

Chapter 4

Policies and Practices That May Affect Whether Participating Households Continue to Receive Food Stamps

This chapter explores FSP policies and practices that may impact whether or not households continue to participate in the Food Stamp Program once they are deemed eligible. The first two sections examine how local offices handle food stamp recertification and the reporting of changes in household income and other circumstances—two basic FSP requirements necessary for continued eligibility. The third section examines local implementation of food stamp sanction policies that may cause food stamp households to either become ineligible or to lose their benefits. The fourth section looks at local office policies and practices that may affect whether or not able-bodied adults without dependents between the ages of 18 and 50 (ABAWDs) lose food stamp benefits due to time limits and work requirements.

The final section takes a specific look at food stamp participation rates among families after they leave the TANF program. Since the implementation of welfare reform, policymakers, public policy researchers, and children’s advocates have been concerned about whether or not this group has access to safety net programs like the FSP. The section examines office practices affecting the continuation of food stamps for eligible families leaving TANF, because they have been either sanctioned for noncompliance with TANF rules, have reached the TANF time limit, or have voluntarily left for employment or other reasons. A summary analysis at the end of this chapter focuses on office policies and practices that alone, or in combination, may impede continued food stamp participation by eligible participants.²³

Food Stamp Recertification Policies

All FSP participants must reapply for benefits at the end of their certification period. The food stamp recertification process usually involves submitting a new application form, sometimes participating in another face-to-face interview, and providing extensive verification of household circumstances. States and local offices set the certification period at standard intervals that often vary by the type of food stamp household. Participants whose income and household circumstances are likely to fluctuate may have shorter certification periods than those whose incomes are relatively stable or come primarily from government cash assistance sources, such as Social Security or Supplemental Security Income.

Frequent recertification requirements may add time and paperwork burdens for FSP participants, but the Federal quality control system has created an incentive for States and local offices to collect information from participants more often. Each State receives a financial penalty or bonus based on its food stamp error rate—the rate of food stamp cases that are found to have overpayments or

²³ This chapter does not include a section discussing differences in policies and practices by office size as only scattered differences were statistically significant. The one policy-relevant difference is noted in the text.

underpayments, or have received benefits when they are no longer eligible. The error rates in a State's food stamp payments are determined by information that is either found in the case records or reported to quality control reviewers by participants. Hence, short certification periods (and frequent reporting requirements) may help reduce or prevent State penalties for payment error rates.

The potential effect of State and local recertification policies on FSP access—a concern that predates welfare reform—is most frequently raised for low-income working households. States often impose short certification periods (or frequent reporting requirements) on working households because they are more likely to experience changes in household income and circumstances than other households. Since the implementation of welfare reform, the burden of these requirements for working households has received increased attention by policymakers and anti-hunger advocacy groups. Beginning in 1999, the Food and Nutrition Service (FNS) greatly expanded State options on these FSP policies to ease the burden of reporting and recertification requirements for food stamp households, and to minimize the risk of food stamp payment errors for States.

This analysis examines three broad research questions:

- What is the most common length of the food stamp certification period for each of the major food stamp household types (TANF cases with earnings, TANF cases without earnings, non-TANF cases with earnings, elderly or disabled households, and ABAWDs)?
- Do local offices require participants to go in for frequent face-to-face office interviews, and for which groups do they routinely waive the face-to-face interview requirement?
- Does the office automatically close food stamp cases or give participants a second chance to recertify if they miss their recertification interviews?

Length of the Food Stamp Certification Period

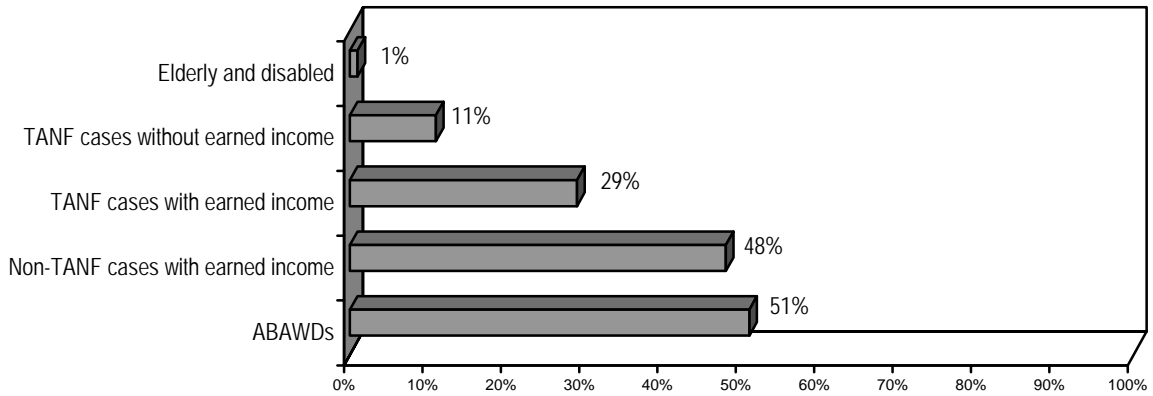
Food stamp law allows food stamp certification periods to range from one month to one year, depending on the type of household, with the exception that households in which all adults are elderly or disabled can have up to two years.

Beginning in the 1980s, many States shortened certification periods to three months, particularly for error-prone households, in order to collect more timely information on changes in household circumstances. In the late 1990s, FNS began reconsidering its emphasis on short certification periods in light of the potential impact on FSP access. However, the local office survey results showed that requiring some households to recertify for food stamps every one to three months was still widespread, particularly for three groups of households: ABAWDs, non-TANF households with earnings, and TANF households with earnings (figure 4.1).²⁴ Fifty-one percent of the offices (weighted) required their ABAWD participants to recertify every one to three months, and 48 percent of the offices (weighted) required non-TANF cases with earned income to recertify within this same

²⁴ The short certification periods for ABAWDs are likely unavoidable, because these participants must be closely monitored each month to determine if they have met their work requirements.

timeframe.²⁵ For 29 percent of the offices (weighted), this short certification period was also set for TANF cases with earned income.

Figure 4.1—Short (1- to 3-month) certification periods, by household type (percent of the national food stamp caseload)



Data from appendix table A4.1.

Not surprisingly, 93 percent of offices (weighted) set certification periods of at least seven months for the elderly or disabled (figure 4.2). Federal food stamp policy recognizes that the recertification process is particularly burdensome for the elderly and disabled, because they may have difficulty traveling to the food stamp office, and that this group’s circumstances remain relatively stable. Thus, food stamp law allows States to set 24-month certification periods for households with seniors and disabled adults (an option that was made available to States in 1996 under the Personal Responsibility and Work Opportunity Reconciliation Act). The survey results showed that 17 percent of all offices (weighted by caseload) had 24-month certification periods for seniors or the disabled (appendix table A4.1).²⁶

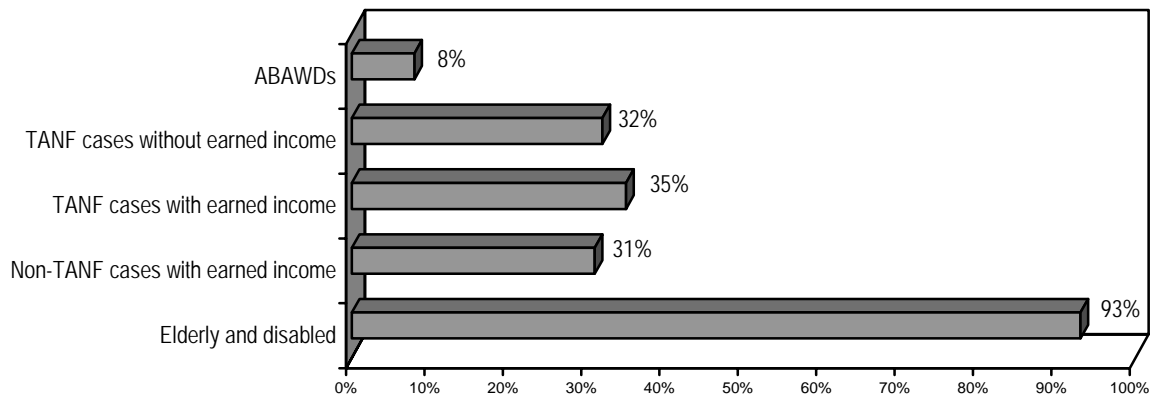
Frequency of Required In-Office Recertification Interviews

Caseworkers have reported that participants’ failure to appear for recertification appointments is one of the most common reasons for closing food stamp cases. A case study of the application and recertification process for TANF food stamp households in Miami-Dade County found that in one month, twice as many TANF food stamp cases were closed for failure to attend joint TANF food stamp recertification appointments than for failure to find employment (Quint and Widom, 2001). Food stamp participants and past participants in focus group discussions have also complained

²⁵ See Chapter 1, pages 6-8 for a discussion of weighting procedures used to develop the national estimates. In this report, the terms “percent of national caseload” and “percent of offices, weighted” are used interchangeably. These weighted numbers do not represent the percent of the caseload directly affected by a policy or practice, but rather, the percent of the caseload served by offices where a practice or policy is in effect.

²⁶ A survey of State food stamp agencies conducted in 2000 by the General Accounting Office (GAO) found that 33 percent of States reported having 24-month certification periods for seniors (GAO, 2000).

