

2012

# An Assessment of FoodShare Modernization in Wisconsin



## ACKNOWLEDGEMENTS

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## EXECUTIVE SUMMARY

The Supplemental Nutrition Assistance Program (SNAP), formerly known as the Food Stamp Program, is the largest federal nutrition program in the United States. Administered by the states, SNAP serves more than 46.2 million low-income individuals each month. In Wisconsin, SNAP is known as FoodShare and is administered by Wisconsin's Department of Health Services.

At the Marcia P. Coggs Human Services Center (Coggs Center) and the Robles Self-Service Center (Robles Center) in Milwaukee County, Hunger Task Force provides computers, printers, scanners, phones, and other office equipment for clients to use in applying for FoodShare benefits or managing existing cases. This self-service application assistance model is one example of FoodShare *modernization*—initiatives to increase the efficiency and accessibility of FoodShare. Hunger Task Force's work in Coggs room 105 and at the Robles Center is the basis for our standard of modernization. Over a period of four months, Hunger Task Force used the criteria from this standard to assess the degree of modernization at FoodShare application assistance sites across Wisconsin.

This report presents data derived from site visits and interviews with staff at income maintenance (IM) agencies, health clinics, food pantries, and other sites that provide FoodShare application assistance throughout the State of Wisconsin.

Major findings from this study include:

- Eighty-one percent of IM sites displayed the *FoodShare Rights* poster and the *And Justice For All* poster.
- Almost 70 percent of IM sites displayed *I speak* cards or posters, compared to 41 percent of non-IM agencies.
- Of 54 sites interviewed, almost 41 percent—22 sites—indicated that at least one staff member spoke Spanish.
- Almost 60 percent of IM agencies and 52 percent of non-IM agencies assessed provided self-service computers for client use.
- Ninety-seven percent of IM sites indicated that they had an agency procedure for handling fair hearing requests, compared to 55 percent of non-IM sites.
- Staff at sites without self-service computers gave mixed reviews regarding the potential effectiveness of a self-service model at their agencies.
- Staff at several sites mentioned that the implementation of the multi-county consortia model in 2012 would result in many changes, likely affecting the data collected by Hunger Task Force.

# I. INTRODUCTION

The Supplemental Nutrition Assistance Program (SNAP), formerly known as the Food Stamp Program, is the largest federal nutrition program in the United States. Distributed by the states, SNAP benefits are received by more than 46.2 million low-income individuals each month. In Wisconsin, SNAP is known as FoodShare and is administered by the Wisconsin Department of Health Services (DHS). Clients can apply for FoodShare and manage their cases online, over the phone, and in person at income maintenance (IM) agencies. Some other government agencies and community-based organizations are also considered FoodShare application assistance sites.

**Modernization:** methods used to increase the efficiency and accessibility of benefit programs

The U.S. Government Accountability Office has demonstrated that the administrative burden of applying for and maintaining benefits can discourage eligible households from applying for public assistance programs.<sup>1</sup> The term *modernization* refers to new procedures and policies that focus on utilizing modern technology to reduce SNAP administrative costs and improve program access. Some goals of modernization are to increase FoodShare participation, decrease staff and administrative time processing cases, utilize modern technology to increase program efficiency, and preserve the dignity and self-sufficiency of FoodShare clients.

Examples of FoodShare modernization discussed in this report include but are not limited to:

- The integration of technology into the FoodShare application and case management process
- Accommodations to make public assistance accessible to elderly, blind or disabled (EBD) and limited English proficiency (LEP) populations
- Established procedures for facilitating customer service and civil rights complaints as well as requests for fair hearings

## A. WHY MODERNIZE?

As in the rest of the United States, poverty and food insecurity rates in Wisconsin have risen in the last ten years. Thirteen percent of Wisconsin residents now live below the poverty line,<sup>2</sup> and 20 percent of Wisconsin families experience food hardship, defined as a condition in which individuals struggle to provide enough food for their families.<sup>3</sup>

For struggling families, safety net programs like FoodShare can make a huge difference. According to the U.S. Census Bureau, SNAP lifted 3.9 million Americans, including 1.7 million children, out of poverty in 2010.<sup>4</sup>

The old welfare office model is no longer a viable solution to 21<sup>st</sup> century income maintenance delivery. More individuals in Wisconsin are receiving FoodShare than ever before; approximately 979,192 residents received FoodShare benefits in 2011.<sup>5</sup> The needs of low-income and food-insecure Wisconsin residents have outstripped the resources available to administer FoodShare, but technological advances can facilitate improved management and

processing of information. FoodShare clients need and deserve an accessible and responsive program, and taxpayers deserve to have their tax dollars used efficiently and effectively.

## B. MODERNIZATION VS. PRIVATIZATION

Modernization is sometimes conflated with *privatization*, or the outsourcing of SNAP case management to non-merit staff or private sector employees. The Food and Nutrition Service (FNS) of the U.S. Department of Agriculture (USDA), which manages SNAP administration at the federal level, closely regulates SNAP privatization. The Food and Nutrition Act of 2008 and 7 CFR 272.4(a)(s) dictate that the certification interview and final decision on eligibility determination are exclusively functions of merit staff (publically employed and trained caseworkers).<sup>6,7</sup> States are required to receive approval from FNS prior to using any paid non-merit staff to “perform discretionary asks in the intake and enrollment process,” such as helping households complete

SNAP applications, gathering verification documents, answering case-specific questions from call centers, and entering information into the states’ automated data processing systems.<sup>8</sup>

For an overview of FoodShare privatization efforts in Wisconsin, see [Appendix A](#) (page 30).

**Privatization:** the use of non-merit staff or private sector employees in SNAP case management

## II. BACKGROUND

### A. BREAKING BARRIERS TO FOODSHARE MODERNIZATION

Technology has advanced at a faster pace than the Food Stamp Act of 1977, and outdated SNAP regulations at the federal level can impede modernization. Fortunately, SNAP statutes, regulations, and waivers—namely, the Security and Rural Investment Act of 2002 and the Food, Conservation and Energy Act of 2008—have granted states policy options that allow them to administrate SNAP with greater flexibility. These options have permitted Wisconsin to make strides in modernizing FoodShare and increasing program accessibility.

Wisconsin has taken advantage of several policy options including the exclusion of vehicles from counted assets, elimination of the child support cooperation requirement, and reduction of change reporting.<sup>9</sup> In particular, the adoption of *categorical eligibility* in 2003 has dramatically increased FoodShare access for Wisconsin residents; individuals are automatically enrolled in FoodShare if their household's gross income is at or below 200% of the federal poverty level and they have been approved to receive Temporary Assistance for Needy Families (TANF) benefits.<sup>10</sup>

Other policy changes crucial to modernization have been state-initiated. For example, federal regulation dictates that SNAP certification interviews must be conducted in person, even though advancements in technology have long since provided other options. In 2008, Wisconsin applied for and received a waiver from SNAP's face-to-face interview requirement, permitting FoodShare interviews to be conducted over the telephone and completed by electronic signature (e-signature). This change has been critical for applicants who are homebound or lack access to affordable transportation.

### B. ELEMENTS OF FOODSHARE MODERNIZATION

#### I. Integrating Technology into Case Management

##### a. Electronic Case Filing

An early step toward modernization was the development of the electronic case filing system. Prior to electronic case files, all client files were paper documents that were mailed, faxed, or dropped off in person. Much of caseworkers' time was spent processing the massive volume of paper that each county's income maintenance (IM) agency received each month, and it was not uncommon for files to be misplaced or improperly managed. The introduction of electronic case filing and document imaging, which allowed verification documents to be scanned by caseworkers and stored electronically, reduced processing time and increased accuracy in case management—improvements that were compounded drastically in October 2010 by system changes allowing clients to scan or upload their documents directly as electronic case files.<sup>11</sup>

## b. The ACCESS Website

One of Wisconsin's most effective FoodShare modernization initiatives is the ACCESS website (<https://access.wisconsin.gov/>), where Wisconsin residents can assess their program eligibility, apply for benefits, complete renewals, report case changes, and check their benefits for a variety of assistance programs, including FoodShare. The website was modeled after the ACCESS Florida website (<http://www.myflorida.com/accessflorida/>).

Over 682,400 FoodShare applications have been submitted via the ACCESS website since its inception in 2004.<sup>12i</sup> Since August 2006, the volume of applications completed through ACCESS has increased drastically as a result of robust advertising efforts across the state.<sup>13</sup> *Figure 1* (below) depicts the usage rates of different methods for applying to health care, FoodShare, and family planning waiver services in Wisconsin from 2006 to 2011, showing that in August 2009, ACCESS became the most frequently utilized method of applying for benefits.

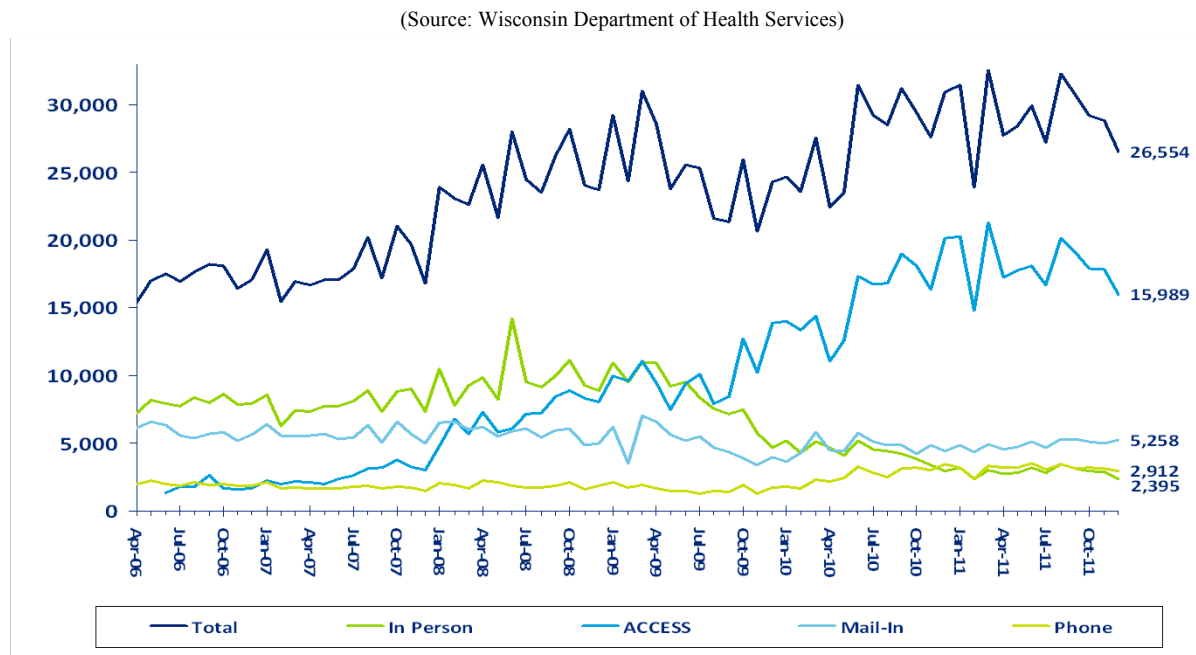


Figure 1. Wisconsin's Health Care, FoodShare and Family Planning Waiver Applications, 2006-2011<sup>14</sup>

## c. Telephonic Case Management

Another technological initiative crucial to FoodShare modernization is telephonic case management. In 2008, with the introduction of the e-signature, Wisconsin residents began completing FoodShare interviews over the phone. Telephonic interviews increase access for individuals who are elderly, blind or disabled (EBD) and help to decrease the burden of costs related to transportation, childcare, and lost work time for all applicants. In addition, case changes, previously submitted only through paper forms, can now be reported on ACCESS and by telephone, through the call/change center.

