



E-FAN-03-013-3

November 2004

Food Stamp Program Access Study

Final Report

By Susan Bartlett, Nancy Burstein, and William Hamilton, with the assistance of Ryan Kling, Abt Associates Inc.

ERS project representative: Margaret Andrews

Abstract

The Food Stamp Program Access Study was motivated by a desire to learn whether and how the administrative policies and practices of local food stamp offices influence the chances of eligible households participating in the program. This report examines the participation decisions of potentially eligible households, together with the local office policies and practices that may enhance or inhibit program access. The findings indicate that many households with no recent contact with the FSP would apply for benefits if they believed themselves to be eligible. In addition, outreach activities are effective in communicating eligibility to nonparticipating households. The processes of application and recertification-and to a lesser extent, complying with ongoing program requirements-are hurdles that a sizable number of apparently eligible households fail to surmount. When surveyed, applicants and program dropouts cited various procedural obstacles as factors in their decision not to participate. The econometric analysis also identifies a number of office practices that vary across offices and appear to be significant in participation decisions.

This report was prepared by Abt Associates Inc. under a research contract from the Economic Research Service. The views expressed are those of the authors and not necessarily those of ERS or USDA.

Acknowledgements

The Food Stamp Access Study was conducted under the direction of the Economic Research Service (ERS), USDA. We would like to thank our two project officers, Margaret Andrews and Peggy Cook for their guidance and support throughout the entire study. Other staff at ERS, in particular Robert Gibbs, Mark Prell, David Smallwood, and staff at the Food and Nutrition Service, USDA, including Jenny Genser, Steve Carlson, Art Foley, Christine Kissmer, Lynn Jordan, Laura Griffin, Carolyn Foley, Judith Seymour, Patricia Seward, and Patrick Waldron, attended briefings, reviewed ongoing work, and provided insightful reviews of the draft report. We would also like to thank David Super of the Center on Budget and Policy Priorities, Sue Hall of the Rushmore Group, and James Ohls of Mathematica Policy Research, who reviewed drafts of the data collection instruments.

This study would not have been possible without the generous support of the State and local food stamp staff in the 109 local offices across the United States that agreed to participate in this study. State staff provided data for the local office and household sampling frames and paved the way for data collection efforts in the local food stamp offices. We spent many months collecting data in the local offices and the office directors and their staff volunteered their time to complete telephone surveys, locate case file records, and provide guidance to our field staff in reviewing the records.

Many persons at Abt Associates contributed to the study. In particular, Diane Stoner directed the data collection effort on the entire study. Michael Battaglia, as sampling statistician, developed the sampling frame and analytic weights. Ryan Kling provided programming support, Frederic Glantz served as technical reviewer, and Jan Nicholson produced the report.

Table of Contents

Executive Summary	E-1
Chapter 1: Introduction.....	1-1
Policy Setting	1-1
Research Objectives	1-3
Previous Research on the Impact of Policies on FSP Participation.....	1-4
Organization of the Report	1-6
Chapter 2: Study Design.....	2-1
Conceptual Model of FSP Participation Decisions	2-1
Research Methodology	2-4
Chapter 3: Characteristics and Perceptions of Potentially Eligible Nonparticipant Households	3-1
Who Believes They Are Ineligible?	3-2
Why Do Some People Think They Are Ineligible?.....	3-3
Who Would Not Apply Even If They Found They Were Eligible?	3-6
Why Would Some People Not Apply Even If They Believed They Were Eligible?	3-7
Conclusion.....	3-9
Chapter 4: Applicant Households.....	4-1
Who Applies for Benefits?	4-2
Who Fails to Complete the Application Process?	4-3
Why Do Some People Fail to Complete the Application Process?	4-6
Conclusion.....	4-9
Chapter 5: TANF-Diverted Households.....	5-1
Did Households That Received Diversion Payments Apply for Food Stamp Benefits?.....	5-2
Who Received Lump Sum Diversion Payments?.....	5-3
Why Do Some Households Not Get FSP Benefits After TANF Diversion?	5-5
TANF Diversion Reported by Applicants.....	5-5
Conclusion.....	5-7
Chapter 6: Households That Left the Food Stamp Program	6-1
Who Leaves the Food Stamp Program?	6-3
Who Fails to Complete the Recertification Process?	6-5
Why Do Some Households Fail to Complete the Recertification Process?	6-7
Conclusion.....	6-9
Chapter 7: Local Food Stamp Office Policies and Practices that May Affect Participation Decisions	7-1
Outreach to Nonparticipants.....	7-3
Availability of Information for Potential Applicants	7-4
Office Accessibility	7-5

