



# **Food Stamps In Upstate New York:**

**Views From the Front Lines**

**October 2001**

**Report Prepared by:**

Greater Upstate Law Project  
Hunger Action Network of NYS  
Nutrition Consortium of NYS  
SENSES

# **FOOD STAMPS IN UPSTATE NEW YORK: Views from the Front Lines**

**Report Prepared by:  
Greater Upstate Law Project  
Hunger Action Network of New York State  
Nutrition Consortium of New York State  
SENSES**

October 2001

## **Acknowledgements**

The authors wish to acknowledge the contribution of Nancy Krupski of the Greater Upstate Law Project to this report. She provided tremendous help by creating a database for the survey responses, entering data, and compiling the results. Andrea Strother, an MSW intern with SENSES, diligently collected information from the local Departments of Social Services and coded their open-ended responses. Kristin Brown and Bill O'Connell helped with early stages of the survey design and collection while working for the Hunger Action Network. Thanks also to all who responded to our survey.

## **Authors**

### **Greater Upstate Law Project**

Barbara Weiner, Staff Attorney  
119 Washington Avenue  
Albany, New York 12210  
(518) 462-6831; bweiner@wnylc.com

### **Hunger Action Network of New York State (HANNYS)**

Mark Dunlea, Organizer  
94 Central Avenue, #2  
Albany, NY 12206  
(518) 434-7371; hannysalb@aol.com

### **Nutrition Consortium of New York State**

Colleen Pawling, Food Stamp Specialist  
235 Lark Street, Albany, New York 12210  
(518) 436-8757 ext. 12; hungerfs@aol.com

### **Statewide Emergency Network for Social and Economic Security (SENSES)**

Christine McKenna, Associate Director  
275 State Street, Albany, New York 12210  
(518) 463-5576; info@sensesny.org

# Table of Contents

Executive Summary .....	1
Introduction .....	2
Methodology .....	7
Responses to survey questions .....	8
STEP ONE: THE DECISION TO APPLY	
STEP TWO: GETTING THE APPLICATION	
STEP THREE: SUBMITTING THE APPLICATION	
STEP FOUR: SCREENING FOR EMERGENCY NEEDS	
STEP FIVE: VERIFYING ELIGIBILITY	
STEP SIX: THE "FACE TO FACE" INTERVIEW REQUIREMENT	
STEP SEVEN: CALCULATION OF THE MONTHLY BENEFIT	
STEP EIGHT: ELIGIBILITY DETERMINATION AND THE ISSUANCE OF BENEFITS	
Narrative Responses to Open-Ended Questions .....	21
Recommendations .....	27
References .....	34
Appendix A: Methodology	
Appendix B: Survey forms	
Appendix C: Raw data from survey	
Appendix D: Background on survey sponsors	

## Executive Summary

The Food Stamp Program is the nation's primary tool to combat hunger, providing benefits that are useable only for the purchase of food. The Food Stamp Program is a federal program under the administration of the United States Department of Agriculture (USDA). All states must operate the program in conformity with federal rules. The state agency in New York responsible for implementing the program is the Office of Temporary and Disability Assistance (OTDA). In New York, the day-to-day administration of the Food Stamp Program is the task of local social services districts.

While demand for emergency food assistance has continued to grow in New York State, food stamp participation has declined. From 1994 to 2000, food stamp participation in NYS declined by 39 percent, from 2.18 million to 1.33 million. At the same time there was an increase in the use of emergency food resources. Since food stamps are a cost-effective approach to reducing hunger, it makes little sense for food stamp participation to decline as hunger is on the rise.

An audit of the Human Resources Administration's management of the Food Stamp Program in New York City, conducted by the United States Department of Agriculture (USDA), as well as the 1999 Reynolds v Wing litigation, revealed serious problems in access to the program in New York City. However, no information was available about the performance of the program in the remainder of the state.

To gain insight about the rest of the state, the authors, a coalition of four statewide agencies, decided to survey four different groups: local food stamp offices, legal services program staff, food stamp outreach workers, and emergency food providers, in order to discover why a program providing much needed nutritional assistance was not reaching nearly all those eligible for its benefits.

## Findings

### The Decision to Apply

~~✍~~ Many potentially eligible people do not apply for food stamps because they think they are ineligible. This issue was among the two top concerns for each group of survey respondents, and was the top issue for food pantry guests.

~~✍~~ Stigma was cited as an issue by more local Department of Social Services (LDSS) offices than any of the other barriers listed in the survey. Nearly four-fifths (78 percent) of these workers identified stigma as a problem. Stigma was among the top problems for food stamp outreach workers as well, with 94 percent answering that it keeps people from applying for needed benefits.

~~✍~~ The fear of being reported to INS was cited as an application barrier by 52 percent of the client respondents, a substantial percentage when one considers the survey was not conducted in New York City.

### Getting and Filing the Application

~~✍~~ Two-thirds (62 percent) of the client respondents considered verbal denials by LDSS a problem; almost one fifth of them (18 percent) reported having been told by LDSS eligibility workers that they were not eligible for food stamps even before they had the opportunity to submit an application. Verbal denials were among the most frequently cited barriers by both food stamp outreach workers (94 percent) and legal services staff (86 percent).

~~✍~~ Failure to accept applications on the same day they are submitted was also cited as a significant problem. Almost one fifth of client respondents (19 percent) reported that they personally had, at one time or another, not been permitted to submit their application on the day they first appeared at the local district office to apply. About a third (31 percent) of clients report that they have been told that there are only certain days or hours that they can submit food stamp applications, contrary to federal law. Several local districts reported engaging in the unlawful practice of limiting hours during which applications are accepted.

~~✍~~ About one in five food stamp applicants are not screened for expedited food stamps eligibility, despite clear requirements that all applicants be screened for emergency needs.

### Verifying Eligibility

~~✍~~ The enormous amount of paperwork and burdensome documentation requirements were seen by all respondent groups as deterrents to food stamp program participation, including almost three quarters (73 percent) of LDSS staff.

### Eligibility Determination

~~✍~~ The restrictions on car ownership were considered a barrier to program participation by all groups responding to the survey.

~~✍~~ The automatic termination of the food stamp case by LDSS when the agency closes a household's cash assistance case without the caseworker making a separate determination as to the household's continuing eligibility for food stamps, was reported to be a problem that kept eligible households from participating in the food stamp program.

## Introduction

The Food Stamp Program (FSP or the program) is the nation's primary tool for the alleviation of hunger. Benefits provided by the program can be used to purchase food in a wide variety of USDA approved establishments, including supermarkets, grocery stores, bodegas, farmer's markets, and food buying clubs such as SHARE, Xtra Helpings, and FoodSense. Food Stamp benefits can also be used as contributions to home delivered meal providers or congregate meal sites.

The Food and Nutrition Service (FNS) of the United State Department of Agriculture pays the full cost of food stamp benefits and about half of the states' administrative costs. The FNS promulgates program regulations and oversees the program's implementation by the states. States administer the program, determining household eligibility, calculating the monthly benefits for which households are eligible and issuing the benefits themselves.

The state agency responsible for supervising the operation of the Food Stamp Program in New York is the Office of Temporary and Disability Assistance (OTDA). The day-to-day operation of the program is the task of each county's Department of Social Services, also known as the local social services district. In New York City, one agency, the Human Resources Administration (HRA), administers the program in all five boroughs. In this report, which only deals with the counties outside of New York City, the local social services districts are alternatively referred to as the local district, "local DSS" or "LDSS".

In the past, program benefits were distributed paper coupons, hence the name "food stamps". coupons have since been eliminated in many states, including New York, where benefits are issued through an Electronic Benefits Transfer (EBT) system. Participants receive an ATM-like card that is swiped at the cash register at the point of food purchase. Food purchases are then debited from the recipient's remaining balance in his/her food stamp account.<sup>1</sup>

The demand for emergency food increased by 37 percent from 1995 to 1999.
--

as  
The  
now

In spite of the availability of the Food Stamp Program, hunger continues to be a significant problem in New York State. Each month, more than 1.5 million New Yorkers turn to more than 3,000 food pantries and soup kitchens for assistance. A recent survey by the Hunger Action Network found that the demand for emergency food increased by 37 percent from 1995 to 1999.

Although the demand for emergency food assistance continues to grow in New York State, food stamp participation has greatly declined. Since the peak in program

---

<sup>1</sup> The Electronic Benefits Transfer system was not yet in use in Upstate New York when the survey was conducted.

enrollment in 1995, some one million fewer individuals are receiving assistance from New York's food stamp program, representing an almost 40 percent decline. The fact that this drop in program participation has been accompanied by the steadily increasing utilization of emergency food services suggests that something other than a lessening of need has been driving the reduction in New York's food stamp caseload.

To investigate the reasons for the decline, four agencies, the Hunger Action Network of New York State, Greater Upstate Law Project, Nutrition Consortium of New York State and the Statewide Emergency Network for Social and Economic Security (SENSES), conducted barriers surveys to ask the people most intimately involved with the food

Welfare reform is having the unintended consequence of diminishing the food stamp rolls without lessening the degree of need or hunger.

stamp program about what they perceived as barriers to full utilization of food stamp benefits. Thus the survey asked questions of the LDSS' employees responsible for running the program, the low income families and individuals who were turning to emergency food providers in increasing numbers, and the legal services advocates and community outreach workers assisting households to get into, and to remain participants in, the food

stamp program.

One fact that had already been established by a number of national studies is that the drop in Food Stamp Program participation was significantly larger than the drop in the number of potentially eligible households, that is, households poor enough to qualify for benefits. Although the economy had improved in the years between 1995 and 2000, USDA studies showed that only about 35 percent of the decline in program participation could be attributed to better employment opportunities. Rather, over half of the decline (56 percent) was due to the fact that fewer eligible individuals were enrolled in the program.

