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Changes in Client Service in the Food Stamp Program After Welfare Reform: A Synthesis of Case Studies in Eight States



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CHAPTER I

Background and Overview

In October 1996, Health Systems Research, Inc. (HSR) was awarded a contract by the Food and Nutrition Service (FNS) of the U.S. Department of Agriculture (USDA) to conduct a study on State Food Stamp Program (FSP) policy choices and local implementation of these policies after welfare reform. This study, titled *Tracking State Food Stamp Choices and Implementation Strategies Under Welfare Reform*, is designed to describe for FNS the State food stamp policy choices and implementation issues at the local office level in the wake of the new flexibility provided to States by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA).

Under this study, HSR has prepared five written products, as listed below:

- A technical memorandum was prepared soon after the enactment of PRWORA, summarizing new State food stamp policy options and waivers under PRWORA and existing information available from FNS and other research agencies on the choices States were making under new and ongoing State options and waiver authority.
- A report on State food stamp policy choices was prepared and released in May 1998, based on a telephone survey of State food stamp officials conducted in November and early December 1997.
- A report to FNS with recommendations for designing a systematic approach for tracking State FSP policy choices over time.
- A set of eight technical case study reports for FNS, describing how States have changed their administrative structures and policy goals and how localities have changed program implementation of the FSP since PRWORA.
- The analytical report on local implementation practices presented here, which is a synthesis of the key changes to client service in the FSP after welfare reform, based on site visits to 24 local offices in eight case study States.

This introductory chapter briefly summarizes the policy context in which the case studies were conducted, the design of the case study research, and the limitations of the research for analyzing program effects. The chapter concludes with a summary of how the key findings will be organized and presented in Chapter II.

A. Policy Context

The central purpose of Federal welfare reform, as enacted through PRWORA, was to replace the Aid to Families with Dependent Children (AFDC) program with the Temporary Assistance to Needy Families (TANF) block grant program. TANF was designed to provide States with more flexibility to increase work and self-sufficiency among low-income families with children. PRWORA also introduced some changes in the FSP. The legislation made two major changes that directly affected FSP eligibility and participation: the majority of legal immigrants and refugees were made ineligible for participation in the program and new work requirements and a time limit on receipt of food stamps were imposed on able-bodied adults without dependents (ABAWDs)--a small but important segment of the food stamp clientele. The work requirement and time limit also resulted in States making a different array of food stamp employment and training (E&T) services available for ABAWDs.

Additionally, PRWORA gave States an array of options in food stamp policies, including the right to impose more stringent penalties on the food stamp benefits of a household that does not comply with TANF rules, even if the adults in that household would otherwise be exempt from work requirements under the food stamp law. States were also given options to change the application process for food stamps.

Recently there has been much attention paid in the news and research literature on dramatic declines in welfare and FSP participation since the mid-1990's. Some of the decline in FSP participation has come from the eligibility changes described above and a portion is a result of the nation's improved economy. However, policymakers, program administrators and anti-hunger advocates have recognized that other factors associated with welfare reform are also likely involved. As a result, there has been increased attention paid at the Federal level to how welfare reform policies may have indirectly affected the operation of the FSP at the local level

and changed service to individuals who are still eligible for and in need of food stamp benefits. While many of the food stamp policy options under PRWORA and the broader welfare reform changes to cash assistance for families had the stated goal of strengthening work incentives for low-income individuals and had the potential for promoting self-sufficiency among food stamp clients, they also created the possibility of changes in client service for food stamp applicants and recipients in three areas:

- Program accessibility,
- Quality of services, and
- Availability of services for the broader non-cash food stamp clientele to support their transition from welfare to work and promote economic self-sufficiency.

These potential changes in client service are the subject of this case study report. This report synthesizes the key findings of the individual case study documents, with an emphasis on local policies and practices that may have altered client service in the FSP after welfare reform. The report highlights those findings that the authors believe have implications for policymakers as they consider ways to improve FSP access and service delivery to food stamp participants.

B. The Case Study Research

1. Overview

To capture the way client service in the FSP changed after PRWORA, information for this study was gathered through site visits to State agencies and 24 local welfare offices—one rural, one small city, and one large urban area—in each of eight States. The case study States were Colorado, Kansas, Mississippi, Oregon, Tennessee, Utah, Washington, and Wisconsin. These States and the location of the three offices visited in each State are highlighted on the United States map in Figure 1. Appendix A provides a list of State level organizations visited in each State, the city or county for each local office visited, and information on the size of each local case study site (rural, small city or large urban).

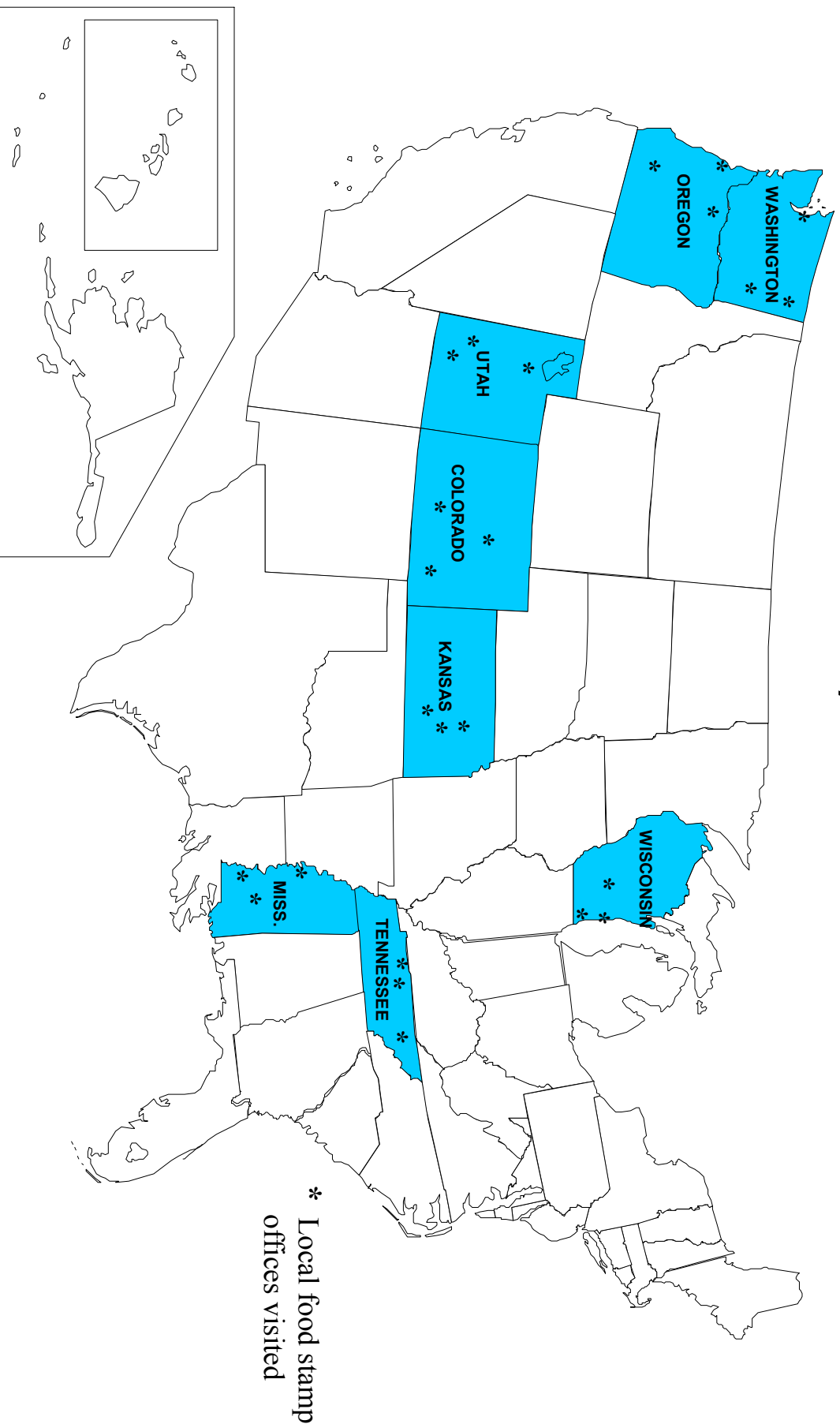
The case study findings are based on interviews with State agency staff in eight States as well as with local program staff, including the director, casework supervisors and caseworkers in

three local welfare offices in each State. In addition, focus groups were used to gather community service providers' and advocates' perceptions concerning changes in the FSP under welfare reform and their potential impact on program accessibility. One such discussion was held in each State, usually in the largest urban community visited. The site-visit interviews took place between September 1998 and February 1999. At the time of the interviews all of the States had established welfare reform efforts in place for at least 18 months.

