

Chapter 9

Conclusions: How Local Offices May Affect the Program's Accessibility to Eligible Households

About 7.2 million households received food stamp benefits in June 2000. An additional 6.3 million households had income and resources that would have made them eligible, based on participation rates estimated for that fiscal year (Cunnyingham, 2002).¹

The Food Stamp Program is intended to be accessible to all households who are eligible and wish to receive benefits. Some eligible households deliberately choose not to seek food stamp benefits, however. The survey of eligible nonparticipants found that 27 percent, or 1.7 million households, would not apply even if they were certain that they were eligible. These deliberate nonparticipants typically cited a desire not to depend on government assistance or a belief that they did not need it, although many also mentioned some aspect of FSP policy or practice as a reason for not wanting to participate. About 25 percent gave only personal reasons and 72 percent mentioned both personal and program issues. Thus it is reasonable to say that the accessibility of the FSP was not an issue for somewhere between 0.4 million and 1.7 million of the eligible nonparticipating households.

Accessibility was potentially an issue for the remaining 4.6 to 5.9 million eligible nonparticipating households. But the policies and practices affecting accessibility would be different for three different groups of nonparticipant households: those who have no direct contact with the FSP in a given month, those who contact the program with an interest in receiving benefits, and those who exit the program despite continued eligibility.

Nonparticipants Who Are Not in Contact with the Program

Excluding households that say they would not apply for benefits, about 4.6 million eligible nonparticipant households in June 2000 had no contact with the FSP in that month. This was by far the largest group whose nonparticipation might have been influenced by local office policies and practices.

A key hurdle for these nonparticipants was whether they perceived themselves to be eligible for benefits. More than a third believed they were ineligible, another fifth were unsure whether they were eligible, and a few (4 percent) were unaware of the Food Stamp Program. Those who believed themselves ineligible gave some reasons that suggested misunderstanding of program rules, such as the fact that they were employed or had reached their TANF time limit.

Outreach to nonparticipants might provide information on key aspects of the FSP eligibility criteria and thereby help nonparticipants understand their eligibility situation. Outreach activities—conducted by the local food stamp office, other community organizations, or both—were reported in about three-quarters of the areas examined. The multivariate analysis showed that eligible nonparticipants in

¹ These figures represent food stamp units (all people in a household who eat together) rather than households as sampled in the nonparticipant survey (all people living in a dwelling unit), which could contain more than one food stamp unit.

areas where a greater number of outreach modes were employed (community presentations, public service announcements, etc.) were more likely to be aware of their potential eligibility. The number of modes seems to represent the intensity or breadth of outreach, and hence the likelihood that any given member of the nonparticipant population was reached.

Because so much of the eligible nonparticipant population is not in direct contact with the FSP, it would be very useful for future research to expand upon the limited information that the present study could provide. One would like to know, for example, what outreach modes and levels of intensity are most effective in reaching various segments of the nonparticipant population. It would also be desirable to examine alternative strategies for influencing perceptions of eligibility, such as directly providing information on key eligibility criteria vs. individualized telephone hot-lines or in-person application assistance. The national FSP emphasis on outreach in recent years, exemplified in the outreach grants to States, may make such information particularly useful.

Research on outreach effectiveness should also consider the dynamic nature of the eligible population, where the present study could provide only a static view. Households move into and out of eligibility (see Farrell et al., 2003). At any given time the audience for an outreach message includes some newly eligible households who may not have heard (or paid attention to) any previous outreach, while others have been eligible long enough to have heard the message multiple times. It would be useful to know whether outreach modes and messages are differentially effective for households at differing points in their eligibility spell.

Nonparticipants Who Contact the FSP Office

In June 2000, an estimated 463,000 circumstantially eligible nonparticipant households contacted a food stamp office, and 363,000 were approved for benefits. But 23,000 did not apply for benefits and 57,000² applied but did not complete the application process. These 80,000 households may have faced accessibility issues related to the application process.

Applying for food stamp benefits can be a difficult, time-consuming, and perhaps intimidating experience. Applicants who were ultimately approved for benefits reported spending an average of 6.1 hours at the process, with 2.4 required trips to the food stamp office. For most applicants, some information must be obtained from third parties such as employers or landlords. Some applicants receive unscheduled home visits, and some are fingerprinted.

About a quarter of those who abandoned the application process mentioned among their reasons experiences that were related to office policies or practices. They emphasized the need to acquire documents for verification, the length of time before benefits would be received, long waits in the office, and the need to take time off from work or to pay for child or elder care.