The food stamp caseload decline more closely resembled the decline in the welfare caseload, even though the financial eligibility rules in the Food Stamp Program are generally more generous than cash assistance rules. It became clear that many of the families leaving cash assistance programs were also leaving the food stamp program, although most of those households probably remained eligible for benefits and could have remained program participants. The vast majority of these households were entering low wage occupations. These "welfare to work" households were losing the nutritional assistance that could have helped ease that transition, compromising their health and well-being.

Thus welfare reform appears to be having the unintended consequence of diminishing the food stamp rolls without lessening the degree of need or hunger. This is true not only for the families leaving welfare but also for families who were applying for assistance. Welfare reform gave birth to a number of practices in local districts that were aimed at "diverting" families from cash assistance. By providing one-time grants to meet a particular need or by other short term measures, districts hoped to avoid the

family's entrance into the welfare system. The evidence is increasingly clear that in the process of welfare diversion, households are also being diverted from the Food Stamp Program.

In New York City, HRA's practice of diversion led to court action in a case called Reynolds v Wing. In response to this lawsuit and to a highly critical evaluation of HRA's food stamp application practices by the regional office of USDA, New York State OTDA issued several administrative directives reminding the local social services districts of the requirement that applications for food stamps be evaluated according to Food Stamp Program rules and that cash assistance application procedures designed to meet the goal of reducing welfare caseloads were not to be imposed on the food stamp application process.

Another reason for the decline in participation was that the 1996 welfare reform greatly restricted the food stamp eligibility of two groups: immigrants and unemployed, childless adults. With respect to the former, generally only permanent residents and immigrants in this country for humanitarian reasons remain eligible for benefits. Children, disabled people, and those over 60 remained eligible under a state-funded program.<sup>2</sup> The immediate consequence was a 60 percent drop in food stamp program participation by immigrants and a 42 percent decline in program participation by the American born children of immigrants, even though the latter continued to be eligible for benefits. The 1996 welfare reform law also restricted the eligibility of adults without children in the household to 3 months out of every 36-month period unless they were employed 80 hours per month or participating in an approved work activity.

Many of the families leaving welfare for employment were also leaving the food stamp program, though most probably remained eligible for benefits and could have remained program participants.

Nevertheless, the effects of welfare reform policies are not sufficient to explain why the Food Stamp Program is not reaching 40 percent of the households eligible for its benefits. The program has long been underutilized, with the number of participants always less than the number eligible, though the gap has increased significantly in the years since welfare reform. National statistics show that from 1994 to 1998 the percentage of eligible households actually receiving benefits dropped from 74 percent to 59 percent. Surprisingly, the greatest decline was among the poorest families, perhaps reflecting the fact that it was the families leaving welfare who were most likely to be dropping out of the Food Stamp Program. In New York State, program participation dropped from a high of 74 percent in 1995 to 60 percent in 1998.

---

<sup>2</sup> The Food Assistance Program (FAP) provided food stamp assistance for these groups. Most were subsequently restored to the federal Food Stamp Program. The elderly who are currently at least 60 but were not yet 65 on August 22, 1996 are still covered under the state program.

Previous studies have shown that certain groups, particularly the elderly and the working poor, have traditionally had a lower rate of participation than other eligible groups. Burdensome and complex documentation requirements, low benefit levels, limited office hours during which applications will be accepted by the LDSS' and the stigma attached to program participation are often cited as reasons for low program enrollment by these groups. The identification of the Food Stamp Program as a welfare program, and the resulting stigma, is known to be a problem especially among the elderly. In New York State, only about 40 percent of eligible elderly people receive food stamp benefits.<sup>3</sup>

People involved with and affected by the program were surveyed to measure to what extent program changes, like welfare reform, and long-standing problems associated with the Food Stamp Program were considered barriers to participation. A fuller understanding of the deterrents to participation seemed a reasonable first step towards developing strategies for increasing the percentage of eligible households receiving benefits, a goal shared by advocates, community outreach workers, as well as LDSSs, New York State and USDA. This understanding is particularly important in light of the imminent re-authorization of the Food Stamp Program, a time when statutory modification of the program to eliminate some of the barriers may well be possible.

“[P]eople like myself, and E--, don't have enough to eat, nor do we have enough money to pay our bills, and buy food. . .I have to borrow money from my friends to keep eating and pay my bills on time, and that is when everything goes well.”  
-- Elderly Food Pantry Consumers

---

<sup>3</sup> Using data from USDA Quality Control samples and Census Bureau poverty estimates, the American Public Human Services Association (APHSA) estimates that 40% of eligible elderly people statewide are participating in the Food Stamp Program. QC samples are not available for sub-state areas. The Nutrition Consortium estimates that in Upstate New York, about 18% of eligible elderly people are participating. This estimate is based on actual numbers participating in Upstate New York in Dec 1997 (excluding the 5 boroughs of New York City) and the 1990 Census poverty data.

## Methodology

In the summer of 1999, troubled by the sharp decline in program participation, the Greater Upstate Law Project (GULP) and the Nutrition Consortium of New York State (the Consortium) discussed undertaking a joint survey of New York's legal services program staff and food stamp outreach workers about what they perceived to be barriers to fuller participation in the Food Stamp Program. Around the same time, the Statewide Emergency Network for Social and Economic Security (SENSES) was preparing to conduct a survey of local social services districts, to ask about their food stamp program practices and for their opinions as to what was turning so many eligible families away from the program. The Hunger Action Network of NYS was interested in surveying consumers of the emergency food system about their experience with the Food Stamp Program.

In light of the differences between the groups targeted by the survey, somewhat different survey instruments were developed for each population. A complete explanation of the methodology is attached as Appendix A. The survey instruments used are in Appendix B. All survey responses were collected between January and June of 2000.

None of the surveys was designed to be scientific. The goal was to obtain insights into the perceived operation of the Food Stamp Program, from a cross-section of those most intimately involved in the issues of hunger. Thus, the survey measures people's beliefs about the program, based on their personal and professional experiences. Hearing from program administrators, applicants, recipients, former recipients, low-income families in search of food assistance, and community and legal services advocates provided a more comprehensive view, and from more angles, than would be the case with a scientific study.

"I think that food stamps serve a very good purpose and because of them many children do not go to bed hungry. I grew up during the depression years and know what they was like. Thank God we have assistance plans that help those in need." -- Food Pantry Consumer

## Survey Results

This report has been developed from the responses to all four surveys. Most of the results reported are based on a survey question that provided a list of possible barriers to participation and asked respondents to indicate whether they perceived each as a barrier. A copy of that question is set forth on the following page. Respondents were also given opportunities to respond to open-ended questions and to comment on the Food Stamp Program generally.

The discussion of the responses is roughly organized according to the order in which people enrolling in the Food Stamp Program might encounter the potential barrier identified by the survey. Where a food stamp rule or regulation exists with respect to a particular aspect of the process, it is cited in that section. Following a statement of the rule, survey responses are described.

As noted, the survey respondents included legal services attorneys and paralegals, community based food stamp outreach workers (outreach workers), LDSS program administrators, and clients of food pantries and soup kitchens. Although generally the same issues and areas of concern were included in the surveys administered to all four groups, the questions were not completely identical. That variation explains why not all four voices are heard in each of the sections below.

### **STEP ONE: THE DECISION TO APPLY**

It is axiomatic that food stamp program participation requires first and foremost knowledge that the program exists. Whether a lack of information about the Food Stamp Program operated as a barrier to food stamp participation was a question asked of all groups. While a minority of LDSS administrators identified lack of information about the program as a problem (29 percent), a majority of clients (65 percent), legal services staff (80 percent) and food stamp outreach workers (88 percent) thought ignorance about the program was one reason for lack of participation.

A substantial majority in each group agreed that many people do not apply for food stamps because they think, often erroneously, that they are not eligible for benefits. This is one of the two or three items on the list that all respondent groups ranked similarly. This may be in large part the result of how complicated Food Stamp Program eligibility rules have become, particularly after the 1996 welfare reform amendments, as well as common misperceptions about program eligibility (i.e., the belief that a household must be in receipt of welfare in order to be eligible for food stamps).

From the list below, please rank the issues which most prevent potentially eligible clients from participating in the Food Stamp Program? (rank on scale of 1-5, 5 being a major issue, 1 being not much of an issue)

**Personal/perception Barriers**

- \_\_\_ Don't know about program
- \_\_\_ Don't think they're eligible for program
- \_\_\_ Don't want to take FS away from needier families
- \_\_\_ Language Barriers
- \_\_\_ Poor Literacy
- \_\_\_ Forms too complicated
- \_\_\_ Stigma attached to Food Stamps
- \_\_\_ Threat of INS reporting
- \_\_\_ Participant offended by finger-imaging

**Application issues**

- \_\_\_ Refusing to accept same day applications
- \_\_\_ Not always doing expedited screenings
- \_\_\_ Failing to waive face-to-face interview
- \_\_\_ Inconvenient appointment time (following day, long orientations, work conflicts...)
- \_\_\_ Verbal denials
- \_\_\_ Unhelpful caseworkers
- \_\_\_ Delays in issuing FS

**Logistics**

- \_\_\_ Face-to-face interview requirement
- \_\_\_ Lack of transportation
- \_\_\_ Poor access to Food Stamp Office (e.g., location, office hours . . .)
- \_\_\_ Poor access to places that accept Food Stamps
- \_\_\_ EBT problems
- \_\_\_ No separate Determination on Food Stamp applications/closings

**Documentation**

- \_\_\_ Too much documentation required/Documentation not available
- \_\_\_ Caseworkers fail to assist in getting documents
- \_\_\_ DSS loses documents

**Eligibility Requirements**

- \_\_\_ Car over resource limit
- \_\_\_ Other resource over limit
- \_\_\_ ABAWDS not offered work program
- \_\_\_ Unwilling to participate in work programs
- \_\_\_ Work sanctions that are not the participant's fault (no day care, no trans, no job available, etc.)

**Comments and Examples:**

The questions asking respondents to rank barriers, as it was presented in the survey.