Subjective Office Features	7-6
Certification Requirements.....	7-7
Interim Participation Requirements.....	7-10
Recertification Requirements	7-12
Summary	7-14

Chapter 8: Impact of Local Food Stamp Office Policies and Practices on Selected Aspects of Participation.....8-1

Models Estimated	8-1
Awareness of Eligibility	8-6
Completing the Application Process	8-9
Conclusions	8-13

Chapter 9: Conclusions: How Local Offices May Affect the Program’s Accessibility to Eligible Households9-1

Nonparticipants Who Are Not in Contact with the Program.....	9-1
Nonparticipants Who Contact the FSP Office.....	9-2
Eligible Participants Who Exit the Program.....	9-4
The Opportunities to Reduce Nonparticipation among Eligible Households	9-5

Bibliography.....Bib-1

Appendix A: Sample Design and Analysis Weights
Appendix B: Supplementary Descriptive Tables
Appendix C: Statistical Methods for Multivariate Analyses
Appendix D: Supplementary Models
Appendix E: Data Collection Instruments Used in the Study

Executive Summary

The Food Stamp Program Access Study was motivated by a desire to learn whether and how the administrative policies and practices carried out by local food stamp offices influence the chances that eligible households will participate in the program. This report examines the participation decisions of potentially eligible households together with the local office policies and practices that may enhance or inhibit access to the Program.

How best to ensure that eligible households have access to the Food Stamp Program (FSP) has long been a concern of program managers and policymakers. Interest was heightened by the dramatic decline in the FSP caseload in the late 1990s, a period characterized not only by an unusually strong economy, but also by major changes in the public assistance landscape following the welfare reform legislation of 1996. Studies have shown that the food stamp caseload declined not only because many households' circumstances improved enough to make them ineligible for benefits, but also because a smaller percentage of the potentially eligible households were participating in the program. This led policymakers and analysts to focus on the broad question of what factors influence FSP participation, including the possible role of local food stamp office policies and practices in encouraging or deterring households' participation decisions. Although the food stamp caseload increased after reaching a low point in July 2000, policy makers remain interested in implementing policies and procedures that ensure that the program is accessible to eligible households.

The Economic Research Service of the U.S. Department of Agriculture contracted with Abt Associates Inc. and Health Systems Research, Inc. to conduct a national study of Food Stamp Program accessibility at the local office level. The study collected information describing the policies and practices in local food stamp offices, the characteristics of participant and nonparticipant households, and the reasons why some eligible households do not participate in the FSP.

This report, one of three prepared for the study, addresses accessibility from three perspectives. It describes the nature and prevalence of local office practices that are hypothesized to influence participation. It describes households' stated reasons for not participating or ending their participation, along with the households' characteristics, attitudes, and experiences that may be associated with participation behavior. Finally, the report presents analyses of the association between local office practices and household participation behavior.

The findings presented here are based on data collected in a nationally representative sample of 109 local food stamp offices. Data collection efforts involved both local office level and household level activities for the reference month of June 2000. Telephone interviews with supervisors and caseworkers and observations in the sampled offices obtained information on the policies and administrative practices that might affect FSP accessibility. Samples of food stamp applicants and recipients were drawn from the local offices included in the study. Data were collected through case file record abstraction and telephone and in-person surveys and provided detailed information on household characteristics, participation decisions, and FSP administrative events. Finally, a random-digit-dial telephone survey of households that were apparently eligible for food stamp benefits, but were not participating in the FSP, was conducted in the geographic areas served by the sampled local food stamp offices.

Household Participation Decisions

In order to participate in the Food Stamp Program, households must make certain decisions and take actions necessary to fulfill program requirements. An eligible nonparticipant household must know of the program's existence, believe it is eligible for benefits, and be interested in applying. Once a household has made the decision to apply, it must complete an application process that includes participating in an interview and obtaining necessary documents verifying household circumstances.

