

**IMPROVING FOOD STAMP
ACCESS
IN UPSTATE NEW YORK:
Solutions in Practice**

DECEMBER 2001

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INTRODUCTION

The Food Stamp Program (FSP or the program) is the nation's primary tool for the alleviation of hunger. Its purpose is "to safeguard the health and well-being of the nation's population by raising levels of nutrition among low-income families."¹ The program achieves this purpose by providing eligible households with a benefit card to purchase food at authorized retail locations.

Hunger, however, continues to be a significant problem in New York State. Each month, nearly 3 million New Yorkers turn to more than 3,200 food pantries and soup kitchens for assistance. A recent survey conducted by the Hunger Action Network of NYS found that the demand for emergency food in upstate New York increased by 37 percent between 1995 and 1999.

Despite the documented increase in usage of food pantries and soup kitchens, since 1995, participation in the FSP has dropped sharply nationwide and in New York State. While some decline in participation was expected due to the improving economy and changes in program rules, both of which reduced the number of people eligible for food stamps, less than half (44%) of the decline can be explained by those factors. The remaining 56% of the decline is the result of eligible people not participating in the Food Stamp Program.²

In *Food Stamps in Upstate New York: Views from the Front Lines* (Nutrition Consortium, et al Oct 2001), a number of reasons why eligible people do not participate in the Food Stamp Program were identified. Many of the reasons cited by survey participants can be remedied through policies designed to facilitate participation by eligible households.

Several policy initiatives are already being implemented in NYS to address the problem of declining food stamp caseloads and improving access to the program. This report highlights some strategies that have been successful in reducing barriers and making it easier for eligible people to

¹ 7 USC 2011

² "The Decline in Food Stamp Participation: A Report to Congress." United States Department of Agriculture, Food and Nutrition Service, 2001.

access food stamps. Also, a few outstanding practices from other states that could easily be adopted by OTDA or local districts are included.

Program Background

To implement Food Stamp Program statutes, USDA sets the rules and regulations governing the Food Stamp Program. Historically, each state has had a degree of flexibility in how it administers the program. In recent years, USDA has deferred more and more policy decisions to the states. Thus, in areas where Congress has left room for alternative interpretations of the law, USDA has given the states broad parameters within which it permits the states flexibility.

New York State has been quick to take advantage of many of these opportunities. The state agency responsible for supervising the operation of the Food Stamp Program in New York State is the Office of Temporary and Disability Assistance (OTDA). New York has 58 locally-run food stamp offices administered by the county departments of social services, each of which has flexibility regarding physical space, organization, office hours, staff training and responsibilities, etc.³ OTDA also provides local districts with some options within policy decisions. Thus, both OTDA and the local districts have opportunities to remove barriers and facilitate full participation in the program.⁴

³ In New York City one agency, the Human Resources Administration (HRA), administers the program in all five boroughs. This report only deals with the 57 counties outside of New York City.

⁴To learn more about local district practices, SENSES surveyed and interviewed Food Stamp Program administrators and the Nutrition Consortium of New York State surveyed and interviewed food stamp outreach workers. Included in those surveys and interviews were questions about local district policies and practices. Unless otherwise stated, the information in this report is from those surveys and interviews.

LOCAL INITIATIVES THAT IMPROVE ACCESS

Although the NYS OTDA supervises the local districts and, when applicable, sets forth state policy regarding the Food Stamp Program, the local social services districts also have a great deal of room for flexibility and can often craft their own policies to improve access. The following are examples of county initiatives in NYS that have the effect of alleviating barriers to participation. (Many of the county practices mentioned here were discovered through the survey conducted for the report *Food Stamps in Upstate New York: Views from the Front Lines.*)

Combined Food Stamp/Medicaid Offices

Across upstate New York, ten local districts have helped eligible households get food stamps by consolidating the food stamp and Medicaid application processing for households not receiving cash assistance. Another seven districts do this by using “generic” workers, who handle all programs.

Households not getting cash assistance have historically been more likely to use Medicaid than food stamps. Therefore, it is hoped that combining the paperwork and appointments for the two programs will reduce the “hassle factor” and encourage food stamp participation by low income working households.

This approach has long been favored by advocates as being more convenient for participants. Having only one worker, who can take care of both programs with one appointment, is efficient for both the applicant and the local district. Participants do not have to bring their documentation in twice to apply to each program, since both programs are handled from one file and the same documents can be used for both programs. Also, the linkage between food stamps as a nutrition program and Medicaid as a health program seems logical and natural.

