could not, however, analyze whether households that closed for procedural reasons were also circumstantially ineligible. In the current study, we collected information on a sample of 71 cases that failed to complete recertification requirements. All but 4 (6 percent) of the cases were apparently still circumstantially eligible for food stamps when they

Whatever the overall frequency of interim exits by circumstantially eligible households, we expect exits to be more likely when the households perceive the requirements for continued participation to be burdensome or onerous, or when they perceive the benefit to be too small to justify the effort of continued participation.

Local Office Practices

Local office practices that might influence perceived burden of continued participation include requirements for participant action, such as reporting household information or participating in employment-related programs.

- At the time of the local office survey, half of the local offices reported having a mandatory periodic reporting requirement for some cases. This included 28 percent of offices that used monthly reporting and 29 percent that used quarterly reporting. Other offices, rather than requiring reports at specified intervals, required participants to report specified types of changes in circumstances whenever such changes occurred. Both monthly and quarterly reporting requirements were applicable mainly to households with earnings and infrequently to other kinds of households.
- When a household fails to submit a required monthly or quarterly report on time, most offices reported sending a notice instructing the client to report within a specified time period. In 12 percent of offices, however, the case was automatically closed.
- Caseworkers reported that 69 percent of offices had a Food Stamp Employment and Training (FSET) program available. The program was usually available to non-TANF non-ABAWD cases as well as ABAWDs.
- In 33 percent of offices, FSET participation was required as a condition of eligibility for some non-TANF non-ABAWD households.
- The ABAWD work requirement was applicable in 69 percent of offices and waived in 31 percent; 14 percent had the work requirement but no FSET services.
- Among offices with ABAWD work requirements, most offices reported no follow-up with ABAWDs who had reached their time limit (59 percent). Other offices sent written notices (31 percent) or made telephone calls (12 percent) to explain how the household might regain eligibility.

Policies that could reduce or end participants' food stamp benefits, such as sanctions or time limits, might lead participants to see a lower value in continued participation. FSP/TANF participants who leave TANF may similarly feel that continuing with food stamp benefits alone is not worth much effort. Local practices regarding the actions necessary to maintain food stamp benefits may consequently affect participation.

terminated, according to income and asset information collected through telephone and in-person interviews. The survey did not, however, collect information on whether households were ineligible due to procedural violations.

- States have the discretion to impose food stamp sanctions on TANF/FSP participants who fail to comply with TANF rules. This practice was employed in 58 percent of offices, with 55 percent applying sanctions for non-compliance with TANF work requirements and 25 percent sanctioning non-compliance with other TANF rules.
- Eighteen percent of offices applied sanctions to non-TANF households failing to comply with child support requirements.
- When FSP/TANF households exit the TANF program, they may be required to visit the food stamp office within a month to have their benefit adjusted, be recertified, or reapply for benefits. Twenty-five percent of offices reported applying such requirements for cases that lost their TANF benefits due to full-family sanctions, 22 percent for cases exiting due to employment or other reasons, and 8 percent for cases reaching the TANF time limit.

Approach to the Multivariate Analysis

Because this study is principally concerned about circumstantially eligible households, and the available data do not allow us to determine circumstantial eligibility for most households who left the FSP in interim months, Chapter 8 does not include multivariate analysis on this topic. However, Appendix D presents models of the probability of closing versus continuing to receive benefits in which the sample includes all households who exited the program. The main model includes a term indicating whether the month is an interim month or a recertification month. This term is interacted with variables representing the practices described above—that is, each practice variable is conditional on the household being in an interim month.

The model includes predictor variables intended to represent all of the dimensions of local office practice identified above. The measures of periodic reporting, one for monthly reporting and one for quarterly reporting, are tailored to a household characteristics (e.g., TANF status, presence of earnings) to indicate whether the household was subject to monthly or quarterly reporting in its particular office. Two indicators of FSET services are included: availability of any FSET services, and participation requirement, given households' characteristics. A single measure of presence of any food stamp sanctions for any TANF violations is used.

Recertification Requirements

Recertification requirements are largely similar to initial certification requirements. The main differences are that some requirements do not have to be repeated (e.g. fingerprinting), and eligibility interviews are nearly always prescheduled. Given the participant's familiarity with the process, it is somewhat surprising that a larger proportion of the households exiting the program in the recertification month failed to complete the recertification process. Many of those households cited confusion or difficulty with the process, with particular emphasis on the verification requirements. Some cited having to do recertifications frequently as an obstacle. Others mentioned features of the program that were not specific to recertification, such as periodic reporting requirements. For these people, the recertification was apparently a convenient point to stop participating.

Whether eligible households continue to receive food stamp benefits after a recertification month may be influenced in part by practices that make the recertification process more/less difficult or convenient for the recipient. In addition, we expect that continued participation may be influenced by

routine participation requirements, such as periodic reporting or participation in employment-related programs. These requirements may pose a burden that discourages participation, and failure to meet the requirements may lead to sanctions, including termination.

