



The Red Tape Divide

STATE-BY-STATE REVIEW OF FOOD STAMP APPLICATIONS

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Introduction



BY DEBORAH LEFF, PRESIDENT & CEO
AMERICA'S SECOND HARVEST

Even in these times of great wealth and national prosperity, we know that millions of Americans go hungry every day. Many of us don't notice them. And they may defy our stereotypes. They're often working Americans, struggling to feed a family. They're newly off welfare, and the \$7.00 they're paid an hour . . . less than \$15,000 a year . . . can't possibly pay for food, rent, medical care, transportation, and all the other expenses of daily living.¹ For these people, the federal food stamp program can make a critical difference.

Hunger is not declining despite the strong economy, but food stamp usage is plummeting. And it's plummeting at a time when the demand at food banks, soup kitchens and church pantries is way up. What's happening here? What's wrong?

America's Second Harvest, the nation's largest domestic hunger-relief organization – reaching 26 million low-income Americans – came across one answer almost by accident. I was scheduled to give a speech last December at a meeting of California anti-hunger advocates. To prepare for that talk, I requested a California food stamp application.

I was stunned by what I received. The food stamp application was 13 pages long, with a complexity that would put the Internal Revenue Service to shame. Just what is a person with limited education to make of a question that says, "If you are a non-citizen applying for Medi-Cal and you are not (a) LPR (an alien who is a lawful permanent resident of the U.S.), (b) an amnesty alien with a valid and current I-688, or (c) PRUCOL (an alien permanently residing in the U.S. under color of law), please do not fill in the shaded box for 'Birthplace.'"?

What?

In all, to complete the form an applicant must fill out more than 120 separate items.

And if that applicant is nervous about misunderstanding these almost comedically complicated questions, he or she will hardly be comforted by a sentence above the signature line that says, "If I do not follow food stamp rules . . . I may be fined up to \$250,000 and/or sent to jail/prison for 20 years." That's pretty threatening when one considers that buying diapers or soap rather than food constitutes "not following food stamp rules."

The California application takes hours and hours to complete, for a benefit that averages \$75 per person, per month. That can mean hours and hours of missing work, for a new employee who often can't even get leave.

And lest one think this is an exaggeration, consider the sheet that accompanied the food stamp application America's Second Harvest received, which said, "What to Expect When You Come In For Your Intake Appointment."

That sheet says in part:

"At 7:25 AM Report to Window 8 to check in."

"At 7:30 AM an orientation will begin that reviews your rights and responsibilities."

It also says:

“At 7:31 AM you are late for this appointment and you will be rescheduled for another day.”

In other words, you won't be seen if you're six minutes late. But you should expect if you're going to be seen to hang around for six hours. The letter is explicit:

“Please be prepared to spend **several hours (noon or longer)** completing the intake process.”
[their emphasis] ²

So a single mother may need to miss a full day's work. Or she may need to bring her children, keep them waiting for 6 hours, only to be then told she is missing one piece of verification and must return another day to complete the process or start over.

No wonder so many people choose not to get food stamps, even though they are hungry and fully eligible to participate. And so they remain hungry or are forced to go to private charities for help.

Was California unique, we wondered?

To answer this question, America's Second Harvest has undertaken the most comprehensive study of food stamp applications in nearly a decade.³ The findings – which are striking and troublesome – follow. State applications may be up to 36 pages. They're often full of inappropriate, irrelevant, and incomprehensible questions. It's no wonder hungry, needy, and deserving people often don't apply.

America's Second Harvest urges policymakers to review our findings and to act upon them. Many of the issues we raise in this report can be corrected by federal reforms and mandates aimed at simplifying the Food Stamp Program. At the state level, food stamp applications need to be changed and simplified, and caseworkers need to be better trained and their caseloads reduced, so that the needy get food stamps.

Food stamps are a bridge between hunger and having enough to eat for a family transitioning from welfare to work. It's a bridge we need to build and to cross, instead of being faced with The Red Tape Divide.

Executive Summary

The Food Stamp Program is the nation's cornerstone federal food assistance program for low-income Americans. As the first line of defense against hunger and food insecurity, the Food Stamp Program provides monthly benefits to poor and hungry individuals and families to help them obtain an adequate and nutritious diet.

Over the past four years, food stamp participation has declined by more than 33% to a participation level of 17 million participants during the first quarter of 2000. Yet, the number of Americans who are food insecure (hungry or at risk of hunger) has remained constant at approximately 31 million over the same period of time. Although the strong national economy can account for some of the decline in food stamp participation, the economic boom cannot explain why more than one-third of those potentially eligible for the Food Stamp Program do not participate. This report suggests that the program's low participation rates can, in part, be explained by the excessive red tape low-income people face when applying for the Food Stamp Program.

Our review of food stamp applications from the 50 states and the District of Columbia found in general that these applications are much longer than necessary, are difficult to understand and complete, and include excessive and invasive questions often with little or no legal connection to the Food Stamp Program. Looking at these applications and considering the multiple visits often required to complete the application and verification process, it is not difficult to understand why many low-income people who could benefit from the program choose not to participate.

APPLICATION LENGTH

Our review of the 50 state and District of Columbia food stamp applications found generally long and burdensome applications in most states:

- More than half (29) of the states and the District of Columbia have food stamp applications between 10 and 36 pages long.
- The average length of a state food stamp application is 12 pages, with the two longest being in Minnesota (36 pages) and West Virginia (33 pages), and 10 other states have applications between 19 and 28 pages long.
- Only 15 states have two-part applications in which the first part, generally shorter, may be used to initiate the process and begin the accrual of benefits once certified.
- Most food stamp applications are far longer than the applications for a federal firearms permit, federal home mortgage loan, and the application for a school bus driver's license.

APPLICATION DIFFICULTY

Our review of food stamp applications also surveyed the clarity or relative difficulty of the information being requested from food stamp applicants. Of considerable importance are certification statements which require applicants to sign under the threat of perjury.

- Forty-nine of 50 state food stamp applications and the District of Columbia contain certification statements that must be signed by the applicant, under penalty of perjury, that are written at the 9th to 12th grade reading level. Only North Carolina has an application certification statement written at the 5th grade level, which studies indicate would most likely be understood by many program applicants.
- Some state food stamp applications require applicants to provide accurate information, under threat of perjury, regarding terms that many applicants are unlikely to understand, such as: liquid assets; deemed income; deprivation factor; and deemer expenses.

NONESSENTIAL QUESTIONS

Our review found numerous questions that seek information about income or resources that would not ordinarily count against a food stamp applicant's benefits or eligibility. These often extraneous questions account for much of the application's length and complexity. Thirty-eight states and the District of Columbia

ask questions regarding sources of income that cannot or would not ordinarily be considered in determining an applicant's eligibility for food stamp benefits.

- Some applications require information regarding children's income and bank accounts; income from baby-sitting; charity and gifts from churches and synagogues; income from panhandling, bingo, and plasma donation; and garage sale receipts.
- Forty-three states and the District of Columbia ask questions regarding family resources that cannot or would not ordinarily be considered in determining food stamp eligibility. Examples include questions about burial plots, the value of one's home, personal belongings or collections, life insurance policies, tools, equipment and/or livestock used for business.

VERIFICATION AND "CRIMINALIZATION" STIGMA

Many states require applicants to identify or provide verification information that is highly invasive and could discourage needy people from applying for food stamp benefits.

At the issuance phase, a disturbing new trend has begun in five states with the **electronic fingerprinting** of recipients to verify they are not applying for multiple benefits at different locations. Sixteen states are either currently fingerprinting or planning to initiate such practices for food stamps, Temporary Aid for Needy Families (TANF) or other social services programs.

Other identification and verification practices include:

- contact information for an applicant's employer and/or landlord, personal references;
- credit checks; and
- home visits.

RECOMMENDATIONS

The significant red tape barriers that divide eligible potential applicants from food stamp benefits raise significant policy concerns. Policy makers at both the state and federal levels should take immediate action to remove the unnecessary obstacles that hungry and poor people face when applying for food stamps.

First and foremost, federal policy makers must simplify the Food Stamp Program. Many of the state practices identified in this report are state reactions to extremely complex federal program rules and the statutorily mandated quality control system. The fiscal year 2002 Food Stamp Program federal reauthorization provides policy makers an excellent opportunity to simplify, strengthen and expand this vital nutrition program.

Program streamlining, enhancing caseworker customer service and aggressive outreach to vulnerable populations are needed to make food stamps work better now, before the program's federal reauthorization in 2002.

At the state level — the frontlines of program administration — we recommend reducing the food stamp application length to one or two pages, streamlining and simplifying the application process and reducing the number of visits required to enroll and re-certify.

We recommend reducing caseworker caseloads, increasing caseworker training and implementing management strategies aimed at caseworker retention. We also recommend increasing food stamp/welfare office hours to include evenings and weekends, providing out-station enrollments, and lengthening the certification periods. Automating the intake process and enhancing outreach and public education efforts are also crucial. States should target food stamp outreach programs for the working poor, the homeless, the elderly and other at-risk groups who have low participation rates in food stamps.⁴

Taken altogether, these actions can cut the red tape faced by applicants to the Food Stamp Program. These program improvements will help ensure that low-income persons will receive the benefits to which they are entitled and help them in their struggle toward self sufficiency and to be free from hunger.





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Purpose of the Study

The Food Stamp Program is the nation's largest and most important food assistance program for poor and hungry Americans. The goal of the Food Stamp Program is to reduce and ultimately eliminate food insecurity.⁵ The program is designed to target benefits to those who most need assistance in obtaining an adequate diet. More than 17 million low-income people participated in the Food Stamp Program in the first quarter of 2000.

Although the number of people who are hungry and/or food insecure, as measured by the federal government, remained relatively constant at 31 million people between 1995 and 1998, there was a dramatic decline in food stamp participation over the same period of time. More than one-third of those potentially eligible to participate in food stamps did not enroll in the Food Stamp Program.

Several national surveys of potentially eligible non-participant households found that many needy people did not participate in the Food Stamp Program because of administrative burdens, either real or perceived, associated with applying for the program.⁶ The purpose of this study is to identify many of the significant hurdles low-income people face when attempting to navigate the food stamp application process.

A 1992 USDA study on the food stamp application process noted, "no previous work has examined the application process in detail or systematically studied the extent to which individuals interested in the Food Stamp Program actually complete the application process."⁷ Unfortunately, since that report nearly a decade ago, no national follow-up study has been conducted. This America's Second Harvest review of the 50 state and the District of Columbia food stamp applications seeks to re-start policy discussions around this important issue before the 2002 Food Stamp Program federal reauthorization.

As this review shows, many of the hurdles placed before needy people attempting to enroll in the Food Stamp Program are not required by federal rules, can be immensely burdensome for the working poor, and often have the effect of keeping hungry people from receiving the assistance they need. It is the hope of America's Second Harvest that this report will encourage state officials to review and reform their food stamp applications, enrollment processes and re-certification requirements in order to provide maximum access to food stamps for the needy.

Methodology

The America's Second Harvest Public Policy & Research Department conducted the review and analysis of food stamp applications from all 50 states and the District of Columbia. Our review began with a random request of food stamp applications from each state between January and April, 2000. In many instances, several requests for applications were required in order to obtain a copy of the application. It is important to note that in some states, individual counties may have different applications. In situations in which counties differ from each other in the same state, as in California, we requested the application which is used most often by the county welfare offices. Some states have set up pilot programs testing different applications and processes. We did not review pilots or other unique, localized applications. According to the information provided to America's Second Harvest researchers, Indiana, Kentucky, New Hampshire, South Carolina, and Tennessee are moving toward entirely paperless application systems. In the cases of Indiana, South Carolina, and Tennessee, this has resulted in a short introductory paper application that begins the process. In Kentucky, the system is completely automated. For the purposes of this study, back-up applications reflecting the questions asked in the automated application process have been used.