2. Information Collected

The purpose of the site-visit interviews was to collect descriptive information about current State food stamp policy choices and on the changes in local FSP practices that have occurred as a result of welfare reform. The interviewers obtained descriptive information and opinions from staff and advocates in four general areas:

Figure I-1. Case Study Sites



- **Changes in the Office Operations for Food Stamp Applicants and Recipients.** A major focus of the case studies was to examine how States had reorganized their local office operations for food stamp applicants and recipients, including those who applied for or received TANF and food stamp benefits (TANF/ food stamp households) and those who applied for or received food stamps but not TANF (non-TANF food stamp households). The case studies examined changes in client flow at application, formal and informal diversion practices, the specialization and division of work among caseworkers serving food stamp clients, and the food stamp application and recertification processes for different client groups.

- **The Extent to Which the Focus of Services Provided for Food Stamp Clients was on Moving Clients to Employment and Self-Sufficiency.** Under PRWORA, States were required to significantly expand their work programs for TANF clients, many of whom also received food stamps. A central research goal of the case study interviews was to assess whether and how local offices also changed the availability of work and training services for the non-TANF food stamp households.

- **Implementation of Optional Food Stamp Sanctions for Noncompliance with TANF Rules.** A third focus of the case studies was the options under PRWORA that allow States to impose stricter food stamp sanctions on TANF/food stamp clients who do not comply with TANF program rules. Specifically, PRWORA gave States the option to disqualify an *individual* from food stamps for noncompliance with TANF rules, under the same sanction rules that apply in each State's TANF program. This includes the option to impose food stamp sanctions on noncompliant parents with children under age six, who are otherwise exempt from food stamp sanctions under food stamp law. A second FSP option afforded to States is the ability to reduce a *household's* food stamp benefits if they do not comply with TANF rules.

Both of these sanction options were designed to reinforce the States' TANF sanction rules. HSR's first report for this study highlighted the FSP sanction choices States had made; however, neither the survey nor other existing studies from FNS provides information on how often these sanctions were being imposed or whether they were posing a barrier to continued access for food stamp participants. These issues were investigated as part of the case study interviews.

- **Opinions on Changes in FSP Access and Recommendations for Program Improvements.** Local office staff, community service providers and advocates were asked their views on how FSP access and services overall have changed since welfare reform and what they would recommend be done to improve these facets of the program.

3. Site Selection

The eight States profiled in this report implemented a variety of approaches to welfare reform and modified their FSP in a variety of ways in response to PRWORA. An eight-State sample was purposely selected to capture diversity in State TANF policies and in States' FSP policy choices. Each State was placed in one of three broad categories that reflect different approaches the States took to operationalize the goals of welfare reform (see Table I-1).

Table I-1. Categories of Case Study States and the Selected Sample		
Categories Based on State Food Stamp Policy Choices	Defining Criteria	Selected States
<u>Category 1:</u> States Emphasizing a Sanction-Oriented Approach Regarding Work Requirements	These States did not waive a large portion of their ABAWDs from the three-month time limit. They also chose the new food stamp sanction options for both TANF/food stamp and non-TANF food stamp clients subject to Food Stamp E&T requirements.	Kansas Tennessee Mississippi
<u>Category 2:</u> States Choosing a Less Sanction-Oriented Approach and Expanding E&T Services for ABAWDs	These States chose the less stringent food stamp sanction options under PRWORA. Also, in FY 1998—earlier than most other States—the Food Stamp Program in these States had expanded services in the Food Stamp E&T Program, particularly for ABAWDs subject to the three-month time limit for food stamps.	Colorado Washington State
<u>Category 3:</u> States Making Changes in Front-End Operations at Local Welfare Offices	As an integral component of their redesigned TANF programs, these States altered the way up-front job-related services are delivered at local welfare offices. Their TANF plans also indicated that they had diversion programs for TANF applicants in the form of lump-sum diversion payments or mandatory job search.	Oregon Utah Wisconsin

The eight-State sample captured diversity not only in policy approaches, but also in size of the food stamp caseload and percentage reduction in FSP participation after welfare reform. Table I-2 provides September 1998 food stamp caseloads for each case study State, as well as the change from 1996 to 1998 in each State's total food stamp participation and public assistance (PA) versus non-public assistance (NPA) food stamp participation.

4. Data Collection Activities

The study involved extensive interviews with State and local program staff in each of the eight States. Focused interviews with State officials were designed to collect information on current State food stamp policy choices and on other State programmatic or administrative changes that could affect the local delivery of FSP services. Interviews were held with the State FSP director and the individuals in charge of FSP field operations and food stamp E&T functions, provided there were such specialized program staff.

At each local office, the office director or manager was interviewed individually. Questions covered the division and specialization of caseworker roles, changes in local policy and operations (both FSP and TANF) that have affected FSP operations, and the director's views on changes in the FSP's objectives since welfare reform and on whether welfare reform-related policy changes had affected services to the food stamp clientele. Group interviews were also conducted with food stamp caseworker supervisors and caseworkers at each local office. The purpose of these sessions was to determine how clients actually proceed through the application process, receive or are referred to E&T services, and to identify the extent of formal and informal diversion practices. Local staff were also asked about their views on the most significant changes in FSP operations since PRWORA and how these may have affected client service. These group interviews were more open-ended than interviews with the State and local administrators, since the researchers wanted to ascertain more detailed information about how local office practices work on a day-to-day level. *The objective was to determine how the office actually ran, rather than how it was supposed to run.*

**Table I-2.
Food Stamp Participation Data for Case Study States¹**

FSP PARTICIPATION	CATEGORY 1 STATES			CATEGORY 2 STATES		CATEGORY 3 STATES		
	Kansas	Mississippi	Tennessee	Colorado	Washington	Wisconsin	Utah	Oregon
Number of Participants (9/98)	113,826	301,924	522,898	181,924	323,251	181,741	89,113	221,115
Percentage Change in FSP Participation (9/96-9/98)	-30.2	-31.5	-16.8	-22.1	-27.5	-28.9	-14.5	-18.6
Percentage Change in FSP Participation Among Public Assistance (PA) Cases (7/96-7/98)	-43.1	-57.7	-36.8	-37.2	-25.3	-82.0	-18.6	-42.5
Percentage Change in FSP Participation Among Non-Public Assistance (NPA) Cases (7/96-7/98)	-15.2	-17.0	-3.5	-15.9	-36.3	+36.4	-15.4	-12.5

¹ State FSP participation data in this table represent the number of individuals participating in the program by month and were obtained from National Databank computer runs provided to HSR by the Food Stamp Program, Program Accountability Division at FNS.

Finally, in one community in each State, less-structured focus groups were conducted with staff from emergency food and shelter organizations and advocacy groups. The purpose of these focus groups was to elicit discussants' views on barriers and facilitators to FSP access and recommended improvements to the quality of client service. A list of the organization participating in the focus groups in each State is provided in Appendix A.

Quantitative data on population size and unemployment rates for 1996 and 1998 were collected for each county or city where the local offices are situated. These figures are presented in the tables in Appendix B.²

C. Limitations of Study Design

The case studies provide a rich source of detailed information about local food stamp policies and practices that has not been published elsewhere. However, the findings must be interpreted in light of several limitations about this research approach.

First, the States were selected on the basis of food stamp and TANF policy choices of interest to FNS. Further, the local offices in each State were selected by the State FSP director because they represented the director's view of offices that best met the State's policy goals and desired implementation practices at the local level. Thus, the site selection process was intentional and not representative of the nation or of the selected States.

Second, reliance on interviews with State and local staff and officials produces data that reflects not only the expertise of the respondents but also their personal perspectives on the value of the policies and their effects on clients. Interviews with advocates for low-income clients were included to provide an informed alternative perspective on the subject matter. However, since this study did not include interviews with food stamp participants or applicants, firm conclusions cannot be drawn about the consequences of particular policies or

² Efforts were also made to collect and analyze program administrative data to determine how many individuals were sanctioned under new food stamp sanction options and how many individuals, particularly ABAWDs, were served by the Food Stamp E&T Program; however, very few States had collected or compiled data about these areas of program operations. Where data were available, they are discussed in the findings section of this report.

procedures for clients. Descriptions of local office operations and State policies were provided by individuals who may have had a vested interest in describing their program in its best light. Respondents were asked their views about the consequences of policies and procedures for clients, but despite their regular contact with food stamp clientele, program staff and administrators occupy very different social positions than clients and may not have been fully aware of how policy changes affected the food stamp applicant and recipient populations.

A final drawback of the case study approach in this study is the limited ability to triangulate qualitative and quantitative data. Researchers found that the States and localities had very limited tracking and data collection ability to identify the number of clients affected by particular policies, such as the number of individuals who had food stamp sanctions imposed on their household or the number of individuals participating in local Food Stamp E&T Programs. Thus, while the authors learned about particular policies, such as comparable sanctions, E&T approaches, or TANF diversion practices that might have posed barriers to participation or promoted employment among able-bodied food stamp clients, the impact of these policies on clients is not measurable.

Without outcome data or information on participants' perceptions of local policies and practices, the case study findings on policies and practices must, by definition, be descriptive in nature and cannot be used to tie specific policies and practices to outcomes. Hence, the discussion of program effects in this report focuses on policies and practices that may be impacting client services, and thus are of policy interest to FNS, other government policy makers, and interested groups. We stress that the discussion of these potential effects is based primarily on the observations and analyses of the senior case study researchers who attended each site visit.