The majority in each respondent group also agreed that the stigma attached to program participation was an enrollment barrier. The receipt of public benefits of any kind is often viewed as a mark of failure or inadequacy. Particularly during the years that food stamp coupons were the currency of the program, many people were reluctant to apply for benefits because they were so easily identified in the grocery checkout line as “so poor that they need a handout”.

The stigma attached to food stamp program participation was cited as an enrollment barrier by more social services district staff than any other of the barriers asked about in the survey. Nearly four-fifths (78 percent) of LDSS workers identified stigma as a problem. Outreach workers also thought it a substantial participation barrier, with 94 percent of these respondents answering that stigma discourages people from participating in the program. A smaller percentage of clients, though still a majority (61 percent), as well as 80 percent legal services staff, concurred.<sup>4</sup> It is hoped that stigma may be less of an issue in the future with the switch from food stamp coupons for the distribution of benefits to the more anonymous EBT system.

With the exception of LDSS staff, a majority of respondents in all groups agreed that one barrier to participation is mistaken belief shared by potential applicants that the receipt of food stamps one family may deprive another needy family of benefits. Significantly, 70 percent of the clients answering the survey cited this as a barrier. The reality that since the Food Stamp Program is an entitlement program, anyone who applies is determined eligible will receive benefits. Almost all food stamp outreach workers (94 percent) thought the reluctance to take benefits at the expense of others was a significant barrier. A smaller majority of legal services program staff (66 percent) thought that the belief in limited food stamp program benefits was a deterrent to application. By way of contrast, only one-third (34 percent) of LDSS offices believed this to be a barrier.

One barrier to participation is the mistaken belief that the receipt of food stamps by one family may deprive another needy family of benefits . . . The reality is that, since the Food Stamp Program is an entitlement program, anyone who applies and is determined eligible will receive benefits.

the  
by  
is

The fear of being reported to INS was cited as an application barrier by 52 percent of the client respondents, a substantial percentage when one considers that the survey was not conducted in New York City. Only a minority (29 percent) of LDSS offices thought that the risk of being reported to the Immigration and Naturalization Service deterred applicants, though food stamp outreach workers (88 percent) and legal services staff (80 percent) saw this as a substantial concern for some potential

---

<sup>4</sup> National studies have found that while low income people are unlikely to report “stigma” itself as a deterrent to participating in the Food Stamp Program, when asked about particular stigmatizing events, such as being embarrassed in the grocery line or by friends discovering they received food stamps, they are far more likely to identify those events as being a deterrent.

applicants. It should be noted that program participation studies conducted after the immigrant restrictions of the 1996 welfare reform had been in place for some time, confirmed that a much larger percentage of children with non-citizen parents dropped out of the Food Stamp Program than children of citizen households in similar financial circumstances.

“It’s a good program. No one should go hungry. Undocumented families should be allowed to get food stamps. They live here and they have to eat.” -- Food Pantry Client

## **STEP TWO: GETTING THE APPLICATION**

### RULE:

Everyone has an absolute right to apply for food stamp benefits. Under federal law, not only must the LDSS make the food stamp application form readily available to anyone requesting it, whether the request is made in person, by mail or on the phone, the local office must encourage any individual expressing a need for food to apply for the program. To guard against arbitrary denials of benefits, local districts are prohibited from discouraging applications even if they believe the applicant will ultimately be determined ineligible for benefits.

Nevertheless, advocates report that LDSS receptionists and eligibility workers sometimes advise potential applicants who they believe will not be eligible for benefits that applying would be a waste of time or might even result in adverse consequences for the household. A major problem with these “informal or verbal” denials is that the applicant is unlikely to complete the application process or to be aware of the right to ask for a fair hearing to contest the worker’s assumption of ineligibility.

### SURVEY RESULTS:

Two-thirds (62 percent) of the client respondents ranked informal or verbal denials by LDSS as a problem, with almost one in five (18 percent) reporting that they had the personal experience of being told by an LDSS eligibility worker that they were not eligible for food stamps even before they had the opportunity to submit an application. Verbal denials were ranked as significant barriers to program access by a substantial majority both of food stamp outreach workers (94 percent) and legal services staff (86 percent).

### STEP THREE: SUBMITTING THE APPLICATION

#### RULE:

The law requires that LDSS accept applications during all regular business hours. Local districts are not permitted to restrict the acceptance of applications to certain hours of the day. Yet, advocates indicate that the practice continues.

The ability to file a food stamp application as early as possible is particularly important in the food stamp program because benefits are provided retroactively to the date eligible households file their applications.<sup>5</sup> The food stamp application filing date is also important because it starts the running of the 30-day period during which the local district must evaluate program eligibility.

Like many states, New York uses a joint application form that allows individuals to apply not only for food stamps but also for Medicaid and public assistance. It is a complicated document, 8 pages long, and asks for information that the applicant may not have readily available on the first day he/she appears at the local district. However, federal food stamp law allows an applicant to establish the food stamp application filing date by submitting an application containing as little as the name, address and signature of the applicant. If the applicant is homeless and has no fixed address, the application can be submitted only with the name and signature. The remaining documentation establishing eligibility can be supplied after the filing of the application, most commonly at the time of the eligibility interview.

Food stamp law, as well as civil rights law in general, requires that applicants with language barriers be assisted with their applications. Applicants with literacy problems or who have disabilities must be accommodated in order that they may have equal access to program benefits.

#### SURVEY RESULTS:

#### **Food Stamp Applicants have the right to:**

- ?? Receive an application when they ask for it.
- ?? Turn in the application the same day they receive it.
- ?? Receive food stamps (or be notified of ineligibility for the program) within 30 days after the application is turned in.
- ?? Receive expedited food stamp benefits within 5 days if they have little or no money.
- ?? Have a fair hearing if they disagree with any action taken on their application.

---

<sup>5</sup> This is unlike the rule in cash assistance, where benefits are only calculated retroactive to the date that eligibility is established, in the case of Family Assistance, or 45 days after the date of application, for Safety Net Assistance.

A substantial majority of legal service program staff (80 percent), outreach workers, (88 percent) and clients (63 percent) identified the local district practice of not accepting applications on the first day the applicant appeared at the office as a barrier. In fact, close to one fifth of client respondents (19 percent) reported that they personally had been prevented from submitting their application on the day they first appeared at the local district office to apply. Nearly a third of the clients (31 percent) reported that they had been told in the past by LDSS staff that applications would only be accepted on certain days or only during certain hours of the day. At least two local districts reported themselves that they limit the hours during which food stamp applications will be accepted.

Almost three-quarters of legal services staff (73 percent) and over four-fifths of outreach workers (88 percent) ranked literacy problems, the complicated application form and, for non-English speaking applicants, difficulties with language access, as barriers to program participation. Though not a majority, a substantial minority of LDSS staff (46 percent) also cited literacy problems and the complication of the application form as a barrier. However, less than a quarter of the local district respondents (24 percent) thought that language access for non-English speakers was an issue. More than three fifths of the clients cited language access (61 percent), literacy, and the complicated food stamp application form (62 percent) as a problem.

A food stamp applicant in New York receives 85 pages worth of paperwork, including:

- ~~///~~ the application form,
- ~~///~~ instructions on how to fill out the application form,
- ~~///~~ three separated books on food stamp program rules and the participant's rights and responsibilities; and
- ~~///~~ an update on all the rule changes since the last printing of the three books of rules.

In addition, most counties also require additional local forms.

**STEP FOUR: SCREENING FOR EMERGENCY NEEDS**

RULE:

The law requires that the food stamp agency screen the eligibility of the applicant for *expedited* food stamp benefits when the food stamp application is first submitted. Expedited benefits are food stamps made available to an applicant household even before eligibility for on-going benefits is fully established. Eligibility is based on the household's lack of liquid resources to meet their immediate nutritional needs. In New York, if the applicant is found eligible for expedited food stamps, the benefits must be provided within five calendar days.

### **Eligibility for Expedited Service**

A household is eligible for Expedited Service if:

1. The household has less than \$150 in total household gross monthly income and liquid resources of \$100 or less; or
2. Monthly gross income and liquid resources total less than their rent/mortgage plus utilities; or
3. It is a “destitute” migrant farm worker household.

### **SURVEY RESULTS:**

Among the emergency food clients who had applied for food stamps, only 26 percent of the survey respondents recalled being screened for expedited food stamp eligibility at the time of application. To the additional question of whether, "during the application process has anyone ever asked you [the client] if you had a food stamp emergency," less than a third of the clients (30 percent) answered yes. Over three fifths (62 percent) of the clients surveyed identified the failure of the local district to screen for emergency food needs as a problem.

At least four fifths of both legal services staff (80 percent) and food stamp outreach workers (83 percent) reported that the local districts did not consistently screen applicants for eligibility for expedited benefits.

“They are overwhelmed by the eligibility/documentation requirements” – LDSS worker, on why eligible people don’t apply.

### **STEP FIVE: VERIFYING ELIGIBILITY**

#### *DOCUMENTATION REQUIREMENTS*

#### RULE:

Applicant households must substantiate that they meet each program eligibility requirement before benefits can be granted. Most verification consists of the furnishing of documents, for example birth certificates to verify age and citizenship status, pay stubs to verify income, apartment leases or rent receipts to verify shelter costs, etc. If an applicant household experiences difficulties obtaining a particular document necessary to verify eligibility, the LDSS is required by law to assist the household, including paying for the document if necessary.

Because the rules governing food stamp eligibility are complex, verification can be both time-consuming and burdensome for applicant households. A rigorous federal “quality control” system that regularly exacts financial penalties from states whose error rates exceed the national average results in pressure on local district workers to err on the side of requiring more documentation than may be necessary or making determinations adverse to the household if the documentation is uncertain.

“Submitting all the documentation necessary to satisfy eligibility workers is sometimes like searching for the “holy grail”, it’s both a mystery and the client can never quite get there.”  
--Legal Services Staff Member

#### SURVEY RESULTS:

Without exception, all respondent groups cited the volume of paperwork required in the processing of the food stamp application as a deterrent to participation in the program. Nearly three quarters (73 percent) of LDSS officials saw documentation as an issue, making this one of the three biggest problems from the point of view of program administrators.