Food stamp recipient households also must take certain actions to continue participating in the program. Households need to comply with various participation requirements, such as periodic income reporting and employment-related requirements, in order to remain eligible for food stamp benefits. Additionally, all households need to complete periodic recertifications by which their continuing eligibility for the FSP is determined.

At any of these points, nonparticipant households may decide not to pursue their FSP application or participant households may decide to leave the program. In addition, households may be found to be ineligible and denied (further) benefits, and participating households may fail to comply with program rules and have their cases terminated. The characteristics, experiences, and attitudes of households that may be associated with participant behavior at these junctures and households' stated reasons for not participating or ending their participation are summarized below.

Why Some Households Think They Are Ineligible

Over half of the approximately 6 million apparently eligible nonparticipant households in June 2000 either believed they were ineligible for food stamp benefits or were not sure whether they would be eligible. Nonparticipating households in relatively more favorable economic circumstances—i.e., closer to the eligibility cutoff—tended to be less certain of their eligibility for food stamps. Those who believed themselves ineligible, or who were unsure of their eligibility, were more likely to have above-poverty incomes and more likely to have bank accounts. They were also less likely to be food insecure or to have experienced hunger in the preceding year. Those who believed they were ineligible were less likely to have received food stamps in the past, suggesting they may have had less information about eligibility requirements. Demographic characteristics such as age, race, ethnicity, and household composition were not associated with whether households believed they were eligible for food stamp benefits.

Many of the reasons households provided for believing themselves ineligible for food stamps focused on central aspects of the eligibility rules: the amount of earned income (55 percent), the value of an owned vehicle (15 percent), and the value of financial assets (12 percent). Because these rules are quite complicated, it is not surprising that people do not know exactly how their circumstances compare to program eligibility limits, and it would be difficult to communicate sufficient information about the rules to the general nonparticipant community.

A substantial number of households seemed to have significant misperceptions of some program rules. These households said, for example, that their reason for ineligibility was being employed (40 percent), receiving other government assistance (19 percent), having reached the time limit on cash assistance (2 percent), or having received a TANF (Temporary Assistance for Needy Families) lump sum payment (2 percent). None of these factors necessarily make a household ineligible for food

stamp benefits, and from a policy point of view, it would be far easier to communicate that general fact than the details of income and asset limits.

Why Some Households Do Not Apply for Benefits

Eligible households who applied for benefits had a profile that differed in several respects from the general population of nonparticipants. Consistent with the literature on food stamp participation, applicant households were younger, more likely to be single-parent households, and in worse financial condition. Nonparticipant households that reportedly would apply for benefits if they knew they were eligible were more likely to be food insecure than households that were not interested in applying.

While most nonparticipant households (69 percent) reportedly would apply for food stamps if they knew for certain they were eligible, 31 percent, or 1.9 million households, would not apply. Those households cited both personal reasons and reasons related to office policies and practices for their lack of desire to apply. Almost all respondents mentioned personal reasons for not applying. The most common set of reasons was related to a desire for personal independence (91 percent). In addition, nearly three-quarters reported at least one reason related to office policies, including perceived costs of applying (64 percent), a previous “bad experience” with the FSP or another government program (24 percent), costs of FSP participation (17 percent), and confusion about how to apply (12 percent).

Local office policies would probably not affect the behavior of households that cited only personal reasons for not applying to the FSP. Nonetheless, because a substantial majority of nonparticipant households mentioned aspects of the application process as deterrents to applying, practices that enhance accessibility might encourage participation for at least some of these households.

Why Some Households Do Not Complete the Application Process

Most (83 percent) of the approximately 440,000 apparently eligible households who applied for benefits in June 2000 completed the food stamp application process and received benefits. Applicants who failed to complete the application process were in a somewhat better financial situation than those who completed the process and received benefits—they were more likely to have earnings and to have above-poverty income and less likely to be receiving cash assistance. Demographic characteristics were generally not associated with whether households completed the application process. However, households consisting of all elderly adults and households in which all adults had disabilities were significantly more likely to fulfill all application requirements and receive approval for food stamps.

