

A BETTER RECIPE FOR NEW YORK CITY:

Less Red Tape, More Food on the Table

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A Better Recipe for New York City: *Less Red Tape, More Food on the Table*

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Foreword by New York State Senator Liz Krueger, District 26

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The Homelessness Outreach and Prevention Project of the Urban Justice Center

The mission of the Homelessness Outreach and Prevention Project of the Urban Justice Center (HOPP) is to strengthen the social safety net for low and no income New Yorkers. Since its inception in 1984 as Legal Action Center for the Homeless, HOPP has provided a unique outreach model for public benefits advocacy services. Rather than requiring clients to come to us, we go to them, with daily walk-in legal clinics in soup kitchens and food pantries around New York City. Since 2002, HOPP has implemented a multi-pronged approach in which direct service, support of social service providers, class action litigation, policy advocacy, research, and technical assistance to organizing groups are combined to significantly improve program access not only for our clients but for all low income New Yorkers.

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And while we thank everyone above for their contributions, any errors in the report are ours alone.

The Authors

FOREWORD



For over 20 years, until I was elected to office, my career focused on creating and running direct service and advocacy programs striving to address the dual crises of hunger and homelessness in New York City, with a targeted emphasis on improving and expanding participation in the Federal Food Stamp Program.

I was delighted to be asked by the Urban Justice Center to review this important report and provide a little analysis from my perspective. The following report is exhaustive and accurate. It looks at a serious problem, evaluates the cause of the problem and recommends reasonable and feasible solutions to the problem of under-utilization of Food Stamps. Below, I will quickly summarize my reaction to their findings, based on my 20 years of asking and trying to answer these same questions.

Fact 1: Today, in NYC, 25% of the population (primarily women and children, the elderly and disabled, and households with low wages) do not have access to enough nutritious food. According to a 2004 report by the Food Bank for New York City, at least 2 million New Yorkers are at risk of going hungry. The city's emergency food programs – approximately 1,300 soup kitchens and food pantries – are providing food to half of these people. The government's own statistics confirm that despite an improving economy, the ability of these New Yorkers to purchase adequate food has not improved during the last few years.

Fact 2: While 2 million New York City residents regularly face the risk of hunger, there is no food shortage in our Country, State or City. In fact, food is readily accessible in food stores throughout the 5 boroughs.

Fact 3: The Federal Food Stamp Program is the most effective anti-hunger program ever created by government and is directly targeted to reach people who have the most difficulty affording an adequate diet. Food Stamp benefits are provided in the form of an electronic benefit card that can be used in nearly every location that sells food for home preparation (supermarkets, small food stores, farmers markets, etc). This debit card can only be used for the purchase of food.

Fact 4: Increasing Food Stamp participation is an economic development win for our local economy. Food Stamp benefits are 100% paid for with federal dollars. Hence, every \$1 in Food Stamps spent in the City of New York is a win-win. Low-income New Yorkers get to purchase desperately needed food, the health costs associated with hunger are decreased, local businesses sell more products and hire more people to work in local businesses, more sales and employees equals more tax revenues. USDA's Economic Research Service (ERS) estimates that \$5 of food stamps generates almost \$10 in total economic activity.

Fact 5: As of January 2005, approximately 1.1 million NYC residents were receiving Food Stamps, with an estimated 760,000 more New Yorkers eligible but not participating. Because of Food Stamps, both these 1.1 million people and the City as a whole benefit enormously, but New York City could benefit even more.

- On average, NYC Food Stamp participant's receive \$112 per month in Food Stamps, thus participating low-income New Yorkers are receiving an estimated \$1.5 billion per year in Federal Food Stamps that are immediately spent buying food in local food stores.
- 760,000 more Food Stamp eligible New Yorkers, at daily risk of hunger, are not receiving Food Stamps. Even projecting a lower average Food Stamp benefit for these individuals (1/3 less or \$75 per month), these New Yorkers and the New York City economy are still missing out on more than \$650 million per year in Federal Food Stamps

This report does a superb job of drawing on both hard data and the real life experiences of applicants to explain why we are failing to ensure that nearly 800,000 poor New Yorkers are not drawing down more than \$650 million per year in money for food that is a win-win scenario for the New York City government and the people of our City. Policymakers, legislators, the press, and all concerned New Yorkers should read this report, digest its recommendations and then make our government take the actions needed to assist these people to participate in the Food Stamp program.

Liz Krueger

New York State Senator, 26th District in Manhattan

EXECUTIVE SUMMARY



The Human Resources Administration SSI-only Food Stamps unit helped Ms. Ramsey: “I didn’t have to go to the welfare office at all, because I’m on SSI, so they mailed me the application. The whole process took under a month.... Now I’m receiving \$149 [in Food Stamps] every month.”

Unfortunately, not everyone has access to this simplified process. In order to apply for Food Stamps, Ms. Sellers gathered her pay stubs, the lease, Con Edison bill, and other documentation, took 2 days off from work, and spent more than 6 hours at the Food Stamps office. For Ms. Sellers, \$259 per month from the federally funded Food Stamp Program was the equivalent of a 28% raise. She told us, “Before, I would skip meals... Now with the Food Stamps I’m able to get the healthy stuff I need to feed my baby.”

And not everyone is able to take 2 days off from work. Ms. Martinez works 6 days per week in a music store to lift herself and her teenaged son just barely above the federal poverty line. She sometimes cannot afford to eat for an entire day, so \$55 per month in Food Stamp benefits could make a big difference for her family. Still, although she knew that she was eligible, Ms. Martinez had not enrolled: “It’s not that I decided not to apply, it’s that I didn’t have the time. My work didn’t allow it.”

Ms. Martinez is not alone. There are approximately 760,000 people in New York City who appear to be eligible for Food Stamps, but are not enrolled. This means that each year, hundreds of thousands of low income New Yorkers miss out on nutrition assistance available to them, and the City loses out on hundreds of millions of dollars in federal aid.

Many studies have documented the importance of outreach to link people to the Food Stamp Program. Clients do not apply if they do not know that they could be eligible. This report asks: First, is outreach enough? Do clients generally enroll once they believe that they are eligible? Second, how can we build on successful innovation to further improve Food Stamps participation?

We draw on the experience of clients in two Food Stamps outreach programs in New York City – the Food Card Access Project (FCAP) and Food Force. Our quantitative analysis draws on records from 1,482 clients who were pre-screened as eligible for Food Stamps, combined with official enrollment records 4 to 5 months after the pre-screening. Qualitative analyses draw on interviews with 144 clients, selected at random from those who had no confirmed application status 1 to 2 months after their pre-screening. This group included Ms. Ramsey, Ms. Sellers, and Ms. Martinez. We describe clients’ choices, difficulties they encountered trying to enroll, and which clients are least likely to make it through the process. Finally, we describe innovative steps that New York City and New York State have taken to improve Food Stamps access, and recommend expanding these improvements in order to put more food on the table for low income New Yorkers and more federal dollars in the local economy.

- **Most clients who were pre-screened as eligible did not enroll.**

New York City Human Resources Administration (HRA) records confirm that the vast majority (78%) of clients who had an application on record enrolled, suggesting that pre-screenings are generally accurate. Only 12% of clients in the study officially applied and were rejected. Still, only 42% of clients in the study ultimately enrolled.

The remaining 46% had no application on record. Many clients described formidable administrative hurdles in the application process. As Ms. Sellers’ experience demonstrates, a great deal of paperwork is required by the federal government. Despite innovative efforts to improve Food Stamps access in New York, all too often, clients were discouraged by reputations of or direct experience with long lines and waiting times in Food Stamps offices, lost paperwork, and unfriendly bureaucratic systems for checking and double checking eligibility.

- **Many clients' life circumstances made the process particularly difficult.**

For example, working people were significantly less likely to enroll. Consistent with other studies, our quantitative data show that only 37% of households with earned income enrolled compared with 45% of unemployed clients. Working people were significantly less likely to enroll, even after taking benefit levels, English language ability, household poverty status, and other factors into account.

Enrollment numbers cannot tell us about other conditions, such as health problems or childcare responsibilities, that could also make required office visits a barrier to Food Stamps access. Clients like Ms. Martinez told us about an array of life circumstances that make visiting the Food Stamps office difficult.

- **Everyone eligible for Food Stamps is in financial need, and Food Stamps can provide a 20% increase in household income.**

Among FCAP and Food Force clients who were eligible but did not enroll: 3 out of 4 were living below the federal poverty line and 42% of those who had income spent more than half of it on rent alone. On average, Food Stamps could have given those who had income a 20% raise. And many, like Ms. Martinez, described unnecessary struggles securing enough nutritious food to eat.

- **Many jurisdictions are working to make the application process easier.**

Many districts around the nation are working to better meet clients' needs: expanding office hours, reducing waiting times for office visits, and waiving face-to-face interviews in favor of interviews over the phone. For example, in response to very low Food Stamps participation particularly among the working poor, Massachusetts began to regularly accept Food Stamps applications by fax and mail. The Massachusetts application asks clients when it would be convenient for the office to contact them, and staff are instructed to conduct application interviews by phone whenever possible.

- **New York has a strong foundation for improving Food Stamps access.**

For years, advocates and government officials in New York City have been working to improve Food Stamps participation. Section 6 describes an array of program enhancements implemented in New York City since 2000.

FCAP pre-screeners work with HRA to schedule appointments for clients in their target neighborhoods. Nearly a quarter of the clients in this study received this service. Fifty-eight percent of FCAP clients with an appointment scheduled enrolled, compared with only 49% of clients receiving other enhanced services, and 34% of the rest. These programs were designed to serve clients, not to evaluate the effect of appointment scheduling. Still, coordinating the application process around clients' schedules, rather than expecting clients to wait during business hours, appears to help.

HRA has also created specialized units, the Homebound and SSI only units, to process applications entirely without office visits for clients with severe health problems or disabilities. Once clients make it to the Homebound or SSI-Only unit, they appear to have very positive experiences, but advocates have raised concerns about referral rates. Two disabled clients we interviewed reported very positive experiences in those units, but two others were never referred. Waiving required office visits in favor of accepting paperwork by mail and fax and conducting interviews by phone is another important way to ease the application process.

- **New York City should build on these innovations to improve Food Stamps access citywide.**

The Brookings Institution estimates that New York City loses half a billion dollars in federal Food Stamps benefits each year. And approximately 760,000 people in New York City are struggling to get by, when those federal dollars are available to buy food for them. The City and the State can and must do better.

- **Make the policy, infrastructure, and programmatic changes necessary to substantially improve access to Food Stamps.**

A long-term vision for improving in-person applications includes: substantially expanded office hours; reduced waiting times and required office visits; and improved office conditions and customer service in every office. In the short term, we recommend that HRA, with the support of state and federal agencies:

- ✓ Bring the current “expanded” hours (until 6pm week nights and Saturdays 9am-5pm) to all centers, not just a few and open at least one office in each borough from 9am to 9pm, seven days per week.
- ✓ Ensure that all hours at all centers are fully staffed to accept applications and conduct client interviews.
- ✓ Reduce average wait times at each center by 50%.