Failure on the part of LDSS workers to assist applicants in securing the necessary documents to establish eligibility was cited by a substantial majority of legal services staff as a significant barrier (87 percent), with an even higher percentage of outreach workers (94 percent) concurring. A majority of the clients responding (63 percent) also considered this an issue affecting participation.

More than six out of ten clients (63%) reported that the LDSS workers' losing documents is a problem. A significant percentage of legal services attorneys (80 percent) and outreach workers (88 percent) concurred.

#### *FINGERPRINTING REQUIRED TO VERIFY IDENTITY*

#### RULE:

Shortly after federal welfare reform, New York implemented the requirement that all members of food stamp applicant households 18 years old and over submit to finger-imaging as part of the application process. Finger-imaging of applicants is intended to prevent households from duplicate participation in benefit programs that had already been instituted in the State’s cash assistance program.

#### SURVEY RESULTS:

Three fifths of both legal services staff and clients considered the requirement that all adult household members submit to finger-imaging to be an issue affecting food stamp participation. Several clients reported that their entire household was denied food stamp benefits because a single member, most often a boyfriend or a child (children

over 18 must also provide their fingerprint), would not come down to the local district office for finger-printing.

Food stamp outreach workers ranked finger-imaging as a barrier by a much wider margin (88 percent) than either the client or legal services group. This may reflect the fact that outreach workers often work with elderly applicants, who are reported to have the most problem with the finger-imaging requirement and its quasi-criminal overtone. Less than a fifth of LDSS offices (19 percent) identified finger-imaging as a problem.

## **STEP SIX: THE “FACE TO FACE” INTERVIEW REQUIREMENT**

### RULE:

Food stamp law requires that an adult member of the applicant household appear at a face-to-face interview. It is often at this point that the applicant submits the documentation necessary to establish eligibility for the program. The face-to-face interview must be

waived in favor of telephone interviews or home visits for households consisting entirely of elderly or disabled members who cannot get to the office or appoint an authorized representative. Face-to-face interviews may also be replaced by a phone interview or home visit based on a case by case determination of hardship, for example in cases of transportation difficulties, severe weather, residency in a rural area or if an applicant's work schedule makes it impossible for the applicant to appear during LDSS office hours.

“I think the overall program is good but the interviewers here could stand a little humanity class on how to talk to others.”

--Food Pantry Consumer

Recently published federal regulations require that LDSSs inform applicants of the right to have the face-to-face interview waived in individual cases of hardship. Whether hardship exists in a particular case is a determination to be made by the agency, and documentation supporting the hardship determination must be kept in the case file.

### SURVEY RESULTS:

#### *THE REQUIREMENT ITSELF*

When asked about the face-to-face interview requirement, an overwhelming majority of outreach workers (94 percent) considered the requirement that applicants appear personally to be interviewed, with the failure of local district staff to waive the requirement in appropriate circumstances, an issue affecting food stamp participation. A somewhat smaller percentage, but still a majority, of legal services staff (66 percent) and clients (61 percent) considered the in-person interview requirement to be a barrier.

#### *INTERACTION WITH CASEWORKERS*

More than three-fifths of the clients responding (66 percent) considered the failure of caseworkers to be helpful in the application process to be a barrier. An even greater majority of both legal services staff (86 percent) and outreach workers (89 percent) considered this to be a significant barrier to the access of individuals to the Food Stamp Program. Local district staff members were asked a more general question about "client conflicts with caseworkers" that did not assign responsibility to either side. Almost one third (30 percent) of the LDSS staff thought such conflicts were an issue in the program.

#### *INTERVIEWS*

Again, an overwhelming majority (88 percent) of outreach workers considered inconvenient appointment times a significant barrier to participation. Close to the same percentage (80 percent) of the legal services advocates cited this as a problem.

Two-thirds (66 percent) of legal services staff ranked failure to tailor appointments to client work schedules a problem. To a question worded slightly differently, almost a third (29 percent) of the LDSS staff responded that "inconvenient appointment times" were an issue for working people who were applying or trying to maintain eligibility for the Food Stamp Program. Very few client respondents (63 percent) identified as a problem.

"If they work, it may mean a day or two without pay. We try to accommodate but sometimes can't."  
-- LDSS worker

this

It is pertinent to note that some districts reported that they had taken steps to make application for the program easier for working families. Two counties reported that they had regularly scheduled evening hours. Fifteen LDSS districts indicated that, at the request of clients, caseworkers were permitted to schedule appointments either early in the morning or after the office closes in the afternoon. One county stated its intent to make its office available to caseworkers for extra hours, but had not yet begun to do so.

#### *GETTING TO THE INTERVIEWS*

In addition to problems with interview scheduling, problems with transportation, particularly in rural counties, is also often cited as a barrier to program participation. Many upstate counties have little if any public transportation so that would be applicants must have a car or access to a car in order to get to the interview. Slightly under three-fifths of the local districts (58 percent) and over three-fifths of clients (67 percent) considered a lack of transportation to be a barrier to program participation, while four fifths of legal services staff (80 percent) and an even greater majority of outreach workers (94 percent) thought so.

LDSS offices were asked questions about the availability of public transportation to their sites. As one would expect, local district offices located in cities reported that they were accessible by public transportation. However, access to such service is likely to be

difficult for families living in outlying areas of the county. Community-provided transportation services by the Offices of the Aging or Community Action Agencies were reported available in two counties to help people get to the LDSS offices. Eight rural counties, however, had no public transportation whatsoever.

"Seniors sometimes only get \$10 a month; what kind of help is that?"

--Food Pantry Consumer

In order to provide better access, fourteen local districts indicated that they have more than one office where people may apply for benefits. Twelve local districts place staff in locations other than the main office for at least one day each month.

## STEP SEVEN: ELIGIBILITY DETERMINATION AND USE OF BENEFITS

### *ELIGIBILITY FOR BENEFITS*

#### RULE:

The food stamp grant for which a household is eligible is based on the USDA's Thrifty Food Plan (TFP), an estimate of how much it costs to purchase a minimally adequate diet. Historically, the TFP was patterned after the "Economy Food Plan", an estimate of what is needed on a short-term basis to purchase food, when funds are extremely low and "...when the cost of food must be lower than the average food expenditures for low income families." The relatively meager food stamp benefit provided through the use of the TFP, which at the very most only allows the household to spend \$1.30 per meal, per person, has been thought to contribute to the lack of participation in the program.<sup>6</sup>

The Food Stamp Program defines a "food stamp household", that is, the group on whose behalf the monthly grant will be issued, as those people who live together and buy food and prepare meals together. People need not be related to constitute a food stamp household. The amount of benefits for which the household will be eligible is based on household size and monthly income. To be eligible for benefits, the household's assets and resources cannot exceed \$2000 (\$3000 if someone in the household is elderly). Only the first \$4650 in the fair market value of an automobile is excluded from being counted as a resource. Anything over that amount must be counted against the asset limit.<sup>7</sup>

#### SURVEY RESULTS:

##### *RESOURCES*

"[Change] resource limit on cars . . .  
People need dependable cars to  
travel long distances and bad roads."

-- LDSS worker

<sup>6</sup> This amount is arrived at by dividing the maximum monthly benefit by the number of people in the household. Since most households do not receive the maximum allotment, the average food stamp payment per meal in Upstate New York as of July 2001 is 84 cents per meal.

<sup>7</sup> The car rules are in flux, with the trend towards allowing the states to exclude at least one car from counting as an asset against the household. At the time of this report the authors anticipate that an expansion to New York's car rule will be implemented soon.

The stringent automobile resource rule, which limits the value of a car that a household can own and still be eligible for food stamps, was ranked as a barrier to program participation by a majority of respondents in all groups. Outreach workers were nearly unanimous (94 percent) in characterizing the automobile resource limit as a substantial barrier to the participation of otherwise financially eligible households in the Food Stamp Program. Well over three-quarters of legal services (80 percent) and LDSS staff (78 percent) agreed. A majority (57 percent) of the clients responding also considered the ownership of a car that exceeded the resource limit a problem.

A slightly higher percentage of clients (59 percent) considered ownership of countable resources other than cars a barrier to participation in the FSP. Outreach workers were again nearly unanimous (94 percent) in ranking the general resource limit a barrier while a smaller percentage of legal services (73 percent) and LDSS staff (63 percent) agreed.

#### *TIMELINESS OF DETERMINATIONS*

##### RULE:

If the household is determined eligible for expedited assistance, food stamps must be provided within 5 days from the date the application is submitted. In all other cases, the local district has 30 days to process the food stamp application, determine eligibility and provide benefits. The application period may be extended for up to 60 days if necessary to obtain documentation the local district needs in order to determine eligibility.

##### SURVEY RESULTS:

About three in five clients responding (61 percent) ranked local district delays in issuing food stamp benefits as a problem. A substantial majority of legal services staff (73 percent) and an even greater majority of outreach workers (88 percent) considered benefit issuance delays to be a serious problem.

#### *USING FOOD STAMPS*

Once provided with food stamps, the household must find stores that accept them. Substantial anecdotal evidence exists that this is particularly difficult in the rural parts of the State. Slightly more than four-fifths of outreach workers (83 percent) thought that access to places that accept food stamps was a problem. A smaller majority of legal services staff (67 percent) and client respondents (60 percent) agreed. Only a small minority (12 percent) of LDSS staff considered access to be a problem.

## Narrative Responses to Open-Ended Questions

The survey instrument not only asked respondents to react to a list of issues and problems commonly associated with Food Stamp Program administration but also gave them the opportunity to comment on the Food Stamp Program in general and to provide narrative answers to certain questions. Some highlights from the responses of the different groups follow.

