

Untangling the Lines

Using Phone-Based Assistance to Increase Access to
Food Stamps

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In Partnership with the
California Department of Public Health's
Network for a Healthy California
and
California Association of Food Banks



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About the author

Rachel Winch is a Bill Emerson National Hunger Fellow completing a field placement at the Network for a Healthy California. The Bill Emerson National Hunger Fellows Program is a yearlong leadership development program that trains emerging leaders in the fight against hunger in the United States. The Bill Emerson Fellows are a living tribute to the late Representative Bill Emerson, who devoted his energies to assisting the poor.

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Introduction

The Food Stamp Program, America's first line of defense against hunger and malnutrition, is a nutrition-assistance program available to all who qualify. An average of 26 million people a month received food stamps in 2006. While food stamp benefits are federally funded through the United States Department of Agriculture (USDA), the program is administered on a state level (and in some states on a county or district level) and the costs for administration are shared by these administration agencies. All states must meet federal USDA requirements for food stamp implementation, but states may choose to exercise certain options or apply for exemptions to regulations so they may implement innovative ways of improving access to food stamps in their state.¹

While the Food Stamp Program is an entitlement program, meaning all who qualify can receive benefits, barriers to access prevent many of those who are eligible from applying for or completing the food stamp application process. In 2005, only about 65 percent of eligible people nationwide and 50 percent of eligible people in California received benefits. Participation rates varied widely among states and among subsections of the population, with participation especially low among the working poor. In California, only an estimated 34 percent of eligible working poor participated in the Food Stamp Program in 2005.²

Telephone-based food stamp services make it possible for households to complete application requirements without visiting an office, which can reduce potential barriers experienced by those who work during food stamp office hours, lack transportation, or lack child care services. In addition to encouraging people to submit initial applications, telephone-based food stamp services have the potential to prevent clients from "falling off," or losing benefits at recertification.

This report explores the potential for improving access to food stamps through increasing telephone-based food stamp services. It accomplishes this by looking at innovative telephone-based food stamp assistance practices that California and other states could implement to increase access to food stamps. Finally, it outlines the potential for using telephonic signatures to complete food stamp applications and recertifications over the telephone.

¹ Cunyngnam, Karen et al. USDA FNS. "Reaching Those in Need: State Food Stamp Participation Rates in 2005." October 2007. Accessed on January 29, 2008 at <http://www.fns.usda.gov/oane/MENU/Published/FSP/FILES/Participation/Reaching2005.pdf>

² Cunyngnam, Karen et al. USDA FNS. "Reaching Those in Need: State Food Stamp Participation Rates in 2005." October 2007. Accessed on January 29, 2008 at <http://www.fns.usda.gov/oane/MENU/Published/FSP/FILES/Participation/Reaching2005.pdf>

Telephone-Based Food Stamp Assistance Can Help Reduce Barriers to Access

If you could change anything about the process of applying for food stamps, what would you change?

“Going to the office. It’s hard to get there because I don’t have transportation.”

-Food Stamp Applicant³

The process for applying for food stamps is often cumbersome, and a large number of people do not receive benefits because they do not complete the process. A study conducted in Alameda County, California, in 2004 tracked the reasons for denial for 496 applications and found that the most common reasons were procedural, rather than because the client was ineligible:

It is striking that the two most common reasons for denial—the applicant failed to provide information or make their second appointment—relate to the application process rather than eligibility criteria per se. Only 16% of the denials in Alameda and 23% in Tulare were due to applicants having income or assets above the limits.⁴

While some applicants may fail to complete the application requirements because they learn that they are ineligible, it is likely that many of those who do not complete the process were indeed eligible for benefits. A 2007 Urban Justice study conducted in New York City found a high percentage of people falling off at recertification for procedural issues; over 80 percent of cases in the study closed at recertification were for procedural reasons, including 53 percent closed because of missed interviews.⁵ These high rates of potentially eligible people being denied food stamps for procedural reasons are the norm, rather than the exceptions. Easily accessible telephone based services could help households gain and maintain food stamp benefits by making it easier to complete application requirements. These processes can be made significantly easier through a combination of policy initiatives (such as USDA Federal Nutrition Service waivers), procedural changes that simplify the process, partnerships with community organizations, and enhanced technology.

³ To gain a better understanding of clients’ experiences with the food stamp application process, interviews of food stamp applicants were conducted at a Food Stamp Application Clinic at the Alameda County Community Food Bank in November and December of 2007. [See Exhibit 5 in Appendix]

⁴ MkNelly, Barbara. Public Health Institute. *Reaching the Other Eligible Californians: California Association of Food Banks’ (CAFB) Food Stamp Outreach Project*. July 2005. Page 16. Accessed on January 29, 2008 at http://www.dhs.ca.gov/ps/cdic/cpns/network/download/foodstamp/CAFB_Case_Study_Report-9-16-05.pdf

⁵ Widom, Rebecca. Director of Research at the Urban Justice Center. “Public Hearing on Food Stamps Recertification and Hunger in New York City: New York City Council Committee on General Welfare. November 20, 2007. Accessed on January 15, 2008 at www.urbanjustice.org/hopp.

Policy Initiatives: Reduce Barriers to Access with USDA Waivers

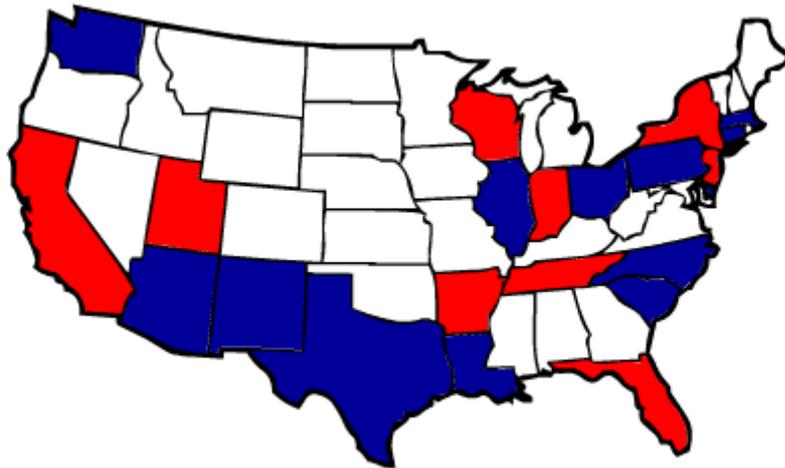
USDA allows states to apply for waivers for exemptions from certain federal regulations. Many states have applied for and received a waiver of the requirement that households document a hardship in order to waive a face-to-face interview at application, recertification, or both. Food stamp applicants in any state have the right to request a hardship to waive the face-to-face interview on an individual basis. Hardship conditions may include, but are not limited to, “illness, transportation difficulties, care of a household member, hardships due to residency in a rural area, prolonged severe weather, or work or training hours which prevent the household from participating in an in-office interview.”⁶ Households for whom a hardship waiver is approved are most often offered a telephone interview instead, though home visits are sometimes conducted. Again, states do not need to apply for a USDA waiver to conduct phone interviews for households who declare a hardship.

To make telephone interviews the default, rather than the alternative option, states may apply for blanket waivers from USDA FNS that allow clients who meets certain criteria to have the in-office face-to-face interview waived without using a hardship waiver. Nine states have received waivers of the face-to-face requirement at both initial application and recertification for at least a portion of the client population, and an additional thirteen states have waivers of the face-to-face requirement at recertification only (see Figure 1).

While many states apply for waivers for which there is already precedence, some states have been quite innovative in their applications for waivers. Examples of these waivers and their implications will be further reviewed in the case study section.

⁶ Food Stamp Regulation [7 CFR 273.2 (e)(2)]. Quoted in: Bailey, David. USDA FNS. Program Operations and Investigations. Food Stamp Program. Western Region. Administrative Notice 05-26. “Clarification on the option to waive the face-to-face interview on a case-by-case basis.” August 8, 2005. Accessed on January 29, 2008 at <http://www.fns.usda.gov/fsp/rules/memo/05/080805.pdf>.

Figure 1: States with USDA waivers of face-to-face interviews at application and recertification



- = States with a USDA waiver of the face-to-face interview at both initial application and recertification: Arkansas, Florida, California, Indiana, New Jersey, New York, Tennessee, Utah, and Wisconsin
- = States with a USDA waiver of the face-to-face interview at recertification only: Arizona, Connecticut, Delaware, Illinois, Louisiana, Massachusetts, North Carolina, New Mexico, Ohio, Pennsylvania, South Carolina, Texas, and Washington.

Source: Tropp, Larry. USDA FNS. "Face-to-Face Interview Policy (Talking Points)." Received on January 10, 2008.

Telephone-Based Food Stamp Assistance in California

Telephone-based food stamp assistance in California varies widely by county since food stamps are administered on the county level. Some counties offer food stamp assistance provided by community partners, such as food banks or 211s.⁷ In certain counties, food stamp clients may call community based organizations, where they can receive assistance completing the initial portions of the application over the phone.⁸

Recently, some counties have been working to establish call centers operated by eligibility staff. San Francisco launched a call center for intake purposes in October 2007 available in at least five languages (English, Cantonese, Spanish, Russian, and Vietnamese).⁹ The call center is housed within a San Francisco food stamp office and is operated by eligibility staff who work for half of the day as call center operators and half of the day completing tasks in other areas of the office. Callers are initially directed to an automated system, where they are asked whether they are currently receiving food stamps. Those who indicate that they are not receiving food stamps can receive information regarding eligibility requirements, make an initial appointment to meet with a case worker, or request an application to be sent to them in the mail. When the center was initially launched, call center operators also filled out applications based on the information clients gave them over the phone. The operators sent a printed copy in the mail for the clients to review, sign, and resubmit with the required verifications. The call center is not currently offering this service because it did not have adequate staffing to spend such long periods of time with callers.¹⁰ Callers who are already food stamp clients can check on the status of their documents, report changes, and schedule appointments. At recertification, San Francisco food stamp clients are mailed a letter instructing them to dial into the call center to schedule their recertification interview. When they call to schedule their recertification appointments, clients may elect to have either a telephone or an in person interview. Because of a State of California requirement that a signed Statement of Facts be submitted at recertification, clients who elect to conduct their recertification interview by phone receive this documentation in the mail upon completion of the telephone interview; they must then mail the signed Statement of Facts back with the rest of their documentation.¹¹

⁷ 211 is the abbreviated dialing code reserved by the Federal Communications Commission (FCC) for community information and referral nationwide. 211s are staffed by information and referral specialists who are professionally trained to assess callers' needs, refer them to the appropriate service agencies, and in some counties, prescreen them for food stamps.