A long-term vision for expanding alternate application procedures includes processing applications without office visits for every applicant who believes this service would be beneficial. In the short term, we recommend that HRA, with the support of state and federal agencies:

- ✓ Put in place a policy that fully implements federal regulations by directing center staff to allow applicants to complete the enrollment process without visiting a center when necessary.
- ✓ Demonstrate increased enrollments without office visits.

Because these recommendations involve changes that may not be possible without the collaboration of parties outside of HRA, and because they arise from a unique collaboration between the government and non-profit sectors, we also recommend that HRA:

- ✓ Convene a working group charged with implementing these recommendations and identifying additional steps for improving Food Stamps participation.

All New Yorkers who are eligible for Food Stamps must know that they are eligible, know how to apply, and know that they can receive this benefit without significant inconvenience or hassle. Until that is the case, and certainly while the recommendations above are being implemented, the commitment of all sectors to continued outreach and application assistance will be crucial.

1. INTRODUCTION



Hundreds of thousands of City residents are eligible for free food but not taking it. The sheer magnitude of that number suggests that the Food Stamps system makes an otherwise helpful benefit unappealing to New Yorkers in need. Federal regulations impose strict documentation requirements and make Food Stamp benefit levels very low. Beyond that, New York City's Food Stamps system often requires persistence and a willingness to sit for hours in a Food Stamps office. This report argues that New York City must remove these unnecessary barriers so that all eligible New Yorkers have real access to this vital support.

To enroll, Ms. Sellers, a single mother from Harlem, made two trips to the Food Stamps office.¹ Although she had left welfare when she found a job several months earlier, her earnings left her family below the federal poverty line. In her first trip, she took the day off from work, gathered her pay stubs, the lease, Con Edison bill, birth certificate, social security card, and immunization records for her son, and spent about 6 hours at the office. Five of those hours were spent waiting. In a second visit, she brought in additional documents to complete her application. For Ms. Sellers, \$259 per month from the federally funded Food Stamp Program was the equivalent of a 28% raise. She told us, "I'm pregnant now, so the Food Stamps that I get help me buy the food that's necessary to have a good pregnancy... Before I would skip meals... Now with the Food Stamps, I'm able to get the healthy stuff I need to feed my baby."

"Before I would skip meals... Now with the Food Stamps, I'm able to get the healthy stuff I need to feed my baby." – Ms. Sellers

But not everyone is able to take 2 days off from work to apply for Food Stamps. Ms. Martinez, from Corona, Queens, works 6 days per week in a music store to lift herself and her teenaged son just barely above the federal poverty line. When we asked about her ability to afford food, she said, "Well, in reality what I earn isn't sufficient. I am a single mother. With what I earn, I pay the rent, I pay the telephone bill. After this, all I get is \$30-40 [for the month] and this doesn't go anywhere. Food is very expensive." Ms. Martinez sometimes cannot afford to eat for an entire day, so \$55 per month in Food Stamp benefits could make a big difference for her family. Even though she knew that she was eligible, Ms. Martinez had not enrolled. She said, "It's not that I decided not to apply, it's that I didn't have the time. My work didn't allow it."

**"It's not that I decided not to apply, it's that I didn't have the time. My work didn't allow it."
– Ms. Martinez**

Ms. Martinez is not alone. There may be as many as 760,000 people in New York City who are eligible to receive Food Stamps, but are not enrolled in the program. (See Appendix A.) Many face food insecurity or hunger and have few supports. In 2004, the City's emergency food providers were forced to turn away an estimated 67,700 New Yorkers.² The United States Department of Agriculture (USDA) estimates that 9.6% of New York State residents experience food insecurity and an additional 3.1% are going hungry.³ Participation in the Food Stamp Program allows vulnerable New Yorkers to spend money on food, in addition to other necessities like rent and utilities.⁴ And, their spending infuses the local economy with federal dollars for economic improvement.⁵

New York City can make the application process significantly easier, without jeopardizing the integrity of the program. Since participation in the Food Stamp Program hit a low in 2002, New York City has implemented innovative changes on a small scale. For example, 4 of the 21 neighborhood Food Stamp offices are open on Saturdays.⁶ New York City's Human Resources Administration (HRA) Homebound and SSI-only Units process Food Stamps applications without requiring any office visits at all for a limited group of clients who meet special criteria and get the appropriate referrals. Massachusetts has brought this innovation to scale, asking all clients on the application for a convenient time to contact them and encouraging case-workers to do phone rather than in-person interviews whenever possible. This report argues for building on existing innovations to put food on the table for low income New Yorkers and federal dollars in the City's economy.

Changes in Food Stamps Participation Over Time

The last 10 years have seen substantial social and economic policy changes in New York City and across the United States. Total participation in the Food Stamp Program fell dramatically in the late 1990s, by nearly 50% in New York City. In January 1995 at its peak, 1.5 million people participated in the Food Stamp Program bringing a total of \$115 million of federal aid to the City.⁷ Participation fell to 0.8 million in January 2002 because of a combination of factors: welfare reform emphasizing reduced caseloads, a strong economy temporarily reducing the need for Food Stamps, and severe restrictions on Food Stamps eligibility for documented immigrants.⁸

Since 2001, we have seen a faltering economy, new programs designed to encourage participation in the Food Stamp Program, and restored eligibility for many documented immigrants.⁹ In January 2005, 1.1 million people were participating, an increase of about 300,000 people in 3 years.¹⁰ However, there are still approximately 760,000 low income New Yorkers eligible for Food Stamps, but not participating in the program. The Brookings Institution estimates that New York City is losing half a billion dollars in Food Stamps each year.¹¹

Food Stamps Outreach

Outreach is one important strategy for increasing participation in the Food Stamp Program. Several local and national studies have indicated that sharing individually tailored eligibility information about Food Stamps raises participation rates. Both national and local New York City studies have identified a need for public education – many people who are eligible, but do not participate, simply do not know that they are eligible.¹² Other studies have focused on outcomes, using a variety of methods and finding that outreach programs increase participation.¹³

Studying Client Outcomes from Outreach Programs

This report draws on the experience of clients in two outreach programs in New York City – Food Force and the Food Card Access Project (FCAP).^{14,15} These projects send staff out into the community to conduct outreach and detailed interviews called “pre-screenings” in schools, hospitals, grocery stores, soup kitchens, and other sites to let potentially eligible clients know how much they could be receiving each month in Food Stamps. Food Force offers pre-screenings in five languages in the community and through a hotline. They also run a multilingual media campaign in low income neighborhoods. FCAP is a collaborative project modeled on Food Force with outreach, pre-screenings, and application facilitation provided by community based organizations in five target neighborhoods and training, management, advocacy, and research provided by citywide partners. Between July 2003 and July 2005, FCAP and Food Force pre-screened almost 40,000 low income New Yorkers and their families as eligible for Food Stamps and approximately 16,000 (40%) enrolled.¹⁶

FCAP and Food Force are two leading Food Stamps outreach programs. FCAP in particular provides resource intensive follow-up services, which help many clients enroll. Still, many clients who know that they are eligible do not enroll suggesting that outreach, while very important, is not enough. We need to look more closely at what happens after the pre-screening.

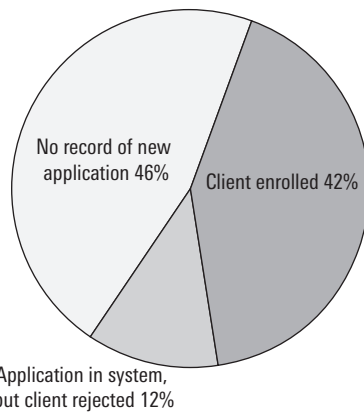
To do that, we have combined records from 1,482 clients pre-screened as eligible, with Food Stamps enrollment records from HRA 4 to 5 months after the pre-screening, and interviews with 144 clients, selected at random from those who had no confirmed application status 1 to 2 months after their pre-screening. This group included Ms. Martinez and Ms. Sellers. (For more on the study design, see Appendix B.) We describe clients’ choices once they knew that they were eligible for Food Stamps, difficulties they encountered in trying to enroll, and which clients are least likely to make it through the process. Finally, we describe government and non-profit efforts to make the enrollment process easier and recommend steps New York City can take to improve program access.

2. MOST CLIENTS PRE-SCREENED AS ELIGIBLE DID NOT ENROLL



Federal regulations require the state to encourage clients to apply if they contact the agency.¹⁷ HRA policy states that clients may submit their application by mail, fax, or at a Food Stamps office.¹⁸ In order to complete the process, clients usually have to attend an interview at a Food Stamps office and get finger imaged.¹⁹ Sometimes this happens on the day that clients submit their applications, and sometimes they are asked to return at a later date. Clients must also collect the documents needed to verify their eligibility. Pre-screeners provide FCAP and Food Force clients with information on documentation requirements, and HRA staff are required to assist all clients in collecting the necessary documents.²⁰ Finally, HRA staff process the application, and clients are either rejected or enrolled.

Figure 1. Many clients did not apply, but most who did were enrolled (total clients = 1,482).



Source: Urban Justice Center calculations from the FCAP Calculator Database and matched HRA enrollment records.

Only 42% of Clients Had Enrolled 4 to 5 Months After Being Told They Were Eligible

Because of the accuracy of the pre-screenings, the vast majority (78%) of clients who applied enrolled, but 46% of FCAP and Food Force clients had no new application in the system.

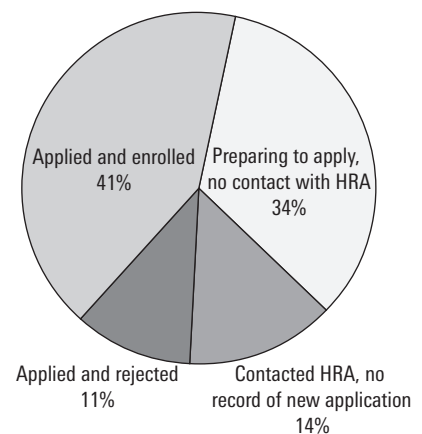
The first question we asked was: what happened to the people who had no application in the system? One to 2 months after their pre-screening, when we drew a sample of clients, 8% had enrolled. Over the months we interviewed clients, many completed the application process. Still when we confirmed 103 clients' statements with records HRA provided, we found that nearly 1 in 3 of the people with no record of a new application had contacted HRA by phone or by visiting an office.²¹ And almost all of the clients we interviewed said that they were interested in enrolling, whether or not they had taken any steps in the application process. While clients stories were unique, there are common themes that explain why more clients did not take advantage of Food Stamp benefits available to them.