D. Organization of Findings

The aforementioned technical reports to FNS present the individual case study findings for each of the eight States visited. Most of the information in these reports is descriptive and focuses on the policy choices of particular interest to FNS that formed the criteria for the State's inclusion in the study (see Table I-1 above). The reports also present information on

demographic and economic characteristics of the local sites and additional information on the overall structure of FSP policies and practices in each State.

Chapter II presents a synthesis of the findings of these reports in terms of how the observed and reported practices may have affected client services, either positively or negatively. Client services are examined in terms of the following three key dimensions.

- **Program accessibility.** The dimension of client service that may have been most affected by various changes in policies and local program operations is program accessibility. The analysis of the case study findings focuses on changes in program operations and policies that may have affected individuals' decision to apply for food stamps, complete the food stamp application process, or to continue participating once they were certified.
- **Quality of service.** The case study research also identified two types of changes that may affect quality of service offered to food stamp applicants and recipients. This included moving ongoing food stamp eligibility functions to a telephone center and thereby eliminating many face-to-face interview requirements in Utah, and a high caseworker turnover rate in several States.
- **Availability of services to support clients' move toward employment and self-sufficiency.** Wisconsin, Utah and Oregon were selected as case study sites for this study because these States had implemented a strong work first orientation for their TANF Program. The case study findings focus on how this strong work orientation was carried over to the services for non-TANF food stamp households.

The largest quantity of information and discussion in this report is on the first dimension, program accessibility. This is because data collected from the site visits about the effects of State changes on local program implementation largely has implications in this area. Findings on the second and third dimensions of client service are limited because, as the case study interviewers learned during their visits to 24 local offices, by 1998 and early 1999 most of the case study States—with the exception of some localities in Wisconsin, Utah and Oregon—had not altered either the administration of eligibility services for food stamp clients or the extent of employment and training services available to FSP participants.

CHAPTER II

Key Findings from the Case Studies

A. Program Accessibility

Some of the State policy choices and local operational decisions about how to operate the FSP discussed during site visits suggest that new factors may have been affecting access to the program after welfare reform. Thus, whereas in the past factors such as the location of the office, the length and complexity of the application process, language barriers, misinformation about eligibility and “welfare stigma” may have affected individuals’ decision to participate in the FSP, at the time of the case studies different factors in the local operation of the program may have also affected access in either a positive and negative manner.

Highlighted below are several changes in State policies and local office operations as reported by the State and local FSP staff that may have acted as barriers or, in some cases, facilitators to access for food stamp applicants and recipients. Some of these changes were a direct effect of welfare reform, while others, such as office hours, verification requirements, and outreach options, were policies and practices that likely affected FSP access prior to PRWORA.

1. Potential Barriers to FSP Access

The case studies revealed several areas of program operations that may have directly or indirectly posed barriers to FSP access. These barriers can be categorized in the following seven areas:

- Formal or informal job search diversion policies,
- Limited office hours,
- Burdensome verification requirements,

- Shortened food stamp certification periods,
- Lack of E&T services to help ABAWDs meet their work requirement and maintain benefits,
- Food stamp sanctions for noncompliance with TANF rules, and
- Privatization of the TANF eligibility process.

Each of these potential barriers are discussed in the sections that follow.

a. Formal or Informal Job Search Diversion Policies

While it is not official State policy to divert eligible clients away from the FSP, the case studies provided evidence that, in practice, formal or informal applicant job search requirements sometimes created obstacles to clients seeking to apply for food stamp benefits.

- **Kansas.** Kansas required TANF applicants to look for a job before their TANF and food stamp application can be approved. In the few counties operating a Food Stamp E&T Program, non-TANF food stamp applicants who were mandatory work registrants were also required to conduct a job search before their food stamp applications were approved.

One of the offices visited in Kansas had also implemented a policy designed to further the State's goals of promoting work, but that may have resulted in discouraging eligible individuals from applying for food stamps. The policy required that all applicants (regardless of whether or not they have a work requirement associated with food stamp eligibility) attend a mandatory orientation session. The session covered work requirements for the TANF Program and the Food Stamp E&T Program.

While this orientation was designed to provide a general overview of both TANF and the FSP, it may have been promoting misinformation or confusion among applicants. After the work requirements were explained, some applicants for TANF and food stamps might not understand that they would be exempt from work requirements if they applied for food stamps only. Others, applying for food stamps only, might have thought they were subject to work requirements as a condition of eligibility when they were not. As a result, after finishing the group orientation session, some food stamp applicants may not have filed their application or come back for a follow up interview to complete the application process.

- **Utah.** A few years ago, Utah merged its employment and training services and eligibility functions for TANF, food stamps and General Assistance programs at both the State and local levels. At the time of the site visit, the local offices were transitioning to a new look that emphasized job placement and job referrals instead of what the State called the “support services” of cash assistance and food stamps. The local offices, called “employment centers”, or “job centers”, were serving a broader population than the population eligible for means-tested benefits. They served all people seeking employment or training. These centers were staffed by a mixture of the old eligibility workers and staff from the former department of employment who had experience with work registration and delivering job placement and training services.

Since welfare reform was implemented in Utah, State agency staff told us they had been encouraging local offices to keep people from applying for TANF if they could find a job instead. At the time of the site visit, the State agency was promoting a coordinated employment services design that would make job placement a priority. Local offices were told that assistance in applying for TANF and food stamps should be provided only as a secondary support service for those who were not able to find jobs. Multiple steps were added to the application process, with the goal of dissuading people from applying for TANF and food stamps if it was possible to first help them find a job. While steps were added to the process, the State office was also encouraging local offices to complete the food stamp application interview, for those who did end up applying, on the same day that they came into the employment center, though the client might have to wait the large part of a day to complete this process.

While there was a very clear State policy goal of promoting work first and streamlining services, the site interviews revealed that these well intentioned policies and procedures may have been keeping eligible clients from applying for food stamp benefits.

For example, in all but the small rural county office visited, multiple interviews with different types of caseworkers were required before a food stamp application could be completed. At the Cedar City office, all applicants were required to talk to an intake/up-front worker and then to an employment counselor before they could even receive an application for any support services, including food stamps. Also in the Salt Lake City office, people applying for both TANF and food stamps had to speak to multiple workers before receiving an application form. The role of the employment counselor was to assess each client’s job readiness, provide job referrals, and establish a plan for employment skills training. If the employment counselor decided that a food stamp application is needed, the client would be referred to a third person to get the application form and get assistance in filling out this form, and then wait for several more hours that day to have the eligibility interview.

While the effort to ensure the applicant had an interview the same day they came in for benefits was meant to streamline the process for clients, emergency food providers and other community service providers in the State said that many

applicants became discouraged with the multi-step process. They reported that many people left the offices before their food stamp application was even filed and often did not choose to go back to the office for needed assistance because of the time and hassle involved.

- **Oregon.** In Oregon, researchers interviewed staff in Medford, Oregon—a small city office—that had recently moved from a generic caseworker structure to a new staffing pattern designed to accommodate the applicant job search requirement for TANF. Clients applying for both TANF and food stamps were required to first meet with a specified caseworker from an assessment team who explained the 40-hour job search rules for applicants to TANF. Supervisors interviewed at this office stated that the large majority of TANF applicants did not complete the TANF application process either because they found a job first or because they did not want to comply with the 40-hour-a-week job search requirement. No information was available on how many food stamp applicants were turned away from filing their food stamp application because of what they learned about the TANF job search requirement at this first visit. However, if clients do not understand the different rules between the two programs, this could have been a potential barrier to FSP participation.

Emergency food providers and representatives from other community service organizations in the Portland area reported instances where families interested in food stamps and cash assistance were handed job leads instead of program application forms in an attempt to divert the applicants from applying for services. They said that the applicants were sometimes told to come back and apply only if the job referrals failed to lead to employment.

- **Wisconsin.** When Wisconsin implemented its welfare reform program, called “W-2,” it put an emphasis on diverting clients from cash assistance whenever possible. One of the principles of W-2, according to the Wisconsin Department of Workforce Development is that, “The new system should provide only as much service as an eligible individual asks for or needs. Many individuals will do better with just a light touch.”³

Anyone applying for W-2 assistance was first required to see a resource specialist, who made an initial assessment of the applicant’s needs, performed initial referrals to employment and training service providers, diverted the individual to other resources as appropriate, and evaluated the need for W-2 supportive services such as food stamps. This resource specialist described the requirements of the various programs; another worker conducted food stamp eligibility interviews.

Representatives from local non-profit agencies in Milwaukee pointed out that the State’s approach to the W-2 intake process may have blocked eligible clients from accessing food stamps. In November 1998, shortly after HSR’s site visit

³ Department of Workforce Development. *Wisconsin Works Philosophy and Goals*. <http://www.dwd.state.wi.us/desw2/philosop.htm>

for this project, Congressman Tom Barrett of Wisconsin called for an FNS investigation of the W-2 agencies in Milwaukee. He cited reports from advocates that Milwaukee W-2 agencies were giving food stamp-eligible households a list of food banks and other resources, instead of referring them to county workers to complete an application.⁴

State officials argued that they have designed the diversion process to give individuals options, not to discourage them from receiving food stamp benefits. They denied that it had ever been official policy to discourage individuals from applying for food stamps and indicated that when the controversy arose in December 1997, the State agency sent out a memo stating that clients should not be discouraged from applying for food stamps. Local office staff generally agreed with the State interpretation; however, Milwaukee County officials did indicate that when the transition to W-2 first occurred, some workers in the W-2 agencies may have discouraged food stamp applications along with TANF applications.