<sup>i</sup> The original ACCESS website featured only the "Am I Eligible?" tool. Additional features were developed in 2006.



## 2. Ensuring Program Accessibility

In addition to utilizing modern technology and improving program efficiency, modernization efforts seek to increase the accessibility of FoodShare for all Wisconsin residents. Hunger Task Force believes that modernization initiatives must include accommodations for FoodShare clients whose needs may not be met by the online and telephonic case management: in particular, clients who are elderly, blind or disabled (EBD) or have limited English proficiency (LEP). For example, ACCESS features are only available in English and Spanish, and LEP clients may be more comfortable meeting with an interpreter or bilingual caseworker in person rather than trying to communicate their needs over the phone. Furthermore, EBD clients may not be able to operate computers or phones.

In order to meet the needs of EBD and LEP clients, modernization initiatives should include hiring multilingual staff, equipping IM agencies and other application assistance sites with paper FoodShare applications in multiple languages, and providing tools to help clients communicate their interpretation needs, such as *I speak* cards or posters (see [Appendix J](#), page 53). In addition, sites should be wheelchair-accessible and provide paper applications and forms for clients who cannot use computers; staff should be available to assist clients who are illiterate or do not understand how to complete the forms. Ideally, sites should also collect information on client computer literacy and ACCESS error rates in order to continuously evaluate the viability of ACCESS and determine the best course for future FoodShare modernization.

## 3. Comprehensive FoodShare Application Assistance

A fully modernized FoodShare application assistance site—IM agencies and non-IM agencies alike—should incorporate self-service technological case management and the major elements of traditional IM agencies: provide paper forms and documents as well as Internet-equipped computers, phones, scanners, and other machines; distribute information regarding public nutrition programs, community-based food assistance, civil rights, and the rights of every FoodShare applicant; post signage in languages other than English and accommodate the needs of LEP and EBD clients. IM agencies should continue to employ merit staff (caseworkers) who can assist clients with case management on the ground.

In effect, a comprehensive application assistance site should provide each client with all of the information and resources necessary for clients to manage their FoodShare cases with confidence and dignity. Hunger Task Force’s complete modernization criteria can be found in [Appendix E](#) (page 38).

# FOODSHARE MODERNIZATION IN ACTION

## 1. Hunger Task Force Self-Service Sites

In January 2009, Hunger Task Force began teaching clients to use ACCESS at the Coggs Center as permitted by a Memorandum of Understanding (MOU) with the Milwaukee County Department of Health and Human Services (DHHS). Initially, Hunger Task Force staff created a classroom-like space in room 105 at the Coggs Center (Coggs 105), providing ACCESS training

sessions and written step-by-step instructions to clients. Over the first year, Hunger Task Force transformed the space into a self-service computer room. The document drop box was replaced by a scanner on which clients could send verification documents to the state, allowing the documents to be processed faster. In March 2010, Hunger Task Force opened the Robles Self-Service Center (Robles Center) to serve residents of Milwaukee's south side, replacing the closed welfare office with a FoodShare application assistance center. One Hunger Task Force staff member has also provided FoodShare application assistance at United Migrant Opportunity Services (UMOS) since June 2011.



*Clients use self-service phones and computers in Cogs 105*

Today, Cogs 105 and the Robles Center both provide self-service computers, phones, scanners, copiers, fax machines, and shredders for client use. Hunger Task Force staff teach clients to apply for benefits using the office technology, empowering clients to manage their own cases rather than waiting in line for hours at the human services agency and relying on overbooked caseworkers. This work is funded through grants from the Helen Bader Foundation, the Greater Milwaukee Foundation, MAZON, and a federal SNAP Outreach grant. Hunger Task Force's modernization standard is modeled after the Cogs and Robles centers.

To date, Hunger Task Force staff have assisted almost 42,000 people, who have received an estimated \$25 million in federal FoodShare benefits. Hunger Task Force tentatively plans to open another self-service FoodShare application center in northwest Milwaukee in 2012.

## 2. Other FoodShare Application Assistance Sites

There are community-based FoodShare application assistance sites throughout Wisconsin, such as food pantries or family resource centers, which provide computers and/or other equipment for clients to use in managing their cases. Other government agencies, such as job centers or aging and disability resource centers, sometimes provide FoodShare application assistance.

Within Milwaukee County, some food pantries and meal programs in Hunger Task Force's service network provide FoodShare application assistance to clients. In addition, DHS distributes a list of application assistance providers within Milwaukee County, available in [Appendix D](#) (page 36). The list includes some health clinics that have indicated that they only assist clients with FoodShare applications in conjunction with a BadgerCare Plus application. Throughout this report, sites listed by DHS will be referred to as state-designated application assistance centers.

The DHS list also includes the Cogs and Robles centers. Application assistance at the Robles Center and in Cogs 105 is managed by Hunger Task Force staff, but another room in the Cogs Center (102A) provides application assistance managed by state-employed caseworkers. In

Coggs 102A, numbers are assigned to clients in order of arrival, and when clients' numbers are called, they can meet with a caseworker or proceed to the self-service computers located in an adjoining room.

Other income maintenance agencies across Wisconsin have also adopted a self-service model, providing one or more computers on which clients can use the ACCESS website. In some counties, the job center and the income maintenance unit are located in the same building, and the job center provides computers that all clients may use to seek employment or apply for public benefits.

### III. METHODS

This study evaluates the degree of modernization at a sampling of FoodShare application assistance sites throughout Wisconsin, including income maintenance agencies, job centers, aging and disability resource centers, and community-based organizations. Hunger Task Force's modernization standard, based on our self-service application assistance sites in Milwaukee, was used to assess all sites.

Hunger Task Force's modernization criteria include:

- Self-service<sup>ii</sup> computers, phones, scanners, copiers, fax machines, and shredders
- Knowledgeable staff available to assist with all equipment and ACCESS website
- Little to no wait time to access technology or receive assistance from staff
- Accommodations for limited English proficiency (LEP) clients, including signs posted in non-English languages and multilingual individuals on staff
- Established procedures for hearing and handling customer service and civil rights complaints as well as requests for fair hearings

The complete modernization standard can be found in [Appendix D](#) (page 36).

Of Wisconsin's 72 counties, 27 were selected in this study to represent the state. Four factors were considered during sample selection: population size, poverty rate, geographical location, and rate of ACCESS usage as measured by Workforce Central and Milwaukee Area Workforce Funding Alliance.<sup>15</sup> The counties chosen represent a diverse cross-section of these characteristics. Complete lists of counties and sites visited are available in Appendices A and B (pages 36 and 37, respectively).

In total, 59 sites were assessed between September 27, 2011 and January 13, 2012. Twenty sites were located in Milwaukee County: of these, one site was an income maintenance agency, 14 were state-designated FoodShare application assistance sites, including three Hunger Task Force sites (Coggs Center, Robles Center, and UMOS), and six were emergency food providers in Hunger Task Force's service network (including UMOS). Of the sites visited in other counties, 31 were income maintenance agencies and eight were other government agencies or community-based organizations.

During each site visit, Hunger Task Force staff completed an assessment based on the visibility and accessibility of modernization criteria and also interviewed one or more staff members at the site. The assessment framework can be found in [Appendix F](#) (page 39).

Interview topics included agency caseload volume, resources available to clients, and self-service technology usage and management, if applicable. A complete list of staff interview questions can be found in [Appendix G](#) (page 41). Interviews were also conducted with clients at seven sites, but the small sample size precludes viable data analysis. Most site visits were

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<sup>ii</sup>Self-service equipment is equipment that clients are permitted to use without staff supervision (unless by clients' request).

conducted by Jean Chung, Bill Emerson National Hunger Fellow. Eleven Hunger Task Force staff members were trained to assist in data collection, primarily at community-based sites in Milwaukee County.

The data gathered present several limitations:

- All but two of the sites were visited in 2011, prior to the major changes in income maintenance administration effective on January 1, 2012. As a result, many observations and interview responses may no longer be accurate. The data presented merely provide a snapshot of each agency at the time of the site visit.
- If an assessment item is marked as absent, this means that the observer did not see or could not find the item; it does not necessarily mean that the item was not at the site.
- Because the data were collected by 12 different people, reporting between sites may be inconsistent.
- In comparisons between sites within Milwaukee County, the sample sizes of the site groupings are extremely small, and the data collected do not serve to represent Milwaukee sites in sum.
- Not all of the state-designated application assistance sites claim to be walk-in FoodShare application assistance sites like Coggs 105 or the Robles Center; many of the sites on the DHS list are health clinics that primarily provide application assistance for health care. For some of these sites, the DHS list explicitly states that FoodShare application assistance will only be provided in conjunction with BadgerCare Plus application assistance. Although those sites do not purport to be FoodShare application assistance sites, those sites are evaluated with the Hunger Task Force modernization standard for FoodShare application assistance in this report.