Required Office Visits and the Reputation of the Food Stamps Office Present a Barrier

About 1 in 3 clients interviewed dropped out while preparing to apply, before contacting HRA. Some clients could not take time off from work to apply for Food Stamps. Although 4 of the 20 neighborhood centers have extended hours, this is simply not enough for many people.²² For example, Ms. Nadal lives on Manhattan's Lower East Side with her two sons. She told us that she was only able to avoid skipping meals with financial help from her mother. One hundred and eighty dollars per month in Food Stamps could offer a critical improvement to the family's food security. Unfortunately, there is currently no extended hours office in Manhattan and the family needs both Ms. Nadal's wages and the Food Stamps. When asked if she would like to enroll, Ms. Nadal said, "I definitely would. The reason why I haven't done it is that it's really hard to take a day off from work to go there, because I lose a day of pay."

In communities of potentially eligible clients, HRA offices have the reputation of prohibitively long wait times. Ms. Martinez and Ms. Nadal head just two of the thousands of working households eligible for Food Stamps in New York

Figure 2: Many clients interviewed tried to apply (total clients = 103).



Source: Urban Justice Center calculations from client interviews and matched HRA enrollment records.

City. Another working mom in the Bronx told us:

When you get WIC, they give you a day and a time when it's convenient for you and you go in. But I just can't take a day out of my work [for Food Stamps]. Because I work Monday through Friday, and my kids go to day care, and I don't do enough hours as it is, because I have to drop them off and pick them up before the daycare closes, because they have a cutoff time... So I can't take a day off to do that.

Other clients cited health problems or temporary disabilities that make visits to the HRA office difficult or impossible. Consistent with other research, serious health problems among Food Stamps eligible populations are quite common.²³ We did not ask explicitly about health problems in our interviews, but 1 in 5 of the people without any household members who met the official definition of disabled mentioned health problems ranging from heart attack to diabetes. Some elderly or officially disabled clients were able to access specialized services allowing them to enroll without visiting a center, but other clients with health problems currently have no such option.

For example, Ms. Cansino lives in Queens with her husband and three sons, and when interviewed, was pregnant with her fourth child. Her family lives below the federal poverty line. And despite receiving WIC, sometimes Ms. Cansino has to skip meals to save money. She could not work or visit the Food Stamps office because of complications with her pregnancy. But \$364 in Food Stamps per month could be a 25% raise to help her husband support the family, if only they had been able to apply.

Still, other clients face cultural and language barriers to interaction in the HRA office. One woman was afraid to leave Chinatown to apply. She told us that she did not contact HRA because she did not understand English and did not know how to take the subway to the Food Stamps office. Another woman in the Bronx cited a combination of problems:

I haven't tried to apply for Food Stamps yet. My husband has work papers, but they're in Spanish so I'm not sure if they will accept them. And I have also just had surgery so I can't walk very well, but now I'm feeling better, so I'll go over to the office tomorrow with all the papers.

These clients would have benefited from shorter waiting times in offices and from a well-publicized option of applying without visiting a center. Unfortunately, months after learning of their eligibility, they had not enrolled.

Some Clients Contacted HRA but Did Not Apply

Many clients who did not contact HRA cited fears of long wait times. Their fears were supported by the experiences of others who reported going in to the HRA office but did not have an application on record. About 1 in 7 clients interviewed contacted HRA but did not have an application recorded.

Some clients visited the office, but left without submitting an application. For example, one client from Brooklyn arrived at her neighborhood Food Stamps office at 8:30am, handed her documents to a clerk and sat to wait. After half an hour, she decided that the process just was not worth the trouble. She asked for her documents and left. Another client, Ms. Bellefond, visited the Melrose office in the Bronx late in the day. When she arrived, there were people who had been waiting since 9 AM, and a caseworker told her to return in the morning. After spending \$4 on the subway and less than 10 minutes in the office, Ms. Bellefond left feeling angry. She told us "I didn't return, because I have to work." Her application was never logged in the system.

Administrative systems failed other clients. Ms. Mendez made two separate visits to the HRA office with her baby. On the first visit she waited 3 hours to submit her application, and was given an appointment. When she returned, she said, "They looked everywhere they couldn't find my application so they told me to fill out a new one and that they would give me priority... Then the person told me that I would only receive \$12 in Food Stamps, so I said it's not

"You need to go over there very early and it's difficult with a baby. It's very dirty and there's so many people and not a lot of places to sit and you know how babies are, they get tired quick."

– Ms. Mendez

worth it for only \$12.” Her pre-screener followed up, double-checked the budget, and said that she could be eligible for over \$100 per month. But Ms. Mendez did not go back, “You need to go over there very early and it’s difficult with a baby. It’s very dirty and there’s so many people and not a lot of places to sit and you know how babies are, they get tired quick.”

These clients were estimated to be eligible in a detailed pre-screening process, had expressed interest to their pre-screeners and to researchers, and had taken the time to visit a Food Stamps office. The fact that they did not even have an application on file, suggests that the process is just too difficult.

Some Apparently Eligible Clients Were Rejected

Clients with an application in the system described challenges with documenting their eligibility, and the difficulties with multiple office visits continued. Ms. Vigñot, from the Bronx, had her case closed for “Failure to resolve computer match discrepancy.” When asked if she had enough money for food, she explained “Because I’m unemployed...

“I called her back up and said ‘Am I going to have to sit and wait for 2 hours again to resubmit the same documents?’ ” – Ms. Vigñot

so, no. It’s been over a year now. It’s such a shame, I have a college degree! I’m dying for a job! ... I’m running out of food right now. It’s humiliating for me and embarrassing.” On her first visit to apply for Food Stamps, she spent about 3 hours, submitted her application, and was told that she would need additional documentation. On her second visit, she brought the papers, but did not hear anything for a few weeks. She called the office and eventually spoke with a supervisor who told her that she would need to resubmit the documents. When she found the documents:

I called her back up and said ‘Am I going to have to sit and wait for 2 hours again to resubmit the same documents?’ and she apologized, but she said ‘Oh, I’m not that uncaring.. you come, you go to the counter and ask for me, and I’ll come out.’ and luckily that’s what happened—I caught her when she was on her way out. That was the third time.

HRA records indicate that her case was rejected about three months after she first applied, right around the time that we spoke with her. She told us that she had not heard anything: “No, I have not called them...I was going to today, but I figured let me just give them one more day. I figured that if she needed additional information, she’d call me.” After three visits and an interaction with a supportive staff member, it might seem like a reasonable assumption, but unfortunately, Ms. Vigñot was incorrect.

Although Ms. Vigñot was persistent enough to visit the HRA office three separate times and FCAP estimated that she was eligible, she too, fell through the cracks. While we do not know for sure whether Ms. Vigñot was eligible, other client stories and our data suggest that with more persistence in convincing HRA of her eligibility, she might have successfully enrolled. Ms. Vigñot’s rejection, like 35% of the rejections among study participants, was due to a documentation problem. Another 13% of cases were closed simply because clients did not return to the office for their interview. Some clients were not actually eligible. But only 21% of the rejections cited clients’ income, resources, or other Food Stamp budget factors, while close to half had to do with hassles in the application process.

Some Clients Received Extra Assistance and Some Persisted Through Administrative Hurdles

Persistence pays off, eventually. At 23 years old, Ms. Reyes was caring for her two young children, her niece, and her nephew. Her wages were not nearly enough to support all five of them. She told us about her application:

It took 4 to 5 hours just to get a return appointment... I don’t know if [the Eligibility Specialist] was having a bad day. I told him I didn’t have a bank account. He told me I did. I gave him my papers and he told me to come back by this day with a statement from the bank or he would close my case... I couldn’t get the right bank statement, so they closed it. ... So I went back with the bank statement saying the account was closed, they looked at the computer and said you have three more accounts, two for you, one for your three year old son. I called customer service right there, but they said they couldn’t

give me information, because it was private. I told them I had to or I wouldn't get Food Stamps, so they told me it was my mom's and I was a beneficiary. The worker said he still needed the statements saying it wasn't mine... I went three [more] times before they gave me the Food Stamps...I went back. They said they were in process of opening my account. They said wait two more days. So I didn't get it and I came back. They said to have a seat. A manager or supervisor walked by and they called her over and she did it within two seconds. She said it would be there within two days. I got it five days later. But I kept going to the office 'cause I didn't know if I was going to get Food Stamps.

We do not know for sure why Ms. Reyes received Food Stamps and Ms. Vigñot did not. While it could be that Ms. Reyes was eligible and Ms. Vigñot was not, they both were pre-screened as eligible. Moreover, after losing her paperwork, the HRA records do not state that Ms. Vigñot actually has too much money to be eligible for Food Stamps. But Ms. Reyes contacted HRA a total of six times, and when we interviewed her, Ms. Vigñot had only contacted HRA three times.

Some clients enrolled, because of sheer persistence, but some clients had positive experiences at the HRA office, with friendly staff and efficient service. Others had additional help either from the pre-screening organization, a friend or other personal contact, or a special HRA program.

One client had a positive experience at the Northern Boulevard office in Queens: “The only thing I can tell you is that I didn't have any inconvenience. I was treated very well, the worker was very nice and she helped me with everything that she could.” Similarly, Mr. Sanchez had a good experience at HRA's Yorkville center in Manhattan. He completed the enrollment process in one three-hour visit to apply and submit documentation. He had another 30 minute visit to a different office the next day to get his benefit card. Mr. Sanchez had heard about problems at the HRA office, but he had a better experience. “The case worker was kinda nice. A lotta times they do give you a hassle, I heard from a lot of people, but I got lucky.”

“The case worker was kinda nice. A lotta times they do give you a hassle, I heard from a lot of people, but I got lucky.” – Mr. Sanchez

Other clients had additional help applying. Two clients we interviewed were able to apply through special centers that allow clients to complete applications exclusively by mail, fax and phone. The Homebound and SSI-Only Units were great supports for these clients. Another disabled client went to the center with her health care attendant, who assisted her with the application.

In addition, as part of FCAP, HRA allows pre-screener to schedule appointments for clients in their target neighborhoods. The project was designed to help FCAP clients, not to evaluate the effect of appointment scheduling. Still, when FCAP scheduled an appointment, 58% enrolled, compared with only 49% of other FCAP clients.

Conclusion

Some, like Ms. Martinez and Ms. Cansino, had life circumstances that prevented them from even starting the application process. Some accessed the system and had positive experiences. Some had extra help along the way, from HRA, non-profits, friends, or family. Others, like Ms. Reyes, were able to enroll simply because they refused to give up. But all of these people were estimated to be eligible for Food Stamps.