⁸ In Alameda County, for example, people interested in food stamps may call the Alameda County Community Food Bank (ACCFB) food stamp line where they can be prescreened for potential eligibility and complete the first portion of the food stamp application. ACCFB mails the client the completed application for them to sign and mail in to the food stamp office.

⁹ Wertheim, Tiana. Senior Analyst. San Francisco Human Services Agency. Personal Communication. February 6, 2008.

¹⁰ Vaughn, William. Section Manager of the San Francisco Food Stamp Program. Personal Communication. February 1, 2008.

¹¹ O'Farrell, Leo. Program Manager. San Francisco Food Stamp Program. Personal Communication. February 5, 2008.

In addition to the efforts of individual counties to provide food stamp applicants and clients telephone-based food stamp assistance, California launched a Statewide Food Stamp Information Line in 2006. Under leadership from the California Association of Food Banks and the Network for a Healthy California, this 24-hour information line offers local information about how and where to apply for food stamps in any county of California. This information line is moving toward offering prescreening for potential eligibility and live assistance by someone knowledgeable about food stamps. While this information line offers an important service to people inquiring about food stamps, in most counties this service does not direct the client to eligibility staff. Callers who are not directed to eligibility staff cannot be interviewed, receive information about the status of their applications, check on the status of documents, recertify, report changes, receive authoritative answers about their eligibility status, or potentially complete applications over the phone.

California recently received a waiver that may potentially improve telephone-based food stamp access statewide. From July 1, 2007 until June 30, 2009, California has a “waiver of the face-to-face interview requirement at recertification for all Quarterly Reporting / Prospective budgeting households” without documenting hardship.¹² This waiver also allows households where all members are elderly or disabled to conduct a telephone interview at both initial application and recertification without documenting hardship, regardless of their source of income. California Department of Social Services combined this waiver with a simplified documentation process at recertification. These efforts to streamline the recertification process were established with the intention of “making it easier for eligible food stamp households to continue receiving benefits.”¹³ While this waiver has the potential to help many food stamp eligible households, it is unclear whether households who were granted a hardship at initial application will be relieved of the obligation to visit the food stamp office because of California’s Statewide Fingerprint Imaging System requirements.¹⁴

As California and other states explore avenues for improving telephone-based food stamp assistance, including more statewide measures, they can learn a great deal from the experiences of other states. In the next section, the experiences of five states are highlighted with special attention to problematic issues and best practices of telephone-based food stamp assistance from which California and other states can draw.

¹² Metsker, Charr Lee. Deputy Directory, Welfare-to-Work Division. California Department of Social Services. Letter to Dennis Stewart, Director of the Food Stamp Program, Western Region. April 2, 2007.

¹³ Metsker, Charr Lee. Deputy Directory, Welfare-to-Work Division. California Department of Social Services. Letter to Dennis Stewart, Director of the Food Stamp Program, Western Region. April 2, 2007.

¹⁴ Stewart, Dennis. Director of the Food Stamp Program, Western Region. Letter to Charr Lee Metsker, Deputy Director of the Welfare-to-Work Division of the California Department of Social Services. FS-10-6/Waiver #2070014. May 17, 2007. *See also:* Usaha, Nu. Staff Attorney at the Western Center on Law and Poverty. Letter to the Office of Regulations Department. California Department of Social Services. Re: Comments to Food Stamp Regulations (ORD #0806-04). November 14, 2007.

Case Studies

States considering improving their telephone-based food stamp assistance can learn a great deal from the experiences of other states to ensure that they implement the most effective assistance possible. The following five case studies—New York, Massachusetts, Florida, Utah, and Washington—provide a broad range of innovative telephone-based assistance, including:

- New York’s simplified recertification interviews using a standard interview protocol and requiring minimal documentation;
- Massachusetts’ responsiveness in improving phone-based food stamp assistance after initially increasing telephone interviews without simplifying other processes or improving technology;
- Florida’s use of waivers and new technology systems that allow the vast majority of food stamp applicants to apply without ever entering a food stamp office;
- Utah’s on-demand call centers staffed by eligibility workers, and the state’s unique waiver allowing the state to conduct unscheduled interviews; and,
- Washington’s document management system that has served as a model for other states that is linked to its Interactive Voice Response (IVR) system, thus allowing food stamp clients to obtain information about their case, including status of documents over the phone 24/7.

New York: Telephone Recertification Pilot

Simplified Recertification Using Standardized Protocol

In response to a large percentage of food stamp clients falling off at recertification, the New York State Office of Temporary and Disability Assistance (OTDA) developed a simplified process of recertification using telephone interviews, a scripted standardized interview, and reduced documentation requirements.

Background

In 2005, New York State ranked 32nd in the nation in food stamp participation with an estimated 61 percent of 2,804,000 food stamp eligible people participating.¹⁵ In 2007, the Urban Justice Center, a community based organization that serves vulnerable residents of New York City, analyzed the administrative records of over 9,500 New York City food stamp clients. They found that the majority of clients (61 percent) had at least one case closure during the 20 months after they were prescreened as eligible for food stamps, 81 percent of these closures were for procedural reasons rather than no longer meeting eligibility criteria—fifty-three percent had missed appointments and an additional thirteen percent were removed for missing documents.¹⁶

Summary

In response to the high rates of food stamp clients “falling off,” or losing their benefits at recertification, New York State OTDA requested a waiver to conduct a telephone recertification pilot. The pilot reduced barriers associated with physically coming to a food stamp office by allowing recertification interviews to be conducted over the phone using a standardized protocol and a policy of only requiring documentation essential for continued eligibility. As of March 2007, the pilot program was operating in 11 districts.¹⁷

In the pilot districts, households were mailed a “notice of recertification,” which included an application form for recertification and a telephone interview date and time, as well as a call time request form. Households were required to return this form along with necessary documentation through the mail. Once this form was received, an eligibility worker attempted to call the household up to four times prior to the scheduled interview date. If the eligibility worker reached the client, the date and time of the interview was confirmed or the worker went through with the interview at that time. If the eligibility worker was not able to reach the client on one of these four attempts, the household was called at the scheduled time and the phone interview was conducted.

¹⁵ Cunnynggham, Karen et al. USDA FNS. “Reaching Those in Need: State Food Stamp Participation Rates in 2005.” October 2007. Accessed on January 29, 2008 at

<http://www.fns.usda.gov/oane/MENU/Published/FSP/FILES/Participation/Reaching2005.pdf>

¹⁶ Widom, Rebecca. Director of Research at the Urban Justice Center. “Public Hearing on Food Stamps Recertification and Hunger in New York City: New York City Council Committee on General Welfare. November 20, 2007. Accessed on January 29, 2008 at

http://www.urbanjustice.org/pdf/publications/food_stamps_testimony_20nov07.pdf.

¹⁷ The pilot program began in the following districts in October 2006: Nassau, Greene, Onondaga, Jefferson, and Washington. Erie County began participating in November 2006. In March 2007 the following five districts were added to the pilot: Cayuga, Oneida, Madison, Suffolk, and St. Lawrence.

Phone interviews were conducted according to a standard procedure outlined in the New York State Telephone Recertification Interview Guide. This procedure standardized interviews and provided clear guidance for requesting documentation. The majority of these interviews (88%) were completed in 5-15 minutes.¹⁸ Food stamp eligibility staff were instructed to request proof of the last four weeks of income as well as supporting documentation if the answers are “Yes” to one of the following questions:

1. Has the household composition changed?
2. Has the customer moved?
3. Has the amount of rent/mortgage changed?
4. Did the unearned income change by more than \$50?
5. Has the child/dependent care provider or cost changed?
6. Have the medical expenses changed by more than \$25?
7. Did the amount paid in child support change?
8. Has any previous documentation that was pending been submitted? (New wage information, Social Security number, address, etc.)

Beyond this minimal documentation, the procedure states that other documentation should not be requested. According to Marilyn Dame at the New York State Food Stamp Bureau, districts participating in the pilot study have reported reduced congestion and traffic in local food stamp offices and have not heard major complaints from food stamp clients.¹⁹

While the telephone pilot succeeded in reducing some access barriers, eligibility staff may only conduct telephone interviews if clients returned a completed recertification and call time request form. Similar to before the pilot, some food stamp clients failed to respond to the request for an interview, putting them at risk for having their benefits cease. Furthermore, the New York phone pilot relies heavily on the food stamp applicant having a phone number where he or she can be reliably reached. Some clients may not have a reliable phone number, their number may change, or their phone may be cut off, making it difficult to conduct the telephone interview.

Recommendations Based on New York’s Experience

1. Simplify the recertification process by requiring only the documentation that is federally required in accordance with Federal Regulation 273.2(f)(8) [See Appendix, Exhibit 2].
2. Create a standardized interview process to ensure for quick and complete interviews.
3. Prepare both workers and clients about the upcoming changes prior to implementation.

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¹⁸ New York State Office of Temporary and Disability Assistance. “Post-Pilot Analysis of Telephone Recertification.” October 2007.