As food stamp eligibility is determined by federal regulation and statute, we reviewed each state's application against the federal requirements. It is important to note that federal food stamp administrative rules are very complex and were made more complex as a consequence of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (welfare reform). Many of the practices identified in this report are likely state reactions to those federal complexities.

In addition to core requirements, we reviewed each state application to determine the number of pages, types of questions, understandability of the questions and instructions to applicants using a standard reading scale (Flesch-Kincaid Reading Grade Level), germaneness of questions asked by food stamp offices including extraneous income or resources, and verification requirements. The review provides an objective comparison of each state's application requirements and what is required under federal regulations and statute.

This review is limited primarily to each state's food stamp application and provides only a cursory review of the application process. Although the application process is as important to a potential applicant negotiating the red tape divide as the application itself, we have nonetheless limited our review to applications themselves. The application process can vary significantly between individual county welfare offices and the states, and even day-to-day among welfare offices. For example, in one state, some county welfare offices accept applications and conduct intake interviews only twice a week. Since the application is the written record of the food stamp casework and serves as the primary determinant of program eligibility and household circumstances, we have limited our review to the applications, and review the application process only when it has a direct impact on the application.

Hunger and the Food Stamp Program

The United States is experiencing one of the strongest and longest sustained periods of economic growth in our nation's history. Yet despite the strong economy, low joblessness, and high productivity, the number of Americans that continue to live in poverty has remained remarkably constant. The percentage of Americans at or below the poverty level has declined only slightly, from 13.7 percent in 1996, or 36.5 million persons, to 12.7 percent in 1998, or 34.5 million persons.⁸ There remains strong and consistent evidence of hunger in the United States. An estimated one in nine Americans, 31 million in 1998, was deemed food insecure – hungry or at risk of hunger – by the federal government, and an estimated 21 million low-income people are relying on emergency feeding programs, food banks, church pantries, and soup kitchens for aid.⁹

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Food Stamp Program Overview

The Food Stamp Program, with more than 17 million participants and approximately \$20 billion in federal expenditures last year, is the nation's largest food assistance program and is considered the cornerstone of nutritional assistance for the poor. The purpose of the Food Stamp Program is to end hunger and improve the nutrition and health of recipients.¹⁰

The Food Stamp Program is a federal program administered by the Food and Nutrition Service of the United States Department of Agriculture (USDA). The program operates in all 50 states, the District of Columbia, and the U.S. Virgin Islands. Although the program is authorized, appropriated, and regulated under federal jurisdiction, each of the individual states and the District of Columbia administers the program within the respective states, under federal guidelines, with shared federal and state administrative funding, and 100 percent federal payment of benefits. The states issue the applications, operate the application process, maintain recipient certification, and dispense benefits to enrollees. To participate in the program, an applicant must meet eligibility and resource requirements as identified and verified through the application process.

The Food Stamp Act of 1977, as amended, is the principal federal statutory authority for the program. The federal regulations, when cited, refer to the Code of Federal Regulations (CFR), Chapter 7, §271 through §283. The welfare reform law cited in this report is the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Public Law 104-193).

From 1977 through 1996, Food Stamp Program participation generally matched American economic cycles. Food stamp participation generally *increases* during times of recession or slowed economic growth, and participation generally *declines* during economic expansions. Since the enactment of the welfare reform law in 1996, however food stamp participation has dropped dramatically and has declined at rates disproportionate to economic factors alone.

Food Stamp Participation vs. Persons in Poverty



— number of persons in poverty (1999 and 2000 data not available)
— number of food stamp participants

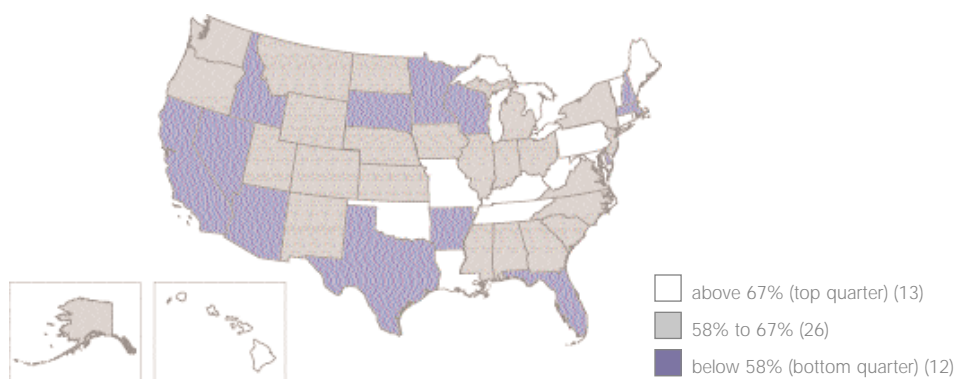
Source: USDA, US Census Bureau



According to USDA statistics, the number of people who receive food stamps has declined each year since 1994, with 75 percent of the participation decline occurring after 1996. Between 1996 and 1998, food stamp participation declined by nearly six million persons. In comparison, the number of Americans leaving poverty over the same period declined by only two million persons. Between 1996 and 2000, food stamp participation declined by more than 33 percent.

The most recent preliminary data released by USDA shows continued declines in program participation across the nation, with the February 2000 average monthly participation at 17.2 million people. That level is over one million fewer persons than the February 1998 participation and six million persons less than the February 1997 level.

State Participation Rates in the Food Stamp Program



Over the same period that food stamp participation declined at rates disproportionate to that of poverty, requests for emergency food aid through private charities increased, suggesting some level of interaction between falling food stamp caseloads and increased demand at emergency food providers. According to the U.S. Conference of Mayors, requests for emergency food assistance in cities increased an average of 18 percent in 1999 over the previous year, reaching the highest level of need since the recession of the early 1990s.¹¹

A 1999 U.S. General Accounting Office (GAO) report of food stamp declines stated, “**The need for food assistance has not diminished; rather, needy individuals are relying on sources of assistance other than food stamps.**” [emphasis added]¹² The GAO report noted that while participation in the Food Stamp Program by school-age children declined by 18 percent between 1994 and 1997, the number of low-income children receiving free school lunches increased by more than six percent over the same period. The GAO report also cited the findings of Catholic Charities USA, which reported increased requests for food assistance at local agencies at the same time that food stamp participation dropped to historically low levels.

When all indicators are factored – including **consistent and high rates of food insecurity**, relatively **minor reductions in the number of people leaving poverty**, and substantially **increased requests for emergency food**, with the extraordinary **declines in food stamp participation rates** — a growing gap between need and assistance emerges.

Much of the continued unmet need has fallen to community hunger-relief agencies, such as America’s Second Harvest food banks and food-rescue organizations, to serve needy families leaving the Food Stamp Program. Reports from food banks around the nation show extraordinary increases in requests for emergency food assistance. Unfortunately, the need has in many instances outstripped our ability to provide aid. Nearly one million low-income people who requested food assistance in 1997 were turned away from local agencies because the agencies lacked sufficient food to provide aid.¹³



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Why are poor people leaving the Food Stamp Program in record numbers even though they still have food needs? Among eligible non-participants – particularly the elderly and working poor — why don't more enroll in the program? The answers are unclear, but several patterns emerge, according to USDA research. Changes in participation rates, which vary widely around the country, seem to reflect a complex interaction between state food stamp administration, welfare reform implementation and the expanding economy, which puts many former welfare recipients in the workforce, but does not necessarily increase their standard of living.¹⁴ In fact, two-thirds of former welfare recipients who are employed have earnings below the poverty level.¹⁵

For many low-income people who could benefit from food stamps, significant barriers are erected at the state and local level that effectively prevent them from getting the food assistance they need. A combination of unnecessary red tape, misinformation and difficulty in getting to the offices where applications and intake occur serve as an effective barrier to enrollment.

There is also a growing body of evidence which suggests a strong interaction between the Temporary Assistance for Needy Families (TANF, cash welfare for families with children) diversions and food stamp declines. Intentional diversion occurs when state or county welfare office staff dissuade families from seeking cash welfare assistance and in that process they may also dissuade participation in food stamps. In other instances, families leaving TANF for employment may still be eligible for food stamps, but they are not informed of this option. In recent years, state, county, and municipal human services offices have been cited by the USDA, the General Accounting Office, and the courts for denying needy people access to food stamps to which they are legally entitled, by supplying false or misleading information and/or failing to inform people of their rights and the possibility of appeal when they are denied food stamps.¹⁶

In some instances, food stamp applicants are instructed to go to a local charity for food aid rather than apply for the program, or they may be denied an application on their first visit and told to come back days later, or they may be sanctioned off the program for failing to meet requirements such as missing a meeting with a caseworker, or failing to file a report. They may be encouraged to withdraw their applications. In short, at least some of the decline in food stamp participation is a consequence of state or local welfare offices purposefully dissuading needy families from participating in the Food Stamp Program.

In some cases, state activities which are meant to dissuade participation in the Food Stamp Program violate the law.¹⁷ These practices are easily documented and easily correctable. But more pervasive than illegal activities by welfare offices is an institutionalized culture of denied access and suspicion of enrollees which is manifested through food stamp applications and the process instituted for applying.

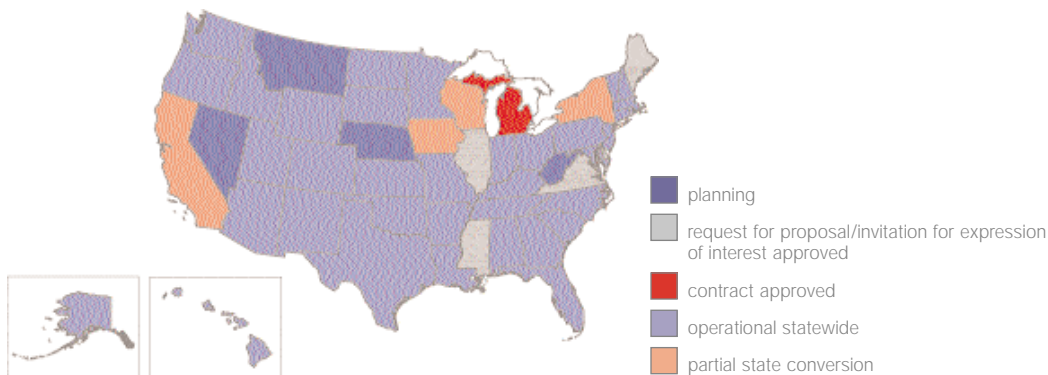
For example, a USDA report on Food Stamp Program integrity offers a “recipe” for improved program efficiency, telling states to “extract all the information....shorten certification periods....sift out the ineligible... and crack down on fraud.”¹⁸ Red tape in the form of legal – but unnecessary – office procedures taking an average of five hours or more, a lack of availability of caseworkers, unanswered phones, multiple trips to the offices, and overly long and often unintelligible food stamp applications serve as barriers to participation.¹⁹ This study aims to identify application barriers, compare state food stamp applications and present alternatives.

How Food Stamps Work

At the federal level, the Food and Nutrition Service of the U.S. Department of Agriculture (USDA/FNS) administers the Food Stamp Program. Regional USDA/FNS offices are responsible for monitoring the program in the states in their respective regions. The program is operated and administered by state and local welfare agencies which have the responsibility to determine eligibility, benefit allotments, and distribution of benefits.