3. LIFE CIRCUMSTANCES SUCH AS WORK MAKE CLIENTS EVEN LESS LIKELY TO ENROLL

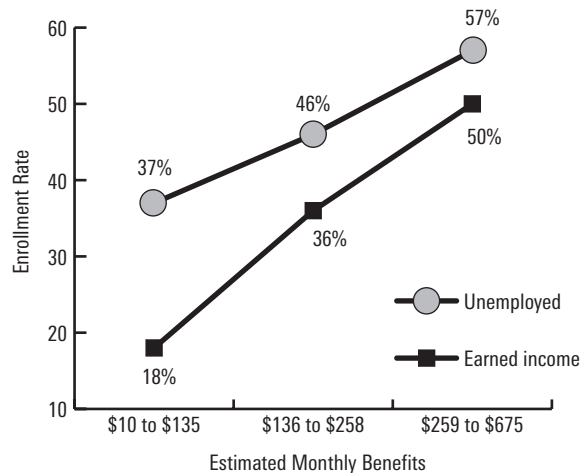


A recent USDA report using census data and Food Stamp Program quality control records found that nationally, and even more in New York State, households with earned income are less likely than other eligible households to receive Food Stamps.²⁴ Another USDA study using survey data also found that working households were less likely to participate.²⁵ Our quantitative data confirm these findings. We found that clients from households with earned income were less likely to enroll, even after taking account of benefit levels, English language ability, household poverty status, and other factors. (See Appendix C for more information on our statistical methods.)

“The reason why I haven’t done it is that it’s really hard to take a day off from work to go there, because I lose a day of pay.” – Ms. Nadal

Client interviews explain why the hassles of the application process are particularly difficult for working people. Clients told us about an array of life circumstances, like job responsibilities and health problems that make going into the Food Stamps office difficult. Many of these circumstances are not part of the discussion in a Food Stamps pre-screening. So without interviewing a client, we cannot know personal information that pre-screeners don’t ask about, such as whether clients have time committed to education or training, responsibilities for care of an ailing household member, or a complicated pregnancy. We can look at whether or not clients were working, because earned income is an important part of the Food Stamps budget. The work numbers support clients’ stories.

Figure 3. Working clients were less likely to enroll, regardless of estimated benefit levels (total clients = 1,481).



Source: Urban Justice Center calculations from the FCAP Calculator Database and matched HRA enrollment records.

Note: One client with 12 household members was estimated to be eligible for \$1,162 in monthly benefits. We have excluded them from this figure in order to provide a more accurate sense of the range of monthly benefits.

4. EVERYONE ELIGIBLE IS IN FINANCIAL NEED, AND FOOD STAMPS CAN PROVIDE A 20% INCREASE IN HOUSEHOLD INCOME



The income cut off for Food Stamps eligibility is 130% of the federal poverty line – \$16,237 per year for a family of two in 2004.²⁶ The Women’s Center for Education and Career Advancement estimates that a single parent with one pre-school aged child living in Brooklyn needs \$38,983 to cover a reasonable level of housing, child care, food, transportation, health care, taxes, and essentials like clothing, non-prescription medicines, and household cleaning products.²⁷

Food Stamps are one of the few government initiatives available to help people gather basic resources to support their families. Among FCAP and Food Force clients who were eligible but did not make it through the enrollment process:

- Three out of four were living below the federal poverty line.
- 42% of those with income spent more than half of it on rent alone, not including utilities.
- On average, for clients who had income, receiving the estimated Food Stamps allotment would raise their total household income by 20%.

And, these clients needed help with food specifically. Ms. Martinez said that sometimes, when she pays the phone bill, she cannot afford to eat for an entire day. Ms. Vigñot had not skipped meals, but she told us that she was running out of food and eating less to save money. Ms. Mendez was sharing the food that her friends got from a food pantry. Ms. Cansino was skipping meals in the midst of a high risk pregnancy.

Highly trained Food Stamps pre-screener estimated that all of these women were eligible for federal aid to help them buy food. We must learn from these women’s experiences in order to work with the hundreds of thousands of other eligible New Yorkers to bring the full support of the Food Stamp Program to the entire City.

5. JURISDICTIONS AROUND THE COUNTRY MAKE ADMINISTRATIVE SYSTEMS MORE SUPPORTIVE



Many districts around the nation are experimenting with approaches that could better meet clients' needs: expanding office hours, reducing waiting times for office visits, and waiving face-to-face interviews. Massachusetts has already implemented some of these innovations on a larger scale.

Expanding Office Hours

Many districts have extended office hours in order to help working families apply for Food Stamps. In Sacramento County California, the Department of Human Assistance takes applications for Food Stamps from 7:00 AM until 9:00 PM Monday through Friday in all of their offices.²⁸ Washington, DC has five offices open from 8:15 AM to 8:00 PM, 7 days per week.²⁹ In Oregon, officials at a local office reported a substantial increase in the caseload after hours were extended. New York and Massachusetts had a different experience, raising questions about adequate staffing and outreach for these extended hours programs.³⁰ A recent national study confirmed that households with earned income were significantly more likely to complete the application process if they could access extended office hours for processing applications.³¹

Reducing Waiting Time in Offices

A USDA study from as early as 1992 suggested that crowded office conditions and long waiting times led interested and eligible clients to drop out of the Food Stamps application process.³² A more recent national study found that among people who had contacted a Food Stamps office but had not completed the application, the median wait time for them to speak with a caseworker was 15 minutes.³³ Maine and Connecticut require offices to see clients for an intake appointment within 20 minutes of arrival at the center.³⁴ Minnesota and Washington offer appointments on the same day as the application is submitted and process follow-up documentation by mail to avoid requiring multiple visits.³⁵

Waiving Face-to-Face Interviews

Federal regulations require Food Stamp offices to waive office visits when necessary to help clients apply.³⁶ Waiving the visit is necessary when clients cannot go to the Food Stamp office because of work or training hours, illness, care of a household member, or other circumstances.³⁷ Some districts are implementing the policy on a broad scale and waiving face-to-face interviews in favor of phone interviews and mail, fax and even online applications. In 2002, Mathematica Policy Research reported that Hennepin County (Twin Cities), Minnesota was piloting a program that exempted families who apply for Food Stamps at community centers from face-to-face interviews.³⁸ Massachusetts has implemented the policy even more broadly, encouraging local offices to interview clients by phone and take Food Stamp applications by mail automatically if the client has a hardship and "whenever possible."³⁹

6. NEW YORK HAS A STRONG FOUNDATION FOR IMPROVING FOOD STAMPS ACCESS

Advocates and government officials across New York State have been working to improve Food Stamps participation for years and have implemented a variety of innovative programs and policies. Figure 4 shows just a few of the improvements in service provision between January 2000 and December 2004. There have been multiple modes of Food Stamps outreach by government and non-profits. New York has adopted a shortened Food Stamps application form. In response to pressure from non-profit advocates, the Public Advocate of New York City, and the New York City Council, HRA has created the SSI-only and Homebound units that process applications entirely through the mail or fax, for people receiving disability benefits or who are both elderly and disabled, and has created a policy of accepting Food Stamps applications by fax and mail for all clients.⁴⁰

Each of these improvements has made a positive difference, and Figure 5 shows associated improvements in Food Stamps enrollment in New York City since 2002. Although the city, state, and federal governments share responsibilities for running the Food Stamp Program in New York City, the clients in our study only interact directly with HRA. So the rest of this section focuses on local innovation in service provision.

Extending Office Hours and Accepting Applications by Mail or Fax

HRA instituted a policy of accepting Food Stamp applications by mail or fax in April 2004.⁴¹ A study by the Public Advocate for New York City found that in July 2004 callers were able to reach someone on the first call and generally received accurate information, a great improvement over their 2003 findings.⁴² HRA has also extended working hours to include Saturdays in 4 of the 20 non-public assistance walk-in Food Stamps offices.⁴³

Waiving Required Office Visits for Elderly and Disabled Clients

The New York State Nutrition Improvement Project automatically opens Food Stamp cases for disabled or elderly individuals who receive SSI and are coded in the government's computers as living alone. In 2004, the state automatically opened 56,000 Food Stamps cases in New York City without requiring a single office visit. HRA has also created specialized units, the Homebound and SSI-only units, to process applications entirely without office visits for a broader group of elderly applicants with disabilities and recipients of federal disability benefits.⁴⁴ Although these programs serve only a small fraction of the clients who could benefit from their help, they do excellent work for the clients they reach.

We do not know how many of the hundreds of thousands of eligible non-participants in New York City could benefit from an application process without required office visits. We know something about the people currently receiving Food Stamps. Government descriptions of the families currently enrolled suggest that at least a third are working or disabled.⁴⁵ Pre-screening records tell us about some of the people who are eligible but not enrolled. Over half the clients in this study were working or receiving disability benefits when they were pre-screened as eligible for Food Stamps.