- **Washington State.** The State agency emphasized its efforts to assure access to the FSP for all eligible individuals, and at the time of the site visit was embarking on a study of the impact of TANF changes on FSP participation in the State. However, we heard a different story from one of the local office administrators whose focus was on client outcomes. The program administrator at a local office in Seattle told us that in his promotion of work first as an office goal, he asked his receptionists to not only enforce the work registration requirement for all TANF and food stamp applicants who appeared able-bodied, but urged them to tell applicants to go to the unemployment office and register for work before applying for food stamps. While the supervisors and caseworkers had no information about how many potentially eligible clients did not apply for food stamps as a result of this informal diversion policy, it clearly could have delayed the filing of the food stamp application by eligible households and may have been a barrier to access for those who needed food stamp benefits, even after they found a job.
- b. **Limited Hours for Accessing the Food Stamp Office**
- **Portland, Oregon.** During the focus group with emergency food providers and representatives from other community service groups in Portland, we learned that in a downtown office, new applicants for TANF and food stamps had to line up outside the welfare office before 9:00 a.m. to make an appointment to have an eligibility interview that day. If applicants arrived after that time, they had to

⁴ Representative Tom Barrett's Office. *Barrett Seeks Examination of State's Food Stamp Practices*. Press Release. <http://www.house.gov/barrett/pr981119.html>. November 19, 1998.

come back the next day to get an interview scheduled. Clearly these very limited hours imposed a barrier to FSP participation.⁵

c. Burdensome Verification Requirements

To reduce the number of errors in the FSP, many States had shortened the food stamp certification periods for households with a history of earned income. In these cases, both TANF and non-TANF food stamp households were required to conduct in-office or telephone interviews every three months rather than every six months. In some States, including a few visited for this study, workers were also being asked by their local administrators and State offices to conduct more checks on the validity of information being provided by clients. In one office in Oregon and in the State of Utah, we heard that these changes were not only placing a burden on caseworkers time, but also causing some eligible participants to leave the FSP.

- **Oregon.** In the Gresham office, the staff said that the emphasis on verification increased the caseworkers' work burden and reduced the time they could spend on case management to help their TANF/food stamp clients find and maintain employment. Because of the increased number of office visits required, staff said that some working clients just stopped participating in the FSP, though they may still have been eligible and in need of food stamps.
- **Utah.** At the time of the site visit, workers responsible for recertifying food stamp cases were required to make direct contact with collateral contacts, including employers and landlords, to verify the household's income and circumstances. Advocates indicated that this was causing an increased burden on many clients in Salt Lake City who did not want their employers to know that they were applying for or receiving public benefits.

d. Shortened Food Stamp Certification Periods

Interviewees in five States (Colorado, Oregon, Utah, Washington and Wisconsin) that had recently shortened the food stamp certification periods for clients with a history of earned income, noted that this policy was increasing the time and paperwork burden on caseworkers and clients. They said that clients were required to come into the office

⁵ Researchers on this study later learned that this office and its administrator were the subject of an FNS audit, initiated by the local legal services office and that the office practices presenting barriers to participation were changed as a result.

more often and supply information and verification documents more frequently. Caseworkers expressed particular concern about the continued food stamp participation of families with children, working families, and persons with transportation barriers.

e. **Lack of E&T Services to Help ABAWDs Meet Their Work Requirement and Maintain Benefits**

Two of the eight States visited—Utah and Oregon—had very limited E&T services available for non-TANF food stamp clients at the time of our visit. Kansas provided Food Stamp E&T services in a small number of counties in the State and offered no services to ABAWDs subject to the time limit.

- **Utah.** State officials said that they were slow to start up activities for ABAWDs because the goal of providing workfare for ABAWDs was incompatible with the broader State welfare reform philosophy of encouraging all applicants and recipients to look for a suitable job and maintain unsubsidized employment. Local office staff indicated that so much effort had gone into building up E&T and job placement systems for TANF applicants and recipients, that they had not yet had time to build up a similar set of options for ABAWDs, though they hoped to in the near future.
- **Oregon.** During our visits to the local offices, the caseworkers in Oregon told us that since the work requirements were imposed on ABAWDs, most had left the FSP and the workers did not know if they had found employment. The exception to this rule was in Medford, where there was a contractor providing workfare slots to every ABAWD subject to the work requirement, though caseworkers stated that most ABAWDs did not go to the orientation session to learn about activities that could help them meet their work requirement. At the time of our interviews, the State agency staff and advocates told us that the State had funded a non-profit organization to study how to best serve the ABAWD population, including how to design an effective workfare component for this population.

Also, during this same period, Oregon officials were requesting a broad waiver from FNS that would have allowed them to impose stricter job search requirements on all food stamp work registrants and eliminate the three-month time limit for ABAWDs. Clearly, Oregon's Food Stamp E&T Program was in transition at the time of our visit. Very few non-TANF food stamp clients were receiving E&T services and many ABAWDs were losing benefits due to limited availability of qualifying work slots to help them meet their work requirement.

- **Kansas.** The decision not to serve ABAWDs in the Food Stamp E&T Program was made at the outset of welfare reform in Kansas. The State official who

administered the Food Stamp E&T Program expressed the State viewpoint that focusing the program on workfare and education and training opportunities for ABAWDs would change its nature and would not meet their needs or further the goals of welfare reform in the State. Since Kansas had not requested any waivers from FNS to exempt certain areas from the three-month time limit, the only way for ABAWDs to collect food stamp benefits after three months was to find unsubsidized employment.

f. **Food Stamp Sanctions for Noncompliance with TANF Rules**

PRWORA offers States the option to impose food stamp sanctions on TANF/food stamp households that would otherwise be exempt from food stamp sanctions under the Food Stamp E&T Program rules. One provision of the welfare reform law, known as the “comparable disqualification option” allows States to disqualify a TANF/food stamp individual from food stamps when he or she is disqualified from TANF for not complying with TANF rules, even if the individual would otherwise be exempt from a food stamp sanction under the Food Stamp E&T rules. A second provision allows States to reduce a household’s food stamp benefits by up to 25 percent when the household’s TANF benefits have been reduced for noncompliance with a TANF requirement. PRWORA also offers States the option to impose food stamp sanctions on a whole food stamp household for up to six months when the head of household is noncompliant with TANF work requirements and a mandatory food stamp E&T registrant.

Three States—Mississippi, Kansas, and Tennessee—were selected as case study States because they had chosen one of these sanction options after PRWORA, and thus were assumed to be using a more punitive food stamp policy option than were many other States. One purpose of the interviews in these States was to determine how often the sanctions were imposed and whether there was a formal conciliation process routinely used to help clients meet their work requirements and thereby prevent a sanction.

The following paragraphs summarize what was learned from interviews with State and local staff about the difference in implementation of the optional sanction policies in the three States.

- **Mississippi.** Mississippi chose the comparable disqualification option soon after the passage of PRWORA. Initially, the State interpreted this option more broadly than intended by Federal policy makers. Beginning in July 1997, if an individual did not comply with TANF work requirements or did not comply with child support agency requirements, the whole family, including the children, lost both TANF and food stamp benefits. At the time of the site visit, and pursuant to a November 1997 policy clarification memorandum from FNS, the State had changed its implementation of this sanction option to disqualify only the noncompliant individual from food stamps. Thus, if a TANF/food stamp household did not comply with TANF work rules and there was no child age six or above in the household then the noncompliant individual was sanctioned. In households with children age six or older, the whole household was still sanctioned because the head of the household was considered a mandatory Food Stamp E&T client and subject to Mississippi's food stamp sanction rules. State and local officials reported that most TANF/food stamp cases were exempt from full household food stamp E&T sanctions because they included a child under age six.

State data on food stamp sanctions for September 1998 indicated that 540 TANF/food stamp individuals or whole households were disqualified from food stamps that month because they had not met TANF requirements. While the State data do not differentiate between individual and whole household sanctions, clearly both the comparable disqualification sanction option in PRWORA and the State's food stamp E&T sanction policies for comparable TANF work requirements were resulting in a large total number of food stamp sanctions that month.

State and local officials indicated that the initiation of the comparable food stamp sanction policy after PRWORA had a limited effect on clients' compliance with the TANF work rules. Rather than be subject to a comparable food stamp sanction many families with children under age six opted to discontinue TANF participation. Interviewers said that these families often applied for food stamps as non-TANF households, thus avoiding TANF work requirements and the potential for related food stamp sanctions. This behavior on the part of clients was in large part attributed to the State's low TANF benefit level. At the time of the site visit, Mississippi had the lowest TANF benefit level of any State (the maximum TANF cash benefit for a family of three was \$120 a month) and as a result food stamp benefits were more valuable to clients than TANF benefits.