Local offices have a great deal of discretion in structuring the procedures and requirements of the application process. The surveys of local office supervisors and caseworkers found more than 30 major areas in which practices varied across offices in ways that were hypothesized to affect the program's accessibility to all or a subset of nonparticipants. The multivariate analysis confirmed the

² This excludes about 20,000 applicants who did not complete the process but said it was because their circumstances had changed and they no longer needed benefits.

proposition that such variations can make a difference, finding that failure to complete the application process was significantly related to the following practices:

- No office hours outside Monday-Friday, 8:00 AM to 5:00 PM
- Fingerprinting of applicants
- Supervisor attitudes less positive toward participation
- Asking clients to leave children at home, for households with young children
- Time-limits for ABAWDs

These findings from the multivariate analysis are plausible and useful, but are probably not the whole story. The significant relationships are all in the expected direction and are consistent with some major themes that have been presented in “promising practices” guidance for improving program access (FNS, 2002), such as “family friendly” arrangements and minimally intrusive verification.

If there is any surprise in these findings, it is that so few of the practices that would be hypothesized to enhance access show statistically significant relationships to household behavior. This probably occurred because the study design was simply not strong enough to capture and disentangle the effects of complicated combinations of practices. Local offices do not adopt a particular practice in isolation, but as part of a procedure that is intended to optimize across the goals of accessibility, program integrity, timeliness, and administrative efficiency. For example, the choice of verification practices involves a potential tradeoff between accessibility and program integrity, and offices may deliberately choose a mix of less intrusive (e.g., no third-party contacts) and more intrusive (e.g., fingerprinting) practices in seeking to balance competing objectives. Findings regarding a single policy in isolation may be misleading if offices avoid one stringent policy but adopt another one instead. Our sample of 109 offices, though quite large for studies of this type, was not sufficient to explore the effects of all combinations of practices, and it even provides limited power for examining large numbers of presumably independent practices. Research using larger samples of offices and households or focusing on narrower sets of practices might reveal more ways in which office practices influence participation.

Note also that the multivariate analysis can find effects only when practices differ across offices—a particular practice might be very difficult and discouraging for applicants, but if all agencies implement it similarly, the multivariate analysis would not find a significant effect. A case in point might be the requirement for applicants to provide documentation of their circumstances. Although 10 percent of people who began but did not complete the application process said that the difficulty of providing documents was one of the reasons for non-completion. Variations in documentation requirements among offices, though included in the model, may have been too small to affect applicant completion rates.

One hypothesis when the study began was that policy changes stemming from welfare reform might have made the application process more difficult or burdensome, or the FSP less appealing, especially for households applying for TANF as well as food stamp benefits. The study provides only limited direct support for this hypothesis, but does not rule it out. A handful of applicants mentioned TANF diversion as a reason for not completing the application process, but none mentioned sanctions or work requirements; the ABAWD time limit had significant effect in the multivariate analysis, but no other welfare reform-related policies were significant in that analysis. More generally, applicants who successfully completed the application process in 2000 reported making an average of 2.4 trips to the

food stamp office and spending 6.1 hours traveling to and dealing with the office, compared to estimates of 1.6 trips and 3.9 hours in the 1996 study. This might reflect an increase in the overall complexity and burden of the application process, but there is no clear link to welfare reform.³ In any event, the overall applicant dropout rate in 2000 was quite similar to that found in earlier studies, as were the general characteristics of the dropouts and the reasons they gave for failing to complete the application.

Even though we cannot see clear links between welfare reform and the likelihood that eligible households would complete the application process, one cannot dismiss the possibility that welfare reform reduced overall participation by eligible households. Other research has shown that the percentage of eligible households receiving benefits declined sharply in the late 1990s, from 69.2 percent in 1996 to 59.7 percent in 2000 (Cunnyngham, 2003). The economic recovery during this period reduced the number of households whose income and resources met FSP eligibility criteria, but would be expected to have less influence on whether eligible households would participate. It is reasonable to suspect that welfare reform contributed to the declining participation rate even though the effect of specific policies cannot be isolated.

Eligible Participants Who Exit the Program

Some eligible households that received benefits in June 2000 ended their participation in that month and became eligible nonparticipants in July. The study provided only imprecise information on how many of the 383,000 households who exited in that month were circumstantially eligible. We estimated that 123,000 households terminating in their recertification month may have been circumstantially eligible, but the estimate was derived from survey whose response rate was low enough to warrant caution. No data were obtained on the circumstances of households exiting in non-recertification months, but many may have been circumstantially eligible. Even allowing for imprecision, it appears that the eligible participating households who exited the FSP in June 2000 substantially exceeded the number of nonparticipants who contacted the food stamp office but failed to become participants.