The Food Stamp Program provides paper coupons (stamps) or, increasingly, Electronic Benefit Transfer (EBT) cards, akin to bank or ATM/debit cards, that recipients use like cash to purchase food at grocery stores. Forty states have implemented EBT statewide, with the remaining states either planning or in the process of moving toward electronic benefit issuance.

State Map of EBT Operational States



To participate in the program, an individual must apply and in nearly every instance, interview, in person, at a local welfare or food stamp office. Exceptions to in-office interviews are made for the elderly and disabled. State agencies are required by federal regulation to process an application within 30 days, or in the case of expedited food stamps, within seven days.

Although individuals apply for the program, eligibility is determined on a household basis. Program eligibility is determined through four criteria:

- Household Income and Expenses
- Household Resources
- Household Size
- Work and Citizenship Status

Households must meet federal eligibility requirements in all four categories and provide information and verification to local welfare agencies about their household circumstances. The 1996 Welfare Reform Act added a number of eligibility barriers excluding from food stamp participation legal immigrants, drug felons and fleeing felons. The Act also instituted time-limited eligibility for unemployed, able-bodied 18-to-50-year-olds without dependent children to three months of eligibility in each 36 months, unless they are exempted through state policies.²⁰

Applicants must agree to cooperate in the verification process, provide social security numbers, and register for work unless exempt from the food stamp work requirements. Eligible households are issued a monthly allotment of food stamp benefits based on the Thrifty Food Plan, the lowest-cost diet plan of USDA's four official food plans.²¹ An individual's household food allotment is equal to the maximum allotment for the

household size, minus 30 percent of the household's net income, which the household is expected to provide for food purchases. Households with no countable income receive the maximum allotment (\$335 per month for a family of three), although the average allotment is approximately half of that amount (\$170 per month or \$71 per person in fiscal year 1998). Participating households are required to re-certify their eligibility in person at least once every 12 months, or 24 months if elderly or disabled, according to federal rules. In practice, many states require re-certification once every 90 days, though states may have longer or shorter certification periods and may require more frequent visits to the food stamp office, especially for working households. The median time between re-certifications is six months, according to USDA.²²

Food stamps may be used to buy only food or food products, or seeds and plants for home food gardening. Most retail food and grocery stores, approximately 161,000 throughout the country, accept food stamps for food purchases. Some restaurants (fewer than 3,000) are authorized to accept food stamps from qualified homeless, elderly, or disabled people – individuals who cannot obtain or have difficulty obtaining food for home consumption – in exchange for inexpensive meals.

Profiles Of Food Stamp Recipients

Generally, food stamp participant households represent some of the most vulnerable people in American society. They are economically disadvantaged and financially poor, often undereducated, unemployed or under-employed if working. Families typically are headed by a single parent if children are present, and food stamp households are likely to include a child, or an elderly or disabled person.

According to USDA profiles of food stamp recipients, food stamp households are universally low-income, with 90 percent at or below the poverty level, (\$14,150 for a family of three) and frequently represent the poorest households in the nation.²³ Nearly three-quarters of food stamp households have no countable resources for program purposes. (Countable resources include checking and savings accounts, investments, and vehicles worth more than \$4,650.)

The typical food stamp household has a gross cash income of \$584 per month, or \$7,008 a year. Food stamp households generally have little cash income and few resources.²⁴

The likelihood of being poor is closely linked to low literacy and low educational attainment.²⁵ Of persons heading a food stamp household, 43 percent have less than a high school education.²⁶ More than two-thirds of participating households with children are headed by a single parent, most of whom are women.

Profile of a Food Stamp Household

According to USDA's Characteristics of Food Stamp Households (Fiscal Year 1998):



26% of food stamp households have earned income.



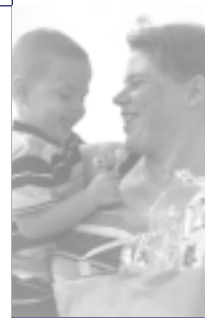
Approximately **39%** of food stamp households with children have earned income.



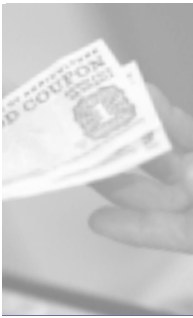
37% of food stamp households have incomes below 50% of the poverty level.



88% of all food stamp households contain either a child or an elderly or disabled person, and **91%** of total food stamp benefits went to these households.



The Red Tape Divide



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How The Application Process Works

THE FOOD STAMP APPLICATION

The food stamp application process is the gateway to program benefits for the needy. To apply for food stamps, a person must fill out an application form and verify his or her information in a face-to-face interview.²⁷ The application process is structured essentially uniformly by all of the states. The food stamp office must provide an application and allow the applicant to submit the form the same day it is requested. All that is necessary to start the process – and the accrual of benefits if determined eligible – is a name, address, date, and signature. Forty-four states and the District of Columbia provide a single intake application for a myriad of low-income programs; six states have separate food stamp applications for those intending to apply only for food stamps.

What is required by federal regulations to get food stamps?

Federal regulations regarding eligibility and verification of eligibility for food stamps are relatively simple. A person must submit an application providing the following information:

- name and address
- social security number(s) (SSN) for all household members applying, or proof of SSN application
- household size and income
- household resource information, including checking and savings accounts, investments, and value of vehicle (exempted are vehicles used to live in, or for some responsibilities, and vehicles used to transport the disabled)
- verification of income, resources, and allowable deductions (allowable deductions include a standard deduction, some earned income, child care or child support payments, utility costs, some shelter costs, and some medical payments)
- sign a statement regarding the citizenship status of all members of the household applying
- register for work unless exempt by age, disability, or child care responsibilities
- sign the application affirming that the information provided is accurate

The intake process requires an applicant to answer questions relating to food stamp eligibility, and many states also screen for eligibility for TANF, Medicaid, General Assistance, and other programs simultaneously. The combination of program eligibility information explains, in part, the generally long food stamp application length in many states. In Minnesota, for example, the Department of Human Services notes “Our administration of [the Food Stamp Program] for families has been simplified by combining it with the Minnesota Family Investment Program, our welfare reform effort. Therefore, financial workers and families have only one set of rules to follow.”²⁸

Generally, the combined application is a positive reform by the states, providing applicants access to multiple programs that can assist low-income families. However, many of those programs have different resource, income or other requirements. Our review shows that many states do not distinguish the varying program rules or questions in their applications. Caseworkers do not always inform applicants which questions are related to food stamp eligibility and which are for other programs. The effect on the intake process at local welfare/food stamp offices has been to require more information than is needed to apply for food stamps, longer applications, repeated office visits, and a greater potential for unnecessary information or incorrect information being requested from applicants or provided by applicants.

A 1992 USDA review of the food stamp application process found that 61 percent of respondents applying for food stamp benefits were applying for food stamps only. Another 15 percent were applying for food stamps, AFDC (now TANF), and Medicaid. Less than one percent were applying for AFDC or Medicaid but not food stamps.²⁹ Thus, the multiple program form, unless specifically identifying food stamp-only questions, requires most clients to provide more information than is necessary.

The combination of many different program rules into one application, coupled with caseworker errors or misinformation may result in the denial of access to the Food Stamp Program by needy people. Four surveys of food stamp eligible or potentially eligible non-participant households by USDA and non-governmental organizations identified the administrative burdens associated with applying food stamps as a barrier to enrollment.³⁰

A 1992 USDA review of food stamp application processes found the following factors most likely to lead to not completing the food stamp process:

- time and ‘hassles’ involved,
- length of the process or particular aspects of the process,
- problems getting to the food stamp office,
- confusion about the process,
- long waits at the office, and
- ‘unobtainable’ documents required to verify the household’s circumstances.³¹

Two major administrative burdens for participation are the necessity for most households to go to a food stamp or welfare office to apply for benefits and the length and verification processes required to complete the food stamp application. Compared to other programs, the application length for food stamps is excessive. The average length of a food stamp application is 12 pages and most states do not inform applicants that all that is needed to begin the process is their name, address, date, and signature.

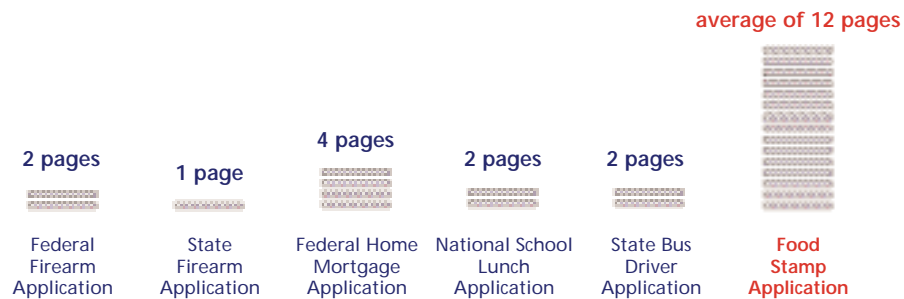
In comparison, a low-income person applying for a federally-guaranteed home mortgage through the U.S. Department of Housing and Urban Development must fill out only a four page application. For a low-income family to apply for free or reduced price school lunches for their children, the application is typically two pages long. A federal Firearms Dealer permit issued through the federal Bureau of Alcohol, Tobacco, and Firearms also requires only a two-page application.

PAGE LENGTH

Application Length in Context:

- **Federal Firearm Application:** issued by the U.S. Bureau of Alcohol, Tobacco, and Firearms is **two pages** long. *Benefit?* Allows bearer to buy, store, and sell firearms and ammunition.
- **State Firearm Application:** issued by the Illinois State Police is **one page** long. *Benefit?* Allows bearer to purchase ammunition and firearms, carry and transport firearms.
- **Federal Home Mortgage Guarantee:** issued by the U.S. Department of Housing and Urban Development (FHA guaranteed loan) is **four pages** long. *Benefit?* Provides guarantee of mortgage payment up to \$219,000 to mortgage lender.
- **National School Lunch Application:** issued by state education departments or local school districts for USDA reimbursed lunches is generally **two pages** long. *Benefit?* Provides federally reimbursed free and reduced price lunches to low-income children at school.
- **State School Bus Driver Application:** issued by the New York State Department of Motor Vehicles is **two pages** long. *Benefit?* Allows bearer to transport school children in a motor vehicle.
- **Food Stamp Application:** issued by states for federal food assistance benefit averages **12 pages** long, but may be up to **30 pages** or more. *Benefit?* Provides coupons for the purchase of food for poor people; average allotment is \$71 per person, per month.

Application Length in Context



Our review found generally long and burdensome applications in most states and the District of Columbia. Fifteen states have two-part applications. In some instances, county welfare/food stamp offices use an “initiation” form that serves as the first part of the application. The first part is, in most cases, relatively short and necessary to begin the application process and schedule an intake interview. Several states — Florida (one page), Indiana (two pages), South Carolina (two pages) and Tennessee (two pages) — have relatively short applications to begin the food stamp eligibility process. The second part of the application, which is longer and more detailed, requires a face-to-face interview to complete.

Thirty-seven states list on the front page of the application that all that is needed to initiate the process, or open a case file, is the name, address, and signature of the applicant, or have a “part 1” application completed. However, 13 states and the District of Columbia do not inform potential applicants of their right to begin the process with a simple name, address, signature, and date.