### Clients' Comments

Some respondents took the opportunity provided by the survey to comment on the Food Stamp Program in general. Overwhelmingly, they said that it is a good program: some called it a "godsend" or a "lifesaver". Just as overwhelmingly, however, they felt that the benefit amounts are not adequate. Many participants replied that they were at the food pantry because the food stamps are not enough to feed their family. "Pantries should be a supplement, not the main source of food" but "around the 2nd or 3rd week of the month you are struggling to survive and you end up at the Food Pantry."

A number of clients, including SSI recipients and senior citizens, stated that the minimum \$10 benefit was too low. "Only ten given, so I refused them." "Does not help the senior citizen when they go on Social Security." "Seniors sometime only get \$10 a month; what kind of help is that?" "I only receive \$10 in stamps. I have a 17 year old grandson. I can hardly keep food."

"They sometimes don't give you enough to get you through the month, if you don't have money to buy food. Then they make a big deal if you need more than what they give you. To me it just seems like the people at social services don't really want to give you anything."

--Food Pantry Consumer

Many clients also expressed frustration with how DSS treated them. "They make you feel like it's coming out of their pocket. They could treat the people kinder. It's hard for the people to go in." "Would like to see employees of DSS more kinder and emphatic [sic]. Would like them to understand conditions of men and women who turn to them for help in getting assistance." "Just got tired of being discouraged and the stress from the dance they put you through." "They treat you like you're begging for food stamps." "It's an uncomfortable experience. We feel put down when we're there."

Clients would like to see more flexibility in how they can spend food stamps. "I recently had a infection in my gums. I needed mouthwash and could not get it. Basic health care items, toilet paper, toothpaste should not be restricted."

Several consumers reported frustrations with the income limits. "My husband made a few dollars too much." "My boss gave me a 75 cents raise which put me over the income level, though the raise doesn't really make up for the food stamps." "They need

to lower their income guidelines." "Problem because food stamps are based on what you make, not on what you bring home." "Makes \$2 too much."

Nevertheless, a number of respondents, including non-participants, also spoke very positively about the benefits of food stamps. "I think that food stamps serve a very good purpose and because of them many children do not go to bed hungry. I grew up during the depression years and know what they was like. Thank God we have assistance plans that help those in need." "I thank God for food stamps for me and my family."

Some of the changes recommended by participants responding to the survey are matters of current federal law. For example, many respondents felt that the income guidelines are too low and exclude too many needy people. Other participants pointed out that the gross income test excludes many working households, suggesting that only net income should count, and that income limits should take into account the age of the children.

Food stamp law does not allow diets required by a participant's medical condition to count as a deductible medical expense. A number of participants thought that this was a problem and suggested that people on special diets should get more food stamps due to the high cost of the food they must buy.

## **COMMENTS OF LEGAL SERVICES STAFF**

Among several open-ended questions, the survey asked legal services staff who served particular populations, such as the elderly or disabled, to report what in their view might be the particular barriers to participation in the Food Stamp Program for these groups.

For the low income elderly, the main barrier cited was the stigma attached to program participation in what is seen as a "charity" program, exacerbated by the implications of requiring applicants to submit to finger-imaging. Legal services staff also stated that the burdensome documentation requirements, the difficulty that many elderly people have in getting to the food stamp office and the fact that benefits were often just too meager to warrant all that trouble were substantial problems discouraging the elderly from participation.

As for households containing immigrant members, as might be expected, legal services staff blamed the immigrant restrictions contained in the 1996 welfare reform law for the drop in participation even by those family members remaining eligible for program benefits. The unavailability of bilingual staff at local DSS offices and the lack of materials in languages other than English and Spanish were also cited as barriers to participation by the foreign born.

The inappropriate imposition of work requirements on disabled applicants, particularly emotionally or mentally impaired individuals whose disabilities often went unrecognized by local DSS staff, was cited as a barrier to participation for this population. Legal

services staff also considered a lack of transportation and accessibility to be barriers in local DSS offices, which interfered with the ability of the disabled to participate in the program.

For low income wage earners, the barriers most frequently cited by Legal Services staff included, as might be expected, the failure of local DSS offices to have extended hours; the onerous documentation and verification requirements that were not only too time consuming for people juggling work and children but embarrassing, revealing to employers and landlords that the family was seeking help from a “welfare” program; and, considering all these and other problems, the benefits were not considered substantial enough to warrant the effort it took to get them. Farm workers were seen as having particular difficulties accessing benefits, with the lack of outreach to labor camps and transportation hardship seen as major barriers.

"I only receive \$10 in stamps. I have a 17 year old grandson. I can hardly keep food."  
--Food Pantry Consumer

Legal services staff were also asked whether there has been an increase in the local district’s use of work sanctions over the years since welfare reform. Work sanctions are periods of ineligibility imposed when the LDSS determines that an applicant or recipient has failed to comply with the work related

requirements of either the cash assistance or food stamp program. Over two-thirds of the legal services programs responding said that there had been an increase. National studies have shown that people sanctioned from welfare programs often do not return to the program even after they become eligible again.

Food stamp sanctions range from two to six months of ineligibility, depending on whether the applicant or recipient has run into problems before. According to legal services staff, applicant or recipient conduct for which local districts impose sanctions runs the gamut, from job quits, to failures to fully complete job searches (sometimes requiring the applicant or recipient to contact up to 20 employers a week for several months), to missing a single scheduled meeting with a caseworker. Legal services staff report in some local districts that strict compliance with program rules is required so that even arriving a few minutes late for a meeting can result in the loss of two months of food stamps, more if the recipient had been sanctioned once before.

## **COMMENTS OF FOOD STAMP OUTREACH WORKERS**

Before the list of potential barriers was presented, the survey asked outreach workers what they believed might be the barriers to participation in the Food Stamp Program for particular sub-groups of the low income population.

For the low income elderly, the most common barrier cited by outreach workers was that they either cannot or do not want to go to the “welfare” office. In a close second was the perceived invasion of privacy. Many people, the elderly in particular, tell outreach workers that the finger-imaging requirement makes them feel that they are

being treated like criminals. Other barriers reported were stigma, pride, they cannot find required documentation, they believe they will only get \$10, they do not want to take benefits away from more needy households, and they can't understand the application.

Language was perceived as the greatest barrier for households containing immigrant members. Since eligibility requirements for immigrants is very complicated and sometimes hard to document, many potentially eligible immigrants may not be able to understand or communicate the necessary facts. They frequently cannot understand

“Several of the temporary assistance administrators are very enthusiastic “Food Stamp Cheerleaders” – they share their enthusiasm and knowledge with other supervisors. They emphasize transitional benefits.”

-- Outreach worker

what is required of them, and find the notices confusing. Other barriers cited were that many immigrants do not understand that they may be eligible, workers misapply the rules, and some ethnic groups express shame for needing assistance.

For low income workers, the main barrier cited by outreach workers was the limited office hours at local DSS offices. Nine of the 17 workers responding to the survey mentioned this. Two workers stated that applicants frequently have two conflicting appointments. LDSS staff usually schedule appointments by mail without consulting with the participant. Most applicants and participants either do not know they may ask for the appointment to be changed, or are unable to reach the correct worker to request a change. Other barriers mentioned were documentation and verification requirements, people are “too busy surviving”, no child care at DSS, car value, transportation, thinking they not eligible because they are working, and incorrect calculation of income.

Outreach workers were asked what their counties had done well to increase FS participation. Three workers said that their LDSSs had streamlined the application process to make it quicker or more accessible to working people. These changes included scheduling appointments instead of using a first-come first-served system<sup>8</sup>, extended hours, flex time, retraining receptionists, and revising the flow within the office to be more efficient.

Some outreach workers were pleased with the results of combining food stamp and Medicaid offices, so that people can apply and recertify for both programs at the same time and interact with only one caseworker. Some counties work with their Offices for the Aging to encourage seniors to apply, and encourage mail-in applications. One county found that applications of seniors applying by mail went more smoothly when they assigned one worker to handle all of them.

Office location and accessibility are very important. One outreach worker reported that when the LDSS needed to move from the County Office Building they selected a location ten miles closer to the main population center in the county, on a public

---

<sup>8</sup> Regulations promulgated after the survey require that appointment times be given, making the first-come, first-served practice illegal.

transportation route, and provided parking. This kind of planning can make an enormous difference to needy people trying to utilize to services offered.

“The new layer of welfare reform mandates has just made the process all the more difficult. My personal opinion is that the states should petition the Federal government to simplify the program administration and requirements.”

-- LDSS worker

**COM  
MEN  
TS  
OF  
LDS**

## **S STAFF**

The survey of LDSS staff ended with the question, "Is there anything you wish you could change about the Food Stamps Program? What would that be?"

The most popular recommendation was to exempt cars from the list of resources that count against eligibility. Nine staff suggested either a total or limited exemption, under which vehicles of newly unemployed applicants would not be considered as an asset for a certain period of time.

A substantial number of suggestions were offered to reduce the complexity of food stamp program rules. The most common recommendations were to simplify the application and eligibility process, to automate the application system, and to make food stamp rules consistent with those for cash welfare. With respect to automation, LDSS workers suggested automating food stamp eligibility for households of disabled or elderly adults living alone and receiving SSI, and creating a screening process to determine eligibility for expedited benefits that the applicant can complete on his or her own.

Some districts wanted to eliminate or change the ABAWD restrictions, which require complicated tracking by the LDSS. One worker, when asked what she would changes about the FSP, responded, “ABAWD – ineffective for the entire country. A large investment of money in our area for little return.”

The local districts also had recommendations for improvement of the program for the benefit of particular populations. Three offices thought that elderly recipients should get higher benefit levels. Other suggestions included that the elderly should be given cash rather than food stamps (to eliminate the concern with stigma) and that the food stamp rule prohibiting participation in the program by students and striking workers should be eliminated.