¹⁹ Dame, Marilyn. New York State Office of Temporary and Disability Assistance. Personal Communication. December 4, 2007.

Massachusetts: Building on Experience

Demonstrating the Need to Build Capacity

Massachusetts serves as an excellent example of the need to implement policy initiatives, procedural simplifications, and technological upgrades before increasing the demand of telephone-based assistance on eligibility staff. Between 2002 and 2005, Massachusetts Department of Transitional Assistance (DTA) was criticized for its poor customer service after increasing telephone interviews without first building capacity to handle such calls. More recently, Massachusetts has built on this experience and implemented policy and procedural changes to accompany technological advances and improve access to food stamps. USDA has praised the state for its 2006 performance improving food stamp participation.

Background

Massachusetts has had below average food stamp participation rates. From 2000 through 2003, Massachusetts had either the lowest or second lowest participation rate in the country. In 2005, the year for which participation rate information is most recently available, the state ranked 47th in the nation for food stamp participation with approximately 54 percent of an estimated 642,000 eligible people participating.²⁰ Through collaboration among anti-hunger advocates and state food stamp staff of the Massachusetts DTA, initiatives were undertaken which triggered a substantial increase in the food stamp caseload. Participation has grown from 306,107 individuals (141,846 households) in July of 2003 to 473,988 individuals (248,231 households) in December 2007.²¹ In fact, Massachusetts has received two USDA Food Stamp High Performance bonuses for their improvements in participation and application processing in 2006.²² Advocates report that the bulk of the caseload increase was the result of policy and procedural changes including:

- The state's implementation of the Bay State CAP (Consolidated Application Pilot for SSI recipients);²³
- Categorical eligibility policy eliminating asset questions for families with children;

²⁰ Cunyningham, Karen et al. USDA FNS. "Reaching Those in Need: State Food Stamp Participation Rates in 2005." October 2007. Accessed on January 29, 2008 at

<http://www.fns.usda.gov/oane/MENU/Published/FSP/FILES/Participation/Reaching2005.pdf>

²¹ DTA Monthly Food Stamp Caseload data. Accessed on January 31, 2008 at www.state.ma.us/dta. December 2007 caseload data available at: <http://www.mass.gov/Eeohhs2/docs/dta/dec07.pdf>

²² "Massachusetts Awarded More than \$3 Million in Food Stamp Program Bonuses." The Commonwealth of Massachusetts: Executive Office of Health and Human Services. September 21, 2007. Accessed on January 31, 2008 at

http://www.mass.gov/?pageID=pressreleases&agId=Eeohhs2&prModName=eohhspressrelease&prFile=070921_food_stamp_program.xml.

²³ Bay State CAP, one of the consolidated application pilots approved by USDA does not require SSI households to file separate applications, provide verifications, or conduct interviews with food stamp workers. The benefit amount is based on information provided directly by SSA to the state agency. For more on CAP pilots see:

<http://www.fns.usda.gov/fsp/government/promising-practices/CAPsDevelopmentGuidance.pdf#xml=http://65.216.150.153/teaxis/search/pdfhi.txt?query=SSI+CAP&pr=FNS&prox=page&rorder=500&rprox=500&rdfreq=500&rwfreq=500&rlead=500&sufs=0&order=r&mode=&opts=&cq=&id=4592cc4e17>.

- Full implementation of the Transitional Benefits Alternative for former cash assistance households;
- Improvements in application processing and reopening of denied applications where missing verifications are provided within 30 days of denial.

Summary

In July 2002, following closure of a number of DTA local offices and an increase in non-cash assistance working households seeking food stamps, the Massachusetts DTA directed food stamp eligibility staff to more liberally accept requests to waive the face-to-face interview because of hardships.^{24,25} The paper application was amended to ask if the household had a hardship the best times they could be reached by phone. Advocates report that this led to an increase in telephone interviews, but the Administration did not seek or receive additional administrative funding to increase the number of case handling workers or clerical staff to assist workers. Furthermore, they did not receive funding to improve the local office phone technology to deal with the increase in volume of calls, receptionist options, mechanisms to allow for automated change reporting – all of which would help filter calls to workers and allow them to deal with interviews and more complex tasks. The increase in telephone contact overwhelmed Transitional Assistance Offices (TAO), clients, and community organizations assisting clients. The demand for phone services far outnumbered the existing staff resources to field such calls and conduct interviews.

Despite the state's intention to improve customer service by approving as many requests for waiver of the face-to-face interview as possible, both USDA and the Massachusetts Law Reform Institute (MLRI) reported poor phone-based service in TAO offices. As MLRI reported, "In some local offices, as a result of the lack of effective phone communication or demands for in-office interviews, clients wait hours in the waiting rooms, and the stream of clients coming in person is so great that workers simply do not have time to make the requisite calls for the mailed-in or online filed applications."²⁶ MLRI and the Food Stamp Improvement Coalition documented dozens of cases of clients and client advocates who were unable to contact a TAO worker by phone, phone interviews not being scheduled or completed, paperwork being lost and clients unable to contact a worker to determine what they are missing, and failed attempts of workers to contact clients for phone interviews.²⁷

In a Program Access Review of Food Stamp Program conducted by USDA FNS in November 2005, FNS reported that TAO staff were inundated with more calls than they could handle: "Local [TAO] office staff indicated that they are unable to keep up with the amount of phone calls and voicemails that they receive on a daily basis."²⁸ While FNS recommended DTA make improvements in the number of voice messages an individual worker's line could handle, this did

²⁴ DTA Field Operations Memo 2002-16, Waiving In-Office Face to Face Interviews for NPA FS AUs, available at <http://www.masslegalservices.org/cat/192>.

²⁵ Massachusetts regulations for waiver of face-face interviews, 106 CMR 361.510, available at http://www.mass.gov/Eeohhs2/docs/dta/g_reg_361.pdf

²⁶ Massachusetts Law Reform Institute. "A Report on Food Stamp Program Client Access: October/November 2005." November 9, 2005. Page 6.

²⁷ MLRI. "A Report on Food Stamp Program Client Access: October/November 2005." November 9, 2005.

²⁸ USDA FNS. "Food Stamp Program Access Review, November 8-17, 2005. Massachusetts Department of Transitional Assistance: Dorchester, Lawrence, Malden, and Somerville Offices." Page 9.

not solve the problem of worker time to be able to return calls. When TAO workers did attempt to conduct telephone interviews in their limited time, it was often difficult to reach clients; clients' numbers had changed, their phones had temporarily been cut off, or the client had not indicated the best time to reach them.

In 2005, MLRI and the Food Stamp Improvement Coalition launched a successful state budget campaign to increase administrative funding and directive language in the administrative line item to require the administration to provide an "on-demand" call unit staffed by DTA workers, reduce the demand of verifications and initiate technology changes to use document imaging for verifications.²⁹ MLRI reports that in the first year of funding, the bulk of the funds for call units was directed to improving the agency's phone systems, as well as piloting a call center model in one area of the state.³⁰ While implemented too recently to have conclusive data on its efficacy, DTA is hoping to incorporate lessons learned from earlier complications with telephone-based food stamp assistance when developing a statewide call center to service the entire state of Massachusetts.

Recommendations Based on Massachusetts' Experience

We think there are MANY problems with phone based interviews—notably endless phone tag and voicemails, workers' lines being busy, worker voicemail being full, clients with limited phone call receipt options (like being at work or cell phones that limit incoming calls or don't have useful caller ID), clients with cell phone numbers that have area codes that the state agency phones read as long distance and thus prohibiting the call from going through, and on and on. At this juncture, Massachusetts advocates think the ONLY system that works best in a state with limited local offices is a statewide "on-demand" call center where state food stamp workers are on a batter-up system at a toll free number and clients can call at any time during business hours to speak with a worker for their interviews. A phone interview system needs to move away from a specific caseworker assigned system for the initial application and interview. We do not endorse a privatized model ala Florida or Texas. We know that in-person interviews simply do not work for food stamp clients who live too distantly from the food stamp office or have work or training conflicts or other time constraints or travel issues. However, a successful phone interview model needs to operate with enough flexibility to ensure every food stamp applicant gets access to a food stamp intake worker without delay and who is trained and authorized to handle their application and immediate needs without additional referrals to specific staff.

-Patricia Baker
Massachusetts Law Reform Institute
Personal Communication. February 5, 2007.

1. Implement policy and procedural changes that simplify that application process before increasing the use of telephone services.
2. Ensure that the technology being used has the capacity to handle increased usage before implementing a process that relies on it heavily. For example, ensure that telephone and

²⁹ Chapter 139 of the Acts of 2007, Section 2, Line item 4400-1001, available at <http://www.mass.gov/legis/> MLRI and the Food Stamp Improvement Coalition expressly advocated for food stamp eligibility staff to staff the call units, versus privatizing the services to a for profit or non-profit. Massachusetts state law limits the privatizing of existing services otherwise provided by state employees. MLRI was also concerned about possible erroneous denials and QC error increases in using non-profit or private entities, as has been the experience in Illinois, Florida and other states.

³⁰ The Call Center is currently being piloted through the local Brockton DTA office, which only serves a small portion of the state. DTA and advocates are presently reviewing the success of this pilot. Source: Department of Transitional Assistance. "New Initiative Memo: Brockton Food Stamp Call Center." July 13, 2007. Accessed on January 31, 2008 at http://www.masslegalservices.org/docs/6480_Call_Center_New_Initiative_Memo.pdf

voice mail systems are up to date and can store a large volume of messages before increasing telephone-based services.

3. Create “on-demand” call centers staffed by experienced eligibility workers where callers can receive immediate assistance, including telephone interviews, in many languages. Such call centers allow clients to have an interview at times convenient for them and relieves eligibility staff from the burden of tracking down clients over the phone.
4. Ensure that clients are asked the best time to call in situations where eligibility personnel are calling clients.