## IV. RESULTS

The results from this evaluation will be discussed in three sections:

- A. Information Posted
- B. Services and Documents
- C. Self-Service Technology
- D. Agency Practices

In each section, statewide data collected at income maintenance (IM) agencies are compared to data from all other agencies, including job centers, aging and disability resource centers (ADRC), community-based organizations, and state-designated FoodShare application assistance sites, which include health clinics and the Coggs and Robles centers. Non-IM sites will be referred to as “other” sites. Within Milwaukee County, the non-IM sites are divided into three categories: state-designated application assistance sites, Hunger Task Force network food pantries and meal programs (food network sites), and Hunger Task Force sites (Coggs 105 and the Robles Center).<sup>iii,iv</sup>

### A. INFORMATION POSTED

#### I. Signage and Information at Sites Statewide

All sites were evaluated based on whether they posted the following information and signs:

- Hours of operation
- *FoodShare Rights* poster (see [Appendix I](#), page 52)
- *And Justice For All* poster
- *I speak* cards or poster (see [Appendix J](#), page 53)
- Income limits for FoodShare
- Enrollment Service Center (ESC) phone number
- Information on other nutritional programs
- Signs in languages other than English

In general, IM agencies displayed the information included in this evaluation at significantly greater rates than other agencies. The exception was the Enrollment Services Center (ESC)

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<sup>iii</sup> Coggs 105 and the Robles Center are also state-designated application assistance sites, but because the criteria used in this evaluation were developed based on these sites, grouping these sites with the other state-designated application sites would be inappropriate.

<sup>iv</sup> One site, United Migrant Opportunity Services (UMOS), is a food pantry in Hunger Task Force’s service network as well as a state-designated application assistance site. Furthermore, one Hunger Task Force staff member works on site to assist clients with FoodShare applications and case management. Because this site is not fully Hunger Task Force-run and was assessed by a Hunger Task Force staff member who assessed only other Hunger Task Force network sites, it has been grouped as a Hunger Task Force network site for the purposes of this report.

phone number, which clients can call to schedule or complete FoodShare interviews: less than 13 percent of IM agencies posted the phone number, while almost 30 percent of other agencies did.

Table 1. Signage and Information at All Sites

	IM agencies (n=32)	Other agencies (n=27)	All agencies (n=59)
<b>Hours of operation</b>	87.5%	88.9%	88.1%
<b><i>FoodShare Rights</i> poster</b>	90.6%	40.7%	67.8%
<b><i>And Justice For All</i> poster</b>	84.4%	51.9%	69.5%
<b><i>I speak</i> cards or poster</b>	68.8%	40.7%	55.9%
<b>Income limits for FoodShare</b>	37.5%	37.0%	37.3%
<b>ESC phone number</b>	12.5%	29.6%	20.3%
<b>Information on other nutrition programs</b>	87.5%	85.2%	86.4%
<b>Any non-English signs</b>	93.8%	66.7%	81.4%

The *FoodShare Rights* and *And Justice For All* posters are printed and distributed by the USDA. IM agencies displayed both posters at far greater rates than other agencies: the *FoodShare Rights* poster was observed at 91 percent of IM sites and 41 percent of other sites, and the *And Justice For All* poster was observed at 84 percent of IM sites and 52 percent of other sites. Still, the *FoodShare Rights* poster was not observed at 3 IM sites, and the *And Justice For All* poster was not observed at 5 IM sites. Neither poster was observed at the IM agencies in Eau Claire and Polk counties. Eighty-one percent of IM agencies displayed both posters.

Hunger Task Force's standard of modernization includes measures to make FoodShare accessible to all populations, particularly families or individuals with limited English proficiency (LEP). *I speak* cards and posters are tools that LEP clients can use to communicate to agency staff the language in which they will need interpreter services. IM agencies are required by law to provide or procure interpreter services in the language required by any LEP client.<sup>16</sup> Among surveyed sites, almost 70 percent of IM sites displayed *I speak* cards or posters, in comparison to 41 percent of other agencies.

Another measure of LEP accessibility is whether sites display any signs in languages other than English. Again, IM agencies far exceeded other agencies, with almost 94 percent of IM sites displaying non-English, compared to 67 percent of non-IM agencies. Non-English signage will be explored in greater detail later in this report.

Sites were counted as distributing information on other nutrition programs if they posted signs, flyers, or pamphlets regarding emergency food providers, the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), free and reduced school meals, or any other federal nutrition programs. IM agencies and non-IM sites posted information regarding other nutrition programs at very similar rates: IM agencies were at almost 88 percent, and other agencies were at 85 percent usage. At a significantly lower level, the income limits for FoodShare eligibility were posted at virtually identical rates at IM and non-IM sites—approximately 37 percent.



## 2. Signage and Information at Sites in Milwaukee County

Within Milwaukee County, food network sites met the assessment criteria for signs posted and information provided at greater rates than the state-designated application assistance sites. The *FoodShare Rights* poster and the *And Justice For All* poster were observed at only two state-designated application assistance sites. In contrast, all six food network sites visited displayed their hours of operation, the *FoodShare Rights* poster, the *And Justice For All* poster, the income limits for FoodShare eligibility, information on other nutrition programs, and signs posted in languages other than English.

Table 2. Signage and Information at Milwaukee County Sites

	State-designated sites (n=11)	Food network sites (n=6)	Hunger Task Force sites (n=2)	All sites (n=19)
Hours of operation	9	6	2	17
FoodShare Rights poster	2	6	2	10
And Justice For All poster	2	6	2	10
"I speak" cards or poster	1	5	2	8
Income limits for FoodShare	1	6	2	9
ESC phone number	2	3	2	7
Information on other nutrition programs	8	6	2	16
Any non-English signs	4	6	2	12

However, it should be noted that Hunger Task Force network pantries and meal programs are required to display the *FoodShare Rights* poster, the *And Justice for All* poster, *I speak* cards or posters, the income limits for FoodShare eligibility, and information in languages other than English, including the hours of operation. The *FoodShare Rights* poster, the *And Justice For All* poster, and the *I speak* cards are provided to network sites by Hunger Task Force.

As the types of information chosen for this assessment were based on the information available at the Hunger Task Force sites in Milwaukee County, both Hunger Task Force sites were observed to possess all of the evaluation criteria.

## 3. Language of Posted Signs and Information Statewide

In addition to evaluating accommodation of LEP clients via *I speak* cards or posters, Hunger Task Force observed whether sites displayed any signs or posters in languages other than English. Almost half of all agencies surveyed had at least some signs in Spanish and Hmong. The most commonly printed non-English language observed was Spanish, with almost 91 percent of IM agencies and almost 52 percent of other sites displaying signs in Spanish.



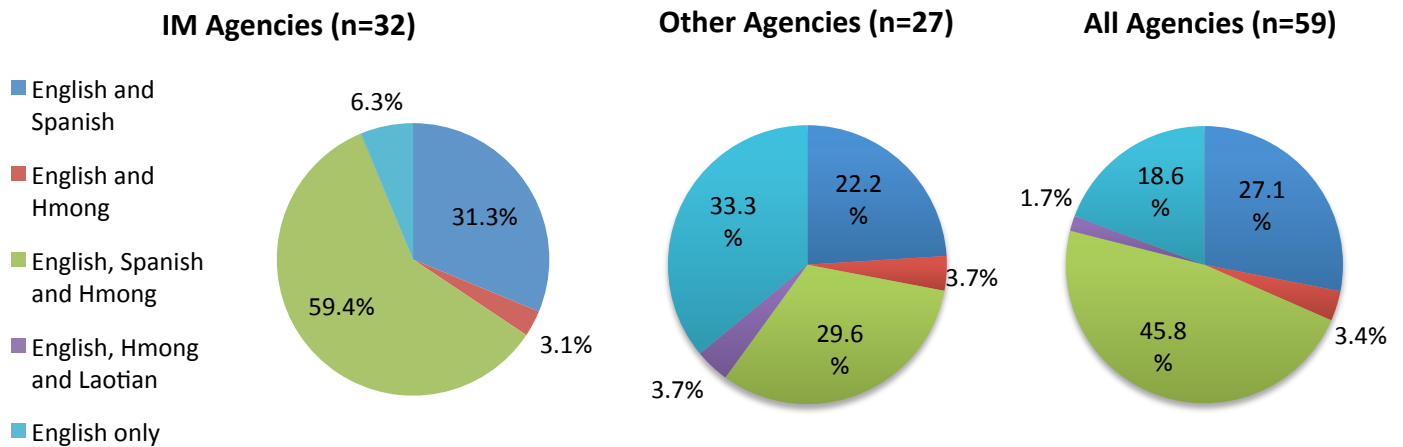


Figure 2. Language of Posted Signs and Information Statewide

#### 4. Language of Posted Signs and Information in Milwaukee County

As Milwaukee County's Latino and Hmong populations continue to grow, LEP accommodations are increasingly crucial to effective FoodShare modernization. The U.S. Census Bureau estimated that Latino residents composed over 13 percent of the population in Milwaukee County in 2010,<sup>17</sup> and the Milwaukee metropolitan area was reported to have 11,904 Hmong residents in 2010.<sup>18</sup>

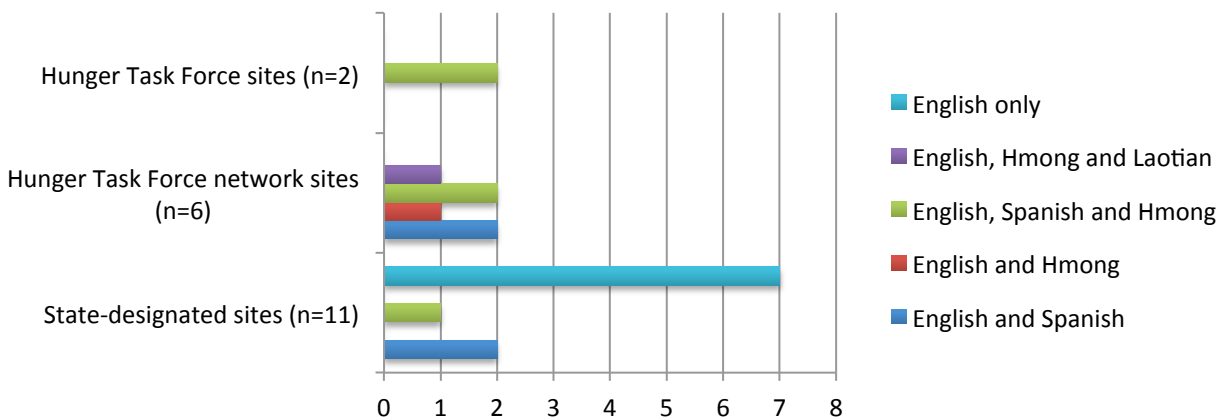


Figure 3. Language of Posted Signs and Information in Milwaukee County

Within Milwaukee County, sites in Hunger Task Force's service network posted signs and information in English, Spanish, Hmong, and Laotian. State-designated application assistance sites and Hunger Task Force sites posted signs and information in English, Spanish, and Hmong. The state-designated application assistance sites were the only sites with English-only signage; 7 out of 11 sites only displayed information in English.