Figure 4.2—Longer (7- to 24-month) certification periods, by household type (percent of the national food stamp caseload)



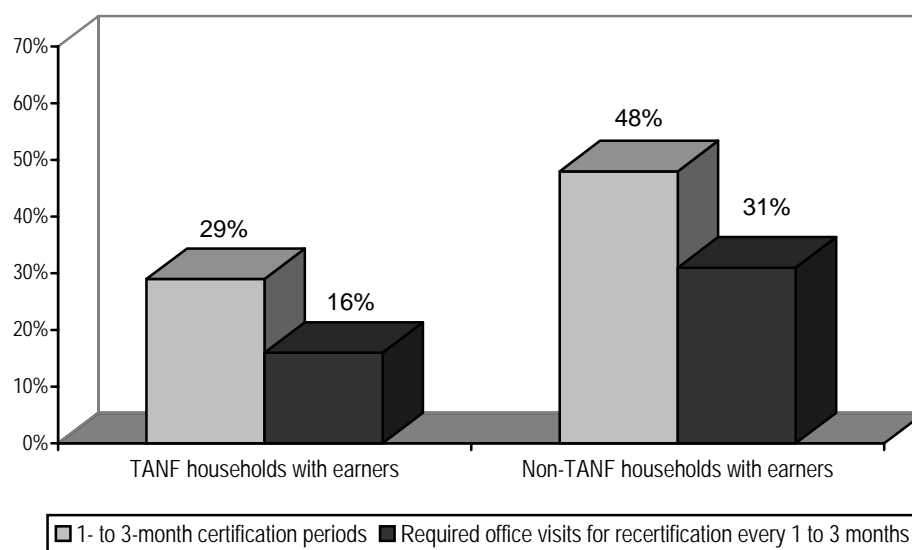
Data from appendix table A4.1.

vigorously about FSP recertification procedures, specifically about the requirements to go to the food stamp office every three months and supply verification of the same information during each visit (Gabor et al., 2002; Maloy, 2001).

These qualitative research findings are not surprising since participants who continue on the FSP face many of the same barriers at recertification that they did during initial enrollment, including access to transportation to the food stamp office, office crowding, lengthy application process, and extensive verification requirements. If the head of a household is required to frequently appear at the food stamp office for recertification interviews, he or she may eventually decide that the cost of food stamp participation outweighs its benefits. Working families may find it particularly inconvenient and a potential barrier to continued food stamp participation if they are required to attend frequent recertification appointments, because it forces the employed household member to balance work, childcare, and other responsibilities.

FNS recently addressed this food stamp access issue by allowing States to waive the requirement of a face-to-face interview for many recertifications. Beginning in 2000, the U.S. Department of Agriculture began approving waivers that allowed recertification for all types of households to be conducted by mail or telephone if a household's certification period was less than one year. Some, though not all, States have taken advantage of these waivers and reduced requirements for in-office interviews, particularly for food stamp participants with earnings. For non-TANF households with earners, 48 percent of the offices (weighted) required short certification periods, and 31 percent of the offices (weighted) required these households to go into the office every one to three months for recertification. Similarly, 29 percent of the offices (weighted) assigned certification periods for TANF households with earners of one to three months, and 16 percent of the offices (weighted) required them to go into the office within this same timeframe to be recertified (figure 4.3).

Figure 4.3—Comparison of short (1- to 3-month) certification periods with requirement to visit the office every 1 to 3 months for households with earnings (percent of the national food stamp caseload)



Data from appendix tables A4.1, A4.2.

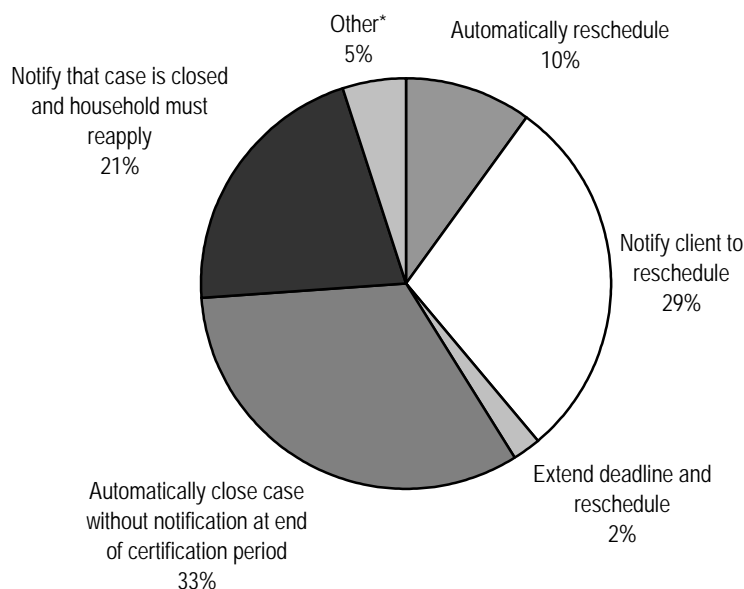
For many years, local offices have had the discretion to waive face-to-face recertification interviews based on hardship, such as frailty, physical disability, or other factors that make it difficult for participants to visit the office. Caseworkers routinely offered telephone or at-home recertification interviews to people with hardships. The disabled and elderly were offered telephone or at-home interviews in 70 percent and 54 percent of the offices (weighted), respectively, whereas participants lacking transportation were offered this service in 16 percent of the offices (weighted). Seven percent of the offices (weighted) routinely offered telephone or at-home food stamp eligibility interviews to employed individuals or those who had other work-related commitments (appendix table A4.4).

Actions Taken When a Household Does Not Show Up for a Scheduled Recertification Appointment

If an individual is required to attend a face-to-face interview to continue FSP participation and he or she misses the scheduled appointment, local offices may decide how quickly they close the case. The local office survey revealed that caseworkers' actions varied considerably when a food stamp client missed his or her scheduled recertification interview (figure 4.4). Fifty-four percent of the national caseload was served by offices that automatically discontinued food stamps (with or without any notification) if a client missed the recertification interview. On the other hand, 41 percent of the national caseload was in offices that had practices that promoted continued participation, including automatically rescheduling the appointment, extending the deadline before closing the case, or notifying the client that he or she needed to reschedule the appointment before the deadline.²⁷

²⁷ The remaining 5 percent of offices either did not schedule interviews in advance or reported a practice that did not easily fit into either of the two categories described above.

Figure 4.4—Office practice when a client misses a recertification appointment (percent of the national food stamp caseload)



Data from appendix table A4.3d.

* Includes 4 percent of offices (weighted) that did not schedule interviews in advance.

The policies and practices discussed above can individually, or in combination, affect an individual's ability or decision to meet the recertification requirement and continue receiving food stamps, even if the household remains eligible for food stamps. When caseworkers were asked what they would change about their office procedures to increase program retention at recertification, only those in offices serving 33 percent of the national caseload made suggestions. Recommendations reported by at least 4 percent of offices (weighted) included: reduce the number of in-office visits required for recertifications, increase the length of the certification period, and conduct follow-up calls or send follow-up notices to clients who missed their recertification appointments (appendix table A4.5).

Household Change Reporting Policies

In addition to complying with recertification rules, participants are responsible for reporting any changes in income or other circumstances that occur during the food stamp certification period. Participants are asked to submit information on a periodic basis or as changes occur. Federal rules let States decide which reporting systems they will use, and States may require different reporting systems for different types of households. Requiring frequent reports increases the likelihood that eligible participants will lose their food stamp benefits because they may fail to submit all the necessary reports and verification paperwork in time. Participants who are frequently required to send in reports and verify changes may find the process so cumbersome and costly that they choose to leave the program rather than meet these requirements.

Change reporting and periodic reporting requirements each have advantages and disadvantages with respect to client access. Under a monthly reporting policy, a participant must submit a report

declaring whether or not any changes in the household circumstances have occurred. If so, he or she must provide details on and verification for any changes that would impact the amount of food stamp benefits. Under a quarterly reporting system, States may require some or all participants to file the report and related verification information every three months. Participants subject to quarterly reporting are not required to report any changes that might occur between quarterly reports. Failure to submit either a monthly or quarterly report on time may mean loss of food stamp benefits and closure of the food stamp case. If a participant is not required to submit a periodic report, he or she must submit a change report.

The findings on local office policies and practices, and on caseworkers' experiences of change reporting are presented below to address the following four primary research questions: Are offices liberalizing the basic change reporting requirements by implementing one or more of the FNS-approved waivers to the standard change reporting rules? What types of households are required to submit periodic reports, and what actions are taken if a household does not submit a required report by the initial deadline? Are offices that require working participants to submit monthly or quarterly reports less likely than others to require these participants to frequently visit the office for recertification? Do caseworkers believe that periodic reporting requirements cause food stamp households to leave the program?

Change Reporting

Households subject to change reporting must report changes within 10 days from the time they occur. This includes changes in income, household composition, address, shelter expenses, resources (including the acquisition of a car), and those related to payment of child support.

Until recently, Federal rules required that an increase or decrease of at least \$25 had to be reported to the food stamp office. This policy could cause a large paperwork burden and hassle for food stamp recipients whose incomes are likely to fluctuate; it also means that if a change as small as \$25 is not reported, it is a potential source of payment error for the State food stamp agency.

In 1999, the FNS implemented several new waiver options on change reporting that were designed to narrow the type of income changes that needed to be reported by households and to reduce States' food stamp payment error rates, since any change in income that was too small to be reported would not count as an error. Based on the most recent State-level data available from the FNS, 66 percent of the offices (weighted) had at least one type of change reporting waiver. The two most common waivers were: only income changes greater than \$80 or \$100 need be reported (30 percent of offices, weighted); and only changes involving a change in income source, wage rate, or employment status require a report (42 percent of offices, weighted) (appendix table A4.6a, b).²⁸

Periodic Reporting

Offices serving 49 percent of the national caseload required some households to submit reports on a periodic basis, either monthly or quarterly (appendix table A4.6c). Offices that required some kind of

²⁸ Since these waivers are approved on a statewide basis and not subject to local office discretion, and since survey pretests indicated much confusion in answering questions about change reporting waivers, the information included in this study on change reporting waivers is based on information from an FNS waiver database report, dated October 2001.

periodic reporting were asked detailed questions about how frequently the reports had to be submitted, the types of households that were required to submit such reports, the actions usually taken when a household did not meet the reporting requirement, and the perceived effect of periodic reporting on continued FSP participation by eligible households. The results are summarized below.

Monthly Reporting

Monthly reporting, which requires households to submit reports each month whether or not any changes have occurred, has been used by many States and local offices for nearly two decades. Of the different reporting systems, monthly reporting is the most burdensome and the one most likely to cause eligible households to lose their food stamp benefits, because participants must submit a required set of paperwork each month. For caseworkers, such frequent reporting may increase their workloads because they must monitor the incoming reports for each case. Thus, they will have less time for interviewing and providing case management to help TANF food stamp and ABAWD clients attain or maintain self-sufficiency.²⁹ Despite these drawbacks, the survey found that 28 percent of the offices (weighted) used the monthly reporting system for one or more types of households (appendix table A4.6d).