Local offices exercise discretion not only in the structure of the recertification procedure, but in the frequency with which each case is recertified—households with shorter certification periods are recertified more frequently. Because recertification requires the household to complete a more complicated and demanding process than is required in interim months, we expect households to be more likely to stop participating in a recertification month than an interim month.

Local Office Practices

Apart from practices described previously, the local office survey examined only two practices that were specific to the structure of the recertification process: whether participants were required to come to the food stamp office for a recertification interview and, for those required to appear, what happened if the participant missed the appointment.

- Telephone or at-home interviews were routinely offered to persons with disabilities and the elderly in 70 percent and 54 percent of offices, respectively. Smaller numbers of offices offered this opportunity to households with transportation problems (16 percent), homebound or hospitalized clients (14 percent), and clients with work-related scheduling conflicts (7 percent).
- When participants missed recertification appointments, 33 percent of offices automatically closed the case. Most other offices either automatically rescheduled the appointment (10 percent) or notified the client to do so (51 percent).

Another key policy issue concerns the frequency with which recertifications are required. States and local offices have considerable discretion to set the length of certification periods, with longer periods generally assigned to types of cases whose circumstances are expected to be stable (e.g., elderly and disabled persons) and shorter periods for more volatile cases (e.g., ABAWDs). Certification policies reported by supervisors varied considerably across local offices, as illustrated by the following examples.

- For elderly or disabled clients, 17 percent of offices used certification periods of more than 12 months and 76 percent used 7–12 month periods.
- For TANF cases without earnings, 58 percent of offices usually set 4–6 month certification periods, but 11 percent used shorter periods and 31 percent used longer ones.
- Among offices in which ABAWDs were subject to time limits, 73 percent of offices used 1–3 month certification periods and 37 percent used longer certification periods.

Approach to the Multivariate Analysis

Because the available data do not indicate circumstantial eligibility for many of the sample households who left the FSP in their recertification month, closures at recertification are not analyzed in Chapter 8. Appendix D presents models exploring the relationship between office practices and all closures at recertification, not distinguishing between eligible and ineligible households. As described

previously, the main model examines the probability that a participating household will continue or not continue to receive benefits in a given month, with a term indicating whether it is a recertification month. Recertification practices are interacted with the recertification month term.

The local office requirement for office visits is represented by a variable indicating whether the individual is in a group for which telephone or at-home interviews are allowed. For the treatment of missed appointments, we use an indicator of whether cases that miss appointments are automatically closed. We also include a number of variables discussed previously to capture dimensions such as the difficulty of getting to the office, staff attitudes, and verification policies. Because the survey data suggested that participants who were unhappy with routine reporting or participation requirements may have chosen not to pursue recertification, we include those interim-month practices in the recertification portion of the model as well.

Certification length is represented by in the model by two variables: the indicator of whether the month is an interim or recertification month, and the measure of the length of the certification period.⁶ The coefficient on the recertification month term indicates the extent to which cases are more or less likely to continue participating in a recertification month than an interim month. The certification length term, which is conditional on being in a recertification month, indicates whether this probability increases with certification length, testing whether participants with short recertification periods are less likely to complete the recertification process.

Summary

Although the Food Stamp Program is a national program, with a uniform set of rules governing eligibility and benefit amounts, local administration of the program varies in ways that might affect participation. This chapter has summarized about 50 distinct dimensions of administrative variation identified by the local office supervisor and caseworker surveys. The more detailed data presented in Gabor et al. show an even greater array of differing practices.

The variations in local practice are expected to affect household participation in several ways. The extent of outreach, for example, may determine whether a nonparticipant knows enough about the FSP to understand that his or her household might be eligible for benefits. The structure of the application process may determine whether the household finds it too confusing, difficult, or unpleasant to continue. Staff attitudes may suffuse all office operations, encouraging or discouraging households in their participation decisions.

Some of the practices that may affect participation are related to changes introduced by the 1996 welfare reform legislation. Examples include TANF diversion practices and time limits for ABAWDS. The majority of the practices identified, however, have long been matters of State or local discretion and are not directly connected to changes at the Federal level.

⁶ The length of the certification period was estimated using the FY 2000 FSP Integrated Quality Control System Database. For each State in the study sample, the frequency distribution of certification lengths was calculated for each of 10 case profiles. All individuals were assigned the mean certification period length found for their case profile within their State. The certification period lengths for each State are shown in Appendix C, table C.2.

For most practices, one can readily hypothesize the direction but not the magnitude of an effect on participation. For example, we would expect that a requirement for applicants to be fingerprinted would not encourage participation, and might—or might not—discourage it. But given such a large number of practices that *might* encourage or discourage participation, it is important to learn which ones actually do so. Local offices cannot simply adopt all practices that might encourage participation; they must also attempt to maximize the accuracy of their eligibility and benefit decisions, minimize administrative cost, meet processing deadlines, and comply with federal and State regulations. Although this study cannot address those tradeoffs, Chapter 8 presents initial analyses of the links between local office practices and selected household participation behaviors.