Joint MA/FS Units also have some advantages for local districts. By processing the cases together, one worker can handle the documentation for both cases, reducing the need for duplicate documents and the demand on a caseworker’s time.

[Note: Food stamp recertifications for households with earnings usually are required every six months, while Medicaid recertifications occur only

once per year. Washington State and Illinois automatically use the income reported for Food Stamp recertification to redetermine Medicaid eligibility. Thus, separate Medicaid recertifications are unnecessary as long as the household is participating in the Food Stamp Program.]

Stationing eligibility workers in the community

One of the most significant barriers to participation, particularly in rural areas, is that many low-income families lack the means to get to the local district office. This problem has been exacerbated by the fact that some local districts have closed satellite offices to reduce expenses. One solution to this problem is to regularly schedule workers to go to easily accessible locations in the community to conduct interviews and accept applications and required documents.

At least sixteen local districts outstation eligibility workers. Many of these districts use senior centers, Offices for the Aging, and town halls as outstation locations. Erie County uses a van as a mobile office to reach people in rural parts of the county and help them to apply. Chenango County reported that they outstation workers at a hospital and at WIC locations.

Outstationing enables clients who may have been reluctant or unable to come into a welfare office to apply for assistance. Counties also establish more positive relationships with community-based organizations and have a better public image as a result of having workers located in the community.

One difficulty with outstationing is that the workers do not have computer access to the Welfare Management System (WMS) at the community site. However, some districts have found that workers can conduct the interviews and input the information when they return to the office. Some questions were initially raised about security, but in practice this does not seem to have materialized as a problem.

Extended hours

One of the frequently mentioned barriers to Food Stamp Program participation is the difficulty many people have, especially those with jobs, reaching local district offices during regular business hours. At least eighteen local districts are actively working on extending office hours.

At least two counties currently offer extended hours. One of these counties has an evening support group to process food stamp recertifications for people who have recently left TANF. The other county plans to start staying open until 7:00 p.m. In fifteen other districts, extended hours are available at the caseworkers' discretion. In these districts, caseworkers may make appointments available during the lunch hour, and/or during evening and weekend hours. Many districts stay open until 6:00 or 6:30 pm or make early morning or evening appointments upon request for working households.

Some local district concerns associated with extending office hours include union issues, having enough workers to cover the second shift, security for the evening shift, and transportation problems for clients. The 18 districts using extended hours have created flexible policies in accordance with the needs and resources available to them. Only one district that was willing to expand hours was deterred by the cost of evening security and the lack of free parking in a safe area.

Waiving the face-to-face interview

Local districts have broad flexibility in waiving face-to-face interviews for households for whom appearing at the local district office creates a hardship. This district option was recently reiterated in a 2001 administrative directive which defines hardship to include "illness, transportation difficulties, care of a household member, hardship due to residency in a rural area, prolonged severe weather or work or training hours that prevent the household from coming in during SSD office hours." Hardships are determined on a case-by-case basis by the local district.

Waiving the face-to-face interview requirement under certain circumstances enables many more eligible households to receive benefits. Several LDSSs report that they waive the face-to-face interview for all the disabled, SSI recipients, and people living in group homes.

The FIT Program

The Financial Independence Today (FIT) Program started in Ontario County on January 1, 1999, as a pilot program. Similar in theory to TOP, FIT was designed to ensure that clients who were transitioning from cash assistance received all of the benefits available to support their transition

to self-sufficiency. Under FIT, an experienced case examiner reviews each case closing to ensure that a food stamp case is not inadvertently closed as a result of the closure of a cash assistance case.

FIT differs from TOP in that it does not require a separate office, and the cases may be assigned to any worker in the department. Since it does not require physical or administrative reorganization, it may be more feasible than TOP for some small districts.

STATE LEVEL EFFORTS TO INCREASE ACCESS

There are several examples of policies recently adopted by NYS that make it easier for eligible households to access food stamp benefits. To inform low-income households that they may be eligible for food stamps, and to assist potentially eligible households through the application process, New York State, with matching federal dollars, funds statewide and community based outreach efforts. Also, NYS OTDA has chosen to implement waivers offered to the states by USDA, and has sought some unique waivers from certain Food Stamp Program rules and regulations in order to promote participation.