- **Kansas.** When Kansas was visited in September 1998, the State had a comparable disqualification option in place. If a head of household in a TANF/food stamp household violated a TANF work requirement or did not cooperate with child support, both the TANF case and the food stamp case were closed, and the household received no benefits from either program. This was

referred to as a “full family sanction.”² If a household member other than the head of household violated the TANF work requirement or did not cooperate with child support, only that individual’s TANF and food stamp benefits were discontinued.

September 1998 data provided by the State indicated that 67 households (with an unknown number of individuals) had their food stamp cases closed that month due to non-compliance with a work requirement. Case managers and supervisors indicated that the monthly number of TANF and food stamp sanctions had been much higher when Kansas initially implemented its TANF program. Therefore, quite a few households had probably been negatively affected by the comparable disqualification policy since its implementation in Kansas.

At the time of the site visit, there was no routine conciliation process in effect for households losing food stamp benefits due to sanctions. Local staff reported that TANF/food stamp full family sanctions had to be reviewed by a caseworker supervisor. Both workers and supervisors indicated that supervisors almost always concurred with the worker. Some staff indicated that the workers were influenced by their supervisor’s philosophy regarding how strict they should be when imposing sanctions. These philosophies apparently varied significantly. Some encouraged sanctions at the first instance of noncompliance, while others encouraged workers to spend time with the client and to do what was needed to help them participate in a work activity before sanctioning their cash and food stamps.

- **Tennessee.** Tennessee was the only State visited that chose the food stamp benefit reduction option for TANF/food stamp households that do not comply with TANF requirements. At the time of the site visit, the State reduced food stamp benefits by 10 percent when a household did not comply with TANF rules. Tennessee was also the only State with a very client-friendly conciliation process designed to prevent sanctions when possible.³ Local and State staff interviewed indicated that the benefit reduction was too small to serve as an incentive for households to comply with TANF rules. According to the staff, it was very common for households to receive reduced food stamp benefits for long periods of time as a result of continued non-compliance with TANF rules.

In response to concerns about the number of TANF cases being closed, in January 1998 Tennessee initiated a review process for all cases that were going

⁶ Kansas officials were aware that its policy was not in compliance with FNS guidance; however, at the time of the site visit, State officials stated that they disagreed with the FNS interpretation and had decided to maintain the policy until official regulations were issued. This decision was subsequently modified. Effective April 1, 1999, the State ended the full family sanction policy for the FSP. All food stamp penalties now effect only the individual violating the TANF requirement.

³ The State did not have data on the number of households that were receiving reduced food stamp benefits because of noncompliance with TANF rules or on how many families left the FSP as a result of this sanction.

to be sent a case closure notice for noncompliance. The reviews, initially done by State employees and subsequently turned over to contract employees hired by four State universities, involved contacting the client and keeping the family on benefits if possible. Workers were told to maintain TANF and food stamp benefits for the household if the reviewer found an error in the case, if the client had good cause for noncompliance, or if the reviewer convinced the client to agree to comply with the TANF requirement.

According to State and local staff and advocates interviewed, this conciliation process has reduced the number of TANF sanctions and has maintained access to the FSP at full benefit levels for most TANF households.

g. Privatization of the TANF Eligibility Process

Of all the local offices visited, only Milwaukee, Wisconsin had fully privatized TANF eligibility and other services. One of the consequences of privatization is the delinking of TANF and FSP functions since the FSP must be administered by State and local personnel. This separation created challenges for food stamp workers and potential participants in Milwaukee. The following summarizes some of the challenges and barriers to FSP access that were assessed through the local interviews.

- **Milwaukee, Wisconsin.** The local delivery of TANF benefits and services was privatized and reorganized in Milwaukee. At the time of the site visit, households applying for both TANF and food stamps went to one of six district offices—administered by five different private contractors—to have their food stamp eligibility determined by Milwaukee County workers who worked on-site with the private contractors. To facilitate enrollment in food stamps in this divided system, a client could apply for food stamps at any of the district offices; the case was then transferred to the correct office for ongoing case management. While this arrangement addressed one potential problem for applicants, it caused discontinuity in services and confusion for participants.

The county workers also indicated that dividing the city into regions caused problems for themselves and clients because of the large number of cases being transferred. Some of these transfers resulted from individuals applying at one center and receiving ongoing case management at another, but an even greater cause of the transfers was clients moving from one district to another. One county worker reported that 300-500 cases were transferred out of his office each month and another 300-500 cases were transferred into the office from other TANF agencies or county food stamp offices. County caseworkers reported that they received as many as 56 new cases from an outside TANF agency in a month. When a case was transferred, the record needed to be

reviewed and the worker was supposed to make sure it was not due for recertification. County workers who reviewed transferred cases said that they frequently ran into problems because procedures had not been followed correctly. This process placed a burden on clients as well because the transferred cases needed to be seen in the new office within 30 days after the transfer.

The nonprofit service providers participating in the focus group in Milwaukee reported that dividing the city into service areas presented a real problem for clients. Many clients did not understand the divisions. Often times the office they were assigned to was not the one closest to their home. The providers reported that some clients had been told that they could get services at county offices, but when they went to those offices, they were sent to private TANF agency offices.

Another potential barrier to participation for ongoing food stamp cases in Milwaukee was the lack of coordination between TANF and food stamp recertifications and its resultant time burden for clients. The certification period for most food stamp households was three months, while TANF and Medical Assistance cases were reviewed every six months. Because different workers were responsible for the food stamp and TANF portions of a household's case, clients had to see two different caseworkers to be recertified, sometimes at two different locations. As a result, they had to provide the same information twice. In addition, while the goal of the local offices was to coordinate the scheduling of TANF and food stamp recertifications when they occurred in the same month, county workers indicated that in practice this was the exception rather than the rule. As a result, TANF/food stamp participants often had to make multiple trips to the office to maintain their eligibility for food stamps and TANF.

2. Potential Facilitators to FSP Access

A few of the local offices visited had implemented efforts to promote FSP participation, particularly among ABAWDs, working families, and elderly persons. Their practices fall into two categories:

- Outreach, and
- Designated caseworkers and on-site E&T assessments for ABAWDs.

a. Outreach

At the time of the site visits, few States had taken advantage of the available Federal matching funds to develop food stamp outreach plans. Three exceptions were

Tennessee, Washington, and Colorado. After PRWORA, these States initiated new outreach efforts targeted to populations with the largest declines in FSP participation. For example, Tennessee began funding a community-based organization to conduct outreach to working families and legal immigrants. In Colorado, a new outreach effort by a private contractor at one local site focused specifically on ABAWDs who had left the FSP. More details on these States' outreach efforts are provided below.

- **Tennessee.** Since the 1980s, Tennessee has spent State food stamp administrative dollars matched by Federal dollars to help fund the outreach activities of several advocacy organizations. Manna, a Nashville area emergency food provider and advocacy organization, has a long-standing food stamp outreach effort that initially targeted the elderly and disabled. Since the implementation of welfare reform, Manna has broadened its focus to include working families and immigrants. West Tennessee Legal Services has also been engaged in food stamp outreach activities. At the time of the site visit, East Tennessee Legal Services had requested to get involved in food stamp outreach and the State had agreed. The outreach effort by these advocacy groups is an accepted part of the Tennessee program. Despite some tension between the policy goals of advocates and those of State officials, there has been good cooperation between the agencies.
- **Washington State.** Washington State has had a food stamp outreach program for several years, administered through private nonprofit organizations funded by the Community Services Block Grant and other agencies serving hard-to-reach populations, such as migrant farm workers and non-English speaking immigrants. During the group interview with advocacy organizations in Spokane, researchers learned about an interesting street outreach program conducted by a local community action agency. This program, targeted to the homeless, encourages participation in the FSP and specifically in workfare programs that can help ABAWDs meet their food stamp work requirement and maintain benefits.
- **Colorado.** In Colorado Springs, Goodwill Industries is the E&T provider for food stamp participants. At the time of the site visit, Goodwill was planning to initiate an outreach program at a local soup kitchen to help ABAWDs regain food stamp eligibility after hitting their three-month time limit. The plan was to meet individually with these ABAWDs and talk to them about how Goodwill and the FSP could help them get back on their feet and find a workfare placement that would not only restore their food stamps, but also lead to the possibility of permanent employment.

b. Designated Caseworkers and On-site E&T Assessments for ABAWDs

Two of the States visited had made extensive efforts to expand their program capacity at the local level in order to offer every ABAWD a qualifying E&T slot. At each local office visited in these States there was a worker specially assigned to help ABAWDs meet their work requirement and thus maintain access to the FSP. The Food Stamp E&T efforts for ABAWDs in these States are described below.

- **Colorado.** Colorado's Food Stamp E&T Program has always had a strong commitment of funding from the counties. By Fiscal Year 1999, the State was planning to provide Food Stamp E&T services with funding provided by 44 of 63 of the counties, including every county that did not have a waiver from the ABAWD provisions.