Monthly reporting places a particular burden on households with earners, since these participants must submit income verification documents each month. Due to income fluctuations, however, working participants' cases are more prone to errors in the calculation of their food stamp benefit levels. As a result, they are more likely to be required to submit monthly reports than households without earners. Monthly reporting was required of TANF food stamp households with earnings in 26 percent of the offices (weighted), and non-TANF clients with earnings in 21 percent of the offices (weighted). In contrast, only 13 percent of the offices (weighted) required TANF households without earnings to report monthly. Few offices required monthly reporting for other types of households (figure 4.5 and appendix table A4.7).

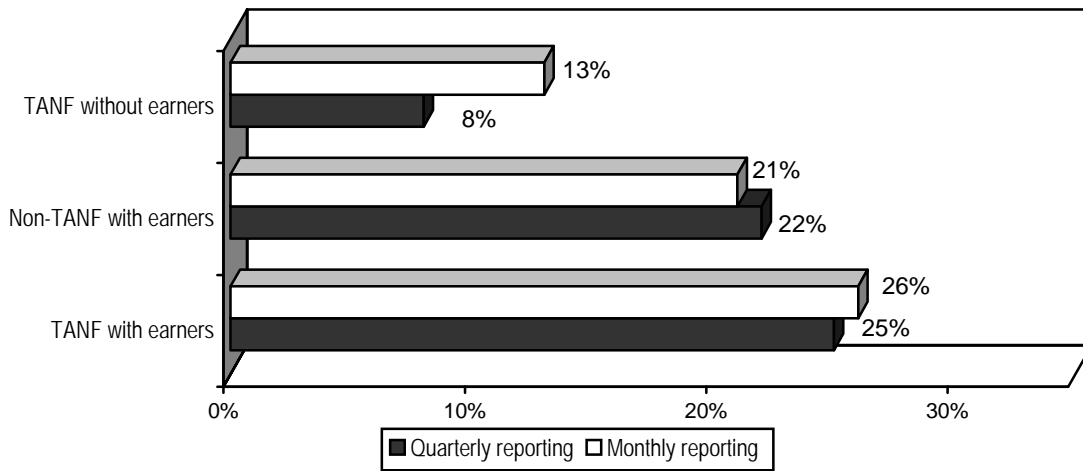
Quarterly Reporting

To encourage working households to continue participating in the FSP and also reduce the pressure on States to overburden these households with frequent reporting requirements, in 1999, FNS gave States the option of requesting a waiver for quarterly reporting. Then, in 2000, FNS gave States the option of offering semi-annual reporting. Quarterly reporting was proposed as a less burdensome periodic reporting system for clients. States have an incentive to choose quarterly reporting over monthly reporting because they are not liable for payment errors arising from changes in household circumstances during the months in between the required reports (Rosenbaum, 2000).

Approximately the same percentage of offices (weighted) used quarterly reporting as used monthly reporting. Twenty-nine percent of the offices (weighted) utilized quarterly reporting for some

²⁹ This concern was voiced by caseworkers in several States that required monthly reporting of most food stamp households in 1998, when HSR research staff were conducting interviews with caseworkers for a study of changes in client service in the FSP after welfare reform. Similar concerns were expressed by caseworkers in some States requiring short certification periods for most or all food stamp households (Gabor and Botsko, 2001).

Figure 4.5—Requirements for monthly and quarterly reporting, by household type (percent of the national food stamp caseload)



Data from appendix table A4.7.

households (appendix table A4.6d).³⁰ The groups most commonly required to submit quarterly reports were TANF clients with earnings, non-TANF clients with earnings, and TANF clients without earnings (figure 4.5).

Periodic Reporting and Frequency of Required Recertification Interviews

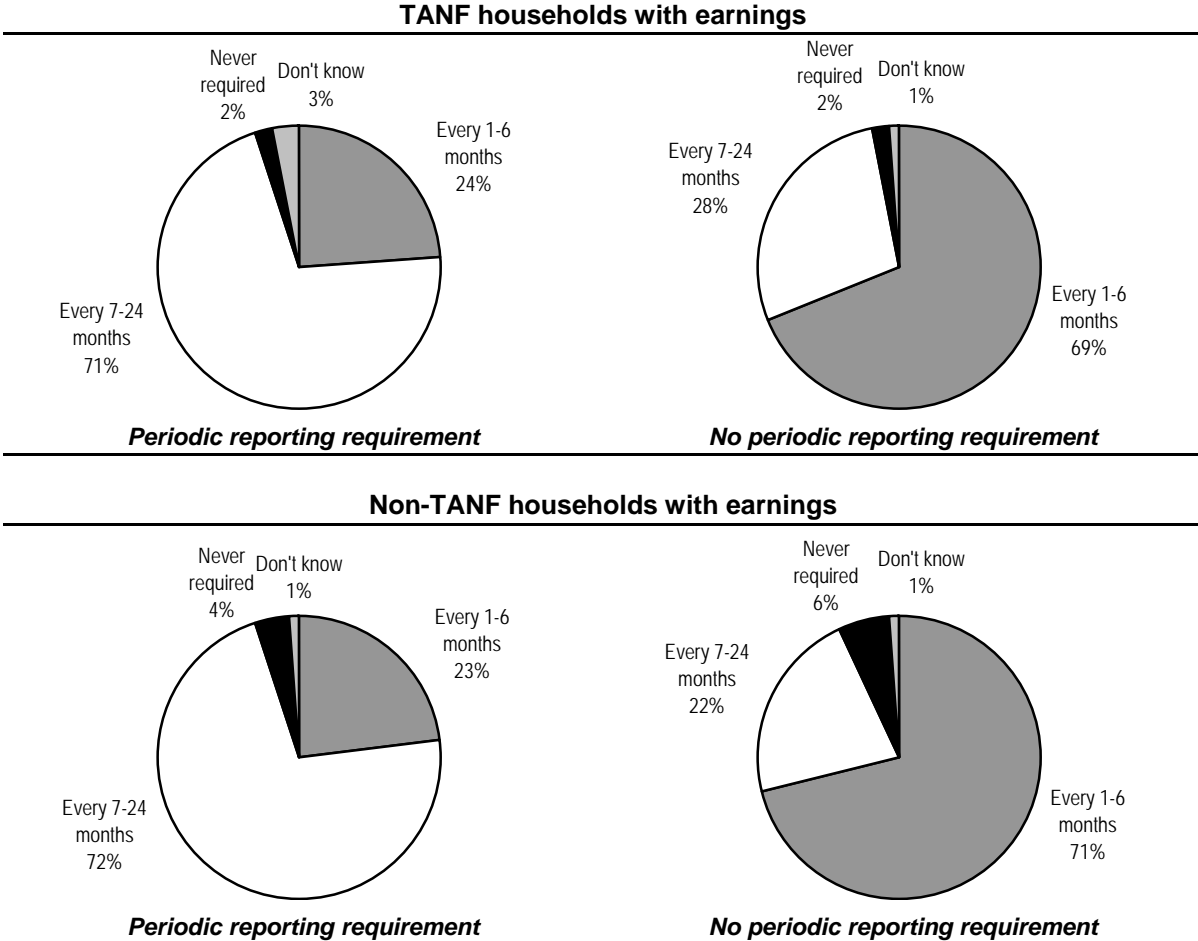
The data on periodic reporting and required office visits for recertification were cross-tabulated to test the hypothesis that offices that required working households to report periodically required them to go into the office less often for recertification visits. The findings confirmed this hypothesis for both TANF and non-TANF working households.

Looking at the subset of offices where TANF households with earnings had to submit periodic reports, 71 percent of the offices (weighted) required these households to go into the office for a visit every 7-24 months. On the other hand, in offices that did not have a periodic reporting requirement for TANF households with earnings, 69 percent of the offices (weighted) required these households to go into the office at least every six months (figure 4.6).

The practice of requiring periodic reports and less frequent office visits correlated similarly for the subset of offices in which non-TANF households with earnings had to submit periodic reports. In this subset, 72 percent of offices (weighted) required non-TANF households with earnings to go into the office for recertification interviews only once every seven months, at most. In contrast, among the subset of offices with no periodic reporting requirement for non-TANF households with earnings, 71 percent of the offices (weighted) required these households to go into the office at least every six months (figure 4.6).

³⁰ Semi-annual reporting was not yet implemented in any office in the sample. This was likely due to the fact that in early 2001, there was still some confusion on the part of States on how to implement the provision, and its potential implications for food stamp payment error rates.

Figure 4.6—Frequency of required office visits, by periodic reporting requirement and household type (percent of the caseload in offices with reporting type)



Data from special tabulations based on variables reported in appendix tables A4.2, A4.7.

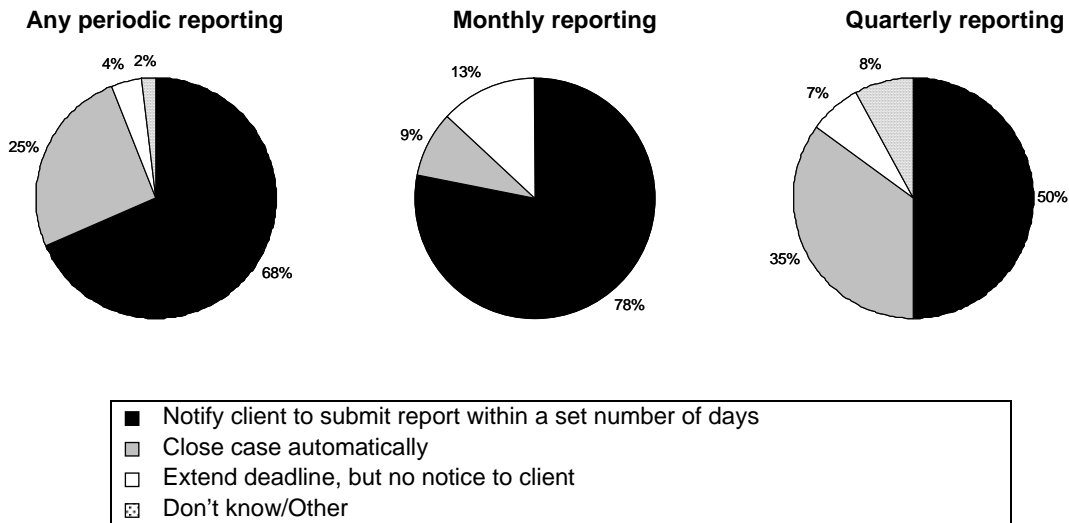
Office Actions for Missed Reports

An office may choose to automatically close a case if the client fails to submit the required periodic report. Alternatively, an office may give the food stamp recipient a second chance to submit the required periodic form and related documentation. Within the subset of offices with any periodic reporting requirement, 25 percent of the offices (weighted) automatically closed a food stamp case when the periodic report was not filed on time (figure 4.7).³¹

Since monthly reporting requires households to submit forms more frequently than any other reporting system, it is also the policy that is more likely to result in missed deadlines. Office policies for dealing with missed deadlines for monthly versus quarterly reporting were examined separately. Offices with quarterly reporting were much more likely to automatically close cases for missed reporting deadlines than offices with monthly reporting. Among the subset of offices with a monthly reporting policy, only 9 percent of those offices (weighted) automatically closed the case when the periodic report was not submitted on time. On the other hand, among the subset of offices with

³¹ Larger offices were more likely than smaller offices to automatically close a case (30 percent versus 6 percent). See appendix table A4.8a.