Access Denied, a report by the Northwest Federation of Community Organizations and the National Campaign for Jobs and Income Support, found numerous program access and application process problems in the six states they surveyed. In their report fewer than half of food stamp applicants were told to submit their applications on the same day they received it, and more than two-thirds were not screened for expedited service for food stamps.³²

States that do not inform applicants on the first page of the application of their right to submit name, address, and signature to begin the process:

Alaska	Kentucky	Texas
District of Columbia	Maine	Vermont
Idaho	Massachusetts	West Virginia
Illinois	North Carolina	Wyoming
Kansas	Oregon	

Fifteen states have a “tear-off” sheet or page 1/part 1 that may be submitted before the rest of the application:

Arkansas	Maryland	South Dakota
Colorado	Minnesota	Utah
Delaware	Montana	Virginia
Iowa	Nebraska	Washington
Louisiana	North Dakota	Wisconsin

In several states, such as Tennessee, the second part of the application is paperless, or automated with a caseworker interviewing the applicant. In the instance of Kentucky, the entire form is paperless. For review purposes, we compared Kentucky’s back-up application to the other states’ paper applications. Food stamp applications’ page length is in parentheses next to each state.



Two states - Minnesota (36 pages) and West Virginia (33 pages) -- have applications more than 30 pages long.

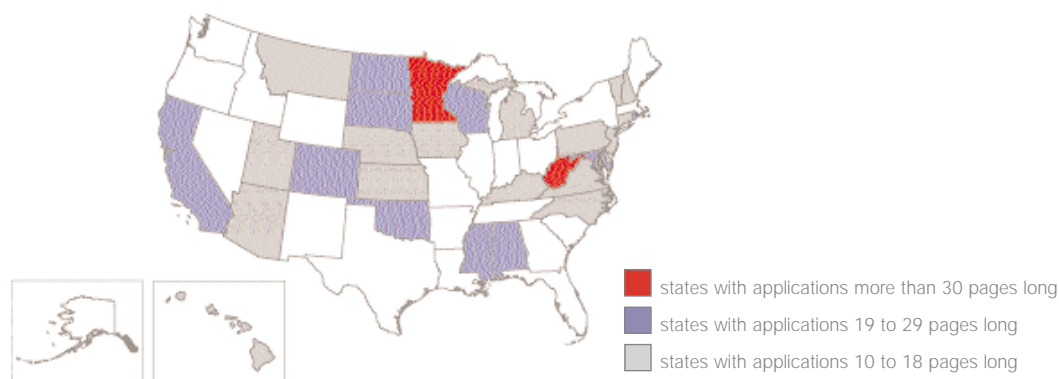
Ten states have applications 19 to 28 pages long:

Alabama (19)	Mississippi (21)	South Dakota (20)
California (21)	Oklahoma (20)	Wisconsin (19)
Colorado (20)	North Dakota (24)	
Maryland (23)	Rhode Island (28)	

Seventeen states have applications 10 to 18 pages in length:

Arizona (14)	Kentucky (17)	North Carolina (15)
Connecticut (16)	Michigan (16)	Pennsylvania (16)
Delaware (12)	Montana (17)	Utah (12)
Hawaii (11)	Nebraska (14)	Vermont (11)
Iowa (10)	New Hampshire (10)	Virginia (14)
Kansas (10)	New Jersey (16)	

States Food Stamp Application Length



Many of the questions that comprise the food stamp application and contribute to the application length are designed to determine eligibility and benefit levels through a complicated formula of eligibility and benefit allotment levels. States must implement complicated federal regulations as part of their administration of the program. Questions are also designed to reduce fraud and ensure program integrity. Program integrity, fraud reduction and accuracy of benefit issuance are critical in determining a state's administrative efficiency in the food stamp program. USDA/FNS is responsible for making error determinations on state program administration.

Incorrect benefit issuance and other factors are used to determine a state's food stamp error rate. The error concern of the states is significant. USDA annually reviews state food stamp benefit issuance under its Food Stamp Program - Quality Control authority, mandated in federal statute.³³ USDA may penalize states for incorrect benefit allotments, either over-issuance or under-issuance of benefits. States may be penalized and, in some instances, fined millions of dollars for higher than average error rates. Rather than collecting these fines, however, USDA typically requires the states to reinvest the Quality Control error rate penalty into internal program improvements, such as intake process automation, caseworker training, and similar activities which can improve program integrity without over-burdening applicants.

It has been suggested that longer applications requesting more detailed household information from applicants not only allow recipients to apply for more than one program during the intake process, but that the additional information and verification questions in the longer applications help preserve program integrity and reduce errors in benefit issuance. In an effort to determine whether longer food stamp applications are associated with reduced food stamp error rates, America's Second Harvest compared length of application in



pages to a state's error rates as determined by USDA in 1999. **Our survey finds no relationship between the length of a state's food stamp application and higher than average error rates.**³⁴ (Table 1 shows each state's 1999 error rate and application length in pages.) Thus, while lengthy applications make the process more difficult and confusing for the applicant, they have no apparent relationship to a state's reduction in quality control benefit errors. For example, West Virginia with a 33 page application has an 8.8 quality control error rate, while Wyoming with a three page application has only a 2.9 error rate.

When confronted with these longer applications, the application and process seem only to affirm the perception among eligible non-participants that the food stamp application process is too cumbersome for the relatively low benefit levels.³⁵ Further, Quality Control error rates are often an insufficient measure of a state's food stamp program efficacy. State error rates are more likely affected by a series of factors including the number of working families participating in the program (with fluctuating income), the overall food stamp participation in a state, automation of the food stamp process which mitigates human errors, the level of state funding for program administration, caseworker training and turn over, and caseworker caseloads.

COMPREHENDING THE FOOD STAMP APPLICATION

A recent General Accounting Office (GAO) report on homeless persons' access to federal programs noted: "the [food stamp] application form can be difficult for some homeless people to complete, particularly those suffering from mental illness."³⁶ In addition to barriers to understanding the food stamp application for the homeless and mentally ill, the relatively low literacy of many Food Stamp Program participants and eligible non-participants, as measured in educational attainment, can also make understanding the application process and complying with food stamp rules difficult.

The average reading level of adult Medicaid participants – an equivalent low-income population to food stamp participants for which data are available – is 5th grade, and the average reading level of all U.S. adults is the 8th grade.³⁷ USDA data, while not identifying literacy rates or reading comprehension levels of food stamp participants, do identify generally lower educational attainment among Food Stamp Program participants and eligible non-participants as compared to the rest of the U.S. population.³⁸ Similarly, 40 percent of emergency food recipients — low-income people accessing hunger-relief programs at food pantries, soup kitchens, and shelters — lack a high school diploma or its equivalent, and 16 percent have only a grade school education.³⁹ Thus, food stamp application questions which are substantially higher in reading comprehension grade level may be confusing and misunderstood by people applying for benefits.

As part of this survey, we reviewed each state's food stamp application certification statement for understandability using a standard Flesch-Kincaid Reading Grade Level Measurement. The certification statement is signed by the applicants attesting that all the information they have provided in the application is true to their knowledge. Our review found that only one state, **North Carolina**, provided a certification statement that would likely be understood, unassisted, as read by a low-income applicant. North Carolina's certification statement meets a 5th grade reading level, while the other 49 states and the District of Columbia provide certification statements at the 9th to 12th grade levels.

The issue of readability is essential because an applicant needs to understand what is being asked of him or her in order to provide accurate information. In particular applicants must understand and sign certification statements, under threat of perjury, that affirm that the information they provide as part of the application is correct.

Yet states often ask application questions which use unnecessarily bureaucratic language. For example, **Alabama, Colorado, Maryland, Mississippi** and **Oklahoma** ask applicants to list or identify "transfer of resources or assets"; **Colorado** asks for information regarding "lump sum payments"; **New Jersey** asks applicants to identify "deemed income," "Marital Status and Deprivation Factor"; and **Maryland** asks for "Deemor Expenses."

Taken out of context, terms like “lump sum payment” or “liquid assets” may not seem especially confusing. But when juxtaposed against an already lengthy application averaging 12 pages long, written with a 12th grade comprehension language, and the relatively low literacy level of many food stamp applicants, the bureaucratic language serves as a significant barrier.

The length and complexity of food stamp applications is made even more difficult when, according to the *Access Denied* report, 55 percent of applicants did not have the process explained to them, and three-fourths were not offered help if there were errors on their applications.⁴⁰

The “bureaucratized” of applications is exacerbated by federal regulations which require warnings which confront the applicant. Warnings contained in all 50 state and the District of Columbia food stamp applications declare that false, misleading, or incorrect information provided as part of this process may subject an applicant to civil and criminal penalties up to \$250,000 and/or imprisonment. Again, while program integrity is important and begins with the application process, the warning of enormous fines and imprisonment for incorrect information for a benefit which averages \$71 per month per person seems more than a little extreme, and quite likely adds to the stigma associated with the program and turns people off from the process.

THE APPLICATION PROCESS

Although exact procedures for applying for food stamps vary from state to state and occasionally from county to county within a state, the application process is generally comprised of four steps in all states:

- 1) requesting and obtaining an application;
- 2) completing and filing the application;
- 3) completing an eligibility determination interview; and
- 4) verifying household circumstances.⁴⁰

In order to apply for food stamps, a person typically needs to visit his or her local welfare office. In fact, 93 percent of food stamp applicants and 80 percent of those re-certifying had to go to a county food stamp office to enroll or maintain eligibility.⁴² If disabled or otherwise homebound, an applicant may request an application by mail, an authorized representative for the applicant may apply in the applicant’s place, or a caseworker may make a home visit. If an application is requested by mail, the food stamp office may schedule an interview for a later date. Many states require applicants to arrive at the beginning of the business day, by 8:00 AM usually, if they want to be seen by a caseworker and have their application processed that day. (See the application instructions in Appendix C.)

Once the preliminary information is taken by a caseworker or through the submission of an application, a second visit with a caseworker is typically scheduled for clients to provide verification of information. In 24 states, caseworkers informed researchers that at least two visits would be required to process an application.

According to USDA, the average application process takes five hours of client time to complete and includes at least two trips to the local welfare office.

Once certified, re-certification occurs on average every six months though some states have shorter or longer certification periods and some categories of recipients may be required to re-certify more frequently. Re-certification usually takes nearly 2.5 hours of a participant’s time and at least one additional trip to the food stamp office.⁴³

Once application information is submitted and an applicant is certified eligible for participation, benefits begin to accrue from the date of the initial application. Therefore it is important that potential participants submit at least their name, address, date, and signature — the basics required to initiate the process — at this stage, but as our survey indicates, the sheer length of the application and unnecessarily intrusive nature of some of the questions too often deter even the beginning of the application process for many needy families.

For many applicants, navigating through the food stamp application interview is no less onerous than filling out the application itself. Most of the states surveyed as part of this research informed our researchers that an application could be picked up and a subsequent appointment date would be scheduled. While in some cases the applicant chooses the appointment time, many states mail an appointment letter to the applicant without consulting him or her for times that meet his or her work or life schedules.

Of food stamp offices queried by the researchers, in 24 states a second interview is scheduled rather than accommodating the applicant for an interview during their first visit.