About one quarter of applicants who did not complete the process indicated that their situation had changed and they no longer needed benefits, and about half discontinued their application because they believed their income or assets made them ineligible. Some of these households may have been correct in believing themselves ineligible. The brief questions that the study used to screen for “apparent eligibility” have been shown in previous research to be reasonable predictors of eligibility, but they do not provide enough detail to determine eligibility with certainty. Even if a sizable fraction of these households actually were truly ineligible, however, it seems clear that many households who would be eligible are unaware of that fact.

Just over one quarter of applicant dropouts, or about 21,000 households, reported that their reasons for abandoning the application included some aspect of the application process, including the need to acquire verification documents (10 percent), the length the length of time before benefits would be available (8 percent), long waits in the food stamp office (6 percent), missing work (5 percent), paying for someone to care for their child or elderly dependent (5 percent), and general confusion about the process (6 percent). For these households, local office policies that reduce the burden of the application process might increase participation by making it easier for households to comply with application requirements.

Why Some Households Leave the FSP

About 5 percent of the food stamp caseload left the rolls during June 2000—2 percent of households experienced an interim closure and 3 percent were denied continuing benefits at recertification. Consistent with published participation studies, those who left were less likely to be made up entirely of elderly adults or adults with disabilities and less likely to be one-person households. Households who left also tended to be in better economic circumstances than those who stayed. They were more likely to have had earnings and above-poverty income at their most recent prior recertification.

Just over half of the households that left the FSP in June 2000 were due for a recertification in that month. Of those that closed at recertification, 35 percent were denied because they no longer met program eligibility criteria such as income and resource limits. Most of the remainder did not meet all of the requirements of the recertification process. Apart from the cases that were denied because of excess income or resources, program records did not indicate whether or not the households who left the program were circumstantially eligible. However, a survey of these households found a large proportion to be in the category of “apparently circumstantially eligible.” Just over 90 percent of the households reached by the survey were in this category, and while a low survey response rate means that this estimate is imprecise, it seems that many households who left without an official finding of ineligibility were in fact still eligible.

Asked why they did not complete the recertification, about a third said they believed they were ineligible – despite giving information in the survey that indicated apparent eligibility. Although it is somewhat surprising that so many people who had been receiving benefits would be unaware of their likely eligibility, recall that rate of perceived ineligibility was even higher for the apparently eligible households who dropped out of the initial application process.

Based on the limited available data on the eligibility of households leaving the FSP, the study estimated that about 123,000 apparently eligible households exited in their recertification month in June 2000. Most (63 percent) did not even begin the recertification process. Smaller proportions either did not complete their certification interview (13 percent) or did not complete their verification (14 percent).

Among survey respondents, 38 percent cited some difficulty with the recertification or some program participation requirement among their reasons. This includes difficulty with verification requirements (23 percent), confusion about the process (16 percent), frequency of recertifications (9 percent), and the need to miss work (7 percent). TANF issues were not a major factor causing closure at recertification according to households’ reports. It is somewhat surprising that households that had already successfully negotiated the food stamp application process reported these difficulties with the recertification process, which may indicate that other, unreported reasons were at work. Nonetheless,

policies that facilitate recertification might lead to continued participation by some households who would otherwise leave the program.

Local Office Policies and Practices that May Affect FSP Participation

Local food stamp office policies and practices may affect household participation decisions at any point in the decision-making process. Policies may make it easier or harder to complete required activities, or they may also increase the costs or decrease the benefits of FSP participation. Policies of other public assistance programs, particularly TANF and Medicaid, may also affect FSP participation decisions. The local office surveys asked about policies and practices that were hypothesized to influence accessibility. The paragraphs below summarize the prevalence of selected practices, which are grouped into seven broad categories.

Outreach to Nonparticipants

Outreach activities were quite prevalent, existing in the catchment areas of offices serving three-quarters of the national food stamp caseload.¹ Nine different modes of outreach were reported, with multiple modes in most areas where any outreach occurred. Practices used in at least half of the areas include community presentations; flyers, posters, and brochures; and toll-free numbers or hotlines. Outreach efforts were conducted by both the local office and other community organizations in most areas that had any outreach, and about a fifth of the areas reported that outreach was conducted only by community organizations. Nearly two-thirds of areas had outreach targeted to particular groups, most commonly the elderly. Food stamp outreach was coordinated with outreach for Medicaid or State Child Health Insurance Programs (SCHIP) in 59 percent of local areas.