Figure 4.7—Actions taken when households fail to meet periodic reporting deadline (percent of the caseload in offices with different reporting types)



Calculated from data in appendix table A4.8a, special tabulations based on variables reported in appendix tables A4.6d, A4.8a.

quarterly reporting, 35 percent of the offices (weighted) followed this practice (figure 4.7). This finding suggests that local offices usually gave monthly reporting households more flexibility in submitting these reports on time than they gave to quarterly reporting households.

Supervisors in the offices with periodic reporting policies were asked to estimate the percentage of cases that were closed in a typical month, due to participants' failure to submit their periodic reports. Supervisors estimated that periodic reporting did result in some food stamp case closures. Specifically, supervisors in 22 percent of the offices (weighted) said that less than 5 percent of the participants had their food stamp cases closed due to failure to submit their reports. Supervisors in 17 percent of the offices (weighted) estimated that between 5 percent and 25 percent of the participants had their cases closed for the same reason, and supervisors in 4 percent of the offices (weighted) said that between one-quarter and one-half of the participants had their cases closed (appendix table A4.8c).

Given the increasing interest on the part of FNS to encourage quarterly and semi-annual reports as an alternative to monthly reports for working households, and the supervisors' estimates of the percent of periodic reporters whose food stamp cases are usually closed each month, finding office policies and practices that facilitate submission of periodic reports may be key to improving FSP access for working households.

Food Stamp Sanctions

New or expanded options under PRWORA gave States considerable latitude in deciding whether or not to penalize TANF and non-TANF households' food stamp benefits for noncompliance with program rules. Each of the three sanction options may negatively impact food stamp participation by reducing the food stamp benefits of a household or disqualifying the household. These options, which are briefly described below and then discussed in more detail, are:

- ***Comparable food stamp sanctions for noncompliance with TANF rules.*** Under an expanded option authorized by PRWORA, States may choose to reduce a TANF household's food stamp benefits or, in some cases, disqualify the household from food stamps if the head of household does not comply with TANF rules, including work rules, compliance with child support, and other behavioral requirements.
- ***Food stamp employment and training sanctions for non-TANF households.*** States have always had the option to determine which non-TANF clients must participate in food stamp employment and training (E&T) program activities. PRWORA gave States the option to decide who to sanction when the head of a non-TANF household does not comply with an E&T requirement. States previously had to disqualify the whole household, but PRWORA allowed States to choose to sanction the head of the household only, or the whole household. When the State chooses to sanction the whole household, the sanction can only last for up to six months.
- ***Child support sanctions for non-TANF households.*** Most States sanction the cash benefits of a TANF household for noncompliance with child support enforcement, but PRWORA gave States the option to reduce the food stamp benefits of a non-TANF food stamp household if either a custodial or non-custodial parent does not cooperate with child support enforcement.

Sanctions for Noncompliance with TANF Rules

Reducing and discontinuing benefits have been used as ways to promote and enforce participation in required E&T activities in TANF and the FSP. Such financial penalties (commonly referred to as sanctions) have become a central and common feature of State TANF programs. States have considerable flexibility in setting the financial penalties for noncompliance with TANF work requirements. According to the State Policy Documentation Project, conducted by the Center for Law and Social Policy and the Center on Budget and Policy Priorities in 2000, 36 States used full-family sanctions under TANF, and the rest of the States sanctioned only the noncompliant head of the household (CLASP, 2000). These sanctions have affected many TANF families and had, at the time of this survey, caused many more families to lose TANF benefits than the more publicized TANF time limits, which had not yet been implemented in most States. According to a national study of TANF program sanctions, conducted by the U.S. General Accounting Office (GAO) in 1998, an estimated 136,000 families, or 5 percent of the TANF caseload, were newly sanctioned each month (GAO, 2000). A recent policy brief on TANF sanctions estimated that more than one-half million families had their TANF cases closed due to full-family TANF sanctions, compared with approximately 85,000 families who had their cases closed because they had reached their State's TANF time limit (Bloom and Winstead, 2002).

In addition to sanctioning the cash assistance benefits of TANF families, States may also sanction the food stamp benefits of households for noncompliance with TANF rules using three options:

- States may use their food stamp E&T sanction rules to sanction individuals or entire households who do not comply with the TANF work rules. Under this option, TANF families with children under age 6 will not have their food stamps sanctioned because they are exempt from food stamp E&T sanctions under food stamp rules.

- States may opt for the comparable disqualification provision of PRWORA. Under this option, when a parent does not comply with TANF rules, the State may either reduce the food stamp benefits of the TANF household or disqualify only the noncompliant TANF participant from receiving food stamps. If the State chooses this option, the sanction can be imposed on food stamp benefits even if there is a child under age 6 in the household.
- States may decide not to sanction food stamp benefits for noncompliance with TANF rules. However, even in States that choose this option, food stamp law dictates that States must freeze the food stamp benefits of households where TANF benefits are sanctioned and, thus, not compensate the household for the loss of TANF income that results from a TANF sanction.

Local office policies and practices regarding food stamp sanctions for TANF food stamp households were examined, to determine the incidence, scope and severity of sanction policies as they were implemented in local offices.

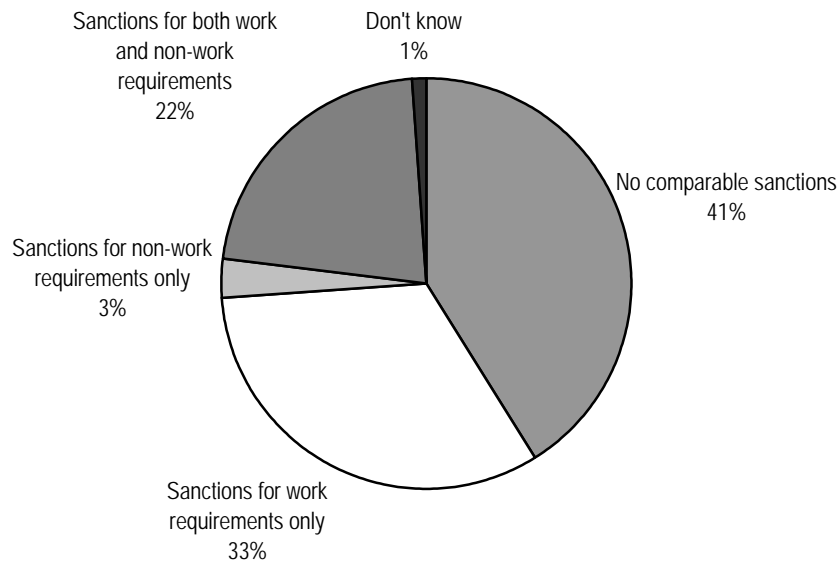
Based on caseworkers' responses, 58 percent of the offices (weighted) imposed sanctions on the food stamp benefits of households who did not comply with TANF requirements.³² As shown in figure 4.8, sanctions were imposed for only noncompliance with TANF work rules in 33 percent of the offices (weighted), for only noncompliance with TANF non work-related rules (such as non-cooperation with child support enforcement) in 3 percent of the offices (weighted), and for noncompliance with either work or non work-related rules in 22 percent of the offices (weighted).

Caseworkers who reported implementing sanctions were asked to estimate the proportion of TANF clients who had their food stamp benefits sanctioned. Caseworkers in 8 percent of all offices said that in a typical month, at least 10 percent of TANF clients had their food stamp benefits sanctioned for violations of TANF rules (appendix table A4.10f).

Supervisors who reported comparable food stamp sanction policies for noncompliance with TANF rules were asked how the policies were implemented—whether food stamp benefits were reduced by a certain percentage, the noncompliant head of household was disqualified, or the whole household was disqualified. The findings show that 19 percent of the offices (weighted) disqualified the whole household for noncompliance with TANF work rules, while only 4 percent did so for non-work violations (appendix tables A4.9b and A4.10c). Supervisors in offices that disqualified the whole household for noncompliance with TANF work rules were asked if this sanction was imposed the first time a household did not comply with the requirement or only after the household had been given several chances to meet the requirement. The analysis reveals that in 14 percent of the offices, weighted (or three-quarters of the offices that disqualified the entire household), a family lost all of its food stamp benefits after the first violation of a TANF work requirement (appendix table A4.9e).

³² Fifty-eight percent represents the total incidence of comparable food stamp sanctions for noncompliance with TANF work or non work-related rules, as reported by caseworkers. Supervisors in 64 percent of the offices (weighted) reported this policy. Because staff responses were similar, and caseworkers' implementation of the policy was deemed more relevant, the analysis of the incidence of sanctions and the proportion of TANF clients who had their food stamp benefits sanctioned is based on the caseworkers' responses. The findings regarding offices that sanction food stamps for noncompliance with both TANF work and non work-related rules are based on a special analysis of the data, not included in the appendix tables. Appendix tables A4.9 and A4.10 present the data separately for TANF work and non work-related requirements, and include both caseworker and supervisor responses.

Figure 4.8—Existence of food stamp sanction policy for noncompliance with TANF rules (percent of the national food stamp caseload)



Appendix tables A4.9f and A4.10e present data separately for work and non-work sanctions.