Households who failed to complete the recertification usually did not even file a recertification or appear for the recertification interview. Most non-completing households said that some aspect of the recertification process was too difficult, such as providing documentation or missing work, or that they were not sure what they needed to do to complete the process. These reasons are somewhat surprising, since these households had previously completed at least the initial certification process, which is usually more demanding than the recertification. Moreover, more than a quarter of the recertification dropouts said that they believed they were ineligible, despite providing information in the survey that indicated apparent eligibility.

Because the study did not obtain data on circumstantial eligibility for some types of households exiting the program, we could not directly model the effect of local office practices on this aspect of eligible households' participation behavior.

³ It would be interesting to examine time estimates separately for TANF and non-TANF households. However, published data for 1996 do not present this information.

One policy whose importance can be seen even without multivariate analysis is the length of the certification period, which determines the frequency with which households are recertified. Nearly a tenth of households who did not complete the recertification mentioned the frequency of recertification as an issue. Participating households who were in their recertification month were far more likely to leave the program than those who were in an interim month. Closures in June 2000—not counting cases that were closed because of excess income or resources—represented 14.3 percent of the cases that were in a recertification month, compared to 2.3 percent of cases in an interim month (derived from table 2.4 and Appendix table B.39). Unless circumstantial ineligibility rates were dramatically different for these two types of households, being in a recertification month substantially increased the likelihood that a circumstantially eligible case would close rather than continue to receive benefits in the following month.

The Opportunities to Reduce Nonparticipation among Eligible Households

If policy makers wish to increase the level of participation by eligible households, the most obvious target is the households who have had no recent contact with the FSP and who would apply for benefits if they believed themselves eligible. This group included more than 4 million households in June 2000—somewhat more than half as many as the number of active participant households in that month. Communicating with these nonparticipant households would be difficult because they are not easy to identify and they are not necessarily the same households from month to month. Nonetheless, increasing these households' understanding of their likely eligibility may be the only way to achieve a substantial reduction in the overall rate of nonparticipation. The State outreach grants and outreach guidance offered since the study period may be useful steps in this direction.

Numbers notwithstanding, a higher program objective may be to avoid discouraging participation by households who have taken action to seek program benefits, including both nonparticipants who contact the office and households who are actively participating. The processes of application and recertification—and to a lesser extent, complying with program requirements in non-recertification months—are hurdles that a sizable number of apparently eligible households fail to surmount. The 2002 Farm Bill and earlier regulatory initiatives introduced changes intended to simplify eligibility rules and the application process. Time and future research will tell whether these changes have effectively lowered the hurdles.

It is important to remember, however, that these processes are not capricious, but are necessary for the program to deliver benefits and to ensure program integrity. Local office practices can adjust the height of the hurdles somewhat, but cannot remove them. Thus while substantial proportions of the application and recertification dropouts cited procedural obstacles, the statistical analysis found few variations in office practices that showed significant effects on the probability that households would complete the processes.

Any effort to increase accessibility through local office practices could benefit from further research on the links between office practices and household behavior. Much of the research to date has been limited to descriptive analysis of households' experiences and stated reasons for their behavior. These analyses can point to practices that may influence participation, but they cannot indicate whether variations in the practices actually affect participation behaviors. Analyses that model participation behaviors have used State-level policy variables, which do not account for differences in office

practices within a State. Such variation is quite substantial: even though the study included only a few offices in each State, we found hardly any policies with no within-State variation.⁴

More focused office-level and household-level research is needed to know how much reduction in non-participation can realistically be achieved, what practices and combinations of practices can have the greatest impact, and how those practices affect goals such as program integrity and administrative costs. Such information would provide invaluable guidance for enhancing the Food Stamp Program's accessibility to eligible households.

⁴ As an illustration, we selected ten practices that were included in dichotomous form in the multivariate models (whether: any outreach was conducted; targeted outreach was conducted; outreach was coordinated with Medicaid/SCHIP; the office had any extended office hours; clients were asked not to bring children to the office; non-TANF clients were fingerprinted; unscheduled home visits were conducted; employment and training services were available to ABAWDS; employment and training requirements existed for non-ABAWDS; and TANF closure requires visiting the food stamp office to continue benefits). For each of the 26 States with 2 or more offices in the sample, we determined how many of the State's sample offices gave the same response. The number of States in which all offices reported the same policy ranged from 6 to 25 across the ten variables, with an average of 12.2. Since 17 of the 26 States had only 2 or 3 offices in the sample, and we selected variables that only allowed a yes/no choice, it is clear that the extent of within-State policy variation was even greater than indicated by this exercise.