Outreach

In a joint effort between NYS OTDA and the New York State Department of Health (DOH), the state funds community-based not-for-profit agencies to provide outreach, education and application assistance to people who might be eligible to receive food stamps. Under the Nutrition Outreach and Education Program (NOEP - currently administered by the Nutrition Consortium of New York State), local outreach projects operating in 15 upstate counties and throughout New York City provide accurate eligibility information about the Food Stamp Program to the general public and low-income households, and assist applicants, as needed, through all aspects of the application process. NOEPs also work with local social services districts to resolve problems in individual cases and try to reduce systemic barriers to participation. Each year, the NOEPs help six to eight thousand eligible households enroll in the Food Stamp Program.

As part of an on-going outreach campaign, OTDA produces TV ads, posters, flyers, and other materials. This year, they ran a series of television commercials, which featured a popular TV chef promoting food stamps as a means to buy healthy foods in grocery stores. These commercials generated many hotline inquiries about the Food Stamp Program and proved to be an excellent way to get the word out to people about the positive aspects of participating in the Food Stamp Program. OTDA also distributed posters and grocery bags to food pantries with positive messages about food stamps.

In addition, New York State OTDA has a statewide toll-free food stamp hotline that people can call for information about the Food Stamp Program and the location of the local district office nearest them.

SSI Automatic Enrollment Project

To improve access to food stamps for the eligible elderly and disabled population, New York State is seeking to use available technology to promote Food Stamp Program participation by automatically providing food stamps to SSI recipients. SSI recipients are categorically eligible for food stamps, but the rate of cross-enrollment is low. USDA has approved the project in concept, and details of implementation are currently being negotiated with the Social Security Administration.

The automatic enrollment project would authorize benefits at standardized levels to all SSI live-alone recipients based on housing type. OTDA, the food stamp administering agency, would send the recipients a letter informing them of their food stamp benefit levels. (New York's EBT system uses a single benefits card for food stamps, cash assistance, and Medicaid. Since all SSI beneficiaries receive Medicaid, they already have EBT cards that can also be used to spend food stamp benefits.) If the SSI recipient chooses to participate in the FSP, use of the EBT card would enroll him/her in the program. If an individual chooses not to participate, his/her account would be deleted and no record of the food stamp case would be kept in the system.

The project requires system changes within the Social Security Administration. Once those are complete, an anticipated 125,000 additional elderly and disabled people will begin using food stamps.

Expanded Auto Exemption

One of the Food Stamp Program rules overwhelmingly identified as a barrier to program participation was the rule excluding households from the program who owned a car worth more than \$4650. Last year, USDA offered states the option of exempting vehicles in which the household had low equity. New York took this option, making it possible for some people, primarily the "newly poor," to get food stamps.

In December, New York began implementing a new vehicle policy, pursuant to another option that was recently made available. New York State is applying resource rules from another TANF assistance program to food stamps, exempting one vehicle for every household and allowing one additional vehicle to be exempt for each employed member of the

household. Not only will this policy result in more low-income households utilizing the Food Stamp Program, it will also greatly simplify the case examiner's task, since there is no longer a need to determine and document the actual retail value of many vehicles.

The Transitional Food Stamp Program

New York is the first state in the country to be granted the opportunity to operate a federally funded food stamp transitional benefit alternative program (TBA).

LDSSs were previously required to separately determine food stamp eligibility when a temporary assistance case closed. For many households, this resulted in erroneous reductions or terminations of food stamp benefits. Under TBA, food stamp benefits are frozen at the pre-TA closing amount or higher (if an increase in benefits is warranted). This freeze lasts for up to three months, depending on the period of time since the household's last recertification. During that three-month period, the household's new circumstances are documented and a determination is made of the household's continuing eligibility for food stamps.

TBA assures that a newly employed worker will not have to take the time to go through a redetermination of her or his family's food stamp eligibility immediately upon transitioning from cash assistance. It also gives the family's circumstances a few months to stabilize before a new food stamp allotment level is set. Most importantly, it makes clear to the family that it can continue to receive important work supports like food stamps after leaving public assistance, thus helping to ensure that becoming employed improves the family's standard of living.

Six Month Reporting

The need to constantly report every change in household circumstances, including even small fluctuations in income, has long been a deterrent to participation. A new option that New York State has adopted allows participants to report minor income changes every six months, rather than every time there is a change. In between, they are required to report only those income changes that are significant enough to make the household ineligible for benefits. This will make it easier for working families to continue receiving food stamps, and it will significantly lighten the burden on case examiners by reducing the opportunities for quality control errors.