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Florida: A State of Innovation

Combining Technological Innovations with Waivers that Simplify the Application and Recertification Process

Using a combination of waivers and new technology systems, Florida has implemented a system in which the vast majority of food stamp applicants never enter a food stamp office.

Background

With 59 percent of an eligible 2,088,000 people participating, Florida ranked 38th in the nation in food stamp participation in 2005.³¹ A large percentage of Florida's food stamp eligible population are seniors or disabled, for whom visiting the food stamp office is particularly difficult.³² Florida has a 27 percent participation rate among this group, which is higher than the national average for this demographic (24 percent), but lower than the overall statewide participation rate.³³ In an effort to increase participation and in response to a state mandate that food stamp offices cut their spending by consolidating offices, Florida developed an online application, established three call centers throughout the state operated by eligibility staff, and built a network of community partners that offer resources and assistance to food stamp applicants and clients.

Summary

Throughout the state, Florida developed a system for categorizing applications and recertifications as “red” or “green.” “Red” indicated a household was at risk for error. Households were “red” for reasons such as having a sanction in the past year, having an intentional program violation in the past, or having frequent changes in household composition and were required to complete full interviews. Non-error prone or “green” cases, which made up around 94.6 percent of cases, had abbreviated interviews that covered the major factors of eligibility.³⁴

Like many states, Florida applied for and received a USDA waiver in 50 percent of the state that waives the requirement to document a hardship in order to have a phone interview replace an in-office face-to-face interview at application.³⁵ In addition to this more standard waiver, Florida has applied for and received a series of innovative waivers and implemented pilot projects to simplify the application process, as described in more detail below.

³¹ Cunyningham, Karen et al. USDA FNS. “Reaching Those in Need: State Food Stamp Participation Rates in 2005.” October 2007. Accessed on January 29, 2008 at <http://www.fns.usda.gov/oane/MENU/Published/FSP/FILES/Participation/Reaching2005.pdf>

³² Statewide in December 2007, there were 212,206 elderly customers, 176,885 disabled but under age 60 and 134,697 who were both elderly and disabled. Source: Mathers, Connie. Operations Review Specialist of Economic Self-Sufficiency Services at the Florida Department of Children and Families. Personal communication. January 28, 2008.

³³ Lange, Jennifer. Director of ACCESS Florida. Personal Communication. January 31, 2008.

³⁴ Lange, Jennifer. Director of ACCESS Florida. Personal Communication. January 31, 2008.

³⁵ According to USDA FNS regulations, “for initial applications, the waiver of the requirement to document hardship status is limited to no more than 50% of the caseload—may be state-wide for recertification interviews.” Source: Tropp, Larry. USDA FNS. “Face-to-Face Interview Policy.” Received on January 10, 2008.

Florida Simplified Elderly Application Demonstration Project

Florida applied for and received a waiver for an innovative and simplified application process for households containing only elderly or disabled individuals, the Florida Simplified Elderly Application Demonstration Project. In the 59 counties where the simplified process for households with only elderly or disabled members is operating, participating households are able to waive the interview altogether and use self-declaration of eligibility criteria rather than providing further documentation, unless the information is not verifiable through state or federal computer matches. The customer must provide proof of non-citizen status. Since many of the customers participating in the pilot receive Social Security, eligibility information is verified using a computer database that checks information with other social service agencies. Even though there are households in this area that do not qualify for the Florida Simplified Elderly Application Demonstration Project and are not covered under the waiver for face-to-face interviews, Florida has a lenient policy for authorizing hardship waivers (including the high price of gasoline) and most households have telephone interviews. Below is an excerpt from the USDA waiver:

Florida Simplified Elderly Application Demonstration Project: Effective October 1, 2006-September 30, 2009

Approved waivers of food stamp regulations

1. 7 CFR 273.2 (d) requires that the State agency interview applicant households in order to determine eligibility. We are waiving this provision of the regulation to permit the State agency to forego interviews with participating households.
2. 7 CFR 273.2 (f) requires the State agency to verify gross nonexempt income, utility expenses, medical expenses, Social Security numbers, residency, and identity. We are waiving this provision of the regulations so that participating elderly and disabled households do not have to provide such verifications unless questionable. Computer matches will be used to the greatest extent possible to verify income and Social Security numbers.”³⁶

SUNCAP

Florida implemented this Combined Application Program in coordination with the Social Security Administration to simplify the food stamp application process for individuals who are eligible for Supplemental Security Income (SSI). Through SUNCAP, one-person households can file a food stamp application and SSI application at the same time. Benefit amounts are standardized automatically using two standard shelter expenses. Data collected from the SSA interview are electronically transferred the ACCESS computer system to open the food stamp case.

Simplified Recertification

In addition to a simplified process at application, Florida applied for and received a waiver to implement a more efficient system of recertifying food stamp clients. Initially food stamp clients completed an application for recertification and unless there was a questionable item on the application, the food stamp benefits were recertified without additional contact, interview, or documentation. Florida requested an extension of this waiver that allowed recertification without an interview. Food and Nutrition Services extended the waiver,

³⁶ USDA FNS. “Florida Simplified Elderly Application Demonstration Project.” September 5, 2006. See Appendix for full text.

though they require at least an abbreviated interview every twelve months, without the need to document hardships on each case.³⁷

Phone-based self-service

Food stamp clients in Florida may check the status of their case 24 hours a day over the phone using an Automated Response Unit (ARU). Clients are asked for identifying information to protect confidentiality; they may then use an automated menu to check on the status of their case. If a client using the ARU system needs further assistance, she may choose to speak with a live person. Callers may also report changes by calling these centers.

Community Partner Network

While food stamp offices where customers could receive in-person service have been consolidated, the state of Florida works with 3,186 community partners throughout the state resulting in an increase in ACCESS locations where customers may be served.³⁸ Many of these partners (88 percent) have computers available for customers to complete an online application and phones to complete telephone interviews.³⁹

Document Management

Because staff in multiple locations, such as call center staff, must be able to access clients' files, Florida has implemented a system of document imaging and management that allows eligibility staff to retrieve cases and supporting documentation electronically in seconds. Eligibility staff at call centers can update files instantly when households call to report changes in household circumstances. When the system was first implemented, food stamp advocates reported that households received inaccurate information about their files because the call center agents did not have access to real-time electronic records. Florida responded by expanding its system of document imaging, which state officials asserted "will help address these concerns."⁴⁰

Florida's use of policy initiatives, procedural changes, and community partnerships has contributed to successful use of enhanced technology of online applications, on-demand call centers, and document imaging. Florida state officials estimate that 90 percent of food stamp application interviews are completed over the telephone and as of December 2007, 87 percent of applications for all programs were submitted online.⁴¹ Online services can be completed by an authorized representative on someone's behalf; for example, an elderly customer's adult child may apply and recertify for food stamp benefits for his or her parent even if the authorized representative lives out of state.⁴²

³⁷ Mathers, Connie. Florida Department of Children and Families. Personal Communication. January 28, 2008.

³⁸ Lange, Jennifer. Director of ACCESS Florida. Personal Communication. January 31, 2008.

³⁹ Government Accountability Office. "Food Stamp Program: Use of Alternative Methods to Apply for and Maintain Benefits Could Be Enhanced by Additional Evaluation and Information on Promising Practices. GAO-07-573. May 2007. Accessed online at <http://www.gao.gov/new.items/d07573.pdf> on January 22, 2008.

⁴⁰ Ibid, page 28

⁴¹ Lange, Jennifer. Director of ACCESS Florida. Personal Communication. January 31, 2008.

⁴² Government Accountability Office. "Food Stamp Program: Use of Alternative Methods to Apply for and Maintain Benefits Could Be Enhanced by Additional Evaluation and Information on Promising Practices. GAO-07-573. May 2007. Accessed online at <http://www.gao.gov/new.items/d07573.pdf> on January 22, 2008. Page 28

While Florida's process of modernization has had many successes, it has not been without challenges, most of which were related to inadequate staffing. Staff has been cut 43 percent in the years since these modernization efforts began. During this same period, Florida experienced an increase in food stamp applications associated with a simplified application process and natural disasters, including an increase in applications directly after Hurricane Wilma. The reduction of staff combined with the increase in applications has strained food stamp personnel. Inadequate staffing at food stamp call centers has resulted in long hold times, and food stamp advocates claimed that some clients who could not get through to a call center operator were denied benefits because they did not provide required verification in time. Florida's increase in its negative error rate, or its rate of denying households that are food stamp eligible, is attributed to workers' heavy caseloads.⁴³ While in theory food stamp clients could turn to local community based organizations for assistance, some community partners lack proper training and resources to assist food stamp applicants and clients well.⁴⁴

Recommendations Based on Florida's Experience:

Connie Mathers at the Policy Unit of the Department of Children and Families offered the following recommendations to other states looking into increasing telephone-based food stamp services:

1. Contact other states to share best practices.
2. Use a clear interview protocol or script to ensure accuracy and consistency.
3. Ensure adequate staff numbers to handle call volume.
4. Pay special attention to expedited cases to ensure timeliness.⁴⁵

Other recommendations based on Florida's experience:

1. Ensure that online applications have an electronic signature function. Without this, applicants still have to mail, fax, or come in person to complete the signature portion, defeating much of the purpose of the online application.
2. Require only documentation at recertification that is required under USDA regulations, and apply for waivers of USDA regulations that are barriers to a simplified application process.
3. Seek innovative ways to obtain documentation, such as through increasing the use of self-declarations and conducting computer matches that cross-reference with other state and federal programs.

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⁴³ Government Accountability Office. "Food Stamp Program: Use of Alternative Methods to Apply for and Maintain Benefits Could Be Enhanced by Additional Evaluation and Information on Promising Practices. GAO-07-573. May 2007. Accessed online at <http://www.gao.gov/new.items/d07573.pdf> on January 22, 2008.