## B. SERVICES AND DOCUMENTS

### I. Resources Available to Clients at Sites Statewide

Statewide, almost 58 percent of all sites visited had self-service computers available for client use. IM agencies and other agencies offered self-service computers at similar rates, with almost 60 percent of IM sites offering self-service computers, compared to almost 57 percent of other agencies.

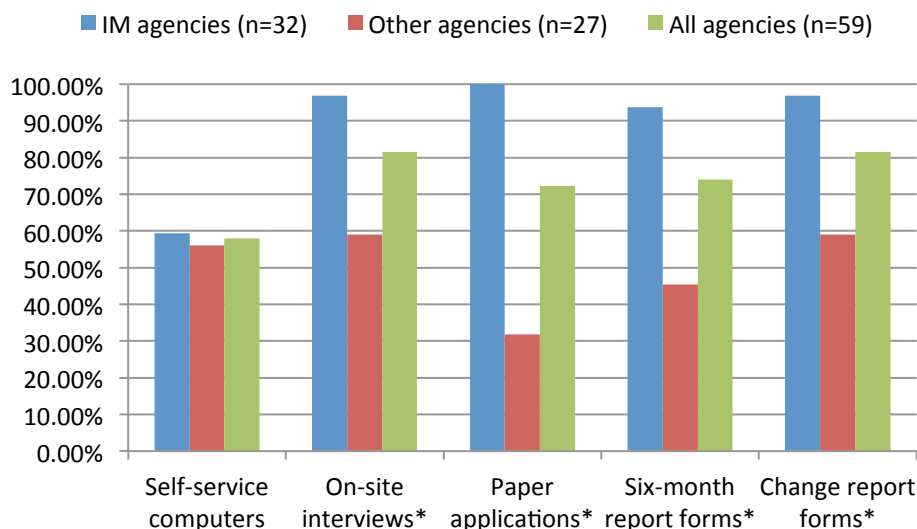


Figure 4. Resources Available to Clients at Agencies Statewide

\*These data were available at only 22 “other” (non-IM) agencies (54 total agencies).<sup>v</sup>

For this evaluation, FoodShare interviews were considered on site if: a) clients used phones at the agency to call ESC and complete telephone interviews, b) clients called from or were called at home by caseworkers at the agency to complete telephone interviews, or c) clients completed interviews in-person at the agency, face-to-face with a caseworker.

One of the defining characteristics of IM agencies is the employment of merit staff (caseworkers) who manage FoodShare cases, including the interview process. On-site FoodShare interviews were conducted at significantly more IM agencies than at other sites. At 59 percent of non-IM sites, clients could complete FoodShare interviews on site. In contrast, clients could complete on-site interviews at almost 97 percent of IM agencies surveyed. (The only IM site at which on-site interviews were not conducted was the satellite office of the main Racine County IM agency, which now functions primarily as a family court. While paper FoodShare applications are available at the office, all other FoodShare-related functions have been assimilated into the main IM location.)

<sup>v</sup> Because some non-IM agencies declined to interview, some data were not available at all sites. Data on self-service computers were available at 32 IM agencies and 27 other agencies (59 agencies total). Data on on-site interviews, paper applications, six-month report forms, and change report forms were available at 32 IM agencies but only 22 other agencies—54 agencies total.

As required by law, all IM agencies we assessed provided paper applications to clients who asked for them. In contrast, only 32 percent of non-IM agencies had paper applications available. Similarly, IM agencies provided six-month report forms (SMRFs) and change report forms at much higher rates than other sites. SMRFs and change report forms were available at IM sites 94 and 97 percent of the time, respectively, while they were available at non-IM sites 46 and 59 percent of the time, respectively. The Forest County IM agency provided change report forms but not SMRFs, and for the reasons discussed above, the satellite Racine office provided neither SMRFs nor change report forms.

## 2. Resources Available to Clients at Sites in Milwaukee County

Within Milwaukee County, less than half of all non-IM sites we visited provided self-service computers for client use. Self-service computers were available at two of eleven state-designated application assistance sites and three of six food network sites. It should be noted that Hunger Task Force requires its network partners to perform FoodShare outreach and strongly encourages the adoption of the self-service application model.

**Table 3. Resources Available to Clients at Agencies in Milwaukee County**

	<b>State-designated sites (n=11)</b>	<b>Food network sites (n=6)</b>	<b>Hunger Task Force sites (n=2)</b>	<b>All sites (n=19)</b>
<b>Self-service computers</b>	2	3	2	8
<b>On-site interviews</b>	*5	4	2	*11
<b>Paper applications</b>	*2	1	2	*5
<b>Six-month report forms</b>	*5	1	2	*8
<b>Change report forms</b>	*6	3	2	*11

\*These data were available at only 10 state-designated application assistance sites (18 total agencies).<sup>vi</sup>

Clients completed on-site interviews at almost half of state-designated application assistance sites and over half of food network sites. The state-designated sites were more likely to provide SMRFs and change report forms than the food network sites. Both types of sites were unlikely to provide paper FoodShare applications.

<sup>vi</sup> Because some non-IM agencies declined to interview, some data were not available at all sites. Data on self-service computers were available at 11 state-designated sites, six food network sites, and two Hunger Task Force sites (19 sites total). Data on on-site interviews, paper applications, six-month report forms, and change report forms were available at 10 state-designated sites, six food network sites, and two Hunger Task Force sites—18 sites total.

### 3. Multilingual Staff Statewide

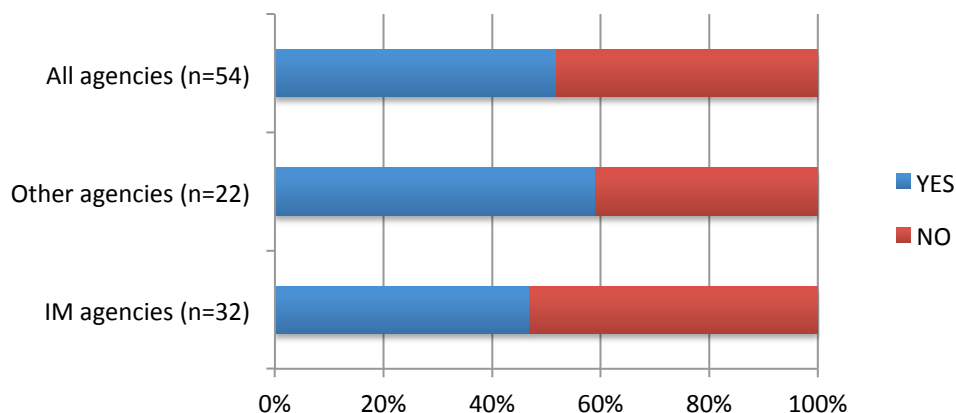


Figure 5. Agencies with Multilingual Staff Statewide

Non-IM agencies were marginally more likely than IM agencies to have multilingual staff members.

Within Milwaukee County, agencies staffed multilingual individuals as follows:

- 6 of 10 state-designated sites
- 4 of 6 food network sites
- 2 of 2 Hunger Task Force sites
- 12 of 18 total sites

Figure 6 (below) represents the different languages spoken by multilingual staff across the state.

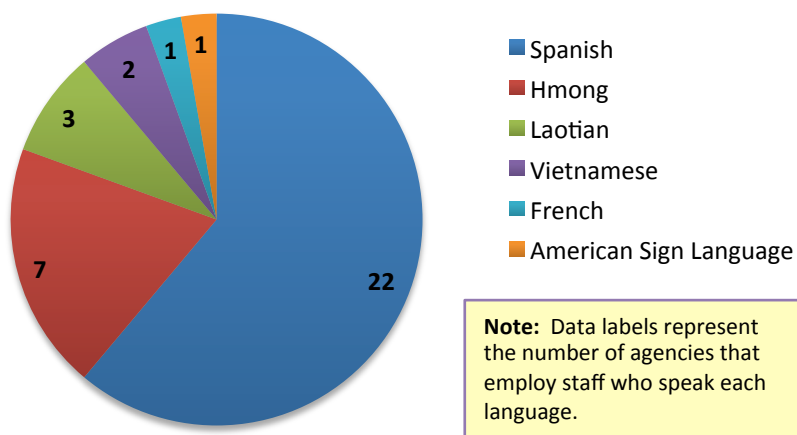


Figure 6. Non-English Languages Spoken by Staff at Agencies Statewide

Of 54 sites interviewed, almost 41 percent—22 sites—indicated that at least one staff member spoke Spanish.

Table 4. Non-English Languages Spoken by Staff at Agencies in Milwaukee County

	State-designated sites (n=10)	Food network sites (n=6)	Hunger Task Force sites (n=2)
Spanish	6	2	1
Hmong	1	2	1
Vietnamese	0	2	0
Laotian	0	2	0

Numbers in each cell represent the number of agencies that employ staff who speak each language.

#### 4. Verification Document Processing

Hunger Task Force’s modernization standard favors a self-service model for verification (“clients scan or fax” in figures 7 and 8) in order to reduce wait times and empower individuals to manage their own cases.