Availability of Information about the FSP

In nearly all offices studied, households who might wish to apply for food stamps could readily find application forms and general program information, particularly information concerning eligibility requirements. Some reception areas offered general program information only on posters, but others used material that might communicate better, such as take-away brochures (64 percent) or videotapes (21 percent). Some offices made information available for special groups or issues. Sixty-two percent presented information in at least one non-English language, and half had specific information for people who were not applying for or already receiving TANF. Among offices serving immigrants, about two-thirds provided specific information on eligibility rules for immigrant households. Two-thirds of offices made application forms available at other locations in the community besides the food stamp office.

¹ In this report, we describe the distribution of office practices in terms of the weighted percent of offices engaging in the practice, where the weighting factor is the number of active cases in the office in June 2000. Thus, “x percent of the offices” is equivalent to “offices serving x percent of the national caseload,” and we use these terms interchangeably.

Office Accessibility

Households interested in applying for benefits generally must visit the food stamp office at least once to complete the application process. Visits to the office are also required for periodic recertification. Five dimensions of office accessibility were therefore examined:

- **Hours of operation**—About two-fifths of offices conducted some eligibility interviews outside standard business hours. Most of these offices offered interviews before 8 am; relatively few offered interviews after 5 pm.
- **Transportation**—Three-quarters of offices were accessible by public transportation. Relatively few offices offered transportation assistance in the form of cash, vouchers, or van service.
- **Child-friendliness**—Local practices regarding child-friendliness varied considerably. Most offices had some play space, and a few offered child care services. A small percentage asked clients not to bring children to the office.
- **Physical accessibility and accessibility to non-English speakers**—Nearly all offices were physically accessible. Virtually all offices that routinely saw non-English speaking clients had translation services available.

Subjective Office Features

The study examined three subjective dimensions that might affect applicants' sense of the program's accessibility: staff attitudes, the presence of waiting lines, and the adequacy of seating in the reception area. To assess attitudes, the supervisor survey asked whether supervisors agreed or disagreed with three judgmental statements. Supervisors in over 80 percent of offices expressed "pro-participation" positions on the attitudinal items. The vast majority of offices (almost 90 percent) always had enough seats for everyone in the reception area, though a small percentage had insufficient seats at some times. While about one-third of offices were observed to have no waiting lines at any time, half sometimes had lines and one-tenth always did.

Certification Requirements

Although basic FSP eligibility criteria and requirements are uniform across locations, local offices exercise considerable discretion in structuring the applications process and the study documented quite substantial variation across offices.

- **Structure of application process**—The eligibility interview is the universally central element of the application process, but substantial variation existed in the process leading up to the interview. Interviews were scheduled in advance in offices serving 55 percent of the national caseload. Meetings prior to the certification interview were required for households applying for TANF in 26 percent of offices; 11 percent of offices had a similar requirement for households applying only for food stamps. About half of offices reported that food stamp applicants usually had to make more than a single visit to the office in order to complete the process.
- **TANF-diversion and other job search**—Most offices (80 percent) had some form of diversion in place for TANF applicants, including lump-sum payments (55 percent), job

search requirements (38 percent), and a requirement to seek alternative resources (9 percent). Some offices (14 percent) required some non-TANF applicants to engage in job search activities prior to benefit receipt.

- ***Verification and anti-fraud procedures***—Third party verification was fairly widespread, used to verify income for TANF applicants (66 percent of offices), household circumstances (53 percent), and shelter costs (43 percent). Third party income verification was somewhat less common for non-TANF applicants (57 percent). Fraud investigations involving unannounced home visits were routine practices in offices that served half the national caseload, with 13 percent reporting such investigations for at least a quarter of all applications. Fingerprinting or finger imaging was required for at least some food stamp applicants in about one-quarter of offices.

Recertification Requirements

Recertification requirements are similar to initial certification requirements in that households must complete an application, participate in an interview, and provide verification of circumstances. The study focused on three practices specific to recertification that could affect accessibility.