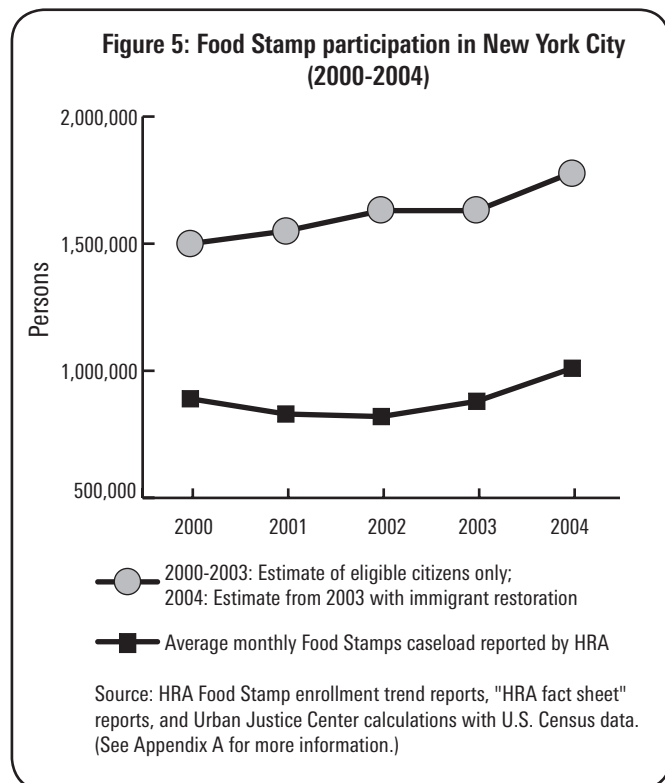
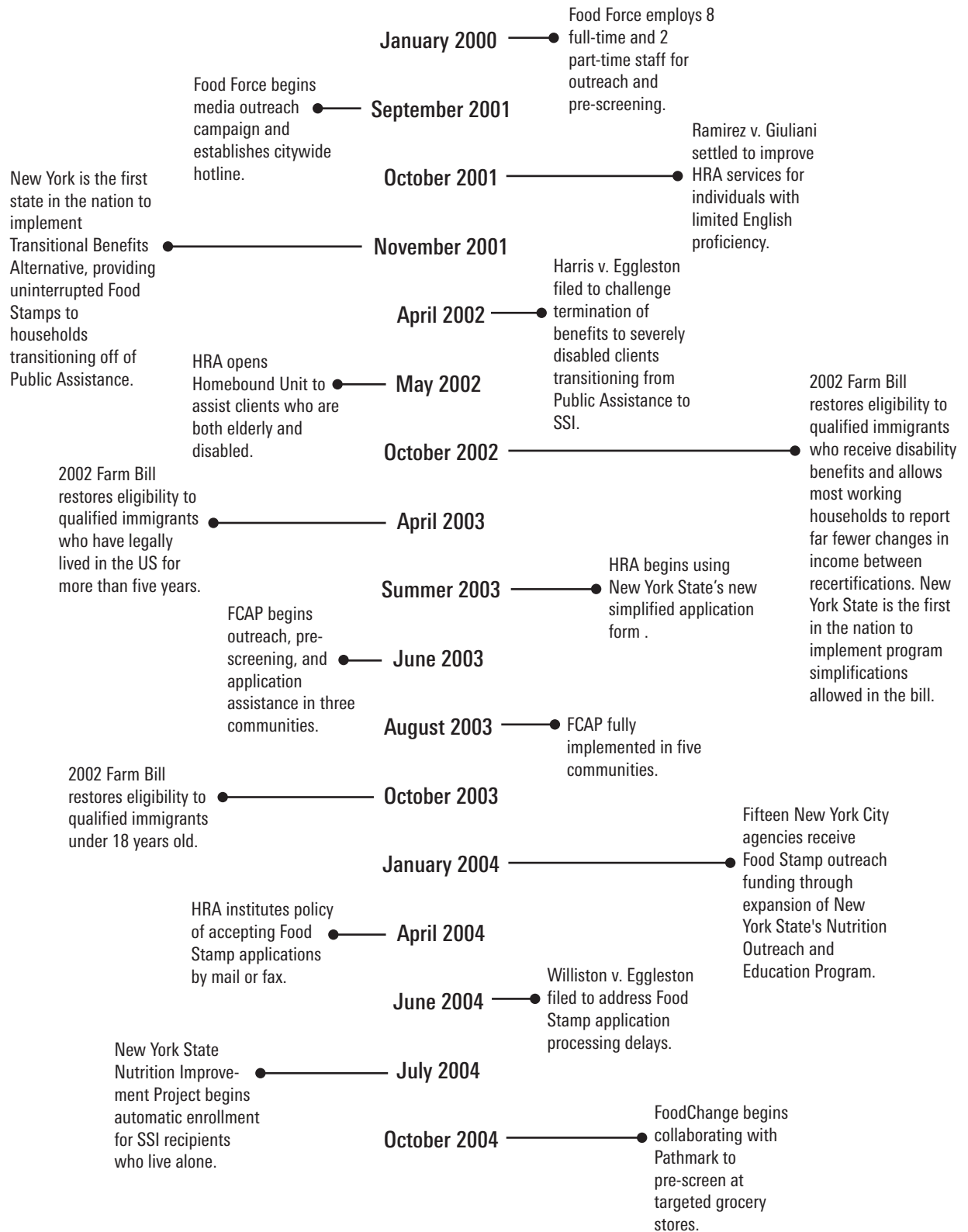


Figure 4: New York has made a number of innovative changes in the Food Stamps program since 2000.



Source: Urban Justice Center communication with advocates and government officials in New York City.

Combined with the broad range of concerns raised in client interviews, it seems safe to estimate that at least one quarter of the people who might want to apply for Food Stamps could benefit from a process without required office visits.

Among the clients in our study, referral rates to the SSI-only and Homebound units were low. Pre-screeners reported referring only 77 clients to the SSI-only or Homebound units, 16% of those with elderly or legally disabled household members. And only two of the clients we interviewed had applied through these units, although many reported serious health problems or disabilities, and could have been referred there by HRA staff.

Clients who were referred had very positive experiences. Sixty-five percent of the FCAP and Food Force clients referred to the Homebound- and SSI-Only Units enrolled, compared with only 42% of others with elderly or legally disabled household members. One elderly FCAP client tried to apply through a regular Food Stamps office and ended up sitting on the floor, because he suffers from arthritis of the spine and could not stand in line for the time required. Ultimately, he left the office that day without submitting his application. However, he persisted in his attempt to enroll and contacted his FCAP pre-screener again. He said, “I told him about my condition, and he says ‘I’ll put you through Homebound.’ And then I sent the documents to Homebound, and they were very nice.” Another client reported a positive experience with the SSI-only unit. She said,

“I sent the documents to Homebound, and they were very nice.”

I didn’t have to go to the welfare office at all, because I’m on SSI, so they mailed me the application. The whole process took under a month... [It] was great because I’d heard people talk about what a nightmare it is. I would have had to go to the one on Rider Avenue in the Bronx and wait there for hours. Instead, I did it through the one on Schermerhorn in Brooklyn.

The City has an opportunity to build on these innovative services. Advocates have raised concerns about processes for referring clients to these units.⁴⁶ And while two clients reported positive experiences in those units, two others did not know that they existed. Polio had left Ms. Erazo with a weak leg and difficulty walking. She called her local Food Stamps office to ask about applying by phone or fax, but was told “No, and I don’t got no time to talk to you!” As an SSI recipient, Ms. Erazo could have benefited from services of the SSI-only unit, but she did not enroll. Similarly, another client was hospitalized in the middle of her first Food Stamps application process, and faced a grueling process trying to enroll her disabled son. Although he is an SSI recipient, and she made at least three separate visits to HRA, she never learned of assistance offered through the SSI-only unit.

Conclusion

Figure 5 shows that these and other steps in the right direction have come with increased Food Stamps enrollment—200,000 more people participated in 2004 than in 2002. But even with a conservative estimate, for every one of these additional participants, at least three more people—disproportionately from working families—are still eligible and not participating. And required office visits remain a barrier for many people.

7. MAKE THE POLICY, INFRASTRUCTURE, AND PROGRAMMATIC CHANGES NECESSARY TO SUBSTANTIALLY INCREASE ACCESS TO FOOD STAMPS



New York City needs a Food Stamps application process that is flexible enough to accommodate clients' diverse circumstances and needs. The Food Stamp Program allows for two modes of application. In New York City, the vast majority of clients are obligated to complete the application process in person. Some clients can handle this requirement and benefit from additional information obtained in face to face contact with an eligibility specialist. Many others are discouraged from applying by the reputation of long wait times, and poor customer service and office conditions. A few clients are allowed to apply without visiting an HRA office, and those we spoke with appreciated the service. In order to meet all clients' needs, we recommend improvements in both paths to enrollment, the convening of a working group to further refine and implement these recommendations, and a continued commitment to outreach programs.

Improve the Application Process in Offices

A long term vision for improving in-person applications includes: substantially expanded office hours; reduced waiting times; fewer required office visits; and improved office conditions and customer service in every office. Toward that end HRA should:

- **Expand office hours:** Bring the current expanded hours (until 6pm week nights and Saturdays 9am-5pm) to all centers, not just 4 of 20, and open at least one office in each borough from 9am to 9pm, 7 days per week. Ensure that all hours are fully staffed to accept applications and conduct client interviews by July 2006.
- **Reduce office waiting times:** Begin to track and publish average times clients wait between entering the center and receiving services from a staff member able to address their needs. Reduce average waiting times at each center by 50% by January 2007.
- **Reduce number of required office visits:** Ensure that all applicants receive the necessary information and assistance to fully document their eligibility, including responding to any contradictory information acquired by HRA, with no more than one return visit to an HRA office. Demonstrate improvement by January 2007.

Expand Access to the Application Process Without Required Office Visits

A long-term vision for improving alternate application procedures includes processing applications without office visits for every applicant who believes this service would be beneficial. Toward that end, HRA, with the support of state and federal government agencies, should:

- **Expand policies allowing clients to enroll without office visits:** Put in place a policy that fully implements federal regulations⁴⁷ by directing center staff to allow applicants to complete the enrollment process without visiting a center whenever such services are necessary. To begin, individuals eligible for this service must include, but should not be limited to, those with illness, transportation difficulties, responsibility for care of a household member, or work or training hours which make it difficult for the household to participate in an in-office interview. The policy should outline procedures for informing clients of this option, conducting interviews by phone, accepting documentation by fax or mail, and waiving finger-imaging requirements. This policy should be in place by April 2006.
- **Implement the expanded policy:** Train staff and put in place the infrastructure necessary to inform clients of the possibility of applying without office visits, fully implement the policy, and track the number of clients who complete the application process without office visits by September 2006.

- **Demonstrate increased enrollments without office visits:** Demonstrate that at least 20% of the new enrollments each month in each borough are completed without requiring applicants to appear at any HRA office, and publish these results. Many clients will only learn about the possibility of completing the process without office visits when they come to HRA to apply. So, the 20% target should include two groups tracked separately: first, clients who complete the entire enrollment process without appearing at an HRA office; second, clients who initially submit an application in person, but are interviewed by phone, submit additional documentation by mail or fax, and are not finger imaged. HRA should achieve these goals by January 2007.

Convene a Working Group to Improve the Food Stamps Application Process

These recommendations involve structural changes that may not be possible without the collaboration of parties outside of HRA. Further, these recommendations expand on existing HRA programs and collaborative efforts such as FCAP. We therefore recommend that HRA convene a working group charged with implementing these recommendations and identifying additional steps for improving Food Stamps participation. For example, the working group might consider additional innovation such as on-line application processing. Such a working group should hold its first meeting by March 2006 and include, in addition to HRA, the following members: the New York City Council, the New York State Office of Temporary and Disability Assistance, the New York City Mayor's office, unions representing HRA staff working in the Food Stamp Program, city and statewide Food Stamp outreach and advocacy organizations, membership organizations representing low income communities, and private funders dedicated to improving access to Food Stamps.

Continue Food Stamps Outreach

New Yorkers who are eligible for Food Stamps must know that they are eligible, know how to apply, and know that they can receive this benefit without significant inconvenience or hassle. Until that is the case, and certainly while the recommendations above are being implemented, the commitment of all sectors—public and private—to continued outreach and application assistance will be crucial.