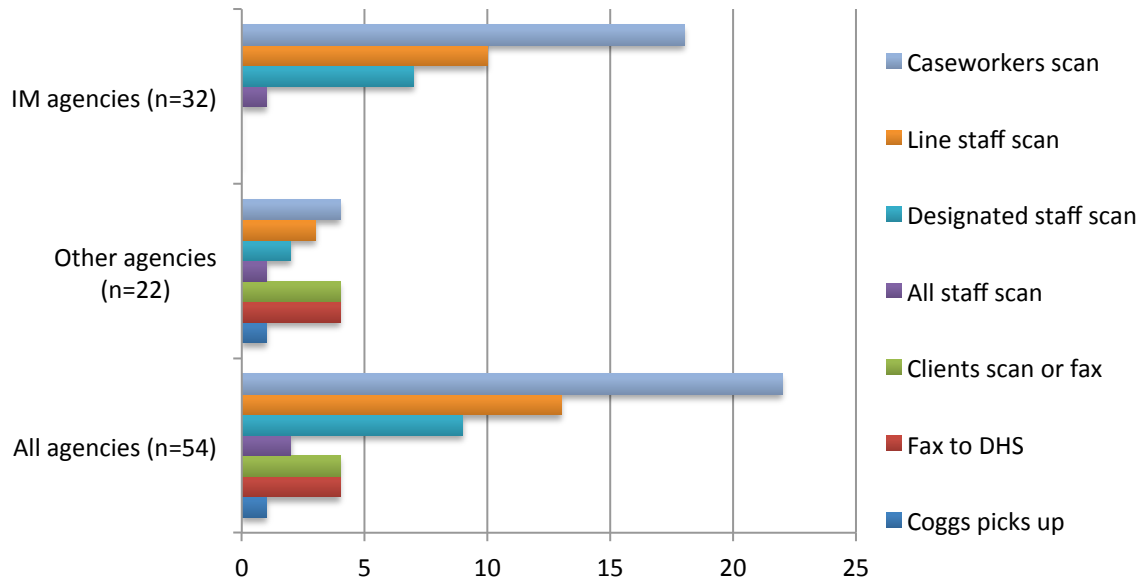


Figure 7. Verification Document Processing Procedures Statewide

Only 4 agencies—all non-IM sites—indicated that their clients process their own verification documents. At IM agencies, various agency staff shared responsibility for verification processing.

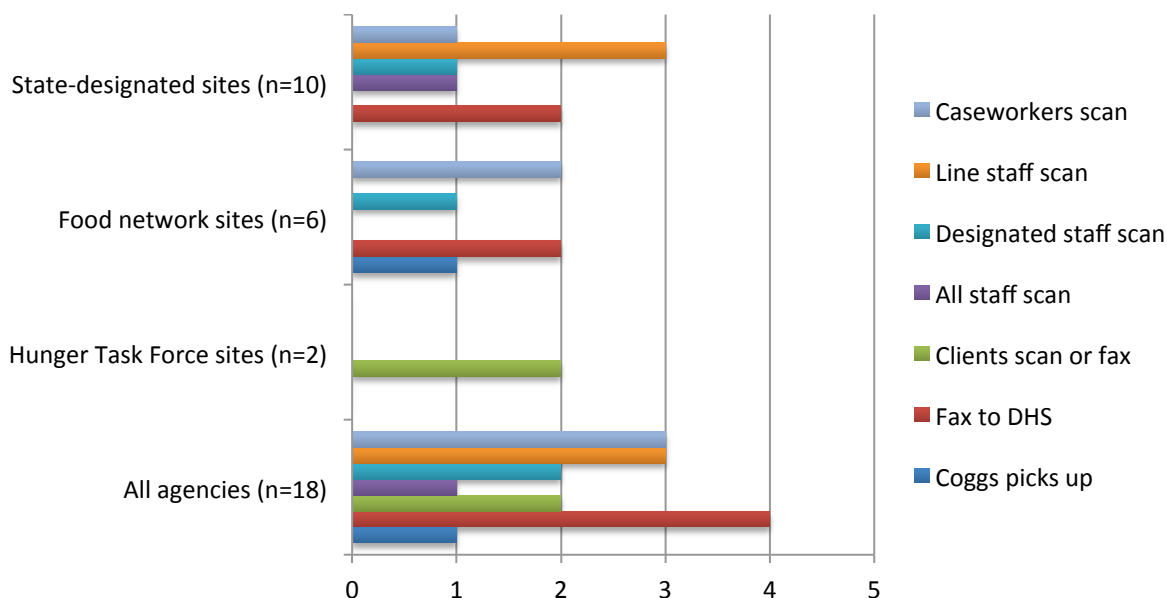


Figure 8. Verification Document Processing Procedures in Milwaukee County

Within Milwaukee County, Hunger Task Force sites were the only sites that enabled clients to process their own verification documents. All other agencies relied on their own staff to fax or scan verification documents and send them to the state.

## C. SELF-SERVICE TECHNOLOGY

### I. Overview of Self-Service Technology Statewide

The table below shows the percent of agencies throughout the state that provided self-service computers, printers, scanners, fax machines, copiers, shredders, and phones.

Table 5. Self-Service Technology Available Statewide

	IM agencies (n=32)	Other agencies (n=27)	All agencies (n=59)
<b>Computers</b>	59.4%	51.9%	55.9%
<b>Printers</b>	28.1%	*36.4%	*31.5%
<b>Scanners</b>	9.4%	*27.3%	*16.7%
<b>Fax machines</b>	15.6%	*22.7%	*18.5%
<b>Copiers</b>	21.9%	*22.7%	*22.2%
<b>Shredders</b>	15.6%	*27.3%	*20.4%
<b>Phones</b>	53.1%	*36.4%	51.9%

\*These data were available at only 22 “other” (non-IM) agencies (54 total agencies).<sup>vii</sup>

<sup>vii</sup> Because some non-IM agencies declined to interview, some data were not available at all sites. Data on self-service computers were available at 32 IM agencies and 27 other agencies (59 agencies total). Data on self-service printers, scanners, fax machines, copiers, shredders, and phones were available at 32 IM agencies and 22 other agencies—54 agencies total.

In general, computers and phones were more commonly available than the other types of office equipment. IM agencies were more likely to provide computers and phones than non-IM sites, but non-IM sites were more likely to provide every other kind of technology.

Some agencies without self-service equipment expressed that they lacked the resources to obtain the technology; one staff member at the Adams County income maintenance agency said, “We’d like to have computers, if you’d like to get the state to allocate funds to us.”

Staff at other agencies explained that there was very little need for a self-service model because few clients were interested in using ACCESS. “Not many people in Forest County use ACCESS at all,” said a staff member at the Forest County IM agency. “[The website] is very confusing.”

IM agencies in several counties indicated that the new consortia model implemented in 2012 would most likely create major changes for their agencies, probably affecting much of the data collected during Hunger Task Force’s assessment. It was not uncommon for agency staff to answer a few interview questions before saying, “You know this all going to change, though, right?” Many agencies expressed that the new changes might include the provision of self-service computers and other machines. A staff member at the Marathon County IM agency said, “We don’t have [self-service] computers at this time, but with the consortium, there will be. We’re also looking at getting a fax machine.”

## 2. Overview of Self-Service Technology in Milwaukee County

The table on the next page shows the percent of agencies in Milwaukee County that provided self-service computers, printers, scanners, fax machines, copiers, shredders, and phones.

### FROM THE INTERVIEWS:

“If we had one person using [the computer] a month, that would be a lot.” – Portage IM

“They do a lot of stuff online, which is really nice.” - Brown IM

“They know about [ACCESS], but they kind of stick it out of their head, because they don’t want to do it. They’d rather do it in person.” – Polk IM

“Those phones are busy all the time. People call for house rentals, food pantries, jobs, transportation.” - Dane IM (Madison)

“Because we have a really rural community and serve a lot of elderly retirees, I’d say we have a lot of people who aren’t aware of it and don’t want to be aware of it.” - Adams IM

Table 6. Self-Service Technology Available in Milwaukee County

	State-designated sites (n=11)	Food network sites (n=6)	Hunger Task Force sites (n=2)	All sites (n=19)
<b>Computers</b>	2	3	2	7
<b>Printers</b>	*1	2	2	*5
<b>Scanners</b>	*1	2	2	*5
<b>Fax machines</b>	*1	2	1	*4
<b>Copiers</b>	*1	2	2	*5
<b>Shredders</b>	*1	2	2	*5
<b>Phones</b>	*2	3	2	*7

\*These data were available at only 10 state-designated application assistance sites (18 total agencies).<sup>viii</sup>

Similar to the statewide data, computers and phones were the most commonly available office equipment, though by a small margin. The sample sizes of self-service technology-equipped sites are too small to make viable comparisons between groupings.

### 3. Waiting Time for Self-Service Computer Use Statewide

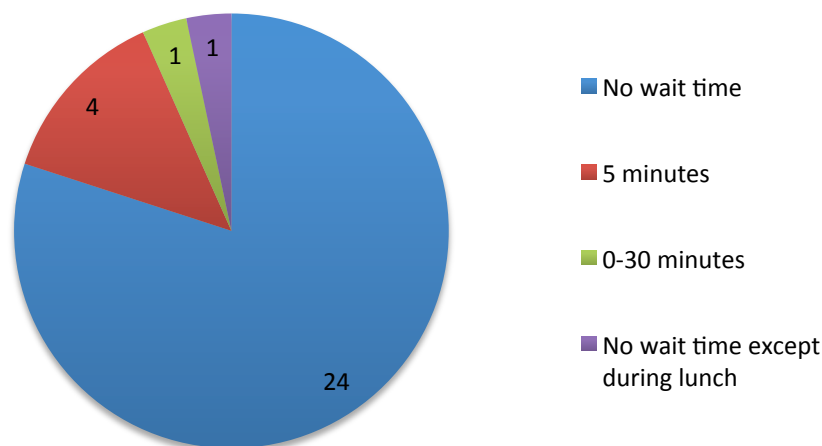


Figure 9. Waiting Time for Self-Service Computers Statewide

No self-service site reported waiting time over 30 minutes, and the vast majority of sites indicated that their clients did not have to wait before using self-service computers.

<sup>viii</sup> Because some non-IM agencies declined to interview, some data were not available at all sites. Data on self-service computers were available at 11 state-designated sites, six food network sites, and two Hunger Task Force sites (19 sites total). Data on self-service printers, scanners, fax machines, copiers, shredders, and phones were available at 10 state-designated sites, six food network sites, and two Hunger Task Force sites—18 sites total.