⁴⁴ Ibid

⁴⁵ Mathers, Connie. Florida Department of Children and Families. Personal Communication. January 28, 2008.

Utah: On Call

Using Innovative Waivers and On Demand Call Centers to Allow for Client Flexibility

Utah has developed on-demand call centers operated by eligibility staff who do not have case loads; these workers conduct interviews when a client calls using a standardized interview protocol.

Background

With 61 percent of an estimated 214,000 eligible people participating, Utah ranked 35th in the nation for food stamp participation in 2005.⁴⁶

Summary

Utah recently expanded telephone-based food stamp services through on-demand call centers operated by eligibility staff. Utah has operated a call center in the Central Region since October 2006, in the Northern Region since early 2007, and in the Southern Region since August 2007. Between these three call centers, all clients statewide can connect to a call center for their initial interview. Food stamp applicants who call the call center are entered into a queue and are interviewed when a call center operator answers. The on-demand structure of the call center allows for client flexibility and reduces the burden of eligibility staff to track down applicants to complete their interviews. Once call center staff have completed the interviews, they then assign the case to a caseworker with the completed information from the interview.

To reduce complications with one eligibility worker conducting the interview and another handling the case, Utah has a clear protocol for conducting interviews. Utah is able to complete these telephone interviews without requiring individual hardship waivers through a policy waiver from USDA. Their waiver, effective from October 1, 2006 to September 30, 2008, “Allows the State agency to use telephone interviews in lieu of the face-to-face interview without documenting hardship” in two pilot districts for up to 50 percent of the caseload. In the rest of the state, clients may still complete a telephone interview if they declare a hardship.⁴⁷ Because food stamp regulations allow states to define hardship and Utah allows for a broad definition of hardship, the majority of applicants outside of the waiver areas meet a hardship and are eligible for a telephone interview. Additionally, Utah received a USDA waiver to conduct unscheduled interviews on the grounds that it is more convenient for a client to complete an interview at a time and location of the client’s choice [See Appendix, Exhibit 3].⁴⁸

Telephone interviews are available regardless of method of application, and many of those who interview through the call center have completed an online application. Once the online application is submitted, clients are given a toll-free number to call for a telephone interview.

⁴⁶Cunningham, Karen et al. USDA FNS. “Reaching Those in Need: State Food Stamp Participation Rates in 2005.” October 2007. Accessed on January 29, 2008 at <http://www.fns.usda.gov/oane/MENU/Published/FSP/FILES/Participation/Reaching2005.pdf>

⁴⁷“Current Face-to-Face Interview Policy.” www.fns.usda.gov/fsp/whats_new.htm

⁴⁸ Link, Kathy. Assistant Director, Operations Support Division, Utah Department of Workforce Services. Personal Communication. January 28, 2008.

Utah has developed a document imaging system using bar codes for all applications—both paper-based and online—that call center operators can pull up when a client calls. In an effort to be proactive about ensuring that applicants complete an interview, all clients who did not complete an interview will receive a notice advising him or her that the interview needs to be completed, and after seven days the applicant will receive a notice of missed interview.

Utah is currently building capacity for community partners to assist clients to complete online applications and submit supporting documentation. Utah recently received a participation grant from USDA, which will allow the state to purchase computers and fax machines for 30 food pantries and 30 senior centers.⁴⁹ Beginning in January 2007, Utah food stamp offices began to mail clients their EBT cards. With these additions, clients who apply from a community partner can complete their entire application without entering a food stamp office.

Recommendations Based on Utah’s Experience

1. Employ experienced eligibility staff who do not have case loads at call centers.
2. Begin with a “soft-launch” (no advertising) to prevent a new system and newly trained workers from being overwhelmed.
3. Maintain low caseloads to contribute to better customer service.
4. Combine online applications with a digital signature, unscheduled telephone interviews at a call center, and a simple process for providing verifications to increase client flexibility in completing the application without entering a food stamp office.
5. Implement new systems gradually. In Utah, unscheduled interviews at regional call centers began as a pilot in a limited area with small numbers of people and have expanded to most offices in 12-18 months. Issues were identified early on and significant changes were made. Additionally, Utah made technological and procedural improvements in multiple stages, such as implementing a document imaging system for paper applications before launching online application.

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⁴⁹ Link, Kathy. Assistant Director, Operations Support Division, Utah Department of Workforce Services. Personal Communication. January 28, 2008.

Washington: Finding Answers in Phones

Using Interactive Voice Response to Increase Client Agency and Use Staff Time More Effectively

Washington has implemented an Interactive Voice Response (IVR) system called Answer Phone that is linked to its document imaging and management system. Answer Phone allows food stamp clients to obtain information about their case including case status, payment level, appointment information, and status of documents. The system has additional features for homeless clients to receive messages from their caseworkers.

Background

With 68 percent of an estimated 736,000 eligible people participating, Washington ranked 18th in the nation in food stamp participation in 2005.⁵⁰

Summary

In an effort to find ways to serve clients outside of the food stamp office, to empower food stamp clients with up-to-date case information, and to use staff time effectively. Washington developed Answer Phone, an IVR system, in 2002.⁵¹ When Answer Phone was first launched, its services included case status, payment level, an option to hear appointment information, a feature for mailboxes for homeless clients, and a system for leaving messages for case workers. After implementing a document management system in 2003, Answer Phone added the service of finding the status of documents.

In order for callers to access private information on Answer Phone, they must enter their client ID number and a Personal Identification Number (PIN). The first time a client uses Answer Phone, she is asked to enter the last four digits of her Social Security number. After the initial activation, she will be prompted to select a four-digit PIN, which the client must enter to access case information. With its PIN-based security system, 24-hour availability, and integration with document management, Answer Phone gives food stamp clients the tools they need to manage their case at the time and place of their convenience, while maintaining privacy and security.

In addition to operating an IVR phone line, Washington implemented call centers staffed by live operators in 2000, launched an online application in 2001, implemented a document imaging and document management system in 2003, and obtained a USDA FNS waiver of the face-to-face interview at recertification in 2003.⁵² According to a 2007 Government Accountability Office report, Washington state officials estimate that 10 percent of interviews at application and 30

⁵⁰ Cunnyngham, Karen et al. USDA FNS. "Reaching Those in Need: State Food Stamp Participation Rates in 2005." October 2007. Accessed on January 29, 2008 at

<http://www.fns.usda.gov/oane/MENU/Published/FSP/FILES/Participation/Reaching2005.pdf>

⁵¹ In an IVR system, a computer detects voice and touch tones to route calls through menu choices.

⁵² Government Accountability Office. "Food Stamp Program: Use of Alternative Methods to Apply for and Maintain Benefits Could Be Enhanced by Additional Evaluation and Information on Promising Practices. GAO-07-573. May 2007. Accessed on January 22, 2008 at <http://www.gao.gov/new.items/d07573.pdf>.

percent of interviews at recertification are conducted over the phone.⁵³ In addition to operating call centers for clients to call in to conduct recertification interviews, Washington is currently making outbound calls to clients to initiate food assistance reviews. The state is considering the use of predictive dialing software, which calls food stamp clients who are due for a recertification interview until someone answers, at which point the software connects the client to a call center operator. This system maximizes human workers by ensuring that they are not spending large amounts of time waiting for phones to ring.

While Washington has had many successes with implementation of new technology, it is faced with budget cuts resulting in reduced staffing while program usage was increasing. According to Gary Hartline at the State of Washington Department of Social and Health Services Division of Employment and Assistance Programs, Washington has lost close to 20 percent of its staff during a period when food assistance program participation increased 60-70 percent. Such cuts in staff make it difficult to maintain quality customer service. Nevertheless, Washington remains fourth in the nation in terms of payment accuracy, some of which can be attributed to successful implementation of technology, including a document management system that is successful in preventing the loss of documents and the standardization of records.⁵⁴

Recommendations based on Washington's Experience

1. Implement IVR phone systems to allow clients 24/7 access to case information without increasing staff time.
2. Ensure that call center operators have access to a comprehensive and easy to use system of document management. Washington developed a document management system in house that other states have looked at as a model.
3. Integrate live call centers with IVR systems. While Washington maintains an IVR system and call centers with live operators, it acknowledges that both systems would be more effective if linked. The state is working toward integrating the systems.⁵⁵
 - a. Washington plans on using the IVR system as a front end menu for call centers. The IVR system will maintain its current services and add options including rescheduling appointments, conducting a recertification interview, reporting changes in household status, and allowing callers to opt out of the IVR system and be connected with a live operator.
 - b. By having callers first enter their information into an IVR system that is passed onto systems used by call center operators, agents will have the caller's case information open when they answer the phone. Using the IVR system as the call center's front end could save time on each call. With three million calls to the Washington call center last year, saving a minute on each call could amount to huge cost and staff time savings.

⁵³ Government Accountability Office. "Food Stamp Program: Use of Alternative Methods to Apply for and Maintain Benefits Could Be Enhanced by Additional Evaluation and Information on Promising Practices. GAO-07-573. May 2007. Accessed on January 22, 2008 at <http://www.gao.gov/new.items/d07573.pdf>. Page 14.

⁵⁴ Hartline, Gary. Washington Department of Social and Health Services. Personal Communication. January 18, 2008.

⁵⁵ Hartline, Gary. Washington Department of Social and Health Services. Personal Communication. January 18, 2008.

- c. Integrating the IVR system with a staffed call center would allow clients to manage their cases more completely. Not only could they listen to the status of their case, but they could also speak to a call center operator to update their file and even conduct recertification interviews.

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Telephonic Signatures

“If you could apply for food stamps over the phone, would you?”