APPENDIX A: ESTIMATING THE NUMBER OF PEOPLE ELIGIBLE FOR FOOD STAMPS



To count the number of people participating in the Food Stamps Program over time in New York City, we use enrollment statistics published by HRA.⁴⁸

However, counting the number of people eligible for Food Stamps over time in New York City is nearly impossible. Some researchers have designed models to accurately estimate the number of people eligible for Food Stamps at the state or national level.⁴⁹ Others look at the city or county level but not at annual changes.⁵⁰ But in order to really know at the city level, we would need to provide detailed Food Stamps pre-screenings to hundreds of randomly selected New Yorkers each year, most of whom would not be eligible for Food Stamps. Instead, we put pre-screening resources to use serving people who are more likely to be eligible and use already available data to make educated guesses about the total number of eligible people.

Speaking very generally, there are three basic criteria used to determine Food Stamps eligibility. The household must be below 130% of the federal poverty line. It must have no more than \$2,000 in resources, or \$3,000 if the household includes an elderly or disabled member. And individuals must have a qualifying legal immigration status. Expenses like rent and child care also factor in to eligibility, but probably affect monthly benefit levels more than whether or not one qualifies at all. Figure 5 uses the following technique to estimate the number of people eligible for Food Stamps in New York City between 2000 and 2004:

- The March supplement of the Current Population Survey (CPS) uses sampling to measure poverty. Each year, the CPS asked over 3,500 respondents from New York City detailed questions about income and some questions about citizenship and immigration. The CPS does not ask any direct questions about resources. Because the survey is conducted annually, the CPS allows us to understand change over time.
- We start by using CPS information to count all individuals from families with total incomes below 130% of the federal poverty line.
- Eligibility criteria for immigrants changed between 2000 and 2004. In 2003, eligibility was restored to documented immigrants under 18 years old or who had been legally here for more than five years.⁵¹ The CPS has information about citizenship, age, and when immigrants “came to this country to stay.” For obvious reasons, undocumented immigrants are reluctant to share immigration information with researchers, so the CPS does not ask about documentation status. Neither does it track the many other details of immigrant eligibility for Food Stamps, such as refugee status and domestic violence. For 2000-2003 we count only citizens as eligible for Food Stamps. This number includes the citizen children of undocumented immigrants. In 2004, we add half of the non-citizens who are under 18 years old or had been in the country for at least five years. Given the number of immigrants in New York City, counting only citizens would dramatically underestimate the number of eligible people. On the other hand, it would be erroneous to assume that all immigrants under 18 years old or who have been here for more than 5 years have legal immigration documents. As a compromise, we chose to count half of the people in this group as eligible for Food Stamps.
- Estimating resource eligibility is even more complicated, because the survey does not ask about total resources at all. Mathematica Policy Research developed a model for estimating resource eligibility at the state level, but we suspect that it is not fully applicable in the local context, because housing costs are so much higher in New York City and vehicle rules are less important here.⁵² Fortunately, in 2003, the Community Service Society estimated that 9% of New York City residents under 200% of the Federal Poverty Line had more than \$2,500 in resources.⁵³ We would expect that individuals under 130% of poverty would have significantly fewer resources, but most families are actually subject to a \$2,000 resource limit and families sometimes under-report their resources to survey researchers. Our best guess is to follow the Community Service Society method by subtracting 10% of the number of people we estimate to be otherwise eligible to account for those whose resources are too high.

- Finally, the CPS asks about the year before the survey is conducted and we wanted to be sure not to exaggerate changes from year to year. So, we used percentages from the CPS applied to the overall population estimate from the 2000 Census.⁵⁴ Our percentage estimate for 2001 averages the resulting percentage from CPS data collected in 2001 and 2002, the estimate for 2002 averages the percentage from 2002 and 2003, and so forth. Because more updated data were not available, both the 2003 and 2004 estimates were based on averages of 2003 and 2004 numbers, but as noted above, our 2004 estimate includes some non-citizens.
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APPENDIX B: STUDY DESIGN



In February 2004, FCAP and Food Force sent HRA about 6,000 client pre-screening records and less than half matched in HRA's Food Stamp database.⁵⁵ We set out to learn what happened to the other clients. These first results were slightly misleading. Some clients who matched were not really new enrollments or rejections. They had already enrolled or had applied and been rejected prior to their pre-screening, sometimes years earlier. And we guessed that some who did not match had actually enrolled. About 21% of the pre-screenings did not have the client's social security number on file, so there was no way to search for them in HRA's database, and therefore no way to know if they had enrolled without asking them directly. Finally, some clients enroll in Food Stamps through public assistance, and HRA had not searched the public assistance records for FCAP or Food Force clients.

HRA first shared data including public assistance Food Stamps in late May 2004, so that question was resolved. Questions remained about what happened to the clients without social security numbers on file, and why so many clients with social security numbers on file still were not matching. To answer them, we needed to interview a sample of clients that included both clients with social security numbers on file but without any record of an application in HRA's system and clients who had no social security number on file. In selecting clients to interview, we wanted recent contact information so that we could reach a random sample of clients, but we also wanted to leave enough time since the pre-screening for the application process to unfold. We decided to interview clients who had been pre-screened one to two months before the data match, which made our study period March 23, 2004 to April 22, 2004.

In the study period, Food Force and FCAP conducted 2,536 complete pre-screenings. Twenty percent were determined not to be eligible for Food Stamps. Another 17% had no social security number on file, and a small number were found to already be enrolled or to not live in New York City. That left 1,482 clients who had been pre-screened as eligible in the study period, were not enrolled at the time of their pre-screening, and could have matched for follow-up enrollment data from HRA. In May, there was no record of a new application for 81% of those clients. We drew a random sample of 220 clients, and 50 of them had no social security numbers on file. Between June and September 2004, we interviewed a total of 144 of these clients, achieving a 66% response rate. Although we were more successful in contacting Spanish speakers than speakers of English, Mandarin or Cantonese, there were no statistically significant response biases in terms of pre-screening organization, borough of residence, household size, homelessness, immigration, employment, disability, or poverty status.

By August 2004, four to five months after their pre-screening, when we next matched records with HRA, many additional clients had enrolled. The statistical analyses presented in this report reflect outcomes for the eligible clients pre-screened during the study period, with valid outcome data, who were not enrolled at the time of their pre-screening. Because of staffing changes at the pre-screening organizations, the study period is not strictly representative of all pre-screenings, and clients pre-screened by FCAP and Food Force are not representative of the hundreds of thousands of New Yorkers eligible for Food Stamps but not enrolled. Still, with data on almost 1,500 clients, this study gives us a better picture than is otherwise available of what happens once clients know that they could be eligible for Food Stamps.

The analysis of clients' experiences draws on the client interviews, including both groups of clients – those with and without social security numbers on file. However, Figure 2 represents only those clients with social security numbers on file, whose stories we could confirm with enrollment data from HRA.

The table below describes the characteristics of the quantitative and qualitative samples.

Table B1: Characteristics of the Study Samples

| | Full statistical sample | Clients interviewed |
|---|-------------------------|---------------------|
| Pre-screening organization | | |
| FCAP: Citizen's Advice Bureau | 13% | 14% |
| FCAP: Chinese-American Planning Council | 6% | 7% |
| FCAP: Sunnyside Community Services | 11% | 21% |
| FCAP: Harlem Congregations for Community Improvement, Inc. | 8% | 5% |
| FCAP: Ridgewood-Bushwick Senior Citizen's Council | 8% | 6% |
| "Food Force" a program of FoodChange, formerly CFRC | 53% | 47% |
| Client residence | | |
| Brooklyn | 24% | 24% |
| Bronx | 28% | 28% |
| Queens | 21% | 31% |
| Staten Island | 1% | 1% |
| Manhattan | 27% | 17% |
| Family size | | |
| Single | 47% | 40% |
| Two people | 22% | 24% |
| Three people | 16% | 15% |
| Four or more people | 15% | 20% |
| Clients reporting homelessness | 3% | 1% |
| Primary language | | |
| English | 59% | 47% |
| Spanish | 33% | 45% |
| Cantonese or Mandarin | 6% | 8% |
| Other | 2% | n/a |
| Client households with members ineligible for immigration reasons | 13% | 24% |
| Client households with earned income | 38% | 51% |
| Client households with elderly or legally disabled members | 32% | 30% |
| Household income relative to the Federal Poverty Level (FPL) | | |
| Below 50% of the FPL | 38% | 31% |
| 50-99% of the FPL | 42% | 38% |
| 100-130% of the FPL | 20% | 31% |
| Food Stamps Status May 2004 | | |
| No Social Security Number on file | | 24% |
| No record of new application | 80% | 76% |
| Newly closed or rejected | 3% | |
| Newly enrolled through Public Assistance (PA) | 1% | |
| Newly enrolled in non-PA Food Stamps | 7% | |
| Case in process, data unavailable | 9% | |
| Food Stamps Status August 2004 | | |
| No Social Security Number on file | | 24% |
| No record of new application | 46% | 37% |
| Newly closed or rejected | 13% | 8% |
| Newly enrolled through Public Assistance (PA) | 5% | 3% |
| Newly enrolled in non-PA Food Stamps | 35% | 26% |
| Case in process, data unavailable | 0% | |
| Total client households | 1,482 | 144 |

Source: Urban Justice Center calculations from the FCAP Calculator Database and matched HRA enrollment records.

Note: A few clients started to receive Food Stamps shortly after their pre-screening, and had their cases closed by August 2004. We still count them as newly enrolled throughout the report.

APPENDIX C: LOGISTIC REGRESSION PREDICTING ENROLLMENT



There are differences between working clients and unemployed clients. For example, clients with earned income were eligible for higher benefits than other households – an average of \$206 and \$162 per month respectively. So you might expect working people to be more likely to enroll, because there is a greater incentive. On the other hand, working clients were more likely to face language or cultural barriers. Fewer working clients spoke English – only 49%, compared with 65% of other clients. Statistical modeling allows us to rule out the idea that working people are less likely to enroll simply because of language barriers or another factor that they happen to have in common.

Modeling enrollment is complicated by the fact that our clients come from different pre-screening organizations, each using tailored approaches to outreach and application assistance in different community settings. Hierarchical models are designed to account for different kinds of differences – like those among clients (e.g. employment status) and those across pre-screening organizations (e.g. tailored practices for a particular community). Logistic regression models treat all kinds of differences as the same. In order to accurately model enrollment, we would need to use hierarchical models, but that is beyond the scope of this report. Presented below are simple logistic regression models run for all clients from both programs and separately for FCAP and Food Force clients. These models allow us to begin to account for differences between Food Force and FCAP. We use these models only as confirmation of our descriptive analysis, in order to rule out any obvious confounding effects.

Some FCAP organizations have dedicated resources to serving working families in particular. We do not have a large enough sample size to account for differences across the FCAP organizations, serving different client populations and using different approaches to application facilitation. Although employment is not statistically significant in the FCAP-only model, working is significant in both of the other models, and the coefficients in the FCAP-only model still suggest that employment makes FCAP clients slightly less likely to enroll.