#### 4. Features of Self-Service Computer Stations Statewide

The following section examines the 32 agencies providing self-service computers in greater detail. Eighteen self-service sites were IM agencies; the remaining 14 were other agencies.

In this evaluation, wheelchair accessibility was assessed by answering two questions:

1. Is the computer station seated (not standing)?
2. Does it look like a wheelchair could fit at the desk?

If the answers to both questions were “Yes,” the computer station was evaluated as wheelchair accessible. Through this process, at least one self-service computer at each site visited was judged to be wheelchair accessible.

**Table 7. Features of Self-Service Computer Stations Statewide**

	<b>IM agencies (n=18)</b>	<b>Other agencies (n=14)</b>	<b>All agencies (n=32)</b>
<b>Wheelchair accessible</b>	100.0%	100.0%	100.0%
<b>Access to other websites</b>	57.9%	92.9%	72.7%
<b>Staff assist clients</b>	78.9%	92.9%	84.8%
<b>ACCESS cards or similar</b>	26.3%	28.6%	27.3%

The Hunger Task Force standard of modernization values giving clients access to websites other than the online FoodShare application so that they can access and print, scan, fax, or copy verification documents. IM sites more frequently restricted clients’ Internet access, with 58 percent of IM agencies allowing clients to visit websites other than ACCESS. The vast majority of non-IM sites (almost 87 percent) permitted their clients to access other websites.

Almost 87 percent of non-IM agencies indicated that if a client had questions about the computer or ACCESS, there was at least one staff member who was available to help. Similarly, 79 percent of IM sites indicated that there were staff available to help with technological or website questions.

Because one of the most common problems that clients experience using ACCESS is having trouble remembering their username and password,<sup>19</sup> Hunger Task Force provides “ACCESS cards” at the Coggs and Robles centers: small, white cards with space for recording username, password, and account registration number (see [Appendix K](#), page 53). For this evaluation, the ACCESS card criterion was met if sites provided paper, even scrap paper, for clients to use for recording their username and password. Almost 30 percent of sites visited were observed to meet this criterion.

## 5. Features of Self-Service Computer Stations in Milwaukee County

Within Milwaukee County, only seven sites with self-service computers were surveyed. Of these, two were state-designated application assistance sites, three were Hunger Task Force network partners, and two were Hunger Task Force locations. All sites surveyed provided wheelchair-accessible computer stations and allowed clients to access websites other than ACCESS.

Table 8. Features of Self-Service Computer Stations in Milwaukee County

	State-designated sites (n=2)	Food network sites (n=3)	Hunger Task Force sites (n=2)	All sites (n=8)
Wheelchair accessible	2	3	2	7
Website access	2	3	2	7
Staff assistance	1	3	2	6
ACCESS cards or similar	0	3	2	5

## D. AGENCY PRACTICES

### I. Complaint Procedures

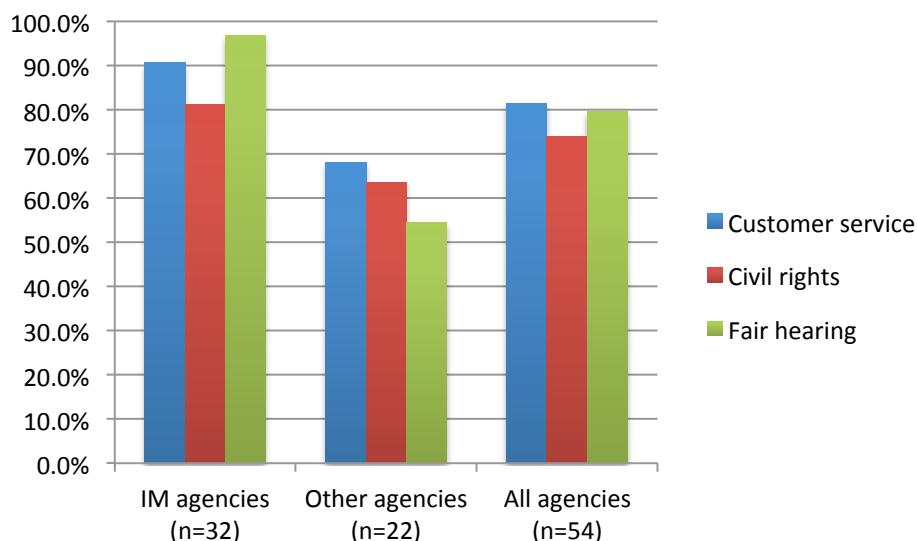


Figure 10. Agencies with Established Complaint Procedures Statewide

IM agencies were more likely than non-IM agencies to have established procedures for handling any kind of client complaints. The largest gap occurred in fair hearing procedure; 97 percent of IM sites indicated that they had an agency procedure for handling fair hearing requests, compared to 55 percent of non-IM sites.

The only IM site that did not handle fair hearing complaints within its own agency was the Milwaukee Human Services office, Coggs 102A. Their stated procedure for handling all complaints was to refer them to Hunger Task Force in Coggs 105.

## 2. Data Collection

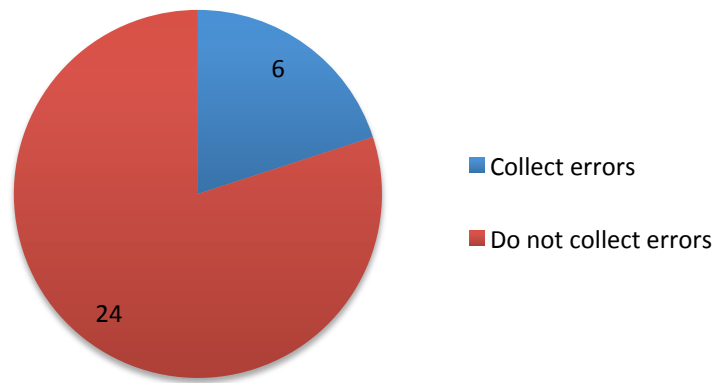


Figure 11. Self-Service Agencies Collecting Examples of ACCESS Errors

Of 30 self-service sites, six collected data regarding ACCESS errors:

- Coggs 102A
- Coggs 105
- Dane County IM Agency – Madison (collected by Second Harvest Foodbank of Southern Wisconsin)
- Milwaukee Christian Center
- Robles Center
- UMOS

Coggs 105 and the Robles Center were the only sites out of 30 self-service sites to collect any data on client computer literacy.

## V. MAJOR FINDINGS

- A. **Eighty-one percent of IM sites displayed both the *FoodShare Rights* poster and the *And Justice For All* poster.**
- B. **Almost 70 percent of IM sites displayed *I speak* cards or posters, compared to 41 percent of non-IM agencies.**
- C. **Of 54 sites interviewed, almost 41 percent—22 sites—indicated that at least one staff member spoke Spanish.** Seven sites, or 13 percent, indicated that at least one staff member spoke Hmong.
- D. **Almost 60 percent of IM agencies and 52 percent of non-IM agencies assessed provided self-service computers for client use.** Within Milwaukee County, less than half of all non-IM sites assessed provided self-service computers for client use.
- E. **Ninety-seven percent of IM sites indicated that they had an agency procedure for handling fair hearing requests, compared to 55 percent of non-IM sites.** The only IM site that did not handle fair hearing complaints was the Milwaukee Human Services office—Coggs 102A. Their stated procedure for all complaints was to refer them to Hunger Task Force in Coggs 105.
- F. **Coggs 105 and the Robles Center were the only sites out of 30 self-service sites to collect any data on client computer literacy.**
- G. **Staff at sites without self-service computers gave mixed reviews regarding the potential efficacy of a self-service model at their agencies.** Some staff expressed interest in providing computers and other equipment for clients but lacked the resources to do so; others, particularly those living in rural areas with large elderly populations, felt that the self-service model would not meet the needs of their clients.
- H. **Staff at several sites mentioned that the implementation of the multi-county consortia model in 2012 would result in many changes, likely affecting the data collected by Hunger Task Force.** Many indicated that the changes might include the provision of self-service office equipment.

## VI. RECOMMENDATIONS

- A. **Hunger Task Force should conduct an education campaign with the 19 income maintenance (IM) agencies assessed in this study that currently provide self-service computers for client use.** The campaign should focus on:
1. Explaining the definition and key principles of FoodShare modernization
  2. Sharing the successes and failures of FoodShare modernization efforts in Milwaukee County and other communities
  3. Providing *FoodShare Rights* posters, *And Justice For All* Posters, and *I Speak* cards where they are not universally available for clients
- B. **Hunger Task Force should conduct statewide follow-up research to assess the impact of Wisconsin's new consortia model.** The study should assess variables such as:
1. FoodShare customer service at the consortia's regional call centers
  2. Self-service computer availability and usage by FoodShare clients
  3. FoodShare client attitudes and beliefs about each consortia's modernization efforts

## APPENDIX A

### I. A Recent History of FoodShare Administration in Wisconsin

In Wisconsin, SNAP is known as FoodShare and is administered by Wisconsin's Department of Health Services (DHS). Until December 31, 2011, FoodShare cases throughout the state were processed in income maintenance (IM) agencies at the county level, with the exception of Milwaukee County. FoodShare in Milwaukee County was administered by Milwaukee County's Department of Health and Human Services (DHHS) until December 31, 2009.

At that time, FoodShare application and case management services were available online, by telephone, and in person at two locations: the Marcia P. Coggs Human Services Center (Coggs Center) and its satellite office, the George Robles Service Center. However, DHHS continuously failed to manage Milwaukee residents' income maintenance cases properly and on time, resulting in high error rates, poor customer service, and the deprivation of food assistance.

In a letter dated February 3, 2009, DHS Secretary Karen E. Timberlake informed Scott Walker, former Milwaukee County Executive:

*Due to the County's failure to provide these basic yet critical [income maintenance] services... [DHS] will assume the leadership and management of these programs.<sup>20</sup>*

Figure 12 (below) is a timeline that outlines the major events of the next year, culminating in a complete state takeover of Milwaukee County income maintenance administration.