States that require multiple visits to apply for food stamps

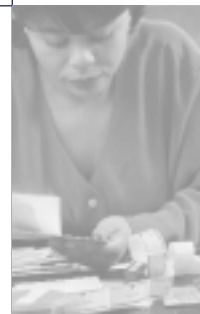


Failure to come to the second interview may cause a food stamp case to be closed, delayed, and/or subject a participant to sanctions if they are already enrolled. Some county welfare offices, as in at least one county in California, inform applicants that if they arrive even one minute late to their appointment, they may have to reschedule for a future date.⁴⁴

Regardless of the state, in many cases applicants will have to return to a food stamp office to complete the verification process if they do not bring the necessary documentation with them. Every state's food stamp application process requires verification documents of some sort, such as employment pay stubs, birth certificates, utility and rent payment receipts, and others. Most people do not keep such documentation on their person, and most states do not inform applicants in advance what will be required to complete the application. Similarly, the *Access Denied* report noted that 80 percent of applicants in the surveyed states were not told which documents would need to be submitted, thus requiring additional visits to the food stamp office.⁴⁵

When county welfare offices in all 50 states and the District of Columbia were queried about the need to bring documentation to the first visit, welfare offices in only nine states stated accurately what would be required for a single application visit, and two offices provided incomplete lists of needed documents. These practices make it likely that applicants will be unprepared for their caseworker interviews and will, therefore, be required to visit the office a second time before the application can be processed and benefits provided. USDA research indicates that 29 percent of people applying for benefits had to make two trips to the county welfare office, and 13 percent had to make three or more trips to enroll. According to USDA, "substantial numbers of participants also reported that they had to go to additional places to obtain necessary information for their most recent case actions."⁴⁶

Two visits — or more — is excessive for the relatively low benefit level of food stamps, and is clearly a burden on working poor applicants who must leave work to apply for the program. For example, USDA estimates that out-of-pocket expenses for applying for food stamps average \$10.31 per person. Most of that \$10 is associated with transportation costs.⁴⁷ Not counted, however, are other expenses associated with missing work while applying for assistance.



Most food stamp offices are open only during “normal” business hours — 8:00 AM until 4:00 PM — or similar hours. Should a working person apply – assuming the five hour average and two visits – the lost wages at the federal minimum wage of \$5.15 an hour would equal \$25.75. Adding the average out-of-pocket expenses of \$10.31 and the lost wages, means that applying for food stamps can cost a working poor family \$36.06, or more than half of the average monthly benefit per person (\$71).

The average number of two visits needed to apply can be a difficult burden for a family transitioning from welfare to work. The newly employed may be reluctant to request leave, and employers may be disinclined to grant it. Monthly or 90 day re-certification requirements for the employed, which are frequently required of working family participants, raise the cost even higher for working poor families whose income and resources may already significantly restrict benefit amounts.

Beyond long applications, difficult language, multiple visits to a food stamp office and substantial documentation proving need, our review of the 50 state and District of Columbia applications found a number of nonessential questions in many food stamp applications.

NONESSENTIAL INCOME QUESTIONS

Income that does not count against food stamp benefits

According to the federal rules, the food stamp office may not legally count the following types of income in determining food stamp eligibility:

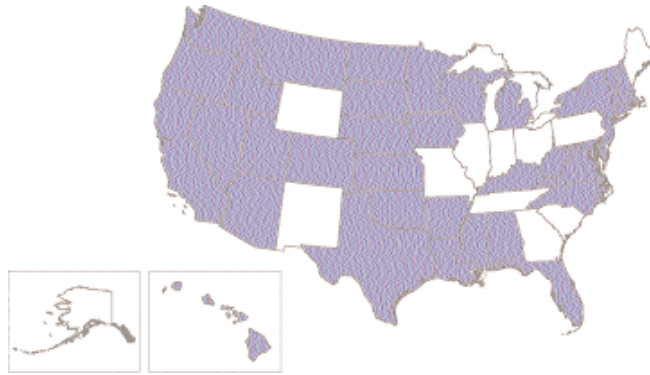
- any gift or benefit that is not in the form of money, such as clothing or food, or most low-income support benefits such as public housing, WIC, school meal or summer food participation;
- money earned by a child under 18, and a student at least part-time;
- small amounts of income (\$30 or less over a three-month period) that are received on an irregular basis or money from private charities such as a church or synagogue that is less than \$300 over three months;
- all loans, including student loans and Pell grants that are used for tuition, fees, and supplies;
- lump sum payments such as Earned Income Tax Credits (EITC), tax refunds, credits from most government programs for back benefits;
- money received for support of someone not in the household,
- some government payments such as Low Income Home Energy Assistance Payments (LIHEAP); and
- reimbursements for past or future work related expenses, and work or business expenses incurred by the self-employed.

Despite federal rules which prohibit the counting of certain types of income, this review found nonessential income source questions in 38 states’ food stamp applications. Table 1 lists a series of extraneous income questions by state.

Please note: The following examples were taken from state food stamp applications, as requested by the researchers between January 2000 through April 2000. Some of the income and resource questions contained in the application are not germane to the Food Stamp Program, but are nonetheless requested of food stamp applicants unless specifically noted in the application as a request for income or resources for another program. If the food stamp application excluded or otherwise noted that the question was to be asked for another program, it was not included in lists below.



States which request nonessential income sources



Nevada requires applicants to provide the following nonessential information:

- income not in the form of money
- money from charities
- lump sum payment
- income from plasma donations, and
- income from street panhandling.

Three of the five nonessential income questions (money from charities, panhandling, and tax refunds) on the Nevada application ask for information on income that would not ordinarily, or could not reasonably, be counted against food stamp income thresholds.

Nevada, Michigan, Minnesota, and New Jersey all require income information regarding gambling winnings and casino profits.

South Dakota, Virginia, and Washington require applicants to provide information on bingo and prize winnings.

Thirty states and the District of Columbia require food stamp applicants to provide information and verification about gifts or money received from churches or synagogues, even though such funds would not typically be counted as income for food stamp purposes, unless the gift exceeded \$300 over three months. The states asking for income and verification of money received from churches, synagogues, mosques, or other religious institutions, charities, friends or relatives are:

Arizona	Iowa	Montana	Rhode Island
Arkansas	Kansas	Nebraska	South Dakota
California	Kentucky	Nevada	Texas
Connecticut	Louisiana	New Jersey	Utah
District of Columbia	Maryland	New York	West Virginia
Delaware	Massachusetts	North Dakota	Wisconsin
Florida	Minnesota	Oklahoma	Virginia
Hawaii	Mississippi	Oregon	

Although federal rules require that income that can be anticipated is countable, regardless of the source, many of the income questions, and particularly those relating to gifts contained in many state applications could not reasonably be expected to be counted. Based on the questions in some of these states' applications, the parent of a child who receives a gift of money from a grandparent on his or her birthday would have to report the gift, or potentially be in violation of the state's requirements. How states expect to verify these sources of income is unclear. However, as the section on verification indicates, states have employed a number of innovative, and often intrusive, policies to determine income and resources. Verification activities utilized by the states include credit checks, home visits, and even monitoring cars parked in food stamp office parking lots.

In the instance of **Utah**, the food stamp application requires applicants to reveal church assistance and **Hawaii** asks applicants to provide information on garage sale income. Even if these questions could be viewed as germane to the income threshold of applicants, how states expect to verify income from garage sales, plasma donations, gifts from relatives or friends, or bingo winnings is unclear and would be extremely intrusive and burdensome to applicants to anticipate and report. As such income is typically not germane and likely unverifiable, why states request the information is unclear.

NONESSENTIAL RESOURCE QUESTIONS

As noted earlier, food stamp eligibility and benefit levels are determined by income and resources or assets, and each state food stamp application requests information about a household's resources. Under current federal rules, food stamp households may not have countable resources in excess of \$2,000, or if the household includes an elderly or disabled person, no more than \$3,000 in countable resources. Most countable resources as reported by applicants include money in checking or savings accounts. Another important resource question asked of applicants is whether or not the household owns a licensed vehicle(s), which counts against the resource limit, and if so, determine the fair market value based on the current "blue book" value of the vehicle(s). (Excluded vehicles are not counted in the resource limit.)

Each dollar over the vehicle resource allowance of \$4,650 counts against the \$2,000 resource limitation, except in cases of "categorical eligibility" applicants. At the time of publication, food stamp rules do not count licensed vehicles used to transport a disabled household member, a vehicle used to make a living (such as a taxicab), a vehicle which someone lives in, or a vehicle necessary to haul water or fuel. States may also exclude the value of vehicle from the resource requirements if the household is applying for food stamps through "categorical eligibility" in TANF or the Supplemental Security Income program (SSI, for disabled or elderly persons)⁴⁸. Otherwise, the food stamp office will count the fair market value of the vehicle over \$4,650 against food stamp eligibility and benefits. (Appendix A lists some of the types of cars that represent the newest model in each category that would meet the vehicle resource allowance threshold for food stamps.)

For vehicles exceeding the \$4,650 vehicle resource exclusion, the value of the vehicle counts against the resource limit. Generally this means that vehicles with a value more than \$6,650 will exclude the household from participation in the food stamp program. Even if the vehicle is owned by a bank or other lender, and the applicant is making payments on the vehicle, the total value is counted as a resource.

For families who purchased a vehicle while employed and then find themselves out of work and in need of food stamps, the vehicle asset limitation can be particularly onerous. Many working poor families in rural or suburban areas require a reliable vehicle to obtain or maintain employment. As those areas frequently lack public mass transportation, the vehicle asset limitation can be a significant burden to participation.

Most of the resources counted against a household's food stamp eligibility will be in the form of a vehicle or money in checking or savings accounts. The following is a list of resources which may not be counted in determining food stamp eligibility, according to federal food stamp rules.

Resources which do not count against food stamp benefits

The food stamp office cannot legally count the following resources against an applicant's food stamp benefit eligibility:

- an applicant's house or the land the house sits upon;
- personal belongings or household goods;
- burial plots;
- cash value of life insurance policies or pensions;
- materials, equipment, tools, livestock or buildings used for income or employment;
- the resources of household members who receive TANF or Supplemental Security Income; and
- property which cannot be sold for a significant return.

Please note: The following examples were taken from state food stamp applications, as requested by the researchers January 2000 through April 2000. Some of the income and resource questions contained in the application are not germane to the Food Stamp Program, but are nonetheless requested of food stamp applicants unless specifically noted in the application as a request for income or resources for another program. If the food stamp application excluded or otherwise noted that the question was to be asked for another program, it was not listed below.

Despite federal regulations which exclude certain resources from the maximum resource/asset limit, most state food stamp applications require applicants to report a number of extraneous resources. Table 1 lists a series of extraneous resource questions common to state food stamp applications. For example:

- Twenty-nine states and D.C. ask if applicants or household members own **burial plots**;
- Twenty-two states ask for the **value of house or land**;
- Thirty states and D.C. ask questions about ownership and value of **life insurance policies** and/or **pension funds**;
- Ten states ask applicants about **personal or household belongings, goods** and/or **collections**;
- Eighteen states and D.C. ask for the **value of tools, equipment** and/or **livestock** used for income; and
- Fifteen states ask for information about **jointly-owned property**, even though such property can not be readily liquidated.

Thirty-six states separate food stamp resource questions from other programs, and presumably will not count those resources against food stamp resource limits. Anecdotal evidence from state-based advocacy groups indicates, however, that caseworkers do not always distinguish countable resources, or they do not inform applicants that the resource questions may not apply to food stamp eligibility.

The *Access Denied* study of welfare program access in six states (Arkansas, Idaho, Montana, Oregon, South Carolina, and Washington), found that 78 percent of applicant "testers" were not informed about other programs for which they may be eligible.⁴⁹ Thus, applicants are often required to complete long applications **providing information for programs for which they are not applying**, and may **not be informed of programs for which they are eligible**.

VERIFICATION REQUIREMENTS

Food stamp rules require applicants to provide verification of information provided. Failure to cooperate with the verification process may cause a food stamp application to be rejected. In the case of an already approved applicant, failure to provide verification may trigger sanctions or reduce future benefits.



Verification Requirements

Federal food stamp regulations require applicants to provide verification for the following:

- Income;
- citizenship or immigration status for anyone in the household applying for food stamps;
- social security numbers for everyone in the household applying for food stamps;
- proof of address or where the applicant resides; (homeless persons do not have to report an address)
- identification for the applicant;
- medical expenses if a medical expense deduction is sought;
- utility expenses if utility expenses beyond the standard deduction are sought; and
- proof of disability if the special disability benefit is sought.