Table C1: Logistic regression predicting enrollment in the Food Stamps Program

| Contrast category | All clients | | | | | Food Force clients only | | | | | FCAP clients only | | | | |
|--|-------------|-------|-------|--------|--|-------------------------|-------|-------|--------|--|-------------------|-------|-------|--------|--|
| | B | S.E. | Sig. | Exp(B) | | B | S.E. | Sig. | Exp(B) | | B | S.E. | Sig. | Exp(B) | |
| Estimated effects | | | | | | | | | | | | | | | |
| \$141 (maximum allotment for a household of one) | 0.851 | 0.197 | 0.000 | 2.117 | | 0.750 | 0.263 | 0.004 | 2.341 | | 1.035 | 0.305 | 0.001 | 2.816 | |
| \$142 - 258 | 0.993 | 0.218 | 0.000 | 1.985 | | 0.686 | 0.312 | 0.028 | 2.700 | | 1.300 | 0.320 | 0.000 | 3.668 | |
| \$259 (maximum allotment for a household of two) | 0.178 | 0.201 | 0.376 | 1.172 | | 0.159 | 0.280 | 0.571 | 1.195 | | 0.277 | 0.294 | 0.345 | 1.319 | |
| More than \$259 | 0.494 | 0.157 | 0.002 | 1.331 | | 0.286 | 0.220 | 0.193 | 1.638 | | 0.717 | 0.235 | 0.002 | 2.048 | |
| Household income above the federal poverty line | 0.399 | 0.165 | 0.016 | 1.619 | | 0.482 | 0.240 | 0.045 | 1.490 | | 0.295 | 0.234 | 0.207 | 1.343 | |
| Household income below the federal poverty line | 0.473 | 0.185 | 0.010 | 1.569 | | 0.451 | 0.298 | 0.130 | 1.605 | | 0.305 | 0.252 | 0.227 | 1.357 | |
| Mixed household, some members ineligible | 0.387 | 0.128 | 0.003 | 1.240 | | 0.215 | 0.197 | 0.275 | 1.473 | | 0.314 | 0.186 | 0.092 | 1.368 | |
| All members eligible, primary language not English | 0.357 | 0.150 | 0.017 | 0.955 | | -0.046 | 0.219 | 0.833 | 1.430 | | 0.727 | 0.221 | 0.001 | 2.069 | |
| Elderly household members | -0.336 | 0.143 | 0.018 | 0.670 | | -0.400 | 0.201 | 0.046 | 0.714 | | -0.319 | 0.210 | 0.130 | 0.727 | |
| Household has earned income | 1.207 | 0.446 | 0.007 | 1.771 | | 0.572 | 0.571 | 0.316 | 3.345 | | 2.523 | 1.041 | 0.015 | 12.462 | |
| No advocacy or mediation provided | 0.690 | 0.115 | 0.000 | 1.767 | | 0.570 | 0.177 | 0.001 | 1.994 | | 0.543 | 0.163 | 0.001 | 1.722 | |
| Follow-up contact recorded | -1.508 | 0.188 | 0.000 | 0.225 | | -1.490 | 0.262 | 0.000 | 0.221 | | -1.310 | 0.287 | 0.000 | 0.270 | |
| Constant | | | | | | | | | | | | | | | |
| N | | 1,481 | | | | | 789 | | | | | 692 | | | |
| Percent did not enroll predicted correctly: | | 79.0 | | | | | 96.2 | | | | | 57.5 | | | |
| Percent enrolled predicted correctly: | | 44.6 | | | | | 12.5 | | | | | 68.1 | | | |
| -2 log likelihood | | 1,873 | | | | | 964 | | | | | 876 | | | |

Source: Urban Justice Center calculations from the FCAP Calculator Database and matched HRA enrollment records.

APPENDIX D: CLIENT INTERVIEW GUIDE



Food Stories

First, I would like to ask about your food situation.

Can you tell me a little bit about whether you have enough and enough of the kinds of foods that you/ you and your family want?

Do you have any problems affording the food you/ you and your family need or do you have enough money for food every month?

Do you use coupons and shop for bargain items?

Do you sometimes get food from a food bank? From friends or family members?

Do you ever skip meals to save money? (If yes, how often?)

Has your ability to pay for and get enough and enough of the kinds of foods you need and want changed much since you spoke with <<pre-screener>> from <<CBO>> in <<month>>?

Interest and application

Would you like to receive Food Stamps?

Since you spoke with <<pre-screener>> have you tried to apply for Food Stamps?

Have you tried to collect the documents that you need to complete your Food Stamps application?

For clients who did NOT try to apply:

My understanding from what you told me is that you did not try to apply for Food Stamp benefits.

Can you tell me why you decided not to apply?

What do you think would make it possible and worthwhile for you to complete the Food Stamps application?

This may be a bit repetitive with what you just told me or may not apply to your situation, but I am now going to read you a list of reasons people have provided for deciding not to apply for Food Stamps. Please listen to each statement and tell me whether it is a reason you decided not to apply for Food Stamp benefits. Please just answer yes or no for each item.

1. You do not know how to apply.
2. The benefits are too small.
3. You are not eligible for cash assistance so it is not worth the effort.
4. You can get by on your own without Food Stamp benefits.
5. You do not like to rely on government assistance.
6. You do not want to be seen shopping with Food Stamps.
7. You do not want people to know you need financial assistance.
8. You do not want to go to the welfare office.
9. You would have to answer questions that are too personal.
10. The application process requires too much paperwork.
11. It would require too much time away from work.
12. It would require too much time away from home and child care or elder care responsibilities.
13. It is too difficult to get to the Food Stamp office.
14. You had a previous bad experience with the Food Stamp Program.
15. You had a previous bad experience with another government program.
16. The work requirements are too difficult.
17. The requirements to participate in the program are too difficult.
18. Your situation changed and you no longer need Food Stamps.
19. A family emergency occurred which prevented you from completing the application process.
20. The application form was too difficult for you to complete.
21. You found out it would take a long time before you could receive any Food Stamps.

22. The other adults in your household would not cooperate with the application process.

23. You did not want the welfare office to contact your landlord or employer.

Did you know that the welfare office is supposed to make the food stamp application process accessible to everyone, so, for example, you should not have to miss work in order to apply?

For clients who DID try to apply:

My understanding is that you did try to apply for Food Stamps after you spoke with <<pre-screener>>.

Can you tell me in your own words how you went about applying for Food Stamps, what happened, and what it felt like? I am really interested in hearing your thoughts and experiences. Probe for the number of visits to the center, office location, dates, and the amount of time spent in the HRA office.

[If CBO is not Food Force ask]: Did you have an appointment scheduled by <<CBO>>?

When did you get there? About when did you leave?

How long did it take you to get to the center?

How much did it cost you to visit the center, including car fare, missing work, child care, etc?

What did you do to get ready to apply? (Probe for need to gather documents and which documents in particular.)

Did you already have that? If not, how did you get it? (Probe for how much it cost, time involved, and other hassles/risks.)

Have you heard anything from them since then?

Have you called them? (Probe for when and how many times.)

Questions about your household

My last few questions are about your household – the people you live and share food with.

From <<pre-screener>>'s notes, it looks like the people in your household are:

<<List of all household members included in pre-screening>>

Is that correct? Is there anyone else?

Questions about <<pre-screened client>>

How old are you?

Where were you born?

(If client was born outside US) How old were you when you first moved to the (mainland) United States?

Are you a citizen of the U.S.?

(If yes) How old were you when you became a citizen?

(If no) Are you a Legal Permanent Resident – that is, do you have a green card? When did you get LPR status?

Do you have a social security number? If yes, what is it? [Note/describe any uncertainty or reluctance to answer, do not have to push this.]

Questions repeated for each additional household member

Does <<household member>> share food with you?

How old is <<household member>>?

Where was <<household member>> born?

(If client was born outside US) How old was <<household member>> when he or she first moved to the (mainland) United States? Is <<household member>> a citizen of the U.S.?

(If a citizen) How old was <<household member>> when he or she became a citizen?

(If not a citizen) Is <<household member>> a Legal Permanent Resident – that is, does <<household member>> have a green card? When did <<household member>> get LPR status?

Does s/he have a social security number? If yes, what is it? [Note/describe any uncertainty or reluctance to answer, do not have to push this.]

Closing

Would you be interested in receiving a copy of the report when it is released?

Is there anything else you'd like us to know about your experience with the Food Card Program?

Thank you so much for sharing your experiences and thoughts with us.

Bartlett, S. Burstein, N. & Hamilton, W. (2004, November). *Food Stamp Program Access Study: Final Report* (E-FAN-03-013-3). Cambridge, MA: Abt Associates, 8-6. Retrieved March 29, 2005, from <http://www.ers.usda.gov/publications/efan03013/efan03013-3/efan03013-3.pdf>

¹⁴ Food Force is a program of FoodChange, formerly CFRC. See <http://www.foodchange.org/food/foodstamp.html> for more information.

¹⁵ The United Way of New York City. (2005). *Our Programs and Initiatives: The Food Card Access Project*. New York, NY: Author. Retrieved May 12, 2005 from <http://www.unitedwaynyc.org/?id=17&pg=fcap;>

United Way of New York City in partnership with Human Resources Administration, Office of the Public Advocate, FoodChange, New York City Coalition Against Hunger, Seedco, and Urban Justice Center. (2005, Winter). *Food Card Access Project: Final 2004 Program Report*. Unpublished Manuscript.

¹⁶ Urban Justice Center (2005). [FCAP and Food Force Enrollment Numbers using Food Stamp Calculator Database and Matched HRA Records from July 2005]. Unpublished raw data.

¹⁷ “State agencies shall encourage households to file an application form the same day the household or its representative contacts the Food Stamp office in person or by telephone and expresses interest in obtaining Food Stamp assistance or expresses concerns which indicate food insecurity.” 7 C.F.R. § 273.2 (c)(2).

¹⁸ For more information see: Diamond, S. Family Independence Administration, Policy Directive #04-10-ELI “Mailed and Faxed Public Assistance and/or Food Stamp Applications” (April 05, 2004).

¹⁹ Clients are obligated to cooperate with interview and finger imaging requirements. (New York State Food Stamp Source Book 2004, Section 5: Investigation and Initial Eligibility, page 53: Household Cooperation). A few clients are allowed to enroll without visiting a center. In New York City, Centers F-15 and F-63 are “paper centers” that process applications without office visits. Only clients who are receiving SSI disability benefits (F-15) or are both over 60 years old and “have medical verification of permanent disability” (F-63) may apply through these units. (HRA, Family Independence Administration, Policy Bulletin #02-128-ELI, “Referrals to NPA Food Stamp Center-63,” May 28, 2002.)

²⁰ 7 C.F.R. § 273.2 (f)(5).