“Of course! That would be much better! No line, no hassle. And I would avoid the transportation issue”

-Food Stamp Applicant

Beyond telephone interviews, accessing over the phone case status information, and telephone recertifications, one option that states are not yet allowed—but may soon become available—is to complete entire food stamp applications over the phone using telephonic signatures.

According to federal food stamp regulations, an adult representative must sign a food stamp application in order for it to be considered complete; this requirement currently prevents food stamp applications from being completed over the phone.⁵⁶ In the 2002 version of the Farm Bill, this requirement was amended to allow for applications to be signed electronically. In the versions of the current Farm Bill passed by the House and the Senate floors in 2007, language was included that allowed states the option of accepting applications “signed” over the phone using a “telephonic signature.” A telephonic signature is a method of verification whereby a client gives authorization over the telephone rather than providing a physical written signature or electronic signature.

There are multiple forms of telephonic signatures. Some of these include: using Personal Identification Numbers (PINs), entering personal identifying information, using voice recordings, and using voice recognition technology (see Figure 2).

Figure 2: Types of telephonic signatures

<p>Personal Identification Numbers (PINs)</p> <ul style="list-style-type: none"> • Clients assigned or choose a PIN they must enter to access information over the phone and verify identity 	<p>Personal identifying information</p> <ul style="list-style-type: none"> • Clients enter personal information such as birth date or Social Security number to access information over the phone and verify identity
<p>Voice recording</p> <ul style="list-style-type: none"> • Food stamp clients make a statement that is recorded, saved, and attached to the clients’ files 	<p>Voice recognition</p> <ul style="list-style-type: none"> • Clients make initial recording of their voice, which is coded using voice recognition technology

⁵⁶ Section 11 [7 U.S.C. 2020](2)(B)(v) of the Food Stamp Act of 1977 [As Amended Through P.L. 108-269, July 2, 2004]

Personal Identification Numbers (PINs)

PINs provide an easy and secure way to verify information. Using this method, food stamp applicants can be assigned or choose a PIN that they must enter as an affirmation of completing the application. This method is currently used by some states for phone based case management. “The Answer Phone,” the statewide phone number run by Washington State Department of Social and Health Services for food stamp case self-service, requires that clients enter a PIN in order to access the details of their accounts. The first time clients call, they must enter a client identification number and the last four digits of their Social Security number as their PIN; they are then prompted to create their own PIN. Self-selecting a PIN allows clients to pick something that is easy to remember, reduces the amount of communication from the food stamp office, and allows clients to access their accounts more quickly because they do not have to wait for a letter from the food stamp office. PINs are commonly used for online applications—including filing for secure government services such as the Free Application for Federal Student Aid (FAFSA), filing taxes,⁵⁷ and some states food stamp applications.⁵⁸

Benefits of using Personal Identification Numbers (PIN):

- PINs are a secure way to complete applications.
- Some state phone systems may be able to implement PIN signatures without completely revamping their technology, especially states like Washington that already have an Interactive Voice Response (IVR) system that uses PINs.
- For states that would need to upgrade their phone systems, these upgrades could serve multiple purposes, such as building capacity for an IVR system to check case status or as the front end of a call center.
- Signing using PINs would not require saving, storing, and managing telephonic signatures or the costs associated with doing so.
- A single PIN can be used for multiple purposes. Clients could use the PIN they are assigned or select to file over the telephone, file online, or access their case information through an IVR system.

⁵⁷ Source: VITA/TCE Publication 4012. Volunteer Resource Guide 2007. Department of the Treasury Internal Revenue Service.

⁵⁸ For example, the application for food stamps through the Virginia Department of Social Services requires that the client enter two of the following: Social Security Number, Confirmation Number, or Application ID. The Confirmation Number serves the function of an assigned PIN. For more information, visit the Virginia Department of Social Services Online Application Procedures, available at http://www.dss.virginia.gov/files/division/bp/fs/policy/manual/p02_appendix2.pdf. Accessed on February 4, 2008.

Personal Identifying Information

Similar to entering a pin code, food stamp applicants could enter personal information such as birth date and Social Security number to verify that they are indeed the person they claim to be. This system is commonly used in the private sector—including medical insurance, banking, and some states food stamp applications⁵⁹—when giving out confidential information over the phone.

Benefits

- Entering confidential personal information requires that the person calling have intimate knowledge of a client’s private information, making it secure.
- Some state phone systems may be able to implement a system of requiring personal verifying information without completely revamping system. It would require the same technology used for PINs.
- Personal identifying information can be used a backup method for people who forget their PIN or as an initial PIN, similar to the way that Washington’s Answer Phone operates using the last four digits of a person’s Social Security number as the initial PIN.

Drawbacks of using personal identifying information

- Some people may be uncomfortable using their Social Security numbers or may not have them, such as non-citizen parents applying for their citizen children.

Voice Recording

Food stamp clients may respond to a prompt such as “Yes, I [“name”] verify that the information I gave today regarding my food stamp application is correct.” This statement may be recorded, saved, and attached to a client’s file. This system is currently used by some auto insurance companies. This type of voice signature can be recorded and retrieved upon request, which ensures that food stamp offices can revisit the voice signature if there is a discrepancy.

Benefits of voice recording

- Voice recordings can be recorded, stored, and revisited. This ensures that the telephonic signature can be revisited and used if there are debates over a case.

Drawbacks of using voice recording

- Implementation of voice recordings may require system upgrades in many states.
- In addition to system upgrades for recording, voice signatures require storing and organizing technology.

⁵⁹ For example, the application for food stamps through the Virginia Department of Social Services requires that the client enter two of the following: Social Security number, Confirmation Number, or Application ID. Clients may sign using the personal identifying information of the Social Security number, but are not obligated to do so. For more information, visit the Virginia Department of Social Services Online Application Procedures, available at http://www.dss.virginia.gov/files/division/bp/fs/policy/manual/p02_appendix2.pdf. Accessed on February 4, 2008.

Voice Recognition

Using voice recognition, clients make an initial recording of their voice, which is coded using voice recognition technology. Future phone communications would be checked against this initial voice signature. Some medical doctors use this technology to certify death certificates and call-in prescriptions. While this system is highly secure as it involves creating voice signatures similar to a retina scan or finger image, it is designed for a few users to use multiple times, rather than a large number of users. According to Gary Van Gordon, Vice President and co-founder of Interactive Northwest—Washington State’s contractor for its IVR systems—voice recognition technology would be extremely expensive: “If it is feasible at all, expect an investment on an order of 10 times the magnitude of the above scenarios.”⁶⁰ Creating such a voice signature could require costly technology and implementation burdens.

Benefits of voice recognition

- Voice recognition is extremely secure, for it is, at least theoretically, impossible to fake a voice signature.

Drawbacks of voice recognition

- Voice recognition requires costly technological upgrades.
- Voice recognition technology is difficult to implement.
- Voice recognition is not designed for a large number of users. It is much better suited for a few users to use multiple times.

⁶⁰ Van Gordon, Gary. Vice President and Co-Founder of Interactive Northwest. Personal Communication. February 6, 2008.

Telephonic Signatures in the Farm Bill

The 2007-2008 Farm Bill may offer states the option to implement telephonic signatures to complete food stamp applications over the phone. While the language in the versions of the Farm Bill passed by the House and Senate floors differs only slightly, the it still has to go to Committee and be signed by the President before it becomes law; thus the definition for USDA purposes is not yet solidified. Some of the key components of telephonic signatures in the versions of the Farm Bill passed by the floors of the House and Senate include the following [See Figures 3 and 4]:

- Requires recording of both the household's assent and the information to which assent was given.
- Requires that the verbal assent be stored for future use.
- Requires that the client be provided a written copy of the application.
- Requires that the date of verbal assent be treated as the date of application.

In addition to the benefits of current forms of telephone-based food stamp assistance, filing an application using a telephonic signature would ensure that the date the client applies over the phone is considered the application date. Currently, if a client fills out an application over the phone without a telephonic signature, the application will not be considered complete until the food stamp office receives the completed signed application.

Figure 3: Version Passed on the House Floor

SEC. 4007. STATE OPTION FOR TELEPHONIC SIGNATURE.

Section 11(e)(2)(C) of the Food Stamp Act of 1977 (7 U.S.C. 2020(e)(2)(C)) is amended (1) by inserting "(i)" after "(C)"; and (2) by adding at the end the following:

"(ii) A State agency may establish a system by which an applicant household may sign an application through a recorded verbal assent over the telephone. Any such system shall— "(I) record for future reference the household member's verbal assent and the information to which assent was given; "(II) include effective safeguards against impersonation, identity theft, or invasions of privacy; "(III) not deny or interfere with the right of the household to apply in writing; "(IV) promptly send the household member a written copy of the application, with instructions on a simple procedure for correcting any errors or omissions; "(V) comply with paragraph (1)(B); "(VI) satisfy all requirements for a signature on an application under this Act and other laws applicable to the Secure Supplemental Nutrition Assistance Program, with the date on which the household member provides verbal assent effective as the date of application for all purposes; and "(VII) comply with such other standards as the Secretary may establish."

Source: http://agriculture.house.gov/inside/Legislation/110/FB/h2419ag_rh_xml.pdf. Accessed on January 28, 2008

Figure 4: Version Passed on the Senate Floor

SEC. 4204. STATE OPTION FOR TELEPHONIC SIGNATURE.