Despite relatively minor federal verification rules, many states have imposed extremely burdensome verification requirements.

- **Alabama** requires applicants to have signed and dated statements from any person who gives money to a person in the household.
- **Arizona** requires verification on deceased parents.
- **Montana** and **North Carolina** require applicants to identify and verify commodity status, that is if they are receiving USDA commodities through a charity like a food bank, pantry or soup kitchen.
- **Maryland** and **Kansas** require medical insurance proof and policy numbers.

Most onerous of state verification requirements is employer and landlord information. **Oregon**, for example, requires pay stubs for two months, and **Pennsylvania** requires information for the last four jobs held. **Montana** requires pay stubs, pay envelopes, and earnings statements from employers. **Mississippi** requires applicants to provide pay stubs from five pay periods. Alabama requires caseworkers to call past employers to determine if an applicant had “good cause” for quitting a job.

Nine state applications require verification through landlord information, either by contacting the landlord, as in **North Carolina**, or by requiring the landlord to sign a statement verifying residence information.

The states requiring landlord verifications, signatures, statements or independent contacts are:

Colorado	Minnesota	North Carolina
Maryland	Montana	North Dakota
Michigan	New Mexico	Oklahoma

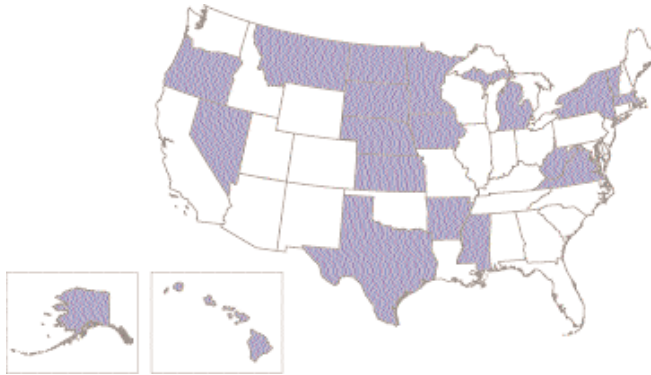
Thirteen states require bank account numbers, including **Nebraska** which requires children’s bank account information. States requiring bank account numbers for verification of resources and income are:

Connecticut	Michigan	New Jersey	West Virginia
Hawaii	Minnesota	North Carolina	
Kansas	Montana	North Dakota	
Maine	Nebraska	Virginia	

In addition to bank account numbers, landlord information, and employer details, 20 states require food stamp applicants to provide detailed directions to their homes in order for caseworker investigators to conduct home visits for verification purposes. Although federal food stamp rules allow home visits if such visits are preceded by notice to the household, some of these visits appear to be “surprise” verification visits. Food Stamp fraud investigators in **Texas** for example, often give no advance notice – beyond knocking on the door – and because these investigators may have badges of the Inspector General, similar to those of law enforcement, household members frequently allow them to enter the premises.⁵⁰ The following 20 states ask applicants to provide directions to their homes on the food stamp application.



States which request directions to the applicant's homes



“CRIMINALIZATION” STIGMA OF FOOD STAMP APPLICANTS

The issue of home visits to verify information provided by a food stamp applicant is closely related to an even more alarming and intrusive practice which a number of states have begun or indicate they will begin, the **electronic fingerprinting**, or “finger imaging” of applicants.

Fingerprinting is a relatively rare occurrence in the United States unless a person is entering the military, employed in public or private organizations with high security concerns, or comes into contact with the criminal justice system.

Nonetheless in three states, Arizona, California, and New York, food stamp recipients are routinely subjected to electronic fingerprinting in order to enroll in the food stamp program.

As of May 2000, legislation has been enacted, is pending, or has been instituted, in at least five states requiring the electronic fingerprinting of applicants.

The following states are currently fingerprinting food stamp applicants and recipients, statewide or as part of pilot programs:

- Arizona
- California
- Michigan (pilot)
- New York
- Texas (pilot)

Sixteen states are currently electronic fingerprinting food stamp, TANF, or other social service program recipients, planning to do so before the end of 2000, or are in the planning stages.⁵¹

- Arizona
- California
- Connecticut
- Delaware
- Florida
- Illinois
- Maryland
- Massachusetts
- Michigan
- Mississippi
- New Jersey
- New York
- North Carolina
- Pennsylvania
- South Carolina
- Texas

The 1996 Welfare Reform Act made drug felons and fleeing felons ineligible for food stamps. Some states have taken these federal requirements and inserted questions on the application aimed at keeping fleeing felons and drug felons from participating according to federal rules, but these questions also have the effect of creating a “criminalization” stigma in the program.

The criminalization stigma is pervasive throughout the application and application process. In one state, **Texas**, an estimated one-third of all food stamp applicants undergo a fraud investigation before their certification in the program.⁵² Table 2 lists a series of miscellaneous questions that are sometimes asked of applicants. For example, **Pennsylvania** requires applicants to declare why they are applying for benefits. Pennsylvania also requires food stamp applicants to sign an affidavit consenting to finger, photo, and imaging processing.

Nebraska requires applicants to sign an authorization for the state agency to:

"make available, upon written request, to any federal, state, or local law enforcement official the address, social security number, and photograph of any food stamp recipient if the officer furnishes the name of the individual and notifies the agency that individual is fleeing to avoid prosecution, custody, or confinement for a felony, is violating a condition of parole or probation, or has information necessary for the officer to conduct an official duty related to a felony/parole violation."

Ohio asks food stamp applicants:

"Are you or any member of your household **fleeing New Jersey** to avoid prosecution, or custody or confinement after conviction of a crime, or an attempt to commit a crime which is a high misdemeanor under the laws of New Jersey? [emphasis added]

Yes ___ No ___

If you answered yes, please list the name of the person(s): _____."

While these practices are allowable under federal rules, electronic fingerprinting, asking applicants if they are fleeing prosecution in another state, and similar requirements likely contribute to a negative stigma associated with food stamp participation.

Some intrusive state food stamp reporting and verification policies may occur without the knowledge of applicants. One example is **Tennessee's "Project Parking Lot"** in which Tennessee Department of Human Services investigators visit food stamp issuance office parking lots for at least one hour each day "...and take the license tag numbers of vehicles that appear to have a value that would exceed the food stamp resource limit."⁵³ The tags are then checked against Department of Motor Vehicles lists and food stamp household participants. The Tennessee program of "fraud reduction" was cited by USDA for its "Commitment to Excellence" in fraud reduction.⁵⁴

In **Delaware**, when caseworkers "suspect" a client or applicant is reporting inaccurate information, they may request credit reports on food stamp participants that track active and closed bank accounts, revolving credit and installment plans, credit accounts applied for, Social Security death benefits, lien and civil suit information, collection activity, "unusual charges" and names of those requesting credit information on the applicant. According to Delaware's Department of Health and Social Services "[Credit] Reports are not requested when the circumstances indicate the possibility of criminal activity because the information cannot be used as evidence or obtained for criminal investigative purposes."⁵⁵ Evidently, information that cannot be used for criminal law enforcement purposes is seemingly quite acceptable to use against low-income people in Delaware applying for hunger relief benefits.

In addition to the intrusive practices of several states, every state application includes federally mandated warnings regarding the provision of false information. However some states have taken the required warnings and efforts at fraud reduction quite far with warnings that declare that false, misleading, or incorrect information provided as part of this process may subject an applicant to civil and criminal penalties up to \$250,000 and/or imprisonment. For example, **Georgia** includes with the food stamp application a flyer with "rolling dice" that warns which practices constitute fraud, including failing to report changes in salary, income, or other changes. (See the Georgia "Food Stamp Fraud" flyer in Appendix B.)

A stigma surrounding food stamps or welfare, most often associated with feelings of shame for needing government assistance, are likely exacerbated with negative feelings associated with the intrusions in personal privacy and a feeling of criminality which states inflict through fingerprinting, surveillance, fraud warnings, and questions related to law enforcement. Such practices likely serve as barriers to participation in the food stamp program. A 1999 USDA report on food stamp participants and non-participants stated: “Eligible households associating higher levels of stigma with receiving and using food stamps were less likely to participate.”⁵⁵ Although the criminal penalty warnings in the food stamp applications, electronic fingerprinting of recipients, searching credit reports for “unusual charges,” and scrutinizing cars in parking lots have not been shown to perpetuate an image of stigma, they can reasonably be assumed to have that effect and would probably not be acceptable to most middle-class Americans applying for federal government programs or benefits.

Conclusions

Although part of the food stamp decline between 1996 and 1999 can be attributed to the strong economy, some of the decline can also be attributed to administrative burdens associated with enrollment in the program after enactment of welfare reform. A recent Urban Institute study of low-income families found that the second most cited reason for non-participation in the Food Stamp Program by low-income people who left welfare was perceived administrative problems and/or hassles in order to obtain food stamps.⁵⁷ As the 50 states and District of Columbia food stamp application review shows, nearly every state has instituted a series of red tape hurdles that have the effect of discouraging participation.

For many families that could benefit from food stamps, the hassles of multiple visits to a county welfare office, missing work, waiting for hours at an office, filling out pages and pages of questions and verifying numerous claims can simply be too much to justify a relatively small financial benefit. The red tape hassles when coupled with the stigma of welfare participation, fingerprinting of applicants, home visits, and other invasions of privacy create a chilling atmosphere for families seeking food security.

As a result, many low-income families that could benefit from this program choose not to participate in food stamps and instead turn to food banks, church pantries and soup kitchens when they need emergency food assistance. Only 40 percent of the people served by America’s Second Harvest food banks and food-rescue organizations participate in the Food Stamp Program, even though most emergency food recipients are income eligible.⁵⁸

Though much of the red tape divide separating needy people from the Food Stamp Program is a consequence of state agencies reacting to or following federal regulations or statute, states have nonetheless created many of their own red tape barriers.

The policy concerns raised by the review of state food stamp applications are serious. As the survey indicates, longer applications have no relationship to program integrity as measured in a state’s quality control error rate. Further, the costs encumbered by potential enrollees in time, money (both out-of-pocket expenses and lost wages for the employed), and dignity can be significant. The obstacles the poor and hungry face to become self-sufficient are often daunting enough for most people. Federal rules and state administration should not be creating a red tape divide for needy and hungry people.

Recommendations

A recent analysis of the value of food stamp benefits to working poor families found that the income of a family of four with a full-time minimum wage worker can be lifted almost to the poverty line, if not above, when food stamps are combined with earnings and the earned income tax credit.⁵⁹ Unfortunately, too many eligible working poor and needy families and individuals are not taking advantage of the useful benefits to which they are entitled due to some of the bureaucratic barriers identified in this report.

Fortunately, the red tape divide can be cut by state actions and policies which simplify food stamp applications, the application process, and lengthen certification periods. Immediate action at both the state and federal level can greatly reduce administrative barriers and improve program access.

The following recommendations include suggested reforms to both the applications and the application/re-certification process.

1. Shorten the food stamp application length.

The sheer length of many food stamp applications is a barrier to participation. Food stamp applications should be reduced to a length of one or two pages. In 1999, Secretary of Agriculture Dan Glickman sent a letter to the nation's Governors urging them to simplify the food stamp application forms. States should begin this process of simplification as soon as possible.