OPTIONS GRANTED TO COUNTIES

There are several instances in which New York State has accepted waivers approved by USDA, but allows counties to choose whether they will implement the waiver. The following are examples of policy initiatives encouraged by the state that are being implemented in some counties in New York State.

Food Assistance Program (FAP)

When the 1996 welfare reform provisions made most legal immigrants ineligible for food stamps, it created an option for states to provide state-funded food stamp benefits to otherwise ineligible immigrants. New York immediately extended these state-funded benefits to children, the disabled, and people 60 years old or older through the Food Assistance Program (FAP) at local option. Twenty-one counties and NYC offer FAP benefits. While certain eligibility limitations remain for immigrants in New York State, the FAP program has provided benefits to thousands of needy immigrants who would otherwise not have been able to get help.

Utilization of “ABAWD” waivers and exemptions

The 1996 welfare reform bill introduced a new subcategory of food stamp applicants termed Able-bodied Adults Without Dependent Children (ABAWDs). This group includes non-disabled individuals between 18 and 50 years of age living in households that do not include children. The welfare reform bill created a special set of work requirements for this population, that are different from the Food Stamp Employment and Training (FSET) work rules that apply to all other food stamp participants. Adults defined as an ABAWD who do not meet the special work requirements can only receive food stamps for 3 months in any 36-month period.

New York State has received a waiver from USDA to exempt certain counties with high unemployment rates from the ABAWD rules.⁵ The state allows the qualified counties to choose whether to exempt their “ABAWD” population from the work requirement/time limit. Forty-one upstate

⁵ Each year, the US Department of Labor designates counties or cities that meet certain federally established criteria related to unemployment as “Labor Surplus Areas”. These districts are eligible for a waiver, which permits them not to apply the ABAWD restrictions to people living in the “Labor Surplus Area”.

districts and New York City are eligible for waivers of the ABAWD rules for all or part of their districts due to high unemployment. Of these, 30 districts have implemented the waiver. The rest, including Cattaraugus, Essex, Franklin, Lewis, and Warren counties and New York City, have declined the waiver. In addition, waivers were declined for the cities of Mount Vernon, Troy, and Elmira, where the balance of the counties in which they are located are not eligible.

In addition to the above waiver, all districts have the opportunity to use individual “exemptions” to exempt ABAWDs from the special work requirements. Only 11 districts utilize these exemptions.

The ABAWD waivers and exemptions continue vital food assistance to those truly in need who would otherwise lose food stamp eligibility. They remain still subject to the strict work requirements of the Food Stamp Program, but not to the unique ABAWD rules. Opting to utilize the waivers and exemptions to the fullest extent possible simplifies administration of the program and provides food stamp benefits to the greatest possible number of hungry people.

Transitional Opportunities Program (TOP)

New York State has recently provided local districts with the opportunity to implement a Transitional Opportunities Program (TOP) to provide intensive services to households preparing to leave cash assistance, and to assist those households during and after the TANF case is closed. Food stamps and other benefits, such as medical coverage and child care subsidies, have proven to be critical supports to households that are leaving welfare and are seeking to maintain self-sufficiency with low-paying jobs. TOP offices are responsible for ensuring that food stamp benefits are not lost during the transition, and helping eligible households to maintain their food stamp benefits after leaving TANF.

Seventeen districts chose to establish TOP offices and received a share of the \$3 million allocated by the state to help them set up offices to serve the specific needs of households leaving cash assistance. TOP offices are physically separate from the food stamp or “welfare” offices. The households keep the same case examiner during and after the time they receive TANF. The hope is that they will come to know and trust the case examiner, so that they feel they can turn to him or her for help in preventing problems with maintaining their benefits.

This individualized approach should improve the chances that eligible households will continue to receive food stamps after their cash assistance ends. Since the TOP offices are quite new, their effectiveness remains to be seen. However, they are based on a model that was extremely successful in meeting the needs of working mothers leaving cash assistance. These local TOP pilots should provide the state with new insights into the needs of transitioning households.