Supervisors reported that 14 percent of all offices (weighted) imposed food stamp sanctions on families with children under age six when the parent or other head of household did not comply with TANF work rules (appendix table A4.9c).

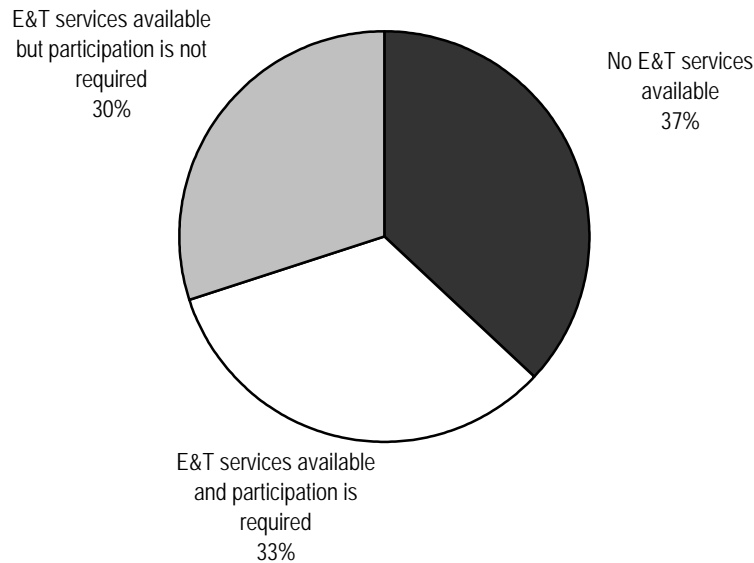
Food Stamp E&T Requirements and Related Sanctions for Non-TANF Participants

Food stamp law requires States to establish E&T programs, but permits them to decide which geographic areas of the State will have programs. According to caseworkers, E&T programs were in offices serving 69 percent of the national caseload (appendix table A4.11g). The food stamp E&T requirement is usually the only work-related requirement for non-TANF food stamp households (except in those few States that still have General Assistance programs with work requirements, like California and Illinois). Thus, this requirement and the accompanying sanction policy for noncompliance likely affects continued FSP participation among non-TANF, non-ABAWD households more than any other type of food stamp household.

To better understand the potential impact of food stamp E&T requirements on non-TANF, non-ABAWD food stamp participants, the rest of this section examines the proportion of the caseload affected by E&T requirements, the characteristics of E&T programs, and the sanctions imposed for violation of the requirements.

Sixty-three percent of the offices (weighted) provided E&T services to non-ABAWD, non-TANF clients, but only 33 percent of the offices (weighted) required at least some non-ABAWD, non-TANF clients to participate in the program (figure 4.9).

Figure 4.9—Food stamp employment and training (E&T) participation requirement for non-ABAWDs (percent of the national food stamp caseload)



Data from appendix table A4.11(c, d).

Supervisors in offices that required non-ABAWDs to participate in E&T were asked whether they required these clients to participate in job search or job search training activities or other more intensive activities. Independent or assisted job search and job search training, the two least intensive employment and training activities, are designed to help clients with job experience or who are considered “job ready” find employment on their own. In 10 percent of offices (weighted), E&T requirements were limited to these activities. In at least 15 percent of offices (weighted), clients were required to participate in activities such as employment and skills training, workfare, or other E&T activities more intensive than job search training (appendix table A4.11e).³³

Overall, the existence of food stamp E&T programs may provide an opportunity for non-TANF food stamp participants to access employment-related services and, thus, find employment or build skills to promote long-term employment and raise their incomes above the poverty level. However, if the service is difficult to access, it may not be widely utilized by either those who can voluntarily participate or those who are required to participate.

The survey examined the accessibility of food stamp E&T services. Forty-two percent of offices, weighted (or 57 percent of offices, weighted, with E&T programs), located placement staff in a different building than the FSP eligibility staff (appendix table A4.11b). This suggests that many offices may have chosen to contract out the provision of E&T services. It also suggests there may be an increased need for coordination of referrals to services, and implementation of sanctions between the food stamp eligibility worker and the E&T program staff. Most importantly, requiring participants

³³ “At least” is a qualifier of this finding because of the large proportion of the caseload in offices where supervisors said they did not know the types of E&T activities in which food stamp households were required to participate.

to go to a location other than the food stamp office increases the hassle and confusion associated with the program. This may increase the likelihood that households subject to an E&T requirement will not comply within the necessary timeframe, and will either have their food stamp benefits reduced or will leave the program.

Food stamp law gives States some latitude in how they sanction the food stamp benefits of non-TANF, non-ABAWD households for noncompliance with food stamp E&T requirements. When the household head does not comply with E&T requirements, either the individual's portion of the household's food stamp benefits may be sanctioned, or the entire household's food stamp benefits may be discontinued for a set period of time. The latter policy could clearly impede continued FSP participation among non-ABAWDs mandated to participate in E&T programs. This strict policy was implemented in only 10 percent of the offices (weighted)—or 31 percent of the offices (weighted) where non-ABAWDs were mandated to participate in E&T activities as a condition of eligibility (appendix table A4.11f).

Child Support Sanctions for Non-TANF Households

Since the mid-1990s, the Federal government has provided assistance to States to help improve parental compliance with child support enforcement agencies. Most States require TANF participants to provide information on the absent parent. At the same time, PRWORA allowed States to disqualify non-TANF custodial or non-custodial parents from receiving food stamps for failing to cooperate with the State child support agency (unless the individual could prove a good cause for noncompliance). In 1997, soon after the implementation of PRWORA, a survey of States found that Maine, Mississippi, Wisconsin, Idaho, and Michigan chose this new FSP sanction option. However, only Maine, Mississippi, and Wisconsin chose to disqualify both custodial and non-custodial parents for noncompliance with the child support enforcement agency (Gabor and Botsko, 1998).

Supervisors reported that 18 percent of the offices (weighted) sanctioned non-TANF households for non-cooperation with child support (appendix table A4.12a).³⁴

ABAWD Work Requirement and Time Limit

PRWORA imposed work requirements and food stamp time limits on able-bodied adults between the ages of 18 and 50 who are not responsible for dependent children and who are not otherwise exempt from the work registration requirements (commonly referred to as ABAWDs). Under this change in the law, ABAWDs who are eligible for food stamps are limited to three months of benefits in any 36-month period unless they work at least 20 hours per week, participate in an approved food stamp E&T program for at least 20 hours per week, or participate in a workfare program. Passage of PRWORA marked the first time Federal legislation had imposed a time limit on the receipt of benefits for any category of food stamp recipients. ABAWDs who lose eligibility can go back onto the program if they begin meeting the work requirement. The law also permitted States to seek

³⁴ A puzzling finding is that caseworkers in offices serving 28 percent of the national caseload said that they personally had imposed food stamp sanctions on non-TANF households for failure to cooperate with child support. The reason for this discrepancy between supervisor and caseworker responses, which is concentrated in larger offices, is unclear. Caseworkers in some offices may be mistakenly sanctioning parents in food stamp households perhaps because the office policy is to impose a TANF sanction for noncompliance with child support.

waivers of this provision for geographic areas where unemployment is over 10 percent, or in localities where it is determined that there are insufficient jobs to provide employment.

During the first year the ABAWD time limit and work requirement provision went into effect, the number of ABAWD participants in the FSP dropped by about 400,000 (from approximately 900,000 in November 1996 to about 500,000 in November 1997). ABAWDs accounted for about 11 percent of the total decline in food stamp participants that one year, though they made up only 3.5 percent of all food stamp participants the previous year (Czajka et al., 2001). While the overall decline in food stamp participation was due in large part to the economic expansion and increase in employment during that period, the three-month time limit for ABAWDs was likely a contributing factor to the decline in participation among ABAWDs (Figlio et al., 2000).

The local office survey looked at how variations in implementation of the ABAWD provision might be affecting the continued participation of ABAWDs in the FSP nationwide. Three local policies and practices were examined: the existence of waivers for some or all of the local area; the existence of an E&T program to help ABAWDs meet the work requirement; and whether and how offices follow up with ABAWDs who have lost their food stamps to help them regain eligibility and benefits.

Local offices serving 31 percent of the national food stamp caseload waived some or all ABAWDs from time limits and work requirements (appendix table A4.13a).

In 1997, Congress passed legislation providing increased funding to States for the food stamp E&T program, with the intention of encouraging expanded services to help ABAWDs meet work requirements. In a survey of State officials conducted one year after implementation of the expanded E&T funding, Health Systems Research found that 45 States had food stamp E&T programs (Botsko et al., 2001). Though most States were found to have implemented E&T services for ABAWDs, they may not have implemented them statewide or in all offices where ABAWDs were subject to work requirements.

Employment and training services were widely available in offices where ABAWDs were subject to the work requirement and time limit. Seventy-nine percent of the caseload in the subset of unwaived offices had an E&T program available to serve ABAWDs (appendix table A4.13a, b).³⁵

FNS has encouraged States to proactively offer E&T services to ABAWDs who hit the time limit and leave the program. To assess the extent to which the caseload is exposed to such practices, caseworkers in offices where ABAWDs were subject to the work requirement were asked if they routinely followed up with ABAWDs who had lost food stamp benefits due to the time limit to inform them of how to regain food stamp eligibility. Among the subset of unwaived offices, caseworkers in 43 percent of offices (weighted) reported providing follow-up either by mail or telephone. Caseworkers in the remaining 57 percent of unwaived offices (weighted) did not do any follow-up (appendix table A4.13a, c).

³⁵ These data are expressed as a percent of the caseload in offices where ABAWDs are subject to the time limit (unwaived offices). The data on the prevalence of services for ABAWDs among the national caseload in all offices, including those waived from the E&T requirements, are presented in appendix table A4.13.

TANF Leavers and Continued Food Stamp Participation

At least 40 percent of the overall decline in food stamp participation between 1994 and 1999 occurred among families who had left TANF (or its predecessor program, AFDC) (FNS, 2001). However, client surveys and studies of TANF leavers have consistently shown that most families leaving TANF are still eligible for food stamps, but only between one-third and one-half continue to receive them (Office of ASPE, 2001; Dion and Pavetti, 2000; Zedlewski and Brauner, 1999).