Applicants should be clearly informed on the first page of applications that the name, address, date, and signature are all that must be submitted to initiate the process. This is particularly important considering that nearly two-thirds of people applying for food stamps are applying only for that program and that those leaving TANF may remain eligible for food stamps but are often not informed of their eligibility. Most importantly, USDA should provide a model, simplified food stamp application, similar to the simplified Medicaid form designed by the Health Care Financing Administration of the Department of Health and Human Services to address similar concerns with confusing Medicaid applications and falling enrollments.

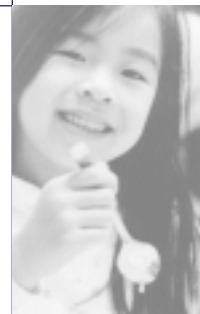
2. Streamline the application processes.

The average application process takes five hours of client time to complete and often includes multiple trips to the local welfare office. This process can and should be streamlined and made more accommodating to the needs of working poor applicants and those with small children.

Applications should be processed in one visit. Two visits to the food stamp office should be the exception, not the norm. Re-certification visits should also be limited to once annually.

The two greatest reforms in this area would be the automating the process, utilizing technology to identify what questions to ask and what information would require verification to be provided by applicants, and assisting caseworkers with caseload difficulties. Applicants should be asked to which program they are applying, and should only be required to answer eligibility, income, and resource questions required under federal law for that specific program. Similarly, verification requirements should be solely limited to the information required by federal food stamp regulations, for those applying only for food stamps. As the *Access Denied* report identified, in those instances in which additional information is requested, applicants should be informed of all the programs for which they are eligible.⁶⁰

States should require caseworkers to familiarize and assist clients with the use of EBT card technology. Further application process reforms should include: making applications available in multiple languages, not only English and Spanish, and translators must be available for non-English speakers; expand office hours to include at least some evenings and weekends; and provide mobile offices or out-stations at places where potentially eligible families frequent such as health clinics, schools, food banks, food pantries, churches, and soup kitchens.





3. Reduce caseworker loads.

The number of caseloads per caseworker should be significantly reduced, and caseworkers should receive ongoing training in program regulations and customer service. According to the American Federation of State, County, and Municipal Employees (AFSCME) Child Welfare Watch, the biggest obstacle to caseworkers doing their jobs well is high caseloads.⁶¹ In Illinois, for example, AFSCME officials state that Department of Human Services caseworkers are responsible for an average of 450 cases each, and 92 percent of caseworkers report increased caseloads and 73 percent report that at least four new duties had been added to their jobs since the advent of welfare reform.⁶²

Caseworkers cannot reasonably be expected to provide adequate service for such high caseloads and the often complex and difficult problems faced by the families they aim to serve. Caseworkers are also often asked to perform their tasks with limited or outdated technology, in addition to the crushing caseload. Too many cases are often assigned to too few caseworkers. To correct the caseload problem, welfare/food stamp caseworkers should be limited in the number of cases assigned to them by state policy or state legislation. States should also provide incentives and other management techniques that promote caseworker retention.

There is significant anecdotal information from state-based advocacy groups and in federal oversight reports of these programs, of rude or uninformed caseworkers whose behavior is a barrier to participation in the program. Food stamp applicants must be treated respectfully and told in advance what materials they will need to bring with them for verification. Reduced caseloads can eliminate barriers to access by allowing caseworkers to give each client adequate time and attention. An ethic of customer service and the recognition that welfare cases are more than numbers — they are, after all, human lives and families with children — should be the standard in welfare/food stamp offices.

Several states have instituted a number of “best practices” or similar innovations, identified in *State Government Responses to the Food Assistance Gap 2000*, a joint report of the Food Research and Action Center (FRAC) and America’s Second Harvest. Some of these innovations include:

- **New York:** The state has earmarked \$3 million in TANF start-up funds to establish a Transitional Opportunities Program (TOP) to support employed TANF recipients and assist them in the transition off of welfare. It also aims to ensure families receive all the program benefits for which they are eligible, including food stamps. Social service districts can apply for the funds and can commit to a portion of their own TANF grants to establish TOP offices.
- **Massachusetts:** The state has pilot programs to provide working families with easier access to food stamps by extending Department of Transitional Assistance office hours in the evenings and on Saturdays at some sites.
- **California:** Sacramento’s County Department of Human Assistance accepts food stamp applications weekdays from 7:00 AM to 9:00 PM. According to the Western Region Anti-Hunger Network state advocates, caseworkers are staggered on day and night shift schedules and share desk space and resources. In addition, night shift caseworkers received compensatory pay increases for their later work hours.
- **Vermont:** The state posts caseworkers at community sites outside of district welfare offices, at or near other state government sites where low-income people can access a variety of programs.

4. Federal Initiatives

Many of the state practices identified in this report are state reactions to extremely complex federal program rules and the statutorily mandated quality control system. The fiscal year 2002 Food Stamp Program federal reauthorization provides policy makers an excellent opportunity to simplify, strengthen and expand this vital nutrition program.

The USDA is currently in the process of rewriting a number of federal regulations pertaining to the Food Stamp Program so that the regulations will conform with the program changes mandated in the 1996 welfare reform law. The USDA should use its authority to simplify Food Stamp Program rules to encourage those who are eligible for nutrition assistance to apply for the program.

In addition, a number of proposals have been introduced by Members of Congress concerned about the gap between the number of children living in poverty and the number of children receiving food stamp assistance (see Appendix D). Policy makers will also have an excellent opportunity to simplify, strengthen and expand the Food Stamp Program when this vital nutrition program is reauthorized by the Congress in FY 2002.

States, however, should not wait for reauthorization to make the changes necessary to cut the red tape that divides poor and hungry people from the food stamp benefits they desperately need and are entitled to under the law. Rather than increasing the burdens of hunger and poverty, the application process should quickly and efficiently connect people with food stamp benefits, thereby providing nutrition assistance and a chance to succeed as families transition from welfare to work.

Table 1 State-by-State Review of Pages and Question Data

	Application Page Length	Error Rate FY 1999	Reading Level of Certification Statement (Flesch-Kincaid Grade Level)	Are Any FSP Questions Separated From Other Services?	Extraneous Income Questions					
					Income Not in the Form of \$	Vendor Payment	Children's Income	Gifts or \$ From Friends, Charities and Relatives	Loans	Lump Sum Payments, Tax Refunds, EITC
AK	6 ^x	15.94	12	Yes						
AL	19	11.29	12	N/A			•			
AR	8 [*]	4.54	12	N/A				•		
AZ	14	6.93	12	Yes				•		
CA	21	11.34	11	Yes	•	•	•	•	•	•
CO	20 [*]	9.02	11	Yes	•				•	•
CT	16	13.9	12	Yes	•			•		
DC	15 ^x	12.12	12	No		•		•	•	•
DE	12 [*]	16.92	12	Yes				•	•	
FL	1	9.43	12	No				•		
GA	5	10.86	9	Yes						
HI	11	6.82	12	Yes				•		•
IA	10 [*]	9.27	12	N/A				•		
ID	4 ^x	10.94	12	No			•			
IL	5	14.79	9	Yes						
IN	2	8.11	10	No						
KS	10 ^x	8.98	12	Yes			•	•		
KY	17 ^x	7.72	12	Yes				•		•
LA	6 [*]	7.35	9	Yes				•	•	•
MA	8 ^x	9.34	12	N/A				•		
MD	23 [*]	13.62	12	Yes				•	•	•
ME	6 ^x	8.79	12	Yes						
MI	16	17.59	12	Yes						
MN	36 [*]	6.68	12	No	•			•		•
MO	4	8.58	12	No						
MS	21	4.91	12	Yes				•		•
MT	17 [*]	8.1	12	No	•			•	•	•
NC	15 ^x	9.25	5	N/A		•			•	
ND	24 [*]	8.03	12	Yes				•		
NE	14 [*]	14.22	12	N/A				•		
NH	10	12.86	12	Yes			•			•
NJ	16	12.93	12	Yes			•	•	•	•
NM	6	10.39	12	Yes						
NV	8	8.14	12	No	•			•	•	•
NY	8	10.47	12	Yes				•	•	•
OH	8	8.44	12	No						
OK	20	11.88	12	Yes			•	•		
OR	10 ^x	10.5	9	No				•	•	•
PA	16	10.79	12	Yes						
RI	28	7.05	12	Yes	•			•	•	•
SC	5	5.79	12	No						
SD	20 [*]	2.19	12	Yes				•		
TN	2	8.64	11	No						
TX	4 ^x	4.56	12	No				•		
UT	12 [*]	12.55	9	Yes			•	•	•	•
VA	14 [*]	11.85	12	Yes	•	•		•	•	
VT	11 ^x	12.09	12	Yes						•
WA	6 [*]	8.55	12	No					•	•
WI	19 [*]	13.42	12	Yes				•		
WV	33 ^x	8.88	12	No			•	•		•
WY	3 ^x	2.91	12	No						

*State has a "tear off" or page 1/part 1 of the application that can be turned in before the complete application to open the case.

^xState does NOT list on the application that all that is needed to open the case file is the name, address, and signature.

Extraneous Asset Questions								Electronic Fingerprinting			
Gov't Utility Assistance	Misc. Income Questions	House or Land	Personal Belongings	Burial Plots	Trust Funds	Life Insurance, Pensions	Tools, Equipment, Livestock, or Buildings Used for Income	Jointly Owned Property	In Use for FSP	Pilot Program for FSP	Planning Stages or in Use for Other Programs
		•									
•	• A,B			•	•		•	•			
•				•	•						
	• C,D	•				•		•	•		
			•	•	•	•	•		•		
•		•	•		•	•					•
		•	•	•	•	•	•				•
				•	•	•					
•	• E,H	•	•	•		•					
						•					•
		•		•	•	•	•	•			
•		•	•	•	•						•
•		•	•	•	•	•	•	•			•
	• F			•	•	•	•	•		•	
	• F	•		•	•	•	•	•			
•	• G			•		•	•	•			•
•		•		•	•	•	•	•			•
•		•		•	•	•	•	•			•
	• H			•	•	•	•	•			
	• F		•	•	•	•	•	•			•
	• H,I	•		•	•	•	•				
	• J	•		•	•	•			•		
		•			•	•	•	•			
	• A			•	•		•	•			•
	• F	•	•	•	•	•		•			•
•	• K,L	•		•	•	•	•	•			
		•				•				•	
	• G			•	•	•	•	•			
	• F	•		•	•		•				
	• K	•		•	•	•	•	•			
•		•	•	•	•	•	•				
		•		•	•	•					

^AWork Study ^BJury Duty payments ^C Excess Child Support ^D Food from Communal Dining ^EGarage Sales ^FGambling winning ^GPell Grants
^HIncome from Plasma Donation ^IPanhandling ^JIncome of a stepparent of a child who lives with you ^KBingo ^LGI Educational Benefits
A statistical analysis of this data shows that there is no correlation between the length of the application and the state's error rate.⁶³