IDEAS FROM OTHER STATES

Other states have also implemented policies aimed at improving program access that deserve mention and consideration by NYS and the local social services districts.⁶

Linking Food Stamps To Health Outreach⁷

Los Angeles County has a very successful Medi-Cal outreach program, similar to NY's Child Health Plus Facilitated Enrollment project. However, in California, state Medi-Cal eligibility staff, not contracted community-based organizations, offer program enrollment at various non-traditional sites such as clinics, hospitals, schools and community centers. The outstationed workers evaluate the eligibility of potential applicants for the Medi-Cal programs, approve initial benefits and transfer the case to a Medi-Cal office near the family's home. Beginning in February 2000, Medi-Cal applicants are also evaluated for food stamp eligibility and encouraged to apply, if eligible. For individuals that indicate an interest in applying for food stamps, the eligibility worker completes an initial screening for eligibility and assists potentially eligible individuals with completing the application. The eligibility worker sets an appointment for the applicant to see a designated worker at the nearest district office to complete the application process. If the potential applicant declines to apply for food stamps, staff documents the reasons for refusal in an effort to identify potential program participation barriers.

One of the main challenges encountered in linking food stamps to health care outreach in New York is the face-to-face and finger-imaging requirement of the Food Stamp Program. People applying for food stamps at a health care outreach site need to return to a county office to complete a face-to-face interview and to be finger-imaged. Another problem is the greater amount of documentation and verification information that is

⁶ Except where otherwise noted, the examples cited in this section of the report are from the USDA report *Improving Food Stamp Access: State Best Practices (2000)*.

⁷ *Best Practices to Improve the Food Stamp Program in California: A Compilation of Ideas to Increase Access and Outreach to the Food Stamp Program in California*, by Susan Chen, Dan McLaughlin & George Manalo-LeClair, California Food Policy Advocates (2000)

required in the Food Stamp Program, versus that of Medicaid. Those who are applying for food stamps need to spend additional time to gather this additional paperwork. However, feedback in California has been positive and indicates a need to educate the public about food stamp eligibility.

Information Centers

Some states provide information centers for the public, where people can get information about the Food Stamp Program, ask questions, and pick up forms. One office in Indiana staffs such a center with three workers and one supervisor available at walk-up windows. In addition to answering questions at these windows, they can accept documents, process change reports, and issue food stamp ID cards.

Social services offices in Nashville, Tennessee have electronic message boards in the reception areas of their offices. Each office can change the messages to inform their clients about changes in Food Stamp Program rules and regulations or post answers to frequently asked questions. Providence, Rhode Island invites non-profit organizations and others providing social welfare information to set up displays in the waiting areas.

On-site child care

USDA reports that at least 3 states provide on-site day care for a few hours while food stamp clients attend interviews. This permits both the client and the worker to concentrate on the interview without the distractions of caring for a child. It also makes the interview process quicker. These districts have arranged for secure and safe environments where parents do not have to worry about their children's well being. The childcare services are free, although some projects require documentation from the worker that the parent had business in the building. These services can be funded with TANF money for participants who also receive TANF.

Self-help area

A local food stamp office in Providence, Rhode Island, has a self-help area for clients located in their main waiting area. The self-help area has forms, program information, a free copy machine, and a drop box where people can submit required documentation or information about changes. Other offices provide drop boxes where people can leave documents after

hours or when there are long lines. The documents are then delivered to the appropriate caseworker, who can handle them at his or her convenience.

The Red Dot System

A worker in Las Vegas helps people get their food stamps more quickly by using a “red dot system”. Since the Food Stamp Program often requires less documentation than other programs, she puts red dots on the list of verification required next to the items required for the Food Stamp Program. She tells the applicant that they can get their food stamps as soon as those items are in, even if they still need more documents for their TANF and/or Medicaid applications. This helps the applicant prioritize, and may make the documentation requirements seem less daunting.

CONCLUSION

Many of the barriers encountered by households as they try to apply for food stamps can be remedied through state and local policies designed to make the application process less onerous for applicants and caseworkers. The practices presented here demonstrate a broad range of solutions that have been effective. New York State and each local district has the ability to take steps that will improve the operation of the program.

Clearly, there is no simple solution that will resolve all of the various barriers to participation in the Food Stamp Program. However, the dedication, creative thinking and hard work of state and local administering agencies can make the difference between eating and going hungry for countless households.

The Nutrition Consortium of NYS gratefully acknowledges the following funders who provided support for this report:

Community Food Nutrition Program: U.S. Department of Human Services/ NYS Department of State

MAZON: A Jewish Response to Hunger

The Robert Sterling Clark Foundation

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