The low FSP participation rate among TANF leavers may be partly due to their lack of awareness or misinformation about their continued eligibility for food stamps. A study of TANF leavers in Virginia (a State that had implemented a 24-month TANF time limit policy) found that among families whose TANF case closed due to the time limit, 54 percent of those with incomes below 130 percent of the poverty level believed they were ineligible for food stamps (Gordon et al., 1999). Quint and Widom (2001), who interviewed TANF leavers in two local welfare offices, found that the majority of leavers thought the time limit for the receipt of TANF cash assistance also applied to food stamps. In a study of TANF leavers in New Jersey, 30 percent of food stamp-eligible nonparticipants were unaware that clients leaving TANF for any reason can continue to receive food stamps (Rangarajan and Wood, 1999). On the other hand, leaver studies in Wisconsin and South Carolina found that most families were aware that they might qualify for food stamps after leaving welfare (Dion and Pavetti, 2000).

Local office practices in effect when families leave TANF may make it easy or pose barriers for those still eligible to continue participating in the FSP. To explore this issue, the local office survey asked detailed questions about local office FSP-related practices when families leave TANF, and about caseworkers' experiences regarding continued FSP participation among TANF leavers. The analysis, which seeks to better understand the local office practices that are potentially contributing to the low FSP participation rate among eligible TANF leavers, addresses three questions:

- How is the food stamp case and certification period affected when a TANF food stamp household leaves TANF? Is it automatically closed or shortened to the next month, thus requiring the household to immediately recertify to receive food stamps? Or, is the household given more time to remain on food stamps without reapplying, by maintaining or extending its food stamp certification period?
- If a family's food stamp case is not automatically closed or shortened to the next month, does the family have to go into the office to have its benefits readjusted or can this usually be done without an office visit?
- What proportion of TANF leavers continue to receive food stamps?

Whether or not TANF leavers continue to participate in the FSP is likely to vary, based on the reasons they leave TANF. Many participants leave the welfare cash assistance rolls voluntarily, because, for example, they have found jobs. However, two of the most important reforms in the PRWORA—the imposition of Federal time limits on the length of welfare receipt and the use of more stringent sanctions for noncompliance with welfare rules—are causing other families to leave the TANF program involuntarily. Hence, the continued FSP participation of TANF leavers is examined separately, according to the reason for leaving TANF.

TANF Case Closures Due to a Full-Family Sanction for Noncompliance with TANF Rules

Sanctions have affected hundreds of thousands of families since the inception of Federal welfare reform. Studies of women who have left welfare because of sanctions have found that these women are less likely to have jobs than other welfare leavers. These women also tend to be less educated, have lower job skills, and be in poorer health than other TANF leavers (Moffitt, 2002). Researchers examining administrative data in the State of Florida followed 3,400 families whose TANF cases were closed in June 2000. They found that 23 percent of these families had no earnings and were not on cash welfare six months after leaving TANF. Of this group, one-third did not participate in the FSP, even though they were likely eligible (Bloom and Winstead, 2002).

Econometric models have not found any strong evidence of a causal relationship between TANF sanction policies and the departure of eligible families from the FSP. Nevertheless, in the few State studies that have monitored families who have left TANF due to sanctions, all but one found that the families' participation in the FSP dropped and continued to decline over time. An Arizona study of TANF leavers showed that FSP participation dropped more among TANF leavers who had left due to sanctions than among those who had left for other reasons; this was still the case nine months after they had left TANF (Dion and Pavetti, 2000). Even in States that have chosen the comparable food stamp disqualification option under PRWORA (discussed earlier in this chapter), households sanctioned for both TANF and food stamps should be able to return to the FSP after six months, because the Food Stamp Act prohibits full-family food stamp sanctions for longer than six months.

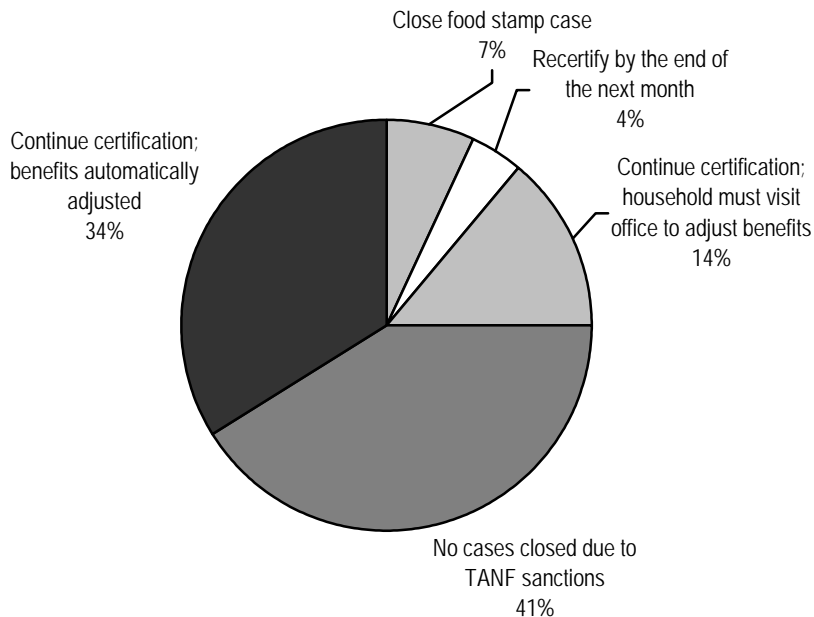
Between 59 percent and 65 percent of offices (weighted) closed the entire TANF case when a household did not comply with TANF rules.³⁶ Caseworkers in these offices were asked how the food stamp certification period was affected, and those in 7 percent of the offices (weighted) reported they automatically closed the food stamp case (figure 4.10). In an additional 4 percent of the offices (weighted), either the food stamp certification period was shortened to the end of the next month, or benefits were suspended so the family had to recertify by the end of the next month. Thus, in 11 percent of the offices (weighted), when a TANF case was closed due to a sanction—even though the household was still likely eligible for food stamps—the family had to go into the office to continue receiving food stamps. For an additional 14 percent of the caseload, the food stamp case was not closed nor was the certification period shortened, but the household usually had to go into the food stamp office to have its benefit levels readjusted. Taken together, caseworkers in 25 percent of the offices (weighted) reported that food stamp benefits were not automatically continued when the TANF case was closed due to full-family sanction (appendix table A4.14c, d).

TANF Case Closures Due to Time Limits

There has also been concern about whether or not families that have hit the TANF time limit will remain on the FSP. At the time of the survey, the TANF time limit had gone into effect in 45 percent of all offices (weighted), based on State-level policy information from the Administration on Children and Families (appendix table A4.15a). Caseworkers were asked a series of questions about the actions they required a participant to take once the participant hit the TANF time limit, in order to

³⁶ Supervisors' responses indicated that this had occurred in 65 percent of offices, weighted, and caseworkers' responses, based on their personal practices and experiences, indicated that this had occurred in 59 percent of offices, weighted (appendix tables A4.14a, b).

Figure 4.10—Office practices that may impede continued food stamp participation for households leaving TANF due to full-family TANF sanctions (percent of the national food stamp caseload)



Data from appendix table A4.14(c, d).

continue getting food stamps. Their responses indicate that in 31 percent of offices (weighted), participants did not have to go into the office in order to continue receiving food stamps.³⁷ In 2 percent of the offices (weighted), the food stamp certification period was shortened to the following month after the participant hit the time limit, and in 6 percent of the offices (weighted), the participant had to go into the office to have his or her food stamp benefits adjusted. Thus, 8 percent of the offices (weighted) required TANF participants who had hit the time limit to go into the office within a month, to either recertify or have food stamp benefits readjusted (figure 4.11).

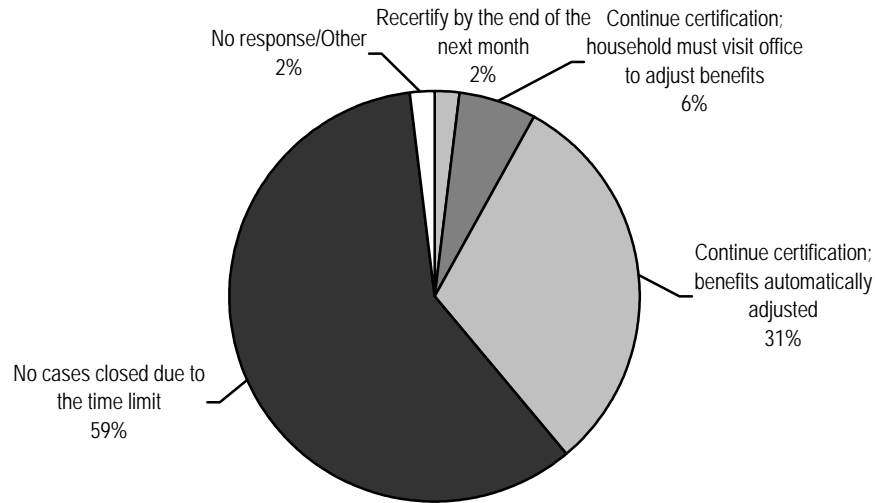
The issue of continued FSP participation among families who are hitting the TANF time limit is likely to become more visible and important to policymakers as the number of cases reaching the TANF time limit grows.

TANF Case Closures When a Household Voluntarily Leaves TANF

Prior to welfare reform, employment was a major reason why people left TANF. Due to the structural and policy changes of welfare reform and the booming economy of the 1990s, more families voluntarily left the welfare program overall, and left with a job. National studies of TANF leavers found that most of these households were still potentially eligible for food stamps.

³⁷ This represents 76 percent of offices (weighted) that had implemented TANF time limits. Calculation: percent not required to visit office (31.1)/percent of caseworkers that had closed cases due to time limit (45.2-4.4). See appendix table A4.15b, c.

Figure 4.11—Office practices that may impede continued food stamp participation for households leaving TANF due to TANF time limits (percent of the national food stamp caseload)



Data from appendix table A4.15(a, b, c).