Workfare has been a major component of the State's E&T strategy for food stamp participants since 1992, when it initiated a mandatory workfare demonstration project in several counties. At the time of the site visit, 42 local programs had workfare activities. The State had also encouraged counties to expand the availability of job training and education services in their Food Stamp E&T Programs. Our visits to the three local offices made it apparent that the key to the successful participation of ABAWDs in E&T in this State was having an individual case manager on site who saw the ABAWD right after his or her first eligibility interview and who was highly motivated to help the client find an appropriate E&T slot and to help him or her follow through with participation.

Colorado is the only State visited that had outcome data on its mandatory E&T population. The counties were required to track and report these data each month, as a condition of receiving funds from the State. According to figures provided by the State agency, the approach in Colorado not only helped ensure continued food stamp participation for many ABAWDs, but also helped many find employment. Forty percent of food stamp participants statewide (ABAWDs and non-ABAWDs subject to mandatory E&T requirements) who were referred to a workfare site complied with the site's participation requirements. More impressive still, 55 percent of those who started a food stamp workfare placement subsequently become employed. These numbers compare very favorably to the ABAWD E&T participation rates noted in local offices in other States visited for this study.

- **Washington State.** Since the passage of PRWORA, the State food stamp agency, with assistance from a statewide anti-poverty advocacy organization, the Children's Alliance, had actively sought to help ABAWDs maintain their food stamp eligibility through participation in qualifying E&T. At the time of the site

visit, each regional office in the State had staff specifically assigned to help local offices identify more workfare sites and build their employment and training capacity for ABAWDs. In addition, local offices were provided temporary funding for a designated worker to provide case management services for ABAWDs.

Each of the three local offices visited had a full-time caseworker assigned to the ABAWD caseload. The caseworker's client responsibilities were to explain the time limit rules and employment and training options, and to provide counseling and referrals to job search and subsequently to workfare positions in the community. These workers were not primarily eligibility workers, but rather more like the case managers for TANF. Local staff reported that many ABAWDs did not participate in the workfare assignments offered them and that the case managers did make an effort to follow-up and assist these clients. The ABAWD workers told us that it was their role either to help the ABAWDs link up with employment services to find a job or to find out why they did not participate in workfare and to help them find a more suitable workfare placement.

Some of the staff from nonprofit agencies who participated in the focus group in Spokane said they worked closely with the ABAWD case managers to find appropriate workfare slots and reach out to ABAWDs who had left the program to inform them of their right to regain food stamp eligibility if they comply with the work requirement. This was identified by focus group participants and local agency staff as a successful partnership effort.

B. Quality of Service

At the same time that welfare reform was changing the way States deliver services to new applicants and participants, the case study site visits revealed changes in the caseworker function that may have positively or negatively affected the quality of service for food stamp clients.

1. **Centralized Telephone Eligibility Center: A New Model to Streamline Services for Ongoing, Non-TANF Food Stamp Cases**
 - **Utah.** In June 1998, in effort to streamline functions related to determining client eligibility and to increase staff time available for employment-related services, Utah's Department of Workforce Service began a pilot project to assess the feasibility of centralizing all eligibility functions for food stamps and other supportive services at a telephone eligibility center. At the time of the site visit, the 3,500 households in this pilot project conducted virtually all food stamp

recertification business over the telephone with this centralized staff. The sole exception was a required annual face-to-face interview with a caseworker at the food stamp office. The telephone center staff were also responsible for responding to that food stamp participant's questions and concerns in between recertifications. Clients without telephones in their homes were being asked to come into their local employment center and talk to a worker using a telephone located in the office.

A consumer satisfaction survey conducted by the State found that people using the telephone service center felt it was easier to do business with the telephone center staff than to visit an employment center. However, two concerns arose from the creation of this center. First, because the telephone center staff were so focused on eligibility functions, the State's goal of integrating employment-related services with eligibility functions for all clients was weakened somewhat. Second, as reported by advocates in the focus group in Salt Lake City, there were long waiting times for clients who called the telephone center. Representatives from community groups and caseworkers also expressed some concern about the State's plan to further automate the telephone service functions for ongoing food stamp cases. Staff from community groups in Salt Lake City reported that clients' were already somewhat confused and frustrated by the fact that after their eligibility was determined they only had access to a worker by telephone. These individuals felt that the clients would be further confused and might not stay on the FSP if the process became less personalized by having to report changes and provide other information to an automated voice over the telephone.

Overall, it appears that the move toward a telephone eligibility system in Utah can ease the burden of multiple office visits required for clients and potentially provide easier access for clients to information about their case and to a worker who can take information they need to report. The model in Utah is one that other States have considered implementing in the near future. However, States must learn from the experience of Utah. In the short-term, advocates in Utah described the confusion that this change caused clients who still want to see an individual caseworker face-to-face and who expect continuity of service from the same worker. State agency staff reported that as the State's system evolved and further evaluations and refinements were being made, one of the State's first priorities would be to improve customer satisfaction by reducing the waiting times for clients who call in and by improving customer education about the benefits of the telephone center for them.

Another early challenge of the centralized system was the transferring of clients' case records from paper files to a centralized automated system so that any worker at the telephone center could quickly pull up a client's file when he or she called in. At the time of the site visit, State agency staff reported this process was being assessed and improved, but had not yet been perfected.

2. Caseworker Turnover

At the time of the site visits, caseworker turnover was high in many States, particularly among the non-TANF food stamp caseworkers whose pay scale was often lower than that for the TANF workers. Turnover may affect quality of service in at least two ways. First, turnover increases the size of caseloads for workers who remain. Second, it means that services are being provided by newer, less experienced staff. Case study information indicates that the problem of caseworker turnover stemmed from a variety of factors, as described below.

- **Low Pay.** Administrators and supervisors in Mississippi, Tennessee, and Colorado pointed to low pay as a major cause of caseworker turnover. These staff left the welfare system for better paying opportunities. In Colorado, many caseworkers who worked with the non-public assistance food stamp clients transferred to the Colorado Works Program (the State's TANF program), where caseloads are smaller and the resources available for both clients and workers are greater.
- **Complexity of the Job.** In Mississippi, the difficulty of understanding and implementing complex policies in multiple programs led offices to seek out individuals with advanced degrees. These individuals were especially prone to leave because of the limited advancement possibilities within the State agency. In Colorado, supervisors in the larger offices noted that there was a large turnover in food stamp caseworkers because of the large caseloads and the complexity and multiple changes in the food stamp rules.
- **Increased Emphasis on Verification and Error Prevention.** In some of the local offices visited in Washington and Utah, caseworkers said that the amount of time they must spend reviewing each case to prevent errors was increasing their workload, decreasing the amount of time they could spend with clients and causing high turnover rates. In Oregon, caseworkers did not directly mention high turnover as an issue, but they did say that their high caseloads and the three month recertification period for food stamp households was resulting in increased paperwork requirements and a consequent reduction in job satisfaction. These workers said the time they spent on verification for food stamps took away needed time to provide quality case management for public assistance food stamp cases—a new function under welfare reform that had greatly increased their job satisfaction. In Salt Lake City, some caseworkers responsible for ongoing maintenance of cases, including contacting collateral contacts and other increased verification requirements, expressed some concern about increased caseloads and noted high turnover and decreased job satisfaction among their colleagues.

- **Limited Labor Pool in a Rural Area.** In most rural offices visited, the caseworkers serving food stamp cases had been working in the program for many years and had experienced many changes in policies and procedures. One office in rural Tennessee had a major problem retaining workers in their community. Most of the workers in this office were recruited from different counties, and were transferred when job opportunities arose closer to their homes.

C. Availability of Services to Support Clients' Move Toward Employment and Self-Sufficiency

A number of States were trying new ways of delivering employment services for the TANF population and, as a result, had dramatically changed the design of the local welfare office procedures for TANF/food stamp applicants. For example, several States were accepting food stamp applications at new employment or job service centers that were emphasizing job search and placement, rather than public assistance eligibility determination. Three such States—Oregon, Utah and Wisconsin—were purposely selected as category three case study sites to examine whether this strong work orientation was carrying over to the non-TANF food stamp clientele and helping them move toward employment and self-sufficiency. Though case study interviewers repeatedly heard that there was little significant change in the ability of the FSP to help non-TANF clients move toward employment and self-sufficiency in all eight case study States, some local offices in Oregon, Utah and Wisconsin had made the greatest changes in this area and the findings from these sites are highlighted below.

- **Oregon.** Since implementation of welfare reform statewide in Oregon, the State required everyone who applied for and received TANF benefits to conduct applicant job search activities for 40 hours a week as a condition of eligibility and then participate in self-sufficiency activities. Oregon also strengthened the TANF sanctions for non-cooperation with the required activities and expanded the range of work activities available to TANF/food stamp clients, including subsidized employment and substance abuse treatment, which the State has a waiver to count as a work activity for TANF/food stamp clients in need of treatment.