Three LDSS respondents suggested ways to make the food stamp program stricter while two wanted to make the program more generous. Those seeking stricter rules suggested that work requirements be imposed on parents once their youngest child turns 3 years old (rather than 6, which is the current rule); that food stamps be prevented from being used to buy candy or soda; and that all recipients apply for child

support as a condition of assistance, regardless of whether their source of income is disability, unemployment, workers' compensation, or any other form of assistance. The LDSS staff proposing more generous rules that food stamp program eligibility should be raised to 200 percent of the poverty line and the minimum benefit level for elderly and disabled households should be increased from the current \$10.

## Recommendations

The intrinsic value of the Food Stamp Program is reflected in its role as a nutritional entitlement, responding to the needs of those who are hungry and others who are at risk of becoming hungry. Since 1977, it has been the most effective response to the problem of hunger in America. The benefits of the program are invaluable, as food stamps prevent hunger among low-income Americans and provide them the resources for nutritious meals for children, the elderly and disabled. It is therefore vital that we make the program accessible to those in need of nutritional assistance.

The survey demonstrated broad agreement among all groups about many of the barriers that hinder access. While solutions are not simple, there are many steps that can be taken at the federal, state, and local levels to improve access. The authors recommend the following changes based on insights received from the responses to this survey and the opportunities for reform that are currently available. Our recommendations for improving access are presented according to the level of government that we believe to be in the best position to implement the proposed change.

### Recommendation for Federal Changes to the Food Stamp Program

Congress is now taking up the task of reauthorizing the Food Stamp Program. This is an opportunity for legislators to review the program and consider a number of policy changes that will help make the program work better for low-income people.

The Farm Bill recently approved by the House includes Food Stamp Reauthorization, and a Farm Bill including Food Stamp Reauthorization is being prepared for Senate consideration this fall. During the reauthorization of the Farm Bill, we must recognize the importance of the Food Stamp Program and ensure that it continues to be a nutritional safety net that acts as the first defense against hunger. This provides an opportunity to make the following recommended changes, which we view as necessary to improve access to the program for low-income individuals.

### We recommend that Congress and USDA:

#### THE DECISION TO APPLY

*Provide fiscal incentives to states that increase access to and participation in, food stamps.* Administration of the program greatly influences local accessibility. Fiscal incentive would reward states that invest in public education and dispel the misconceptions surrounding the Food Stamp Program.

- ✍* *Extend QC criteria beyond payment accuracy* to other important considerations such as success in delivering benefits to needy eligible households, customer service, retention rates, and state compliance with expedited service standards. These are standard measures of success for any program.
- ✍* *Extend transitional benefits, for families moving from welfare to work, to six months.* This would eliminate the need for households to reapply at the same time as they are making the transitional from cash assistance.
- ✍* *Align the Food Stamp Program with other entitlement programs such as Medicaid.* Better coordination between the programs could help to connect eligible nonparticipants to the programs, without the need to apply twice
- ✍* *Improving Nutrition for the Elderly* -- Projects such as that proposed as a demonstration project in New York to automatically enroll SSI recipients should be established as the norm nationally. This would obviate the need for these particularly needy people to go through another application process after being determined eligible for SSI.
- ✍* *Increase the minimum benefit to \$40 and index it to inflation.* A larger benefit would encourage applicants to persevere through the entire process.

## **GETTING AND SUBMITTING THE APPLICATION**

- ✍* *Develop a shorter, user-friendly federal application model for state use.*

## **VERIFYING ELIGIBILITY**

- ✍* *Extend QC criteria beyond payment accuracy.* The QC system as currently operated puts more emphasis on documentation than on the actual need of the applying household. While payment accuracy must necessarily be the centerpiece of the QC assessment, the system's penalty provisions should be redesigned.<sup>9</sup>
- ✍* *Institute a twelve-month eligibility redetermination process with no required interim reporting.* Most other programs serving low-income families, such as Medicaid, SCHIP, SSI, determine when a review of the recipient's circumstances is needed and ask her or him to provide information or to

---

<sup>9</sup> The National Academy of Sciences made specific recommendations for reform of the QC system in the late 1980's, at USDA's request.

appear at its office. If the recipient does not appear, or does not cooperate in the review, her or his benefits are terminated.

Using this model for food stamps would give states the flexibility to manage their caseloads by aligning the food stamp redetermination process with that of other benefit programs. Households would continue to be considered eligible until the state makes a determination that the household either has become ineligible or has failed to cooperate in a review of its eligibility.

#### THE “FACE TO FACE” INTERVIEW REQUIREMENT

*✍* **Develop innovative ways to improve access to underserved populations and working families**, such as facilitating enrollment outside of the welfare office, and allowing applications over the Internet. The models created and implemented by the states in enrolling low-income children in SCHIP programs could provide an excellent starting point for similar initiatives in Food Stamp Program enrollment.

*✍* **Make face-to-face interview a state option.** This would permit states the flexibility to coordinate the food stamp application process with that of other programs, such as CHP or services offered by County Offices for the Aging.

#### CALCULATION OF THE MONTHLY BENEFIT

*✍* **Eliminate the excess shelter deduction cap for families with high shelter costs.** The current artificial cap on the shelter deduction has the effect of treating some money that a family must spend on housing costs as if it were available to meet its food needs - and reducing the family's food stamp benefits accordingly. This is particularly important to New York State, which has the highest shelter costs in the country, as counted by the Food Stamp Program. Since there is no policy basis for the existence of the cap, it should be eliminated completely.

*✍* **Increase the earned income disregard and include child support income to be earned income.** This will support families who work and support their children, consistent with federal policy in other areas.

#### ELIGIBILITY DETERMINATION AND THE ISSUANCE OF BENEFITS

*✍* **Increase the eligibility level to 185 percent of the federal poverty level;** this is consistent with other health and nutrition programs.

*✍ At a minimum, Congress should institute a \$5,000 limit, tiered to household size, and exempt all retirement accounts, education savings accounts and Earned Income Tax Credits. The food stamp asset limits have not been adjusted since 1985; the Consumer Price Index has risen about 60 percent since then. Paradoxically, families applying for only food stamps in many states face more restrictive food stamp asset rules than they would if they applied for cash assistance and food stamps.*

*✍ Eliminate the work requirement for participation in the program – the Food Stamp Program is the only nutrition program requiring compliance with special work rules. Households receiving TANF are already satisfying rigorous work rules for that program. Other households receive only a small food stamp benefit to supplement their food budget. Conditioning this nutrition subsidy on complicated work requirements is ineffective and inefficient. Work requirements should not be part of any federal nutrition program, including the Food Stamp Program.*

*✍ Exempt from consideration at least one car for each household member engaged in a work activity.*

*✍ Eliminate special rules for non-citizens; students; singles; childless adults between the ages of 18 and 50; those who are on strike; and those who have been convicted of a drug-related felony. The provisions are unduly complicated, difficult to administer, discourage eligible people from participating, and do not efficiently serve the purposes intended.*

## **INADEQUACY OF BENEFITS**

*✍ Index the standard deduction to reflect increased costs of living. The standard deduction is supposed to reflect various non-food expenses that families incur and that rise with inflation. Increasing and reindexing the standard deduction would improve the overall adequacy of the food stamp benefit and restore the program's responsiveness to the increasing cost of living.*

*✍ Replace the “Thrifty Food Plan” with a benefit level that reflects the current market basket value to enable people receiving Food Stamps to meet the USDA's nutritional recommendations.*

*✍ Increase benefit levels. Increasing benefit levels would not only enable participants to have enough food, but would also provide more motivation for potential applicants to complete the entire application process.*

## Recommendations for State and County Action

The state has great leeway in establishing the policies and the extent of oversight that will govern the localities in the administration of the Food Stamp Program. In recent years, OTDA has taken advantage of many policy options intended to make the Food Stamp Program more accessible, yet not every locality takes full advantage of these policy decisions. There are many additional measures both the state and localities could take to improve the accessibility of the program and help needy people obtain better nutrition.

### GENERALLY

- ~~✍~~ It should be the stated policy of the State and local DSS offices to maximize participation in the federal food stamp program. Caseworkers should be informed of this policy. Training of food stamp caseworkers should be strengthened.
- ~~✍~~ New York State should require all local districts to participate to the extent allowed by law in all available waivers that would enhance access to the Food Stamp Program.
- ~~✍~~ New York State should maintain minimum initial and ongoing training standards for all local case examiners.
- ~~✍~~ The State and local districts should participate in efforts to improve the national food stamp program, including simplifying eligibility requirements and application process, and increasing access for all immigrants. The state should support the detailed recommendations for federal action to strengthen the food stamp program as set forth herein.

### THE DECISION TO APPLY

- ~~✍~~ The State should continue to assist the LDSSs in improving the provision of food stamps to households leaving welfare to work. We commend New York State for becoming the first state in the country to adopt the new federal option of continuing food stamps for three months after someone leaves welfare for employment. Local districts will have three months to review whether the household is eligible to continue receiving food stamps after becoming employed.

- ~~✍~~ Increase efforts to make the general public aware of eligibility rules and, in particular, that households who work may still be eligible for food stamps. State outreach funding, which is matched by the federal government, should be increased for the Nutrition Outreach and Education Program to support community groups that promote participation in federal nutrition programs and assist needy people seeking to participate. We commend New York State for its ongoing efforts to educate residents about the value of the food stamp program, including funding public service announcements and community outreach staff.
- ~~✍~~ Automate the application system for food stamps. An automated application system would ensure that every individual is screened for eligibility for expedited food stamps. It would also help ensure that every individual is able to submit an application at any time.

### **GETTING AND SUBMITTING THE APPLICATION**

- ~~✍~~ Instruct local DSS staff to encourage every potential applicant to fill out an application, rather than discourage applicants by telling them that they may not be eligible.
- ~~✍~~ Develop a simple joint application form and procedures by which working families can apply for Medicaid and food stamps together, preferably in settings outside of the welfare office.
- ~~✍~~ Ensure that diversionary practices adopted for the welfare program do not negatively impact the provision of food stamp benefits. Rather, caseworkers should be encouraged to promote participation in the food stamp program.