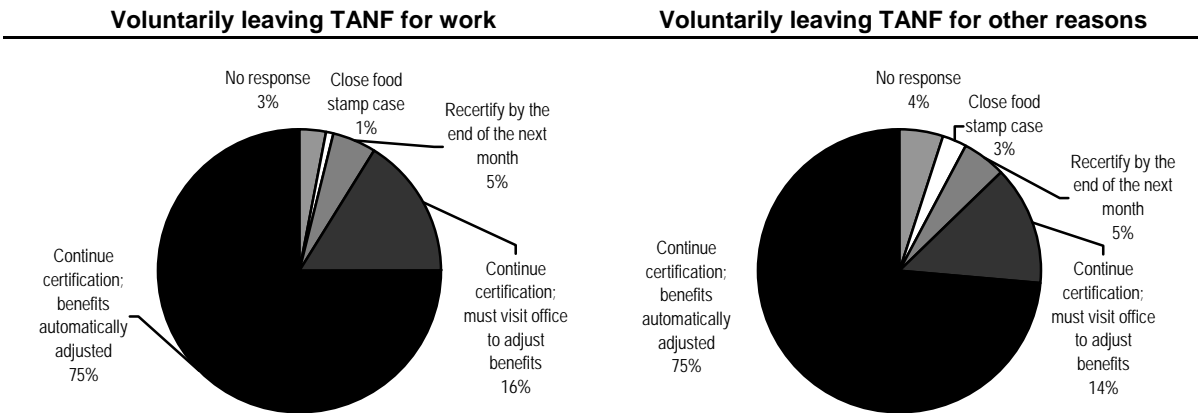
Caseworkers in all offices were asked what actions they required families to take if the families had voluntarily left TANF and wanted to continue receiving food stamps. Only 6 to 8 percent of all offices (weighted) routinely asked voluntary TANF leavers to go into the office to reapply or recertify for benefits, because their case was either automatically closed or their food stamp certification period was shortened to the end the following month (figure 4.12).³⁸ An additional 14 to 16 percent of the offices (weighted) did not automatically close the cases for these households or shorten their food stamp certification periods to the next month, but they did require these clients to go into the office within the next month to readjust their benefits.³⁹

Totaling these three practices together, 22 percent of all offices (weighted) did not routinely maintain the food stamp benefits of TANF leavers, but required households voluntarily leaving TANF (due to employment or other reasons) to go into the office to reapply for food stamps, recertify, or adjust their benefit levels, if they wanted to continue receiving food stamps. These additional actions may pose a barrier to continued FSP participation for TANF leavers because they require action on the part of participants who may be unaware that they are still eligible for food stamps. This may also be a particular barrier for newly employed participants who may have difficulty arranging time off from work.

³⁸ Six percent of offices (weighted) for households leaving TANF due to work and 8 percent of offices (weighted) for households voluntarily leaving TANF for non-work reasons.

³⁹ In 14 percent of the offices (weighted), households voluntarily left TANF due to reasons other than employment, and in 16 percent of the offices (weighted), households voluntarily left TANF for employment.

Figure 4.12—Office practices that may impede continued food stamp participation for households voluntarily leaving TANF (percent of the national food stamp caseload)



Data from appendix tables A4.16(a, b), A4.17(a, b).

Caseworkers’ Estimates of Continued Food Stamp Participation by Families Leaving TANF

Caseworkers, who estimated the number of TANF leavers who continued to receive food stamps, indicated that in about three-quarters of offices (weighted) in which caseworkers had ever closed TANF cases for TANF sanctions, at least three-quarters of households leaving TANF continued to receive food stamps (appendix table A4.14f). Similar results were found for households leaving TANF due to the time limit (appendix table A4.15d). Voluntary TANF leavers appeared somewhat less likely to continue to receive food stamp benefits. Caseworkers in only 63 to 68 percent of offices (weighted) estimated that at least three-quarters of these households continued to receive food stamps after leaving TANF (appendix tables A4.16c and A4.17c).

Staff Opinions Regarding Factors That May Affect Continued FSP Participation by Households That Leave TANF

Supervisors and caseworkers were asked their opinions on four possible reasons for the large number of TANF leavers who also leave the FSP when they are likely still eligible. These reasons included the following: lack of knowledge by the food stamp office staff about the household’s situation; lack of follow-up to encourage FSP participation; confusion created by computer-generated notices when a household leaves TANF; and the difficulties that working households generally have staying on the FSP.

When asked whether people who leave TANF also leave the FSP without the office knowing whether or not the household is still eligible for food stamps, a majority of the supervisors (in 74 percent of the offices, weighted) and caseworkers (in 68 percent of the offices, weighted) either disagreed or strongly disagreed. When asked whether the office encouraged TANF leavers to reapply for food stamps after they have left, supervisors in 95 percent of the offices (weighted) and caseworkers in 87 percent of the offices (weighted) either agreed or strongly agreed (appendix table A4.18a, b).

Supervisors and caseworkers were also asked if computer-generated notices resulted in food stamp case closures when households were still eligible for food stamps—an administrative concern that has been documented in some local offices as a barrier to continued participation in both FSP and Medicaid households leaving TANF. Supervisors in 75 percent of the offices (weighted) and caseworkers in 69 percent of the offices (weighted) either disagreed or strongly disagreed with this statement (appendix table A4.18c).

Studies of TANF leavers show that a large number of these leavers were working when they left TANF and the FSP, yet their low incomes would still qualify them for food stamps. It has been suggested that the barriers to continued FSP participation among TANF leavers might simply reflect the barriers that have long existed for eligible working households with historically low FSP participation rates. However, when office staff were asked whether they agreed or disagreed that it was hard for eligible working clients to do what was required to stay on the FSP, supervisors in 78 percent of the offices (weighted) and caseworkers in 77 percent of the offices (weighted) either disagreed or strongly disagreed (appendix table A4.18d).

Staff Recommendations to Promote Continued FSP Participation by TANF Leavers

Supervisors and caseworkers were asked to provide recommendations for changing office policies and procedures to help increase the number of eligible participants who continue to receive food stamps after they leave the TANF program. Most workers had no suggestions for changes. Supervisors in 31 percent of the offices (weighted) and caseworkers in 21 percent of the offices (weighted) suggested recommendations (appendix tables A4.19 and A4.20), which are discussed below.

The recommendations cited by greatest proportion of offices (weighted) regarded providing education and information to clients about differences between the goals and eligibility rules of TANF and the FSP. In 8 percent of the offices (weighted), supervisors recommended providing general public information and outreach campaigns on this topic. Supervisors and caseworkers in 4 and 5 percent of the offices (weighted) recommended providing education and outreach targeted to participants who have already left TANF, offering better education and information on program differences during the initial application process, and/or encouraging clients who voluntarily leave TANF to get more information about their potential food stamp eligibility. The other recommendations, each cited by workers in 1 to 4 percent of the offices (weighted), were to lengthen food stamp certification periods or provide more flexibility so participants can complete food stamp recertifications by mail and telephone; change FSP benefit or eligibility rules; provide transitional food stamp benefits similar to transitional Medicaid (a policy that is now a State option); and change the computer system so that a family's food stamp case does not automatically close when the TANF case is closed (appendix tables A4.19 and A4.20).

Summary

This chapter examined a range of local food stamp office policies and practices that, potentially, may impact whether or not eligible households continue receiving food stamp benefits. These policies and practices include recertification and reporting policies, sanctions, ABAWD requirements, and practices affecting households that leave the TANF program. This final section summarizes the chapter findings, presenting selected variables that may encourage or discourage food stamp

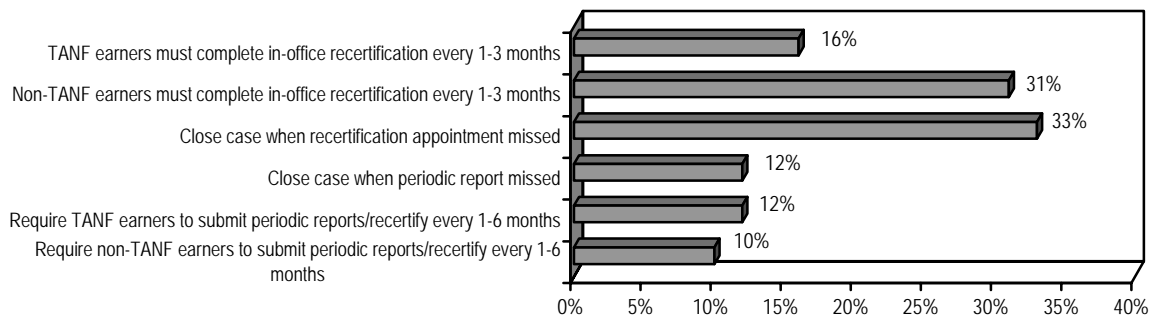
recipients from completing all requirements for continued participation, and examines which policies and practices are more common among local offices and which are relatively rare.

Recertification and Reporting Requirements

Recertification and reporting policies impose costs on households by requiring them to periodically reapply for benefits and to provide additional reports on their circumstances during the food stamp certification period. Fulfilling these requirements may take a considerable amount of time and, in the case of recertification, generally requires one or more trips to the food stamp office. Policymakers have been particularly concerned about the impact these requirements have on working families, a group significantly affected by welfare reform and one that is likely to have difficulty getting to the local food stamp office.

A significant minority of households with earnings were required to make frequent visits to the food stamp office to fulfill recertification requirements. In 31 percent of offices (weighted), non-TANF cases with earnings had to attend in-office recertification interviews every one to three months. TANF earners in 16 percent of offices (weighted) faced similar requirements (figure 4.13).

Figure 4.13—Office recertification and reporting requirements (percent of the national food stamp caseload)



Data from appendix tables A4.2, A4.3d, A4.8a, figure 4.6 (adjusted by percent required to submit periodic reports).