State officials reported that they encouraged local offices to provide case management services to all clients coming in to apply for benefits, including the non-TANF unemployed and underemployed food stamp households. However, local office staff in the two urban offices (Gresham and Medford) indicated that both limited resources and the Food Stamp E&T Program rules prevented them from providing case management services for non-TANF food stamp households. While there were requirements for caseworkers to refer ABAWDs to E&T

services that qualified to meet their work requirement, in these offices the focus of the caseworkers' interaction with the non-TANF food stamp households was on food stamp eligibility determination and verification of client circumstances to prevent overpayments.⁴

At the two urban offices visited in Oregon, employment and training services and case management were generally not available or utilized for non-TANF food stamp individuals, except for workfare as an option in Gresham for some ABAWDs. In the rural office of Tillamook, where all caseworkers were generic in their responsibilities and thus determined eligibility for multiple programs for all client types, all food stamp clients received one-on-one case management services, even if they were not ABAWDs. This office had a particularly large proportion of non-TANF food stamp households in its food stamp caseload. Of a total food stamp caseload of approximately 1,300 in September 1998, 90 percent were non-TANF food stamp households. The caseworkers, many of whom knew these clients on a very personal level in this close-knit community, told us that they tried to provide the same set of services, including referrals to appropriate E&T opportunities and case management, for all their TANF and non-TANF food stamp clientele. Also of note is that in this office, at the time of our site visit, caseloads averaged about 100 per caseworker, a much smaller number than in the larger offices visited in Oregon and in other States. Clearly workers with smaller caseloads had the time to provide more intensive counseling, referrals and follow-up services for their clients.

Oregon was taking another innovative approach to E&T services in its Medford office. At the time of our visit, this office was beginning job retention services for families with children either diverted from TANF or who had left TANF for a job. In this office, retention team workers provided preventive case work to assist clients in retaining employment for the first year of work. While the supervisors discussed an office-wide emphasis on job retention, the retention team staff—each of whom had a caseload of about 150 to 180—felt that the limited funding available in the Food Stamp E&T Program overall and the Federal requirement to target 80 percent of the available funds on ABAWDs prohibited them from being able to provide the same intensity of services for working households on food stamps who had not recently left the TANF rolls.

- **Utah.** After State welfare reform was enacted in 1997, the Department of Workforce Services in Utah urged all local “employment centers” to change their image and the way they deliver services. The caseworkers were no longer to emphasize eligibility determination for public benefits; instead, they were to serve as “employment counselors”, whose primary function was to find jobs in the community and place people in these jobs.

8

At the time of the site visit, Oregon had requested a comprehensive waiver to the Food Stamp E&T Program rules that would have permitted it to enforce more stringent sanctions for noncompliance with E&T requirements for food stamp households and required most adults in the FSP to have a self-sufficiency plan, with adherence to the plan a mandatory condition of eligibility. The waiver also asked for FSP funds to be passed along to the State in a form similar to a block grant. This waiver was not approved by FNS in the form in which it was submitted.

State officials reported that their goal was to blur individual program lines to provide customers with seamless employment-oriented services. When the State merged its employment and supportive services into one-stop employment centers at the local level, it was envisioned that all customers, regardless of the specific reason that brought them to the office, would receive similar employment-related services. In the State's plan, and in each of the three offices visited, each employment center had an up-front area with a job board and other resources, such as personal computers, to help clients with their job search. In mid-size and larger offices, someone was always available in this front area to help people use the on-line job information and to counsel them briefly about job opportunities. In the State model, each client then had a more in-depth counseling session with an employment counselor who could match the client's skills and experience with job openings in the community or referrals for appropriate training if needed.

While the State encouraged a broad model of employment support for all persons coming to an employment center, local staff reported that they were not able to provide extensive, or in some cases any, E&T services for non-TANF food stamp households, unless the client was job-ready. Office directors and supervisors reported that they prioritized the TANF population because these parents had strict work and education requirements and a three-year lifetime limit for receipt of TANF, and the State had strict work participation rate requirements for the local offices. In only one office visited, an office serving a large caseload in downtown Salt Lake City, did staff routinely provide employment counseling to non-TANF food stamp households. This was focused solely on ABAWDs subject to the three-month time limit and disabled clients who were receiving State general assistance and not eligible for SSI.

State officials said that one of the reasons workers may not have implemented the employment emphasis for non-TANF food stamp households is that in most offices, the non-TANF food stamp cases were served by a different set of workers, whose primary function was eligibility determination and benefit calculation. Another factor impeding the ability of caseworkers to provide employment-related services for non-TANF food stamp households was their larger caseloads.

- **Racine, Wisconsin.** The local welfare office in Racine represents a model combination of employment and benefit services. It offered integrated, one-stop shopping approach for all clients. Like in Utah, employment services were also available to anyone in the community seeking employment assistance. The food stamp E&T caseworker reported that participation in food stamp E&T was higher since E&T services and eligibility services were co-located. In the past, it was much easier for clients to become disengaged as they went from place to place to access E&T services.

In contrast to the offices visited in Utah, where local offices had not yet been able to realize the State's goal of serving all clients, Racine provided one-on-one ongoing case management for all food stamp E&T clients, including non-TANF

food stamp clients. At the Racine job center, food stamp E&T clients had the same intensity of employment services available to them as the TANF/food stamp clientele do. Workshops, job search assistance, and adult education classes, held at the job center, included a mixture of TANF/food stamp participants, non-TANF food stamp E&T participants, and other interested people from the community. On-site child care was available for anyone who used the job center, whether they came to look for work, meet with a food stamp or TANF worker, or participate in an E&T activity. When major employers in the community needed to hire a large number of workers they regularly conducted their interviews in the job center. All the staff interviewed emphasized the tremendous advantage of having many services located in one place.

Mandatory food stamp E&T clients were assigned to a group orientation at the job center. They then attended a group assessment, where they learned about the resources available and were assigned to a specific component and a case manager. The center offered multiple tools for finding a job including job search resources at the center and a series of workshops tailored to individual client needs. Among the workshops offered in the month of the site visit were: "Techniques for a Great Receptionist," "Career Assessment," "Cover Letters," "Thank-you Notes and More," "Triumph over Termination," "Interviewing

Skills," "Careers in Health Care," the "Earned Income Tax Credit," and "Nontraditional Occupations." Workshops were made available in the evening to accommodate working people who wanted to advance their job skills.

While Racine offered a wide range of services to food stamp clients, utilization of these services was low. According to a case manager interviewed, less than one-third of all mandatory E&T participants attended the initial orientation session. Most people who attended the orientation and received job search assistance found jobs quickly. Staff indicated that this was probably also the case for a portion of clients who applied for food stamps and never went to an E&T orientation. Those food stamp E&T participants who were not able to find a job were assigned to workfare ("work experience") slots in the public and private sectors.

D. Conclusion

Without doubt, the strong U.S. economy and the impact of cash assistance reforms and changes in FSP eligibility contributed to the decline in food stamp participation since 1994. These factors also had a profound impact on the way services were delivered at local welfare offices and on individuals' attitudes towards public assistance. This study suggests that the way in which clients are served at local food stamp offices and changes in local office operations under welfare reform *may* also affect participation decisions by eligible households in ways that contribute to the decline in FSP participation.

The in-depth study of 24 local offices in 8 States provided an opportunity to examine how State policy choices under welfare reform are implemented at the local level and how local office choices affect client service. Interviews with supervisors, caseworkers and local non-profit organizations examined ways in which the FSP is presented to applicants, the application and recertification processes, and the availability of employment and training services to non-TANF food stamp clients. The site visits revealed a number of practices in several of the 24 offices visited that potentially pose barriers to participation in the FSP. Examples of these policies and procedures included:

- Multiple interviews with employment-related staff before the food stamp application can be completed,
- Withholding of information about FSP eligibility and an overemphasis on TANF rules in ways that may have misled applicants about the differences between TANF and FSP requirements and their relevance to their circumstances,
- Overzealous promotion of employment goals to the point of urging clients to visit the unemployment office before filing for food stamp benefits,
- More frequent certifications and direct collateral verifications of employed clients' circumstances with the consequence that caseworkers had less time for case management services to help clients find and maintain employment,
- Limited E&T services for non-TANF food stamp clients, particularly ABAWDs and those who were not job ready, despite, in one State, a general policy to provide these services to all clients,
- More punitive food stamp sanctions for noncompliance with TANF rules and E&T work requirements, sometimes without opportunities for conciliation, and
- Lack of coordination between TANF and food stamp certification and change reporting processes.

Site visits also revealed local office policies and procedures that were designed to facilitate program participation. These examples demonstrate that the goals of welfare reform and of maximizing FSP participation by eligible households are not fundamentally in conflict with one another. Some of these local practices included:

- A designated worker in each office to help ABAWDs meet their work requirement and thus maintain food stamp eligibility,
- The integration and co-location of food stamp E&T and eligibility services,

- The availability of the same mixture of E&T services to both TANF and non-TANF food stamp participants, and
- Food stamp outreach activities initiated to help those most affected by welfare reform, namely, legal immigrants, ABAWDs and working families.

The case study findings also suggest that local office characteristics may influence how State welfare reform policies are implemented. For example, in one State, an office in a more rural area was more successful at offering E&T services to all food stamp clients than its urban counterparts, in large part because of smaller caseloads and personal relationships between workers and clients. In another State, years of experience operating workfare projects was the basis for the commitment to serve ABAWDs. Finally, many of the local food stamp outreach initiatives that were identified built upon prior relationships with community-based organizations serving low-income individuals.