### **SCREENING FOR EMERGENCY NEEDS**

- ~~✍~~ Ensure that all workers, including reception staff and workers who are trained to divert applicants from assistance, understand both the importance and the legal obligations surrounding the Expedited Food Stamp screening.

### **VERIFYING ELIGIBILITY**

- ~~✍~~ Simplify the food stamp application and eligibility process. Educate staff and clients about the variety of options available to document eligibility. The state should direct the local districts to utilize the least burdensome documentation alternatives that are available.
- ~~✍~~ The State Food Stamp Director should convene a working group of advocates, legal aid attorneys, worker representatives, food stamp

participants and local food stamp directors to develop and implement a plan to make it easier for working families to access food stamps. This would include financial support for evening and weekend hours at local district offices.

#### **ELIGIBILITY DETERMINATION AND USING FOOD STAMPS**

- ~~✍~~ The ownership of a car should not be a barrier to receiving food stamps. The limit should be significantly increased or eliminated. This was the recommendation most supported by DSS officials. We commend the state for expanding the eligibility of households owning vehicles.
- ~~✍~~ New York should apply for, and require local districts to implement, every federal waiver that is available designed to maximize Food Stamp Program participation and benefit allotments. For example, every district that, because of the scarcity of employment opportunities, has been declared eligible to waive food stamp time limits otherwise imposed on unemployed, childless adults (ABAWDs) should be required by the State to do so.
- ~~✍~~ Include in the state Food Assistance Program all legal immigrants excluded from the federal Food Stamp Program due solely to their immigration status.
- ~~✍~~ New York should ensure ease of access in using food stamp benefits at farmer markets.

## References

Castner, L. 2001. *Trends in Food Stamp Participation Rates 1994-1998*. Mathematica Policy Research, Inc.

Federal Register, April 4, 1980.

Fix, M. and Zimmerman, W. 1999. "*All Under One Roof: Mixed-Status Families in an Era of Reform*". Urban Institute.

Fyfe, A. October 2000. "*The Reality of Hunger*", Hunger Action Network of NYS.

Genser, J. 1999. *Who is leaving the Food Stamp Program? An analysis of Caseload Changes from 1994 to 1997*.

New York State Office of Temporary and Disability Assistance monthly Social Statistical Reports.

Ponza, M., Ohls, J., Moreno, L., Zambrowski, A., and Cohen, R. 1999. "*Customer Service in the Food Stamp Program*", Mathematica Policy Research, Inc.

Reynolds v. Wing, 35FS2d 331, SDNY (1999)

Rockefeller Institute for Government. 1999. *After Welfare: A Study of Work and Benefit Use After Case Closing*. Interim Report Submitted to the U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation.

Schirm, A. 2001. *Reaching Those in Need: Food Stamp Participation Rates in 1998*. Mathematica Policy Institute.

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

## **APPENDIX A**

## Methodology

The Hunger Action Network of New York State (Hunger Action), a group whose analysis of hunger issues frequently focuses on the experiences of low income individuals as they themselves report it, joined these three groups. Hunger Action requested that their member agencies poll the clients of food pantries and soup kitchens about their experiences with, and perceptions of, the Food Stamp Program.

The Greater Upstate Law Project mailed its survey to staff members in all 18 legal services programs operating outside of New York City. Fifteen of the programs responded, fourteen of which provide services in 29 of the 57 counties in upstate New York and Long Island. The other is a program providing legal assistance to migrant farm workers across the State.

The Nutrition Consortium obtained written responses to its survey from outreach workers in all of its seventeen upstate food stamp outreach programs. These programs provide outreach and food stamp application assistance in 18 of 57 upstate counties.

SENSES had designed its survey to be administered to local social services districts over the phone. However, many of the food stamp offices preferred to return the survey by fax rather than discussing it with a SENSES staff member. SENSES obtained detailed responses from 52 of the 57 local social services districts outside of New York City, achieving the broadest geographical reach of all the surveys. The remaining five districts responded simply that they followed Food Stamp regulations in their administration of the program, but provided no details.

The survey of local social services district personnel was administered in two versions. The first twelve LDSS respondents were not asked to rate the degree to which each item on the list of possible impediments to food stamp participation actually constituted a barrier to food stamp access in their county. That question was added after the survey of the local districts had already commenced, in order to conform the LDSS survey to the survey being conducted of the other 3 groups. The percentage results reported include only the districts that were asked this question.

The Hunger Action conducted a non-random convenience sample of emergency food clients. It sent a copy of its survey to its member food pantries and soup kitchens outside of New York City, whose staff and volunteers were then asked to read the survey instrument to their clients. Hunger Action received 773 completed surveys back from clients in 15 of 57 upstate counties. Respondents included both those who were at that time participating in the Food Stamp Program as well as those who never participated. Not all the food pantry and soup kitchen respondents filled in answers to the issue ranking question reproduced below. Of the 773 surveys returned, less than half (299) had responded to this question. The percentage results reported below were calculated include only the survey responses that answered the question.



## **APPENDIX B**

## FOOD STAMP BARRIERS QUESTIONNAIRE

### Introduction

This questionnaire is being sent to a variety of community agencies and programs that work with low income individuals who are, or could be, participating in the food stamp program. In large part the impetus for the survey is to uncover the reasons for the declining participation in the food stamp program. Because there has been no real decline in the numbers of poor people eligible for, and in need of, these benefits the declining food stamp roles must be the result of barriers to access. We have some anecdotal information of what these barriers might be but this is an effort to get at the problem in a more systemic way. The organizations sponsoring the survey include the Nutrition Consortium of New York State, the Greater Upstate Law Project, Inc., SENSES and the Hunger Action Network of New York State.

### Advocate Information

Name of Person Completing Survey: \_\_\_\_\_

Agency with Whom You Work, If Any: \_\_\_\_\_

Service Area: \_\_\_\_\_ Date: \_\_\_\_\_

### Questionnaire

1. Do you work with special populations, e.g. the elderly, homeless people, the disabled?
2. If yes, what specific populations do you serve?
3. What category of welfare and safety net programs do you work with? (Check all that apply.)  
Food Stamps \_\_\_\_\_ Family Assistance \_\_\_\_\_ Safety Net \_\_\_\_\_  
SSI \_\_\_\_\_ WIC \_\_\_\_\_ Summer Food \_\_\_\_\_ Other \_\_\_\_\_
4. In your experience, what are the main barriers to participation in the food stamp program by the people you serve?
5. Has your local social services done anything to increase participation in the food stamp program, for example outreach or expanded hours to accommodate working families?

If yes, please list the activities: \_\_\_\_\_

6. Have you or other community advocates in your service area engaged in activities to increase food stamp participation?

If yes, please list the activities and indicate whether they were successful:

7. There are particular eligibility and program access issues associated with certain groups. For the groups set forth below, please indicate the specific barriers you see to the participation of these groups in the food stamp program in your area.

1. Elderly: \_\_\_\_\_

2. Immigrants: \_\_\_\_\_

3. Disabled: \_\_\_\_\_

4. Working poor: \_\_\_\_\_

8. Under welfare reform, the eligibility of “able bodied adults without dependents” (ABAWDS) for food stamp benefits has been sharply curtailed in ways not always easy to understand or for the local districts to administer. Essentially, the eligibility of childless, unemployed adults is limited to 3 months out of 3 years unless the person is working or engaged in an employment and training program for 80 hours a month or is earning their food stamps through workfare. To the degree you can, please answer the following question about how the local districts operate the ABAWD rule in your area:

Is the rule applied to one of the two parents in 2 parent households with children?

Are individuals who are approaching the end of their 3 months of eligibility advised by the local district about how they can stay in the program?

If yes, what work activities are they offered? \_\_\_\_\_

Are individuals who have exhausted their 3 months of eligibility and who seek to reenter the food stamp program advised about how they can get back in?

If yes, what are the options provided by the local district? \_\_\_\_\_

Does the local district provide a workfare slot to every unemployed childless adult who needs it in order to maintain eligibility for the food stamp program?

If the district does not do so, please indicate whether this is a policy (written or informal) and provide any details you have of instances where an individual was not offered a workfare slot. \_\_\_\_\_

9. Are you seeing increasing numbers of people and/or households sanctioned from participation in the food stamp program for violations of work rules in the cash assistance programs (Family Assistance and Safety Net)?

If yes, what are the kinds of violations for which people are getting sanctioned?

10. Are there instances in the social services districts you work in where the whole household loses food stamps for rule violations by an individual member?

If yes, what are the kinds of rule violations which result in the whole household losing their food stamps?

11. Are *applicants* being denied food stamp benefits for failure to comply with work rules or other conduct related requirements?

If yes, what kinds of rule violations or failures to cooperate during the application process are resulting in a finding of ineligibility (e.g. finger-imaging, job search, work registration, etc.)?

Do any of these violations result in the whole household becoming ineligible rather than just the member charged with the failure to cooperate?

If yes, what particular rule violations result in household rather than individual ineligibility?

12. Have you seen instances where the closing of the cash assistance case has resulted in the automatic termination of the household's food stamp case?

If yes, please state, if you know, the basis on which the cash assistance case was closed that resulted in the loss of food stamp benefits (e.g. increase in earned income, increased child support, sanctions, etc.)?

13. Do the local social services districts in your service area do an automatic screening for the applicant's eligibility for expedited food stamps?

Have any of the local social services districts in your area taken the position that expedited benefits are no longer available?

14. Does your legal services program still represent people with food stamp problems?

If yes, do you handle (please check all that apply):

Application Issues \_\_\_\_\_

Termination Issues \_\_\_\_\_

Sanctions \_\_\_\_\_

Budgeting Issues \_\_\_\_\_

Overpayment Issues \_\_\_\_\_

Other (please list) \_\_\_\_\_

15. Over the last several years, has your legal services program reduced the number of food stamp cases that it takes in because of other priorities?