Section 11(e)(2)(C) of the Food and Nutrition Act of 2007 (7 U.S.C. 2020(e)(2)(C)) is amended— (1) by striking “Nothing in this Act” and inserting the following: “(C) ELECTRONIC AND AUTOMATED SYSTEMS.— “(i) IN GENERAL.—Nothing in this Act”; and (2) by adding at the end the following: “(ii) STATE OPTION FOR TELEPHONIC SIGNATURE.—A State agency may establish a system by which an applicant household may sign an application through a recorded verbal assent over the telephone. “(iii) REQUIREMENTS.—A system established under clause (ii) shall—“(I) record for future reference the verbal assent of the household member and the information to which assent was given; “(II) include effective safeguards against impersonation, identity theft, and invasions of privacy; “(III) not deny or interfere with the right of the household to apply in writing; “(IV) promptly provide to the household member a written copy of the completed application, with instructions for a simple procedure for correcting any errors or omissions; “(V) comply with paragraph (1)(B); “(VI) satisfy all requirements for a signature on an application under this Act and other laws applicable to the food and nutrition program, with the date on which the household member provides verbal assent considered as the date of application for all purposes; and “(VII) comply with such other standards as the Secretary may establish.”

Source: <http://agriculture.senate.gov/>. Accessed on January 28, 2008.

Requirements of Digital Signatures as a Basis for Telephonic Signatures

The purpose of offering the state option for telephonic signatures is to reduce barriers to access to food stamps by making it possible to apply over the phone. Depending on the wording in the Farm Bill, states may potentially face barriers to implementing this service.

The current regulations for digital signatures in the Farm Bill can provide a basis for defining telephonic signatures. Section 11 [7 U.S.C. 2020](2)(B) of the Food Stamp Act of 1977 [As Amended Through P.L. 108-269, July 2, 2004] ensures that states are not bound by paper applications and physical signatures, but does not set down specific requirements for digital signatures that states must use:

“Nothing in this Act shall prohibit the use of signatures provided and maintained electronically, storage of records using automated retrieval systems only, or any other feature of a State agency’s application system that does not rely exclusively on the collection and retention of paper applications or other records.”⁶¹

⁶¹ Section 11 [7 U.S.C. 2020](2)(B) of the Food Stamp Act of 1977 [As Amended Through P.L. 108-269, July 2, 2004] Accessed on February 2, 2008 at <http://agriculture.senate.gov/Legislation/Compilations/FNS/FSA77.pdf>

The language of digital signatures in the Farm Bill allows for states to determine their own regulations. California Government Code Section 16.5, California's Digital Signature Regulations outlines requirements for digital signatures [see Exhibit 4 in Appendix]. California code requires that digital signatures be:

- Unique to the person using it
- Capable of verification
- Under the sole control of the person using it⁶²

If the regulations of California Digital Signature Regulations were applied to telephonic signatures, it could allow for a broader range of methods— including PINs and using personal identifying information.

Telephonic signatures have the potential for expanding telephone-based food stamp services to the highest level—completing the entire food stamp application over the telephone. When defining the requirements of telephonic signatures and when states are deciding how to implement telephonic signature systems, it is essential that the practicalities of the various types of telephonic signatures be considered and that the implementation costs and burden not outweigh the benefits. Furthermore, states should ensure that they have simplified application and recertification processes in a way that allow for maximum benefit of over-the-phone applications.

⁶² California Digital Signature Regulations. California Government Code Section 16.5. Accessed on February 2, 2008 at <http://www.sos.ca.gov/digsig/code165.htm>

Recommendations

California

Long Term Actions

1. Establish on-demand call centers with eligibility staff. Call centers operated by eligibility staff make it possible for clients to check the status of documents, report changes, schedule interviews, complete recertification requirements, complete initial application interviews, and potentially complete initial applications.
2. Apply for a waiver to conduct unscheduled interviews, as Utah has successfully done.
3. Develop standard interview procedure for both initial application and recertification.
4. Decrease client and staff burden by not requiring documentation above and beyond that required by USDA.
5. Direct clients who apply online to a call center to complete an interview, as Utah has done.
6. Develop an Interactive Voice Response (IVR) system as the front end to call centers operated by eligibility staff. This will most effectively use staff time and allow clients to manage their cases from checking the status of documents to conducting recertification interviews.
7. Develop a statewide document imaging and management system, which would allow eligibility staff at call centers to access and update clients' accounts.
8. Encourage the use of state and federal computer matches to reduce requirements for verification, as Florida has done in its Simplified Elderly Application Demonstration Project.
9. Explore options for completing entire applications over the phone using telephonic signatures.

Short Term Actions

1. Apply for waivers that increase access to the Food Stamp Program, and ensure that households who were granted a hardship at initial application are able to benefit from California's current waiver regarding face-to-face interviews at recertification.
2. Continue to expand the Statewide Food Stamp Information Line by increasing access to live operators.
3. Partner with Information and Referral centers, including 211s, to field calls regarding food stamps. These organizations are in the unique position of referring callers to multiple social services, and thus have a great capacity for cross-promoting among programs.

Federal

1. Allow a definition of telephonic signatures that gives states flexibility to pursue forms that are easily implemented.
2. Allow states to waive face-to-face interviews, without documenting hardship, for more than 50 percent of the population.
3. Continue to grant waivers that increase access to the Food Stamp Program.

Appendix

Exhibit 1: Florida Simplified Elderly Application Demonstration Project

FLORIDA SIMPLIFIED ELDERLY APPLICATION DEMONSTRATION PROJECT

APPROVED WAIVERS OF FOOD STAMP REGULATIONS

1. 7 CFR 273.2(d) requires that the State agency interview applicant households in order to determine eligibility. We are waiving this provision of the regulations to permit the State agency to forego interviews with participating households.
2. 7 CFR 273.2(f) requires the State agency to verify gross nonexempt income, utility expenses, medical expenses, Social Security numbers, residency, and identity. We are waiving this provision of the regulations so that participating elderly and disabled households do not have to provide such verifications unless questionable. Computer matches will be used to the greatest extent possible to verify income and Social Security numbers.

WAIVER TERMS AND CONDITIONS

FLORIDA SIMPLIFIED ELDERLY APPLICATION DEMONSTRATION PROJECT GENERAL

- The Florida State agency may operate its Simplified Elderly Application Demonstration Project statewide for a period of 3 years from the effective start date of the project.
- The State agency will operate the demonstration in all counties except Hillsborough, Manatee, Miami–Dade, Monroe, Pasco, Pinellas, and Sarasota. The remaining 60 counties contain approximately 44 percent of Florida’s elderly/disabled food stamp recipients.
- Upon determining that all members of a household are elderly (60 years of age or older) or disabled with no earned income, the State agency will supply the household with a simplified application form. The completion of the application will require the household to self-declare all required eligibility information, except non–citizen status, for which the household must provide verification.
- The household will not have to verify any additional information in order to determine eligibility, unless the information is not verifiable through State and Federal computer matches (e.g., SDX, BENDEX, IEVS).
- The household will not be required to complete a face–to–face interview, unless it requests one. Eligibility will be determined based on information on the application and any information from State and Federal computer matches.
- Project households will be required to report changes to the State agency within 10 days. The State agency will review cases on a regular basis for changes revealed through State and Federal computer matches.

- Participating households will receive the standard deduction, deductions for excess shelter costs and excess medical expenses, as well as a standard utility allowance if they incur heating or cooling costs, or a limited utility allowance if no heating or cooling costs are incurred.
- Participating households will receive an annual interim contact form to complete and return in order to maintain food stamp eligibility.
- If a participating household experiences a composition change that results in all members not being elderly with no earned income, the household must be removed from the demonstration. However, their benefits will not be terminated pending certification under normal procedures for establishing program eligibility.
- Households participating in this demonstration project may not participate in the Florida Combined Application Project (SUNCAP).

EVALUATION TERMS AND CONDITIONS

FLORIDA SIMPLIFIED ELDERLY APPLICATION DEMONSTRATION PROJECT

- To assess the impact of the Simplified Elderly Application Demonstration Project on participation among the eligible elderly, the State agency will first establish a baseline by conducting a review of households that participated in the Food Stamp Program during each of the 2 calendar years prior to implementation of the project to identify all applicable households, i.e., those whose members are all over 60 or disabled with no earned income—excluding households that were (or were eligible to be) in SUNCAP. The State agency will also report the number households as a percentage of all food stamp households.
- For the 2 prior years the State agency will provide to the Food and Nutrition Service (FNS) a report that includes an unduplicated count of participating households; their length of participation; the types of unearned income they reported; household size and the ages of all household members.
- The State agency will provide to FNS the same report at the end of each of the 3 project years, for the year just ended.
- To assess the impact of the demonstration on error rates, the State agency will conduct a re-review of all error cases meeting the project criteria and reviewed by Quality Control (QC). This re-review will examine if the waiver procedures had an impact on the errors. Staff will be required to take immediate corrective action for any negative finding case. The State agency will also monitor the overall error rate for these cases.
- The State agency will provide an annual report to FNS detailing the number and kinds of errors found, the number of cases meeting project criteria that fell into the annual QC sample, along with an error rate comparison over time, including 2005 and 2006, to examine trends. The reports will be submitted in January of each year beginning with 2008.

Exhibit 2: Federal Regulation 273.2(f) (8) (i): *Verification Documentation Required at Recertification*

(8) Verification subsequent to initial certification. (i) Recertification—(A) at recertification the State agency shall verify a change in income if the source has changed or the amount has changed by more than \$50. Previously unreported medical expenses, actual utility expenses and total recurring medical expenses which have changed by more than \$25 shall also be verified at recertification. The State agency shall not verify income if the source has not changed and if the amount is unchanged **or has changed by \$50 or less**, unless the information is incomplete, inaccurate, inconsistent or outdated. The State agency shall also not verify total medical expenses, or actual utility expenses claimed by households which are unchanged or have changed by \$25 or less, unless the information is incomplete, inaccurate, inconsistent or outdated. The State agency shall require a household eligible for the child support deduction to verify any changes in the legal obligation to pay child support, the obligated amount, and the amount of legally obligated child support a household member pays to a nonhousehold member. The State agency shall verify reportedly unchanged child support information only if the information is incomplete, inaccurate, inconsistent or outdated.