Although case studies provide a rich source of detailed information about local food stamp policies and practices, the research approach has several limitations. First, the site selection was purposive and not representative of the nation or of particular States, although State officials were asked to select offices that best met the State's policy goals. As a result, the *list of examples is not comprehensive and statements about the prevalence of certain practices cannot be made*. Second, the data are qualitative and *impacts on participation were not measured*. The study, however, does support the concern that the design of local office food stamp operations *may be* a factor contributing to the rapid decline in FSP participation.

The task of identifying and remedying practices that can negatively impact access to the FSP is a difficult challenge for policymakers because, as this study demonstrated, official State policies are not a reliable indicator of what occurs at the local level. This study also revealed that many local procedures that may impede program participation are frequently the product of well-intentioned efforts to further the goals of welfare reform.

Appendix A: Lists of Case Study Sites, State Agencies
Participating in Interviews, and Nonprofit
Organizations Participating in Focus Groups

Case Study Sites

States	Local Food Stamp Offices		
	Offices in Rural Areas	Offices in Small Cities (Name of City)	Offices in Large Urban Areas (Name of Major City)
.....			
CATEGORY 1 STATES			
<i>Kansas</i>	McPherson County	Saline County (Salina)	Sedgwick County (Wichita)
<i>Mississippi</i>	Adams County	Washington County (Greenville)	Hinds County (Jackson)
<i>Tennessee</i>	Robertson County	Montgomery County (Clarksville)	Knox County (Knoxville)
CATEGORY 2 STATES			
<i>Colorado</i>	Bent County	Fremont County (Canon City)	El Paso County (Colorado Springs)
<i>Washington</i>	Tri-County Area Stevens County Pend Oreille Ferry County	Spokane East (Spokane)	Ballard (Seattle)
CATEGORY 3 STATES			
<i>Oregon</i>	Tillamook County	Medford (Medford)	Gresham Branch (East Portland)
<i>Utah</i>	Beaver County	Iron County (Cedar City)	Downtown Salt Lake City Office (Salt Lake City)
<i>Wisconsin</i>	Dodge County	Racine County (Racine)	Milwaukee County (Milwaukee)

State Food Stamp Agencies in the Case Study States

State

Agency

CATEGORY 1 STATES

Kansas Department of Social and Rehabilitation Services

Mississippi Department of Human Services

Tennessee Department of Human Services

CATEGORY 2 STATES

Colorado Department of Human Services

Washington Department of Social and Health Services

CATEGORY 3 STATES

Oregon Adult and Family Services Division, Department of Human Resources¹

Utah Department of Workforce Services

Wisconsin Department of Workforce Development

¹The agency name was changed to the Oregon Department of Human Services after the site visit was conducted.

Non-Profit Agencies and Advocacy Groups Participating in Focus Groups

CATEGORY 1 STATES

Wichita, Kansas

The Salvation Army
Interfaith Ministries
The Campaign to End Childhood Hunger

Jackson, Mississippi

Stewpot Community Services
Iona House

Knoxville, Tennessee

Knoxville Community Action Committee
The Private Industry Council
Knox Area Rescue Ministries
Knoxville Community Development Corporation
The Salvation Army
Volunteers of America

CATEGORY 2 STATES

Colorado Springs, Colorado

Care and Share Food Bank
Manna Ministries
Ecumenical Social Ministries
Ranch House Ministries
Westside Cares
Faith-Based Mentoring Task Force

Spokane, Washington

Spokane Food Bank
Central United Methodist Church
Spokane Neighborhood Action Program
Children's Alliance

CATEGORY 3 STATES

Portland, Oregon

Asian Family Services
Oregon Food Bank
Oregon Hunger Relief Task Force
Sisters of the Road

Salt Lake City, Utah

Cathedral of the Madeline
Salt Lake Community Action Program
Northwest Food Pantry
Crossroads Urban Center
Utahans Against Hunger

Milwaukee, Wisconsin

Hunger Task Force of Milwaukee
Hmong/American Friendship Association
Central City Churches
New Life Presbyterian Church
Social Development

Appendix B: Tables of FSP Participation and Selected
Demographics for Local Sites

Table B-1.				
State and Local Food Stamp Participation Trends For the Case Study Sites September 1996 to September 1998¹				
Location	Number of Individuals Participating		Percentage Decline in Participation 1996-1998	
	September 1996	September 1998		
U.S. Totals	24.85 million	18.68 million	24.8	
CATEGORY 1 STATES	Kansas	163,172	113,826	30.2
	McPherson County	884	733	17.1
	Saline County	3,403	2,102	38.2
	Sedgwick County	37,268	24,917	33.1
	Mississippi	440,523	301,924	31.5
	Adams County	7,933	5,956	24.9
	Hinds County	44,318	29,247	34.0
	Washington County	19,205	15,288	20.4
	Tennessee	628,657	522,898	16.8
	Knox County	34,371	27,002	21.4
	Montgomery County	10,320	8,211	20.4
	Robertson County	3,634	3,245	10.7
CATEGORY 2 STATES	Colorado	233,505	181,924	22.1
	Bent County	805	651	19.1
	El Paso County	26,031	21,333	18.8
	Fremont County	3,172	2,532	20.2

¹ Data on the number of individuals participating in each State's Food Stamp Program in September 1996 and September 1998 were obtained from National Databank computer runs provided by the USDA, FNS, Food Stamp Program, and Program Accountability Division on February 11, 1999. The State food stamp agencies provided county and local office-specific food stamp participation data.

Table B-1 (continued).				
State and Local Food Stamp Participation Trends For the Case Study Sites September 1996 to September 1998				
	Location	Number of Individuals Participating		Percentage Decline in Participation 1996-1998
		September 1996	September 1998	
CATEGORY 2 STATES(cont.)	Washington²	446,036	323,251	27.5
	Ballard Office- Seattle	7,404	5,363	27.6
	Spokane East Office	13,637	10,875	20.3
	Tri-county Office	7,164	6,363	11.2
CATEGORY 3 STATES	Oregon	271,491	221,115	18.6
	Gresham Office- Portland	60,025	38,537	35.8
	Medford Office	10,549	7,950	24.6
	Tillamook Office	1,571	1,303	17.1
	Utah	104,216	89,113	14.5
	Beaver County	319	280	12.2
	Iron County	2,378	2,197	7.6
	Salt Lake City	40,699	32,789	19.4
	Wisconsin	255,669	181,741	28.9
	Dodge County	1,334	961	28.0
	Milwaukee County	126,459	94,125	25.6
	Racine County	8,631	6,053	29.9

²

In 1996, Washington State converted to a new computer system. Though the State believes the 1996 data it provided are reliable, these represent the average number of cases per month and are a combination of the old and new computer data.

Table B-2. Population and Unemployment Rates for the Local Case Study Sites				
Location	Population¹ in 1998	Unemployment Rates²		
		1996	1998	
CATEGORY 1 STATES	Kansas			
	McPherson County	28,549	3.0%	2.8%
	Saline County	51,399	3.9%	3.5%
	Sedgwick County	447,819	4.4%	3.3%
	Mississippi			
	Adams County	34,141	7.0%	8.3%
	Hinds County	247,262	4.0%	4.1%
	Washington County	65,173	10.1%	9.2%
	Tennessee			
	Knox County	374,693	3.4%	3.1%
	Montgomery County	127,156	4.0%	3.5%
	Robertson County	53,192	5.0%	3.4%
CATEGORY 2 STATES	Colorado			
	Bent County	5,798	4.0%	4.0%
	El Paso County	490,044	4.6%	4.5%
	Fremont County	44,225	5.0%	4.7%

¹ U.S. Census Bureau, *Population Estimates*,
<http://www.census.gov/population/www/estimates/popest.html>

² U.S. Department of Labor, Bureau of Labor Statistics, *Local Area Unemployment Statistics, Selective Access*. <http://stats.bls.gov/lauhome.htm>

Table B-2 (continued).				
Population and Unemployment Rates for the Local Case Study Sites				
	Location	Population in 1998	Unemployment Rates	
			1996	1998
CATEGORY 2 STATES (cont.)	Washington			
	Seattle	536,978	5.8%	3.6%
	Spokane	184,058	6.6%	5.5%
	Tri-county			
	Stevens County	39,591	10.8%	9.0%
	Pend Oreille	11,523	16.4%	12.1%
	Ferry County	7,163	13.7%	11.5%
CATEGORY 3 STATES	Oregon			
	Portland	503,891	5.5%	5.1%
	Medford	57,156	7.8%	6.4%
	Tillamook County	24,283	6.0%	6.0%
	Utah			
	Beaver County	5,901	5.3%	4.9%
	Iron County	28,777	3.8%	3.9%
	Salt Lake City	174,348	3.0%	3.4%
	Wisconsin			
	Dodge County	83,007	2.8%	2.8%
	Milwaukee County	911,536	4.1%	4.0%
	Racine County	185,537	4.2%	4.1%