- ***Certification period***—States and local offices have considerable discretion to set the length of certification periods, with longer periods generally assigned to types of cases whose circumstances are expected to be stable and shorter periods for more volatile cases. Reported certification policies varied considerably across local offices even for similar types of cases. For example, TANF/FSP cases without earnings were given 4-6 month certification periods in 58 percent of offices, but 11 percent used shorter periods and 31 percent used longer ones. Short certifications (1 to 3 months) for non-TANF cases with earnings were reported in about half of the offices, but nearly a third of the offices usually assigned certification periods of 7 months or more for this group. Elderly and disabled clients received longer certification periods – 7-12 months in 76 percent of offices, and 24 months in 17 percent of offices.
- ***Telephone or in-home interviews***—Most offices offered telephone or at-home recertification interviews to persons with disabilities and the elderly (caseload-weighted 70 percent and 54 percent, respectively). A relatively small percentage of offices offered this opportunity to other types of clients who experienced difficulties visiting the office.
- ***Missed appointments***—One third of offices automatically closed the food stamp cases of participants who missed interview appointments; most other offices either automatically rescheduled the appointment or notified the client to do so.

Interim Participation Requirements

In the months between certifications, households in some offices must comply with reporting or employment-related requirements in order to continue receiving food stamp benefits.

- ***Periodic reporting***—About half of all offices reported having a mandatory monthly or quarterly reporting requirement, generally applicable to households with earnings. In over one-tenth of offices (12 percent), cases were automatically closed for failure to provide the required report.

- **Employment and training requirements**—Just over two-thirds of offices had work requirements in place for ABAWD (able-bodied adults without dependents) households and one third of offices required some non-TANF, non-ABAWD households to participate in E&T activities as a condition for continuing eligibility.
- **Sanctions**—When food stamp households fail to comply with FSP requirements, or when households receiving both food stamp and TANF benefits fail to meet certain TANF requirements, local offices may impose sanctions that reduce or terminate food stamp benefits. Supervisors in 18 percent of offices reported that non-TANF households could be sanctioned for noncompliance with child support requirements. Sanctions for TANF/food stamp households were reported in 58 percent of offices.
- **TANF leavers**—In about one-quarter of offices, households that lost their TANF benefits due to full-family sanctions and those that left voluntarily due to employment or other reasons were required to visit the office in order to continue receiving food stamps, and in 8 percent of offices, households that reached the TANF time limit faced this requirement.

Relationship between Local Office Policies and Household Participation Decisions

Multivariate models were estimated to explore the relationship between apparently eligible households' participation behaviors and the policies and practices of the local offices in their area. These household-level models took into account the households' characteristics and selected characteristics of the local areas. The two models focused on:

- Whether eligible nonparticipating households believed they might be eligible for food stamps.
- Whether households that contacted the office completed the food stamp application process.

Awareness of Eligibility

The first step in the process of becoming a food stamp participant is for the household to be aware of its potential eligibility, which we hypothesized to be influenced by local agency outreach.

In areas where a larger number of outreach modes were employed, nonparticipant households who were apparently eligible for food stamps were more likely to perceive themselves as eligible. We interpret the number of outreach modes as reflecting the intensity or breadth of the outreach efforts. With more outreach, it appears, more people were aware of their potential eligibility. Which organization conducted the outreach, and whether it was targeted to particular groups, had no statistically significant association with perceived eligibility.

Coordination of food stamp outreach with Medicaid or SCHIP was negatively related to perceived eligibility. This raises the possibility that linking food stamp outreach with that for other programs may dilute the food stamp message. A coordinated approach may still generate food stamp participation, however, if it brings people into the social services network and they are appropriately referred to the food stamp office.

Completing the Application Process

The multivariate analysis included some 27 dimensions of local office practice, representing information availability, office accessibility, subjective dimensions, and certification requirements. Five practices were significantly associated with the likelihood that households who contacted the office to apply for benefits would successfully complete the application process:

- ***Restricted office hours***—Households with earnings were less likely to complete all application requirements in offices that were only open for interviews between the hours of 8 a.m. and 5 p.m. Monday through Friday.
- ***Positive supervisor attitudes***—“Pro-participation” attitudes expressed by supervisors were positively associated with the likelihood that applicants completed the process.
- ***Fingerprinting of applicants***—In offices where applicants were fingerprinted or finger imaged prior to benefit receipt, households were less likely to complete the process.
- ***Child-friendliness***—Households with young children were less likely to fulfill all application requirements in offices that requested that children not be brought into the office.
- ***Time limits for ABAWDs***—ABAWDs in offices with time limits were less likely to complete the application process.