Exhibit 3: Utah Waiver of Scheduled Interview



United States
Department of
Agriculture

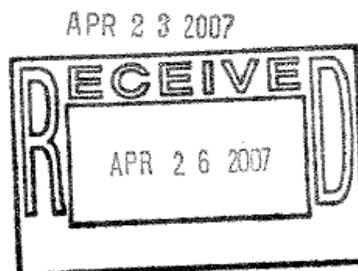
Food and
Nutrition
Service

Mountain
Plains
Region

1244 Speer Boulevard, Suite 903
Denver, Colorado 80204-3585

MPFS-300:FS 10-1-1

Mr. James Whitaker
Director
Operations Support Division
Department of Workforce Services
140 East 300 South, 5th Floor
Salt Lake City, Utah 84111



Dear Mr. Whitaker:

This is in response to your waiver modification request of February 20, 2007. This request seeks to modify Waiver No. 2070016 so that other areas in the State outside of the Central Region, are included in this waiver. Under this waiver, the State allows clients the opportunity to call a call center during normal business hours for an unscheduled telephone interview, in lieu of a scheduled interview.

Enclosed is the response to Utah's request. We have approved this waiver modification request with conditions as explained in Item 11 of the Waiver Response Outline. The State will fulfill or agree to these terms before implementing the waiver. Additionally, this waiver is limited to implementation in those areas in the State that are specified in the response outline.

If the State agrees to the conditions of this 2-year waiver, it can be implemented immediately and is effective through January 31, 2009. The State must provide the Food and Nutrition Service with an interim report at the 12-month point that includes error rate data and analysis of data gathered from the State's monitoring systems.

If you have any questions, please contact Julie Maxwell at (303) 844-0341, Extension 0-3528, or by e-mail at julie.maxwell@fns.usda.gov.

Sincerely,

JODY CORNWELL
Regional Director
Food Stamp Program

Enclosure

cc/enc: Kathy Link, Manager, Eligibility Services Support, Department of Workforce Services,
Salt Lake City, Utah
Gina Stavros, Program and Policy Manager, Eligibility Services Support, Department of
Workforce Services, Salt Lake City, Utah
Jennifer Meyer-Smart, Food Stamp Program Specialist, Program and Policy, Eligibility
Services Support, Department of Workforce Services, Salt Lake City, Utah
Bill Bridge, Manager, Food Stamp Quality Control, Operations Support Division,
Department of Workforce Services, Salt Lake City, Utah

WAIVER RESPONSE

1. **Waiver serial number:** 2070016
2. **Type of request:** Modification
3. **Primary regulation citation:** 7 CFR 273.2(e)(3)
4. **Secondary regulation citation:**
5. **State:** Utah
6. **Region:** MPRO
7. **Regulatory requirements:** Regulations at 7 CFR 273.2(e) require State agencies to schedule interviews for clients who do not receive an interview on the date of application. State agencies are required to promptly schedule appointments to allow the clients the opportunity to participate, scheduling appointments to accommodate the needs of those with special circumstances, especially working households. The State agency must notify clients who miss their interview appointment that they are responsible for rescheduling it. If the household contacts the State agency within the 30 day application processing period, the State agency must schedule a second interview.
8. **Description of proposed alternative procedures:** Utah proposes to waive the requirement to schedule interviews, instead allowing clients to call the Central Region Eligibility Service Center (CRESC) at their convenience for a telephone interview. At the time of application, clients will be given a form which instructs them to complete a telephone interview the same day. All telephone interviews will be conducted by eligibility specialists, who are available to take calls between 7:30 a.m. and 5:00 p.m. Monday through Friday. All clients calling by 5:00 pm will be able to speak with an eligibility specialist and complete an interview. All callers will hear a message that gives them the approximate wait time to reach an eligibility specialist. Callers will be instructed by a recorded message not to leave a message if they are unable to hold, but instead advised to call back at another time more convenient to them. Clients who do not complete a telephone interview on the date of application will be sent an interview reminder notice the day after their filing date. If the client does not complete a telephone interview within 7 days of filing their application, the State agency will send a notice of missed interview, which will again remind the client of the need to complete a telephone interview within 30 days of the date of application.

The original waiver request and approval limited use of the waiver to offices in the Central Region. The State agency wishes to extend the waiver to the following areas, under these specific circumstances:

Region	Office	Use of Waiver
North Region	Clearfield Office	For all applicants, as this office is also covered under waiver number 2060022, which waives face-to-face interviews for all applicants
North Region	All Offices except the Clearfield Office	Only applicants who are afforded a telephone interview because of hardship.
Mountainland Region	American Fork Office	Only applicants who are afforded a telephone interview because of hardship.
All Regions	Online applications from any area not covered by waiver number 2060022	Only applicants who are afforded a telephone interview because of hardship.

9. **Action and reason for approval or denial:** We are approving this waiver modification request. We predict that expanding the waiver to serve clients in additional Regions will further increase program access and improve customer service.
10. **Regulatory or legislative basis for action:** Approval is based on 7 CFR 272.3(c)(1)(ii), which allows the Food and Nutrition Service to approve waivers that would result in a more effective and efficient administration of the program.
11. **Conditions and reasons:** Approval is conditional upon the State agency rewording the original interview notice and notice of missed interview to clarify that the client has 30 days to complete the application process, to correct the hours of operation for the call center, and to state the specific date by which the interview must be completed. Additionally, the State must provide a scheduled or face-to-face interview to any applicant who requests one. This waiver may only be implemented for applicants served by the Central Region and the Clearfield Office of the North Region, for clients of any Region who are afforded a

telephone interview because of hardship and who applied by online application, and applicants served by the remaining offices of the North Region and the American Fork Office of the Mountainland Region who were afforded a telephone interview because of hardship. If the State wishes to expand use of the waiver to other regions of the State, they must in advance of any expansion submit a waiver modification request to the Food and Nutrition Service (FNS). At one year after the date of the waiver's *original* approval, the State agency must also provide to FNS an interim report that includes error rate data and analysis of data gathered from the State's monitoring systems.

12. **Information required for extension:** The State agency must provide data from their application tracker on the number of applications filed, the number of applicants who interview the first day, the number that fail to interview by the seventh day, and how many are denied specifically for failing to interview.
13. **Expiration date:** The waiver will expire on January 31, 2009, as specified for the original waiver approval.
14. **Limitation, if any, on regional office approval of like requests:** Approval of this waiver is limited to the Utah State Agency.
15. **Quality control procedures:** No special QC procedures are required for cases subject to the provisions of this waiver. Cases should be reviewed using standard review procedures contained in the FNS Handbook 310.
16. **Date of national office action:**
17. **Date of State agency's request:** February 20, 2007.
18. **Date of regional office transmittal of request to national office:** March 9, 2007.
19. **Date of regional office's transmittal or response to State agency:** APR 23 2007
20. **Actual implementation date:**

Exhibit 4: California's Digital Signature Regulations

California Government Code Section 16.5

16.5 (a) In any written communication with a public entity, as defined in Section 811.2, in which a signature is required or used, any party to the communication may affix a signature by use of a digital signature that complies with the requirements of this section. The use of a digital signature shall have the same force and effect as the use of a manual signature if and only if it embodies all of the following attributes:

- (1) It is unique to the person using it.
 - (2) It is capable of verification.
 - (3) It is under the sole control of the person using it.
 - (4) It is linked to data in such a manner that if the data are changed, the digital signature is invalidated.
 - (5) It conforms to regulations adopted by the Secretary of State. Initial regulations shall be adopted no later than January 1, 1997. In developing these regulations, the secretary shall seek the advice of public and private entities, including, but not limited to, the Department of Information Technology, the California Environmental Protection Agency, and the Department of General Services. Before the secretary adopts the regulations, he or she shall hold at least one public hearing to receive comments.
- (b) The use or acceptance of a digital signature shall be at the option of the parties. Nothing in this section shall require a public entity to use or permit the use of a digital signature.
- (c) Digital signatures employed pursuant to Section 71066 of the Public Resources Code are exempted from this section.
- (d) "Digital signature" means an electronic identifier, created by computer, intended by the party using it to have the same force and effect as the use of a manual signature.

Source: California Digital Signature Regulations. California Government Code Section 16.5. Accessed on February 2, 2008 at <http://www.sos.ca.gov/digsig/code165.htm>

Exhibit 5: Food Stamp Applicant Interviews

To gain a better understanding of clients' experiences with the food stamp application process, interviews of food stamp applicants were conducted at a Food Stamp Application Clinic at the Alameda County Community Food Bank in November and December of 2007. Eighteen interviews were conducted: eleven in English, six in Spanish, and one in Cantonese. Applicants were asked about the ease of applying for food stamps, their previous experiences with applying, their access to a telephone and a computer with the internet, whether they would apply for food stamps over the telephone or internet if that were an option, and "If you could change anything about the process of applying for food stamps, what would you change?" Some of the most frequently repeated responses to the final question stressed that the application process be easier and that people not be denied benefits. Responses included:

- "Going to the office. It's hard to get there because I don't have transportation" (English)
- "I would reduce the processing time." (English)
- "Make it easier! It is harder to get food stamps than it is to get cash welfare, and once you're on it's hard to stay on. You have to bring [recertification documents] in every three months. It feels like it is every month!" (English)
- "No one should be denied benefits." (3 English responses)
- "Fewer requirements" (Spanish)
- "Obtaining help from someone who knows my language and needs" (Spanish)

More than half of respondents (11 out of 18, plus 1 maybe) said they would apply over the phone if they had the opportunity citing such reasons as "no line, no hassle [of the food stamp office]" and "would avoid the transportation issue."

Some respondents, particularly Spanish speakers, mentioned hesitations with the notion of applying over the phone because they did not want to give out such personal information over the phone and felt that they were being heard when they spoke with someone in person. Responses among Spanish speakers were similar in regards to online applications.

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