As noted earlier, research has shown that failure to attend recertification interviews is one of the primary reasons cited for closing food stamp cases, even among TANF families. Thus, a caseworker’s response when a household does not show up for a scheduled recertification appointment may impact FSP access. The survey found that one-third of the caseload was in offices that automatically closed food stamp cases if households missed their scheduled recertification interviews (figure 4.13). In addition, 12 percent of the national caseload was in offices that enforced a similarly strict policy when a household did not submit its periodic report by the initial deadline. These practices may significantly impact working households, who are more likely than other types of households to have

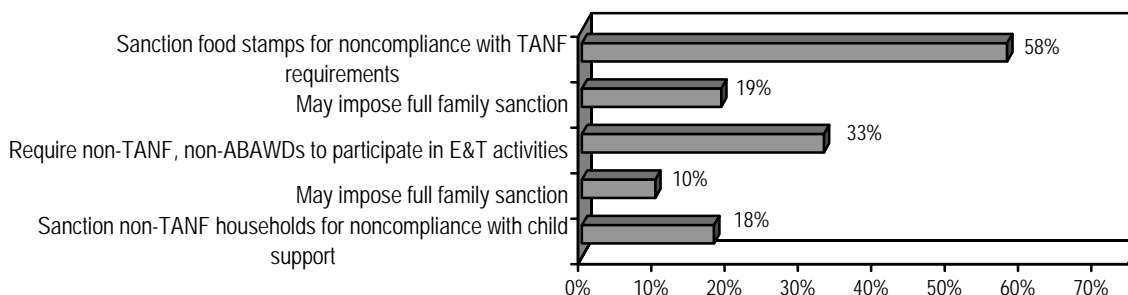
short food stamp certification periods or to be required to submit periodic reports. Such requirements may hinder working families from continuing to participate in the FSP.

While households with earnings are likely to have short certification periods and be required to submit periodic reports, most are not subject to both requirements. Only approximately 10 percent of offices (weighted) required working households to both submit periodic reports (either monthly or quarterly) and go into the office every one to six months for recertification interviews (figure 4.13).

Food Stamp Sanction Policies

Welfare reform legislation provided States with new and expanded options for penalizing households for not complying with program requirements. These penalties or sanctions may negatively impact FSP participation by reducing households' food stamp benefits—either partially or entirely. The types of potential sanctions include comparable food stamp sanctions for noncompliance with TANF rules; sanctions on non-TANF households for noncompliance with E&T requirements; and sanctions on non-TANF households for noncompliance with child support. Sanction policies reported by local offices are shown in figure 4.14.

Figure 4.14—Office sanction policies (percent of the national food stamp caseload)



Data from figures 4.8, 4.9, appendix tables A4.11f, A4.12a, special tabulations based on variables in A4.9b and A4.10c.

In 58 percent of the offices (weighted), caseworkers reported sanctioning food stamp benefits for noncompliance with TANF rules (work rules, as well as non-work rules, such as child support enforcement and child immunization requirements). States have additional choices within the comparable disqualification option on the severity of food stamp sanctions. Nineteen percent of the offices (weighted) chose the more severe option of disqualifying the whole TANF family when the household head did not comply with TANF work requirements.

States may choose to require non-TANF food stamp participants (who are not ABAWDs) to participate in E&T activities as a condition of food stamp eligibility. According to the survey, 33 percent of food stamp offices (weighted) required some non-TANF food stamp clients to participate in E&T programs and sanctioned their food stamp benefits if they did not comply. Ten percent of

offices (weighted) disqualified the entire household when the household head did not fulfill the E&T requirement.

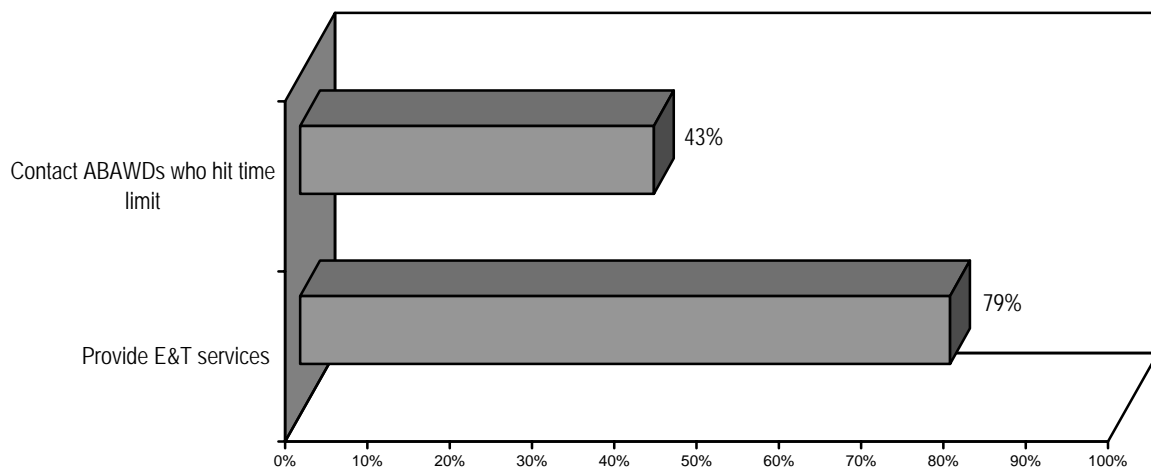
States may also require custodial and absent parents who reside non-TANF food stamp households to comply with child support enforcement, or sanction their food stamp benefits for noncompliance. Supervisors in 18 percent of the offices (weighted) reported using this policy.

ABAWD Policies

PRWORA imposed work requirements and food stamp time limits for noncompliance with the requirements on ABAWDs—able-bodied adults without dependent children between the ages of 18 and 50. Recognizing that ABAWDs living in certain geographic areas would have trouble fulfilling the requirements due to difficult economic conditions, the law allowed States to seek waivers in areas with high unemployment or insufficient jobs.

Employment and training services were widely available to help ABAWDs fulfill their work requirements. Seventy-nine percent of offices (weighted) that did not have waivers provided some services to this group of food stamp recipients (figure 4.15). In addition, caseworkers in 43 percent of offices (weighted) reported contacting ABAWDs who reached the time limit and lost their food stamp benefits to discuss how they might regain benefits.

Figure 4.15—ABAWD policies (percent of caseload in offices without ABAWD waivers)



Calculated from data in appendix table A4.13(a, b, c).

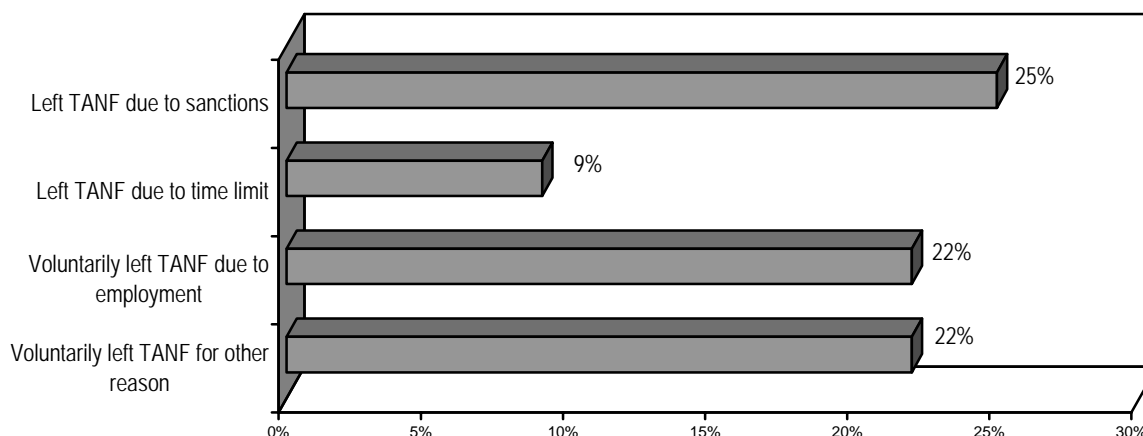
TANF Leavers

Many households that leave TANF leave the FSP at the same time, even though numerous studies have suggested that most of these families are likely still eligible for food stamp benefits. Anecdotal evidence suggests that many families who leave TANF are confused about their eligibility for the FSP. Local food stamp office policies and practices can either make it easier or pose barriers to the continued food stamp participation of eligible TANF leavers. Office practices that may pose barriers include:

- Closing the food stamp case and requiring households to reapply;
- Shortening the food stamp certification period to the end of the following month, thus requiring households to go to the office to recertify; and
- Requiring households to visit the office to adjust food stamp benefit levels.

A significant number of offices (weighted) had practices that may impede the continued FSP participation of households that leave TANF, as figure 4.16 shows. In 25 percent of offices (weighted), the food stamp benefits of households that left TANF due to sanctions, were not automatically continued, but rather, the household needed to visit the office, either to reapply, recertify, or adjust benefits. Similar requirements were imposed on households voluntarily leaving TANF in 22 percent of offices (weighted). In 9 percent of the offices (weighted), households that reached the TANF time limit had to visit the office within the month to recertify or to have their food stamp benefits adjusted.

Figure 4.16—Office closes food stamp case of TANF leavers or requires them to visit office for recertification, by reason household left TANF (percent of the national food stamp caseload)



Calculated from appendix tables A4.14(c, d), A4.15(b, c), A4.16(a, b), A4.17(a, b).

Conclusions

Local food stamp offices organized food stamp recertification and reporting requirements in a variety of ways as was presented in this chapter. They utilized different sanction policies and handled ABAWDs and TANF leavers differently. No set of policies and practices is used by the majority of offices. However, several concluding points can be made concerning three groups significantly impacted by welfare reform—working households, households leaving the TANF program, and ABAWDs.

Analysis of the local office surveys suggests that certain policies and practices concerning recertification and reporting requirements may make it difficult for working households and households leaving TANF to continue participating in the Food Stamp Program. In a potentially significant minority of offices, working households were subject to frequent recertification

requirements. It may be difficult for these households to fulfill mandated requirements, particularly making the necessary visits to the food stamp office. Policies that terminate households either for missing recertification interviews or failing to submit required reports may also present special difficulties for working households.

Studies suggest that many TANF leavers may be confused about their continuing food stamp eligibility. While the majority of offices automatically continue the food stamp benefits of TANF leavers, a significant minority of offices require households to take some action in order maintain their eligibility. This could, potentially, affect their access to food stamp benefits.

ABAWDs were also significantly affected by provisions of welfare reform. As a group, they experienced substantial declines in food stamp participation after implementation of PRWORA. Most local food stamp offices that have not waived ABAWDs from work requirements, reported providing employment and training services specifically targeted to this group. This should help ABAWDs maintain their food stamp eligibility. On the other hand, most offices could do more to help ABAWDs who lose their food stamp eligibility for failure to comply with work requirements, regain their access to benefits.

The final chapter examines the prevalence of various local office policies and practices in the light of what might be considered “best practices” for assuring access to the Food Stamp Program for needy households. It also examines the prevalence of practices that might hinder access.