Table 2 Miscellaneous, Nonessential Food Stamp Application Questions

State	Question
Arizona	How have you been supporting yourself and others living with you?
California	Does anyone get food from any of the following programs: <ul style="list-style-type: none"> • Communal dining facility for the elderly or disabled, • food distribution program operated by a Native American reservation, • other Food program Verification required for the following expenses for school: tuition, books, equipment, round trip per day to school/child care, days attending school, transportation used, cost per week, amount paid by car pool members, public transportation cost.
Georgia	Do you live in public housing?
Illinois	What do you feel would help you become more self-sufficient or independent? Do you know of any community organizations that might help you with your situation?"
Kentucky	Does anyone eat in a communal dining facility? Does anyone receive meals on wheels or use a food delivery service?
Minnesota	Does each person listed have a parent in the home? Does each person have a brother or sister in the home? When did each person most recently move to Minnesota? Does each person intend to make Minnesota his/her home?
Montana	If you have lived in Montana 12 months or less, list the state you came from: Please check <u>one</u> reason why you moved to Montana: Work, Like Montana, Relatives, Other.
Nebraska	Must sign to authorize the DHHS to "make available, upon written request, to any federal, state, or local law enforcement official the address, social security number, and photograph of any food stamp recipient if the officer furnishes the name of the individual and notifies the agency that the individual is fleeing to avoid prosecution, custody, or confinement for a felony, is violating a condition of parole or probation, or has information necessary for the officer to conduct an official duty related to a felony/parole violation."
Nevada	Applicants 60 years old or more waive their right to confidential identity.
Pennsylvania	State why you are applying (separate question from the check-off for which services). Affidavit requires consent to cooperation in the finger, photo, and signature imaging process.
Rhode Island	Did you recently move to Rhode Island? If yes, what was your reason for moving here?
South Carolina	Please explain why you are applying for assistance
South Dakota	Does anyone who lives with you receive commodities?
Utah	If you do not have time to fill out all of the form today, complete questions #1-#6, sign the form and turn it in TODAY. This will make sure your benefits start from today if you are eligible. (Questions 1-6, however, are not required to start the food stamp application process, only name, address, and signature).
Washington	We have lived in Washington since ____ (date). We intend to live in Washington

Appendix A. Vehicle Asset Deduction Examples

The following are some of types of cars that represent the newest model in each category that can be owned by a family or individual in order to be eligible to receive food stamps:


- Buick**
- Century, 1993
- Reatta, 1988
- Regal 1992

- Chevrolet**
- Monte Carlo, 1988

- Ford**
- Taurus, 1993
- Probe, 1994

Appendix B. Georgia Food Stamp Fraud Notice

**Food Stamp Fraud:
Don't Take A
CHANGE!**



**Play by the rules ...
report household changes.**

When it comes to protecting your food stamps, why roll the dice? You are required by law to report all changes in your household that might change your eligibility for food stamps.

Not sure exactly what changes to report? Please follow these simple directions.

You must immediately report changes in:

- Salary or wages
- Your address
- Number of people living in your household (even if temporary)
- Other money you receive, such as child support, disability, alimony, gifts
- Household resources valued at more than \$2,000, or \$3,000 for household member over age 60 (vehicles, lump sum insurance payment, inheritance)

If you don't report these changes, you are committing FRAUD.

➡ **Go** to your phone and call your county DFCS caseworker. You may write or visit to report these important changes, or to ask questions.

Remember: It's Your Responsibility. Play It Safe.

Georgia Department of Human Resources • Division of Family and Children Services

Appendix C. California County Office Food Stamp Instructions

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**WHAT TO EXPECT
WHEN YOU COME IN
FOR YOUR INTAKE APPOINTMENT AT
RESEARCH DRIVE**

**At 7:31 AM, YOU ARE LATE FOR THIS APPOINTMENT AND YOU WILL BE
RESCHEDULED FOR ANOTHER DAY. RESCHEDULE YOUR APPOINTMENT AT
WINDOW 7 OR CALL 648-0923.**

At 7:25 AM report to Window 8 to check in. At 7:30 AM an orientation will begin that reviews your rights and responsibilities. During the orientation your case will be assigned to an intake worker.

Your intake worker may see 4 or more applicants each day. Please be patient as a worker will see you as soon as possible.

We use this process so we can see as many people as possible each day. There may be a wait depending on the number of people applying. Please be prepared to spend **several hours (noon or longer)** completing the intake process.

Please have your forms completed.

If you do not have all your required verification, and are otherwise eligible, there may be a delay in granting your case.

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Thank You

Appendix D. The Food Stamp Outreach and Research for Kids - FORK- Act (S. 1800/H.R. 3738)

- Requires USDA's Food and Nutrition Service (FNS) to conduct **annual on-site inspections of local food stamp offices in each state** and authorizes appropriations for such purpose.
- Authorizes a demonstration project for **developing caseworker training materials and guidebooks to help states provide clearer information about food stamps to Temporary Assistance for Needy Families (TANF) recipients.**
- Authorizes USDA, in consultation with HHS, to administer a competitive grant program to develop innovative **local strategies for improving food stamp access and educating working families and families with children about eligibility.** Grantees would be community- based organizations as well as state and local governments.
- Authorizes USDA demonstrations to evaluate the feasibility and desirability of **allowing eligible households to participate in the Food Stamp Program through Internet and telephone use.**
- Directs the Comptroller General to conduct a study of state outreach efforts, including **extended food stamp/welfare office hours for working families.**
- Expands USDA/FNS' toll-free Food Stamp information line to include all USDA nutrition programs and authorizes funds for live operators, translation services, and other improvements.
- **Requires state TANF programs to provide clear information about food stamp eligibility to people being diverted from TANF and people exiting the TANF Program.** Directs HHS to develop a model application and one-page notices for possible state use.
- Authorizes a tax credit for businesses designated as USDA's "information partners" for contributing substantial goods or services to help expand the toll-free hotline.
- Authorizes appropriations for FNS to conduct studies to measure Food Stamp Program impacts and integrity.

Endnotes & Sources

- ¹ The average wage for former welfare recipients is \$6.50 to \$7.00 per hour, and two-thirds of those leaving welfare for work have earnings below the poverty level — Ron Haskins and Wendell Primus, “Point-Counter Point Perspectives on Welfare Reform and Children,” *Poverty Research News* 4, no.4 (July-August 2000).
- ² California Food Stamp Application cover memo, April 1998. See Appendix C for a copy of this document.
- ³ Department of Agriculture, Food and Nutrition Service, The Food Stamp Application Process: Office Operations and Client Experiences (Washington, DC: U.S. Department of Agriculture, Food and Nutrition Service, 1992). This report, conducted for USDA by Abt Associates, examined the food stamp application process in five counties in two states in 1990. The report provides an excellent primer on the food stamp application process. However, since the report was issued, there have been significant federal and state changes to the program.
- ⁴ Only 17 states have filed food stamp outreach plans with USDA in fiscal year 2000 — Food Research and Action Center and America’s Second Harvest, State Government Responses to the Food Assistance Gap 2000: Annual State-by-State Review, Advance Release, (July 15, 2000).
- ⁵ Department of Agriculture, Food and Nutrition Service, About FSP – Introduction, (Washington, DC: U.S. Department of Agriculture, <http://www.fns.usda.gov>, September 1999).
- ⁶ Surveys cited include: Department of Agriculture, Food and Nutrition Service Office of Analysis, Nutrition, and Evaluation, Customer Service in the Food Stamp Program, by Michael Ponza, James C. Ohls, Lorenzo Moreno, Amy Zambrowski, and Rhoda Cohen, (Washington, DC: U.S. Department of Agriculture, Food and Nutrition Service Office of Analysis, Nutrition, and Evaluation, July 1999); Department of Agriculture, Economic Research Service, The Decline in Food Stamp Program Participation in the 1990s, by Parke Wilde, Peggy Cook, Craig Gundersen, Mark Nord, and Laura Tiehen, (Washington, DC: U.S. Department of Agriculture, Economic Research Service, June 2000); Lissa Bell and Carson Strega-Flora, Access Denied, (Northwest Federation of Community Organizations/National Campaign for Jobs, May 2000); and Sheila R. Zedlewski and Sarah Brauner, Are Steep Declines in Food Stamp Participation Linked to Falling Welfare Caseloads, (Washington, DC: The Urban Institute, November 1999).
- ⁷ U.S. Department of Agriculture, The Food Stamp Applications Process.
- ⁸ Department of Commerce, Bureau of the Census, Current Population Survey (Washington, DC: U.S. Department of Commerce, 1996-1998).
- ⁹ Department of Agriculture, Food and Nutrition Service Office of Analysis, Nutrition, and Evaluation, Household Food Security in the United States 1995-1998, by Gary Bickel, Steven Carlson, and Mark Nord, (Washington, D.C: U.S. Department of Agriculture, Food and Nutrition Service Office of Analysis, Nutrition, and Education, 1999).; and America’s Second Harvest, Hunger 1997: The Faces & Facts, (Chicago: 1998).
- ¹⁰ U.S. Department of Agriculture, About FSP – Introduction.
- ¹¹ U.S. Conference of Mayors, A Status Report on Hunger and Homelessness in America’s Cities, (December 1999).
- ¹² General Accounting Office, Resources, Community, and Economic Development Division, Food Stamp Program: Various Factors Have Led to Declining Participation, GAO/RCED 99-185 (Washington, DC: U.S. Government General Accounting Office, July 1999).
- ¹³ America’s Second Harvest, Hunger 1997: The Faces & Facts.
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- ¹⁹ Department of Agriculture, Food and Nutrition Service Office of Analysis, Nutrition, and Evaluation, Customer Service in the Food Stamp Program, by Michael Ponza, James C. Ohls, Lorenzo Moreno, Amy Zambrowski, and Rhoda Cohen, (Washington, DC: U.S. Department of Agriculture, Food and Nutrition Service Office of Analysis, Nutrition, and Evaluation, July 1999).
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- ³³ Food Stamp Act of 1977, as amended through P.L. 105-394 (November 13, 1998).
- ³⁴ Regression analysis R-squared value .000602; adjusted R-squared value of -0.019794.
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- ³⁸ Ibid.
- ³⁹ America's Second Harvest, Hunger 1997: The Faces & Facts.
- ⁴⁰ Northwest Federation of Community Organizations/National Campaign for Jobs, Access Denied.
- ⁴¹ U.S. Department of Agriculture, Customer Service in the Food Stamp Program.
- ⁴² Ibid.
- ⁴³ Ibid.
- ⁴⁴ California Food Stamp Application cover memo. Please see Appendix C.
- ⁴⁵ Northwest Federation of Community Organizations/National Campaign for Jobs, Access Denied.
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- ⁴⁹ Northwest Federation of Community Organizations/National Campaign for Jobs, Access Denied.
- ⁵⁰ Comments made by an unidentified Food Stamp Office Supervisor from Region 10 (El Paso, Texas) during the "Payment Accuracy: Effectively Handling Earned Income Cases" workshop at the 1999 American Association of Food Stamp Directors National Conference (Salt Lake City, Utah: 4 October 1999).
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About America's Second Harvest



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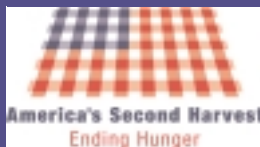
America's Second Harvest is the largest private hunger-relief organization in the United States. Our mission is to feed hungry people by soliciting and distributing food and grocery products through a nationwide network of certified affiliate food banks and food-rescue programs and to educate the public about the nature and solution to the problem of hunger in America. The America's Second Harvest network of nearly 200 regional food banks and food rescue programs serves all 50 states, the District of Columbia and Puerto Rico by distributing food and grocery products to approximately 50,000 local charitable hunger-relief agencies, including food pantries, soup kitchens, homeless and emergency shelters, faith-based organizations, Kids Cafes, and other community organizations that provide food assistance to the needy. Last year, America's Second Harvest distributed more one billion pounds of food and grocery products, providing hunger relief and food assistance to more than 26 million low-income Americans, including eight million children and four million seniors.

In 1999, the *Chronicle of Philanthropy* calculated an efficiency rating for America's Second Harvest of 99.3% — the highest among the nation's charities. 99.3% of all product and money donations received by America's Second Harvest goes directly toward feeding needy and hungry people.

To learn more about America's Second Harvest:

- network of food banks and food rescue organizations
- hunger relief programs
- the needy individuals we serve
- public policy advocacy or research efforts

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