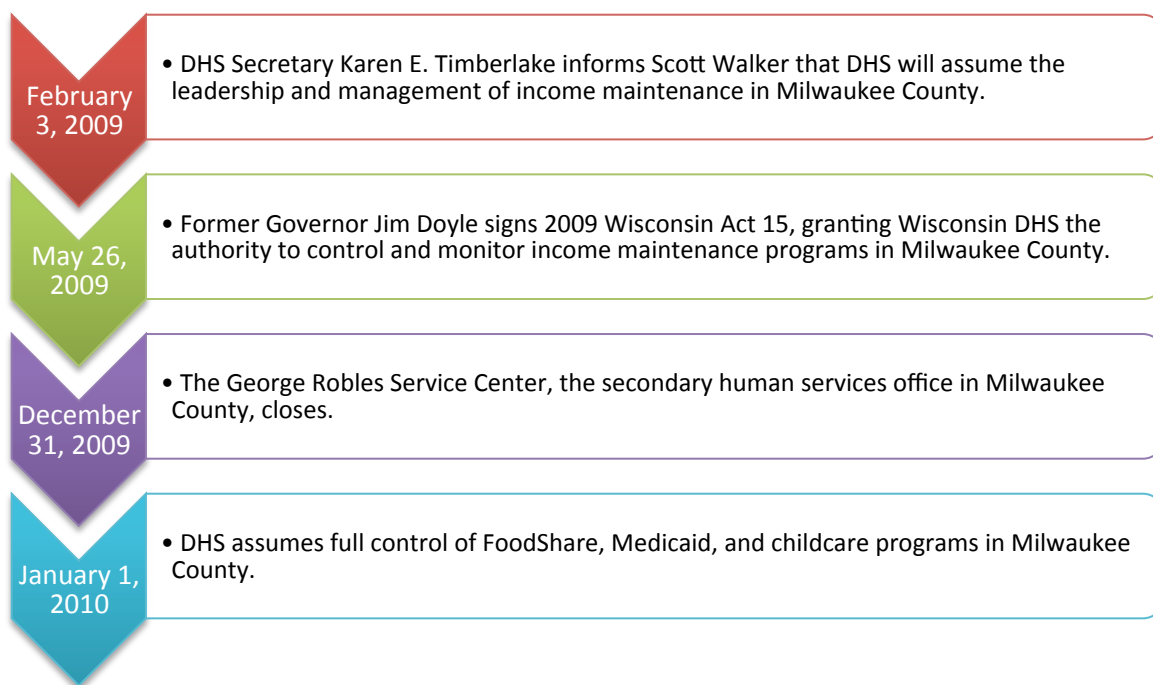


Figure 12. State Takeover of Milwaukee County Income Maintenance Management<sup>21</sup>

## 2. FoodShare Privatization in Wisconsin

The federal government discourages the privatization of public assistance programs and maintains rigid rules regarding the functions that may be performed by private vendor staff. The State of Wisconsin began outsourcing FoodShare application processing and other case maintenance activities to private vendors in July 2009<sup>22</sup> and continued expanding privatization of FoodShare administration until the Food and Nutrition Service (FNS) intervened. *Figure 13* (below) outlines the major events marking DHS privatization efforts and the FNS intervention.

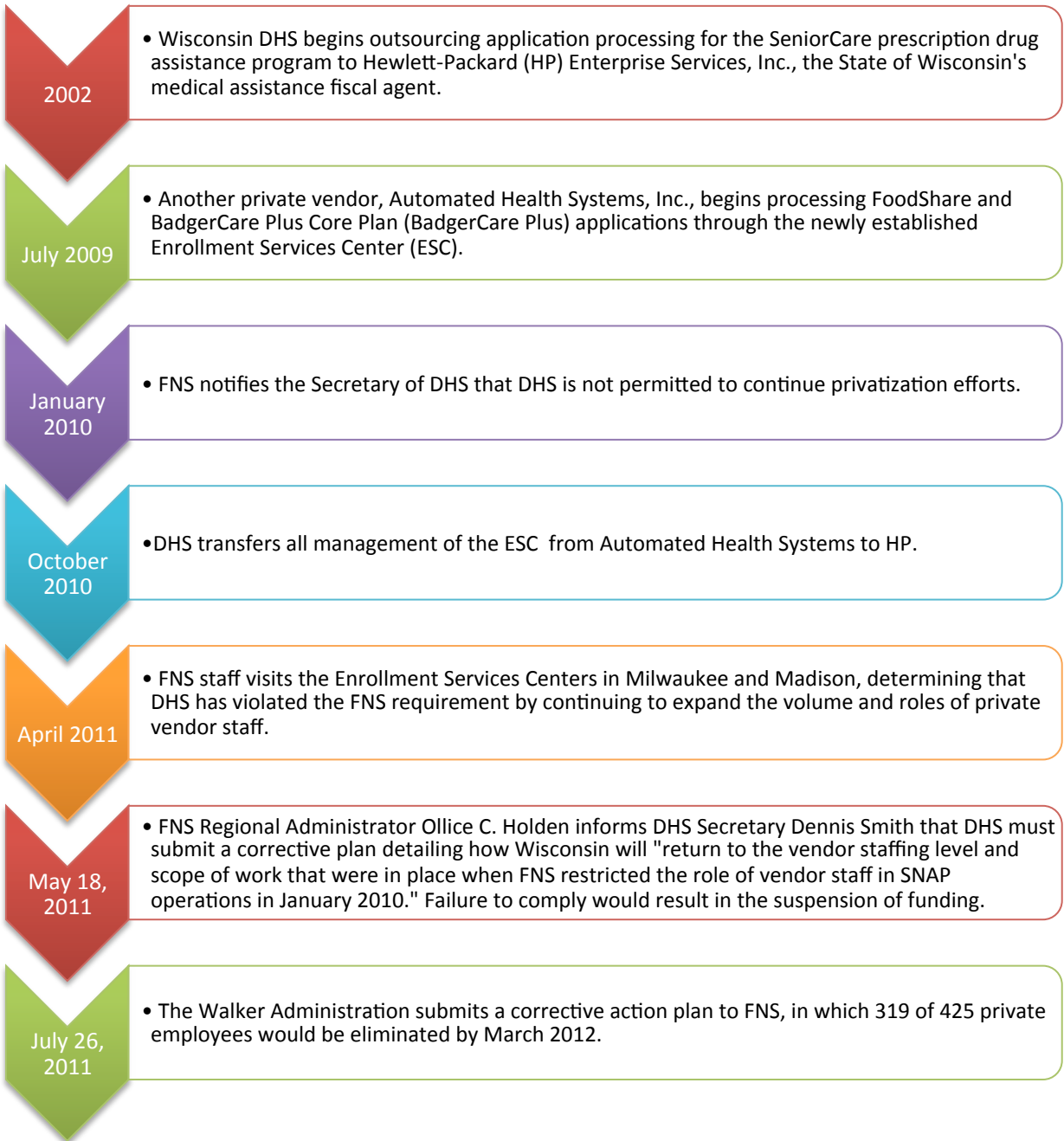


Figure 13. Wisconsin DHS Privatization Efforts and FNS Intervention<sup>23,24,25</sup>

### 3. New in 2012: Multi-County Consortia

On March 1, 2011, Governor Walker released a state budget proposal for fiscal years 2011-13. The Governor's proposed budget contained an initiative to consolidate all statewide income maintenance operations within Wisconsin DHS. By centralizing IM services, the Governor's budget estimated annual savings of \$48 million, in part due to the elimination of 270 full-time staff. The Walker administration planned to create a statewide FoodShare application process accessible by telephone, Internet, or mail; the state would rely on community-based organizations to assist clients with FoodShare application and case management services. By May 2012, income maintenance services would be performed by 250 state employees and 1,300 private vendor staff. The budget also proposed to change state statutes to authorize counties to combine to form multi-county departments of human services.

County representatives and many advocates believed that the state proposal to increasingly centralize and privatize IM operations would make it more difficult for individuals and families to receive public assistance services. In particular, counties and advocates argued that the Governor's proposal would result in decreased program efficiency, unnecessary complications for clients, a decreased ability for clients to connect face-to-face with caseworkers, and a loss of trained staff.

The Wisconsin Counties Association (WCA) and Wisconsin County Human Services Association (WCHSA) worked with various interest groups and state officials to craft an alternative IM delivery system. The alternative proposal devised by the WCA and its stakeholders argued that there are several key factors needed for effective service delivery to low-income people, including:

- A face-to-face presence in every county that is accessible during regular office hours to all customers, and includes extra help for people with disabilities, the elderly, persons with limited English proficiency, and persons with other limitations
- Administration of all programs in a unified manner by one state agency with local service delivery
- Cases assigned to individual caseworkers that are responsible for proper handling and processing of benefits
- A formal process for advocates and community partners to contact agencies directly for assistance and troubleshooting

The WCA/WCHSA proposal was eventually adopted by the state legislature and Governor in the final 2011-13 state budget bill. Among the key components of the IM model that were eventually adopted by the legislature and Governor were the following:

- Each of the 10 new consortia would develop its own unique 800 number for its call/change center, and its own unique Client Assistance for Reemployment and Economic Support (CARES) inbox for new applications.
- Clients wanting face-to-face interviews can set up an appointment at any IM office within the consortium. All new client applications are sent to a consortium inbox. Online applications and interactions would continue to be encouraged.



- All caseworkers from counties within a specific consortium have the ability to access and process cases from any of the counties within the consortium.
- Each consortium would develop its own operational procedures to ensure that federal and state performance standards for processing and maintaining IM cases are met.
- Milwaukee and Menomonee Counties would be administered by the state-managed Milwaukee Enrollment Services (MILES).

#### 4. Other States' Models of Modernization

In large part, FoodShare modernization in Wisconsin has been modeled after the methods used in Florida and Utah.