While the findings from the multivariate analysis are reasonable, and consistent with some major actions that USDA has taken to improve program access, they are probably not the entire story. Local offices do not adopt particular policies in isolation, but do so as part of a procedure to optimize across different program goals. The applicant’s overall experience results from the combination of many separate office practices. The study sample of 109 offices, although large for studies of this type, was not sufficient to explore the effects of all observed combinations of practices. It is therefore quite possible that practices other than those identified in the present analysis could have significant effects on participation.

Remaining in the Food Stamp Program

The study did not include a multivariate analysis of whether eligible participating households remain in the FSP because the available data did not indicate the eligibility status of all households exiting the program.

One policy whose importance can be seen without such an analysis is the length of the assigned recertification period. Based on the limited available data, it appears that eligible households are several times more likely to leave the FSP in a recertification month than in other months. This implies that less frequent recertifications would be associated with greater participation by eligible households.

It is likely that other local office practices also influence the likelihood that eligible households will leave the program. Households who failed to complete recertification requirements cited several factors potentially related to office practices, such as difficulty with documentation requirements, the need to miss work, and confusion about what they needed to do.

Policy Implications for Reducing Nonparticipation

If policy makers wish to increase the level of participation by eligible households, the biggest target is households with no recent contact with the FSP who would apply for benefits if they believed themselves eligible. This group included more than 4 million households in June 2000—somewhat more than half as many as the number of active participant households in that month. Communicating with these nonparticipant households would be difficult because they are not easy to identify and they are not necessarily the same households from month to month. Nonetheless, increasing these households' understanding of their likely eligibility may be the only way to achieve a substantial reduction in the overall rate of nonparticipation. FNS has emphasized outreach in recent years, disseminating outreach guidance material and making grants available to States, and the analysis suggests that these steps are likely to be helpful in increasing participation.

Although most eligible nonparticipants are not in contact with the FSP at any given time, it is also important to avoid discouraging participation by households who have taken action to seek program benefits, including both nonparticipants who contact the office and households who are actively participating. The processes of application and recertification—and to a lesser extent, complying with program requirements in non-recertification months—are hurdles that a sizable number of apparently eligible households fail to surmount.

These “hurdles” are not capricious, however, but represent operations that the program must carry out in order to deliver benefits and ensure program integrity. Local office practices can adjust the operations somewhat, but cannot remove them. Thus while a substantial proportion of the applicant dropouts cited procedural obstacles, the statistical analysis found few variations in office practices to be significantly associated with the probability that households would complete the process. Moreover, this analytic approach can identify effects only when the policy variation across offices is sufficient to influence households' behaviors. For example, the need to provide documentation of income, which is often cited by households as a reason for abandoning the application process, may not have been significant in the multivariate analysis because the policy differences among offices may have been too small to make a real difference in the difficulty that households experienced. For these reasons, it is likely that local office practices influence households' participation behaviors in more ways than the models could reveal.

The 2002 Farm Bill and earlier regulatory initiatives included steps intended to lower barriers to food stamp participation, such as allowing States to use longer intervals between recertifications and establishing transitional benefits for participants who leave TANF. Such modifications are quite consistent with the general study findings, which indicate that many potentially eligible households are tripped up by administrative requirements. Lengthening certification periods seems particularly likely to reduce the frequency with which eligible participating households leave the program. It might also be useful to explore new policy options for verifying households' income and other circumstances. Survey respondents mentioned this as a problem at both application and recertification, though the existing range of allowable practices was too limited to affect participation.

Any effort to increase accessibility through local office practices could benefit from further research on the links between office practices and household behavior. More focused office-level and household-level research is needed to know how much reduction in non-participation can realistically be achieved, what practices and combinations of practices can have the greatest impact, and how

those practices affect goals such as program integrity and administrative costs. Such information would provide invaluable guidance for enhancing the Food Stamp Program's accessibility to eligible households.