## FOOD STAMP QUESTIONNAIRE

Name \_\_\_\_\_

Date \_\_\_\_\_

Position \_\_\_\_\_

Interviewer \_\_\_\_\_

County \_\_\_\_\_

SENSES has decided to survey local DSS offices in order to better understand the operation of Food Stamps benefits across the state. We hope to find "best practices" that help eligible families to access Food Stamps. President Clinton's initiative to enhance access to Food Stamps was one impetus for the study, as well as the continued drop in the Food Stamps caseload.

1. Does your county have separate workers for Food Stamps, PA, and Medicaid; or does each worker handle all the programs; or some other arrangement?
2. How many Food Stamp offices are in your county? Where else in the community may people apply or recertify for Food Stamps?
3. How often (if at all) does public transportation service reach your office(s)?
4. During what hours can people apply for Food Stamps? Are there additional hours for appointments at the discretion of the caseworker?
5. What is the process in your county for someone to apply for Food Stamps if they are also applying for cash benefits? What happens if their public assistance application is not approved?
6. What is the process in your county for someone to apply for Food Stamps if they're not also applying for public assistance?
7. You may already have mentioned the following issues, but we want to be sure to have this information:
  - a) Do people have an interview the same day they show up for an application?    Y    N  

If yes, generally by what time of day must someone arrive if they want to have an interview that day?
  - b) Is there a group or one-on-one orientation session? \_\_\_\_\_  

Are children allowed to attend?    Y    N
  - c) Do people generally hand in their applications on the first day they come in?    Y    N
  - d) Are there any differences when someone sends an authorized representative?
  - e) Are there any job search requirements before a Food Stamps applicant can be determined to be eligible (for both non-PA and PA)?

- f) Are there any front-end detection requirements (e.g. home visits) before an applicant can be determined to be eligible?
- g) Do you have any exceptions to this application process, such as waiving face-to-face interviews for seniors or working people?

Approximately what percent of people use these exemptions? \_\_\_\_\_

- 8. Approximately what percent of people who start the application process follow through to the end? Why do you think the others don't complete the process?
- 9. What are the most common reasons in your county that applicants are ineligible for Food Stamps?
- 10. Approximately what percent of people who apply for benefits are granted expedited Food Stamps?
- 11. Approximately what percent of the Food Stamps caseload becomes sanctioned?
- 12. When a PA case is closed, what happens to the Food Stamp case?
- 13. What is your county's policy for serving the ABAWD population (childless adults)? Was your county granted a waiver for work requirements because you're in a labor surplus area? Did your county apply for an exemption from the work requirements?

If you are enforcing ABAWD work requirements, what notice do you give of the time limit?

- 14. Do you think there are eligible people in your county who have not applied for Food Stamps? IF YES...What do you think are the main reasons that people wouldn't apply?

I'm now going to read you a list of perceived barriers to the Food Stamp program. Please rank the relevance of each one for your county. Tell me if you think each is (1) a big issue, (2) somewhat an issue, or (3) not an issue at all in your county. [JUST CIRCLE "A BIG ISSUE" IF THEY'VE ALREADY MENTIONED THE ITEM ABOVE]

1 (big)	2 (issue)	3 (not)	People don't know about the program
1 (big)	2 (issue)	3 (not)	People don't think they're eligible for food stamps
1 (big)	2 (issue)	3 (not)	People don't want to take food stamps away from needier families
1 (big)	2 (issue)	3 (not)	Language barriers
1 (big)	2 (issue)	3 (not)	Poor literacy/can't fill out the forms
1 (big)	2 (issue)	3 (not)	Stigma
1 (big)	2 (issue)	3 (not)	Fear of INS reporting
1 (big)	2 (issue)	3 (not)	People are offended by finger-imaging
1 (big)	2 (issue)	3 (not)	Inconvenient appointment time
1 (big)	2 (issue)	3 (not)	Conflicts with caseworkers
1 (big)	2 (issue)	3 (not)	Lack of transportation

1 (big)	2 (issue)	3 (not)	Poor access to places that accept food stamps
1 (big)	2 (issue)	3 (not)	People don't inform DSS of their new incomes
			leave welfare
1 (big)	2 (issue)	3 (not)	Too much documentation required
1 (big)	2 (issue)	3 (not)	Car over the resource limit
1 (big)	2 (issue)	3 (not)	Other resource over the limit
1 (big)	2 (issue)	3 (not)	Unwilling to participate in work programs
1 (big)	2 (issue)	3 (not)	Sanctioned in past
1 (big)	2 (issue)	3 (not)	Other - (explain)

15. [CHECK THE CASELOADS FOR THEIR COUNTY AHEAD OF TIME] I notice that your caseloads have gone from ..... in 1996 to ..... in March of this year. What do you think explains your caseload dynamics?

16. Is there anything you wish you could change about the Food Stamps program? What would that be?

17. Could you please send me copies of anything related to Food Stamps that you hand out to your applicants or recipients - written policies, resource sheets, etc.?

## APPENDIX C

Number and Percent of Respondents Identifying Each Factor as a Problem, by group <sup>10 11</sup>								
	<i>Pantry Clients (299 responding)</i>		<i>Legal Services (15 responding)</i>		<i>Outreach Workers (18 responding)</i>		<i>LDSS Workers (43 responding)</i>	
	#	%	#	%	#	%	#	%
<b>Personal/Perception Barriers</b>								
<b>Don't know about the program</b>	194	65%	12	80%	16	89%	12	29%
Don't think they are eligible	231	77%	13	87%	16	89%	31	76%
Don't want to take FS away from needier family	209	70%	10	67%	17	94%	14	34%
Language Barriers	182	61%	11	73%	16	89%	10	24%
Poor Literacy	184	62%	11	73%	16	89%	19	46%
Forms too complicated	184	62%	11	73%	16	89%	20	49%
Stigma attached to Food Stamps	181	61%	12	80%	17	94%	32	78%
Threat of INS reporting	156	52%	12	80%	16	89%	12	29%
Participant offended by finger-imaging	179	60%	9	60%	16	89%	8	20%
<b>Application Issues</b>								
<b>Refusing to accept same day applications</b>	188	63%	12	80%	16	89%		
Not always doing expedited screening	184	62%	12	80%	15	83%		
Failing to waive face-to-face interviews	180	60%	10	67%	17	94%		
Inconvenient appointment time	189	63%	10	67%	16	89%	12	29%
Verbal denials	185	62%	13	87%	17	94%		
Unhelpful case worker	197	66%	13	87%	16	89%	9	22%
Delays in issuing food stamps	181	61%	11	73%	16	89%		
<b>Logistics</b>								
<b>Face-to-Face interview requirements</b>	182	61%	11	73%	17	94%		
Lack of Transportation	201	67%	12	80%	17	94%	24	59%
Poor access to FS Office	188	63%	12	80%	17	94%		
Poor access to places that accept food stamps	180	60%	10	67%	15	83%	5	12%

<sup>10</sup> Percentages calculated based on number of respondents who completed the survey. Those who were not asked this question or who left this entire page blank were excluded.

<sup>11</sup> Boxes left blank indicate that the group was not asked that item.

Documentation								
<b>Too much documentation/not available</b>	200	67%	13	87%	16	89%	30	73%
Caseworkers fail to assist in getting documents	189	63%	14	93%	17	94%		
DSS loses documents	189	63%	12	80%	16	89%		
Eligibility Requirements								
<b>Car over resource limit</b>	170	57%	12	80%	17	94%	32	78%
Other resources over limit	177	59%	11	73%	17	94%	26	63%
ABAWDS not offered work program	131	44%	10	67%	14	78%		

## APPENDIX D

## Sponsoring Organizations

**The Greater Upstate Law Project (GULP)** is a not-for-profit statewide legal services support center. As such, GULP provides legal expertise and assistance to legal aid and legal services offices throughout the state.

GULP pursues litigation to protect, defend and expand the legal rights of poor and d low income New York residents. GULP undertakes research and policy analysis, and engages in legislative and administrative advocacy to advance public policies that assist poor and low income New York Residents. For more information visit [www.gulpny.org](http://www.gulpny.org).

**Hunger Action** is the statewide membership organization of emergency food programs, advocates, and low- income individuals whose goal is to end hunger and poverty in New York State. Started in 1982, Hunger Action seeks to address the root causes of hunger while working to maintain a strong social safety net for those not able to work or attain economic security. Hunger Action Network in Albany county and statewide assists households in obtaining food stamps. Hunger Action Network represents the three thousand emergency food programs that distribute food to 1.6 million New Yorkers monthly. Only half of the guests of such programs are presently receiving food stamps.

**The Nutrition Consortium of New York State, Inc.**, formed in 1985, is a statewide, private nonprofit organization dedicated to addressing problems of hunger. The Consortium believes that the crippling reality of hunger in New York State and the USA is unacceptable, and that it is reversible. We contend that a governmental response to hunger through state and federal food programs is the appropriate first line of attack in the fight to end hunger. Full use of these programs, made possible by adequate federal and state support in the form of funds, policies and actions will significantly reduce the incidence of hunger. The mission of the Nutrition Consortium of New York State, Inc., is to alleviate hunger for poor and near poor residents of New York State, by expanding the availability of, access to, and use of governmental nutrition assistance programs, through outreach, education and advocacy.

**The Statewide Emergency Network for Social and Economic Security (SENSES)** is a network of human service, economic development, religious, grassroots advocacy, and labor organizations in New York State. SENSES is committed to ending poverty by promoting both economic equity and economic opportunity for low-income people.

In the year 2001, we celebrate our twentieth anniversary. In the early 1980s, numerous activists from across the state came together to protest drastic national cuts to health and human services. They founded SENSES in order to present a more organized challenge to such policies and to push the state to make up for lost federal dollars.

SENSES' advocacy over the years has followed a three-pronged strategy: Analyze, Educate, and Organize. We focus on the underlying structural reasons for poverty and promote comprehensive public policy and program design. SENSES works for basic income support for families in need, but argues that we must augment the safety net with strategies that build the economic opportunity and assets of low-income people.