²¹ We defined contacting HRA fairly narrowly. For example, one woman went to the office, had a discouraging conversation with someone outside of the office door and never went inside. She is not counted as having contacted HRA.

²² Retrieved July 13, 2005 from http://www.nyc.gov/html/hra/html/serv_foodstamps.html

²³ London, A., Martinez, J. & Polit, D. (2001, May). *The Health of Poor Urban Women: Findings from the Project on Devolution and Urban Change*. New York, NY: MDRC. Executive summary retrieved July 6, 2005 from <http://www.mdrc.org/publications/77/execsum.pdf>

²⁴ Castner, L.A. & Schirm, A.L. (2004, November). *State Food Stamp Participation Rates for the Working Poor in 2001* (Contract No.: FNS-03-030-TNN, MPR Reference No.: 6044-714). Washington, DC: Mathematica Policy Research, 14-15. Retrieved March 24, 2005, from <http://www.fns.usda.gov/oane/MENU/Published/FSP/FILES/Participation/working-poor.pdf>

²⁵ Bartlett, S., Burstein, N. & Hamilton, W. (2004, November). 8-10.

Bartlett, S. & Burstein, N. (2004, May). *Food Stamp Program Access Study: Eligible Nonparticipants*. Cambridge, MA: Abt Associates, 15. Retrieved June 17, 2005, from <http://www.ers.usda.gov/publications/efan03013/efan03013-2/efan03013-2.pdf>

²⁶ Health and Human Services Poverty Guidelines, 69 Fed. Reg. 7335-7338 (Feb. 11, 2004). Retrieved July 13, 2005, from <http://aspe.hhs.gov/poverty/04poverty.shtml>

²⁷ Pearce, D. (2004, November). *Self-Sufficiency Standard for the City of New York 2004*. New York, NY: Women’s Center for Education and Career Advancement, 69. Retrieved May 12, 2005, from <http://www.unitedwaynyc.org/?id=69>

²⁸ US Department of Agriculture. (June 2002). *State Best Practices Improving Food Stamp Program Access*. Alexandria, VA: Author, 7. Retrieved July 18, 2005 from http://www.fns.usda.gov/fsp/rules/Memo/state_best_practices/pdfs/statebestpractice_all.pdf

²⁹ Ibid.

³⁰ United States General Accounting Office. (2004, March). *Food Stamp Program: Steps Have Been Taken to Increase Participation of Some Families, but Better Tracking of Efforts Is Needed* (GAO-04-346). Washington DC: Author. 31-32. Retrieved May 12, 2005, from <http://www.gao.gov/new.items/d04346.pdf>.

³¹ Bartlett, Burstein, & Hamilton. (2004, November). 8-10.

³² Bartlett, S., Burstein, N., Silverstein, G., & Rosenbaum, D. (1992, April). *The Food Stamp Application Process: Office Operations and Client Experiences* (Contract number 53-3198-8-34). Cambridge, MA: Abt Associates for U.S. Department of Agriculture Food and Nutrition Service Office of Analysis and Evaluation, 88.

³³ Bartlett, S. & Burstein, N. (2004, May). *Food Stamp Program Access Study: Eligible Nonparticipants* (E-FAN-03-013-2). Cambridge, MA: Abt Associates for U.S. Department of Agriculture Food Assistance and Nutrition Research Program, 38.

³⁴ Pavetti, L., Maloy, K. & Schott, L. (2002, June). *Promoting Medicaid and Food Stamp Participation: Establishing Eligibility Procedures That Support Participation and Meet Families' Needs: Final Report* (MPR Reference No. 8661-403). Washington DC: Mathematica for the Department of Health and Human Services, 46.

³⁵ Ibid.

³⁶ 7 C.F.R. § 273.2(e)(2) states, "The state agency must notify the applicant that it will waive the face-to-face interview required in paragraph (e) (1) of this section in favor of a telephone interview on a case-by-case basis because of household hardship situations as determined by the state agency."

³⁷ 7 C.F.R. § 273.2(e)(2) states, "These hardship conditions include but are not limited to: Illness, transportation difficulties, care of a household member, hardships due to residency in a rural area, prolonged severe weather, or work or training hours which prevent the household from participating in an in-office interview."

³⁸ Pavetti, Maloy & Schott, 40.

³⁹ "In an ongoing effort to expand access to Food Stamp benefits, USDA has clarified that more waivers of the in-office face-to-face interview should be given to applicants and recipients. ... AU Managers must inform applicants and recipients of their right to request a waiver of the in-office face-to-face interview. Applicants and recipients who have a hardship reason automatically qualify for a waiver of the in-office face-to-face interview... AU Managers are encouraged to waive in-office face-to-face interviews whenever possible."

Derderian, C. (July 2002). *Field Operations Memo 2002-16 Re: Waiving In-Office Face-to-Face Interviews for NPA FS AUs*. Boston, MA: Commonwealth of Massachusetts, Executive Office of Health and Human Services, Department of Transitional Assistance. Retrieved March 29, 2005, from <http://www.masslegalservices.org/docs/FOM-2002-16.pdf>

⁴⁰ City of New York. (2005, April 21). The Council Report of the Governmental Affairs Division Committee on General Welfare. *Int. 593: A Local Law to amend the administrative code of the city of New York, in relation to maximizing the number of eligible New Yorkers enrolled in the federal Food Stamp Program by distributing applications to emergency feeding programs throughout New York City*. New York, NY: Author. Retrieved May 13, 2005 from, <http://webdocs.nyc-council.info/attachments/65915.htm?CFID=398049&CFTOKEN=56301180>;

City of New York. (2005, April 21). The Council Report of the Governmental Affairs Division Committee on General Welfare. *Int. 594: A Local Law to amend the administrative code of the city of New York, in relation to maximizing the number of eligible New Yorkers enrolled in the federal Food Stamp Program by developing an on-line application system*. New York, NY: Author. Retrieved May 13, 2005 from, <http://webdocs.nyc-council.info/attachments/65916.htm?CFID=398049&CFTOKEN=56301180>;

City of New York. (2005, April 21). The Council Report of the Governmental Affairs Division Committee on General Welfare. *Int. 615: A Local Law to amend the administrative code of the city of New York, in relation to increasing the number of eligible New Yorkers enrolled in the federal Food Stamp Program*. Retrieved May 13, 2005 from, <http://webdocs.nyc-council.info/attachments/65917.htm?CFID=398049&CFTOKEN=56301180>;

Gotbaum, B. (2004, October). *Food Stamps for Working New Yorkers: Follow-Up Investigation*. New York, NY: Office of the New York City Public Advocate;

Gotbaum, B. (2003, November). *Locked Out: New York City Working Families Unlawfully Denied Access to Food Stamps*. New York, NY: Office of the New York City Public Advocate;

Gotbaum, B. (2002, September). *Stamping out Hunger: Why New York City is Falling Behind in Food Stamp Registration*. New York, NY: Office of the New York City Public Advocate;

La Cheen, C. (2004, Spring). *Home Alone: The Urgent Need for Home Visits for People with Disabilities in New York City's Welfare System*. New York, NY: Welfare Law Center, Inc;

Rodriguez, C. & Norman, E. (2002, December). *Missing millions/missing meals: New York City's Food Stamp Crisis*. New York, NY: Community Food Resource Center;

Choi, B. (2005, February). *Food Stamp Enrollment and Growing Hunger in New York City*. New York, NY: The City Council of The City of New York.

Policy Directive #02-128-ELI; Office of Temporary and Disability Assistance, Food Stamp Source Book Section 4 at 21-22; Policy Directive #04-10-ELI.

⁴¹ Policy Directive #04-10-ELI.

⁴² Gotbaum, B. 2004.

⁴³ Retrieved July 13, 2005 from http://www.nyc.gov/html/hra/html/serv_foodstamps.html

⁴⁴ Policy Bulletin #02-128-ELI.

⁴⁵ U.S. Department of Agriculture, Food and Nutrition Service, Office of Analysis, Nutrition and Evaluation, *Characteristics of Food Stamp Households: Fiscal Year 2003*, FSP-04-CHAR, by Karen Cunningham and Beth Brown. Project Officer, Kate Fink. Alexandria, VA: 2003. 19, 37. Retrieved July 18, 2005 from <http://www.mathematica-mpr.com/publications/PDFs/2003Characteristics.pdf>

As of February 2005, the New York State Office of Temporary and Disability Assistance reports that 28% of the households receiving Food Stamps in New York City were “non-Temporary Assistance” households, meaning that they were neither receiving public assistance nor disability benefits. Some were living on social security or veteran’s benefits, but a substantial portion of this group must have been employed. See table 16, retrieved July 18, 2005 from <http://www.otda.state.ny.us/bdma/2005/STATS0205.pdf>

⁴⁶ La Cheen, C. 2004.

⁴⁷ 7 C.F.R. § 273.2(e)(2)

⁴⁸ Human Resources Administration of New York City, Office of Program Reporting, Analysis and Accountability. Food Stamp Recipients: Trend, % Change from Previous Month; % Change from Previous Year. New York, NY: Author. Retrieved May 18, 2005, from, http://www.ci.nyc.ny.us/html/hra/pdf/fs_new.pdf ;

Human Resources Administration of New York City, Office of Program Reporting, Analysis and Accountability. HRA Fact Sheet. Monthly, January 2000 – December 2001 New York, NY: Author. Retrieved May 18, 2005 from, <http://www.ci.nyc.ny.us/html/hra/html/hrafacts.html>

⁴⁹ See, for example: Castner & Schirm.

⁵⁰ Fellowes, M. & Berube, A. 2005.

⁵¹ U.S. Department of Agriculture. (2003, January). *Non-Citizen Requirements in the Food Stamp Program*. Alexandria, VA: Author. 1, 2.

⁵² U.S. Department of Agriculture, Food and Nutrition Service, (2004) *Trends in Food Stamp Program Participation Rates: 1999 to 2002*, FNS-03-030-TNN, by Karen Cunningham. Project Officer, Kate Fink: Alexandria, VA. 49.

⁵³ DeFilippis, J. (personal communication, March 7, 2005); Rankin, N. (personal communication, April 26, 2005).

⁵⁴ 2000 Census counted 8,008,278 people in New York City. Retrieved July 4, 2005 from <http://www.ci.nyc.ny.us/html/dcp/html/census/pop2000.html>

⁵⁵ “In July [2003], United Way kicked off a \$1.5 million effort to screen 6,000 applicants in the hope of making it easier for them to get Food Stamps. So far, only 1,500 of the 6,000 have actually received the benefit.... HRA does not know what happened to the remaining 3,760 applicants.”

Wasserman, J. (2004, February 17). No Stamp of Approval: City’s Needy Often Tangled in Red Tape. *Daily News*, 19. Retrieved July 11, 2005 from <http://www.nydailynews.com/news/local/story/165179p-144668c.html>