Utah created an online SNAP application, electronic case filing, document imaging, and a call center, which allows applicants to complete their interviews by telephone. Verification documents can be faxed, and the electronic case filing system notifies workers when a new document has arrived in the system. Furthermore, Utah has introduced a barcoding system that reduces document mislabeling.<sup>26</sup>

In addition to an online application, electronic case filing, document imaging, telephone interviews and a call center, Florida utilizes the Community Partnership Network (CPN), an extensive network of over 3,300 organizations statewide that provide SNAP application assistance. CPN sites include food banks, hospitals, public schools, and libraries. Ninety percent of Florida's SNAP applications are submitted online, and error rates--as high as 9.61 percent prior to modernization--were reduced to 1.08 percent in 2008.<sup>27</sup>

## APPENDIX B

### COUNTIES VISITED

The following counties were visited for this project:

Adams  
Brown  
Dane  
Dunn  
Eau Claire  
Fond du Lac  
Forest  
Kenosha  
La Crosse  
Lafayette  
Marathon  
Menominee  
Milwaukee  
Ozaukee  
Pierce  
Polk  
Portage  
Racine  
Rock  
Rusk  
Sauk  
Sheboygan  
St. Croix  
Vernon  
Vilas  
Washington  
Waukesha

## APPENDIX C

### SITES VISITED

The following sites were visited for this project. County names have been provided in parentheses following the sites that do not include the county name in the site name.

1. 16th St. Health Center (*Milwaukee*)
2. Adams IM
3. Beloit Family Resource Center (*Rock*)
4. Brown ADRC
5. Brown IM
6. Cross Lutheran Church (*Milwaukee*)
7. Dane IM – Madison
8. Dane IM – Stoughton
9. Dunn IM
10. Dunn Job Center
11. Eastbrook Church (*Milwaukee*)
12. Eau Claire IM
13. ELCA Urban Outreach Center (*Kenosha*)
14. Fond du Lac IM
15. Forest IM
16. Forest Tribal IM – Potawatomi
17. Forest Tribal IM – Sokaogan
18. Health Care for the Homeless (*Milwaukee*)
19. Hillside Family Health Center (*Milwaukee*)
20. Hmong American Friendship Association (*Milwaukee*)
21. Isaac Coggs Health Center (*Milwaukee*)
22. Keenan Health Center (*Milwaukee*)
23. Kenosha IM
24. La Crosse IM
25. Lafayette IM
26. Lisbon Avenue Health Center (*Milwaukee*)
27. Marathon IM
28. Marathon Job Center
29. Marcia P. Coggs Human Services Center– Room 102A (*Milwaukee*)
30. Marcia P. Coggs Human Services Center – Room 105 (*Milwaukee*)
31. Milwaukee Christian Center (*Milwaukee*)
32. Menominee IM
33. MLK Heritage Health Center (*Milwaukee*)
34. Northwest Health Center (*Milwaukee*)
35. Ozaukee IM
36. Pierce IM
37. Polk IM
38. Polk Job Center
39. Portage IM
40. Racine IM - Burlington
41. Racine IM - Racine
42. Riverworks Development Corporation (*Milwaukee*)
43. Robles Self-Service Center (*Milwaukee*)
44. Rock IM
45. Rusk IM
46. Rusk Job Center
47. Sauk IM
48. Sheboygan IM
49. South Milwaukee Human Concerns (*Milwaukee*)
50. Southside Health Center (*Milwaukee*)
51. St. Croix ADRC
52. St. Croix IM
53. United Migrant Opportunity Services (*Milwaukee*)
54. Vernon IM
55. Vilas IM
56. Washington IM
57. Waukesha IM - Pewaukee
58. Waukesha IM - Waukesha
59. West Allis Health Department (*Milwaukee*)

## APPENDIX D



Organizations throughout Milwaukee County are available to help children, parents, pregnant women and caregivers to apply for health insurance through BadgerCare Plus (BC+). Many of these sites are also available to assist community members with applying for BC+ Express Enrollment (please see back of sheet for details), Family Planning Only Services (FPOS), FoodShare (FS). Please call the site for an appointment unless otherwise noted.

### Southside Self Service Center

1673 S. 9<sup>th</sup> St., First Floor

Hours: M – F 8 am – 4 pm

Walk-ins only

Self-service location for applications, renewals, reporting changes, checking benefits, and submitting verifications

\*Se habla Español

\* Muaj Neeg Txhais Lus Hmoob

### City of Milwaukee Public Health Department

#### Southside Health Center

1639 S. 23rd St.

414-286-6629 / 414-286-8620

Hours: Daily 8 am – 12 pm and 1 pm – 4 pm

Extended Hours on Monday and Thursday until 5:45 pm

\*Se habla Español

\* Muaj Neeg Txhais Lus Hmoob

EE Pregnant women and children, BC+, FPOS, and FS only in combination with a BC+ application.

### Keenan Health Center

3200 N 36<sup>th</sup> Street

414-286-6629/414-286-8620

Monday, Wednesday, and Friday: 8 am – 12 pm and 1 pm – 5:45 pm

Tuesday, Wednesday and Friday: 8 am – 12 pm and 1 pm – 4 pm

Thursday: 12 pm – 5:45 pm

EE Pregnant women and children, BC+, FPOS, and FS only in combination with a BC+ application.

### Northwest Health Center

7630 W Mill Rd

414-286-6629 / 414-286-8620

Hours: Daily 8 am – 12 pm and 1 pm – 4 pm

Extended Hours on Wednesday and Thursday until 5:30 pm

EE Pregnant women and children, BC+, FPOS, and FS

### 16th Street Community Health Center

#### 16th St. Community Health Center

1032 S. Cesar E. Chavez Dr

414-672-1353 ext 3363

Hours: M-F 8:30 am – 5 pm

Call for appointment, walk-in applications accepted depending on staff availability

\* Se habla Español

Express Enrollment for pregnant women and children, BC+, and FS only in combination with a BC+ application.

### Parkway Health Center

2906 S. 20th St

414-672-1353 ext 3363

Hours of operation 8:30 am – 5 pm by appointment only

EE for pregnant women and children, BC+, and FS only in combination with a BC+ application.

\* Se habla Español

### Progressive Community Health Centers

#### Lisbon Avenue Health Center

3522 W. Lisbon Ave

(414) 935-8000 ext. 221 (Tina)

Hours: 8 am – 4 pm

EE for pregnant women and children, BC+, FS, FPOS

\*Muaj Neeg Txhais Lus Hmoob

#### Hillside Family Health Center

1452 N. 7th St. (Hillside Family Resource Center-2nd floor)

414-935-8000 ext. 712 (Sophia)

Hours: 8 am – 4 pm

EE for pregnant women and children, BC+, FS, FPOS

\*Muaj Neeg Txhais Lus Hmoob

### Milwaukee Health Services

#### MLK Heritage Health Center

2555 N. MLK Drive

414-372-8080 ext: 1290 (Roberta)

Hours: 7 am – 1 pm, 2 pm – 3:30 pm

Walk-ins: Express Enrollments & Full Applications

EE Pregnant Women and Children, BC+, FS only in combination with Medicaid applications, FPOS

#### Isaac Cogg's Health Center

8200 W. Silver Spring

414- 760-3900 ext 4116 (Tanya)

Monday – Thursday 8:30 am – 11 am and 1 pm – 4 pm

Fridays 8:30 am – 2 pm

Walk ins or by appointment

EE Pregnant Women and Children, BC+, FS only in combination with Medicaid applications, FPOS

### Health Care for the Homeless

210 W. Capitol Drive

(414)727-6320 Ext 139 (Benefits Office)

Hours: 8 am – 4 pm

Services: Medicaid/BC/FS applications/renewals for Only Clinic or Case Managed Clients

BC applications or renewals can be provided for walk-ins.

### West Allis Health Department

7120 W National Ave

(414) 302-8600

EE Pregnant women and children, BC+, and FS

\*\*Services are limited to West Allis and West Milwaukee residents only

### **Social Development Commission**

4041 N. Richards Street

414-906-2743

By appointment

EE for Children, BC+, and FS

### **Angel of Hope Clinic**

209 W. Orchard Avenue

414-389-3848 (Gilbert)

9 am -3:30 pm

By appointment only

EE for children, BC+, and FS

### **Riverworks Development Corporation**

303 E Vienna Ave

Milwaukee, WI 53212

Mon – Fri 9 am – 5 pm

414-906-9650

EE for children, BC+, and FS

8 am-4:30 pm

BC+, EBD Medicaid, FS, FPOS

### **Coggs Center**

1220 W Vliet Street

Milwaukee, WI 53205

8 am – 4:30 pm

BC+, EBD Medicaid, FS, FPOS

Mon – Fri 9 am – 5 pm

414-906-9650

EE for children, BC+, and FS

### **Boys & Girls Club of Greater Milwaukee**

Family Resource Center

3400 West North Avenue

Milwaukee, WI 53208

414-874-0130

By appointment only

BC+ and FS

### **UMOS Job Center Southeast**

2701 S. Chase Avenue

(414) 389-6600

**\*All sites self-report compliance with Americans with Disabilities Act (“ADA”) accessibility guidelines, unless otherwise noted.**

### **Please Note:**

**Express Enrollment is temporary coverage that is available for the populations listed below. It provides coverage from the date of application until the last day of the following month. It is full coverage for children and coverage for outpatient prenatal services only for pregnant women. You must be a citizen to apply and children may only be express enrolled once in a twelve month period of time.**

**Children:** Birth to 1: Up to 250% FPL, 1-5 up to 185% FPL, and 6 -19: Up to 150% FPL

**Pregnant Women:** Up to 300% FPL

Family size	100% Monthly Income	150% Monthly income	200% Monthly income	300% Monthly income
1	\$ 907.50	\$1,361.25	\$1,815.00	\$2,722.50
2	\$1,225.83	\$1,838.75	\$2,451.67	\$3,677.50
3	\$1,544.17	\$2,316.25	\$3,088.33	\$4,632.50
4	\$1,862.50	\$2,793.75	\$3,725.00	\$5,587.50
5	\$2,180.83	\$3,271.25	\$4,361.67	\$6,542.50
6	\$2,499.17	\$3,748.75	\$4,998.33	\$7,497.50
7	\$2,817.50	\$4,226.25	\$5,635.00	\$8,452.50
8	\$3,135.83	\$4,703.75	\$6,271.67	\$9,407.50

\*These amounts are based on the 2011 federal guidelines, which increase by a small percentage each year.

## APPENDIX E

### HUNGER TASK FORCE'S MODERNIZATION STANDARD

#### A. SIGNAGE AND INFORMATION

**1. The following signs and information are posted in visible locations:**

- a. Hours of operation
- b. *FoodShare Rights* poster
- c. *And Justice For All* poster
- d. *I speak* cards or poster
- e. Income limits for FoodShare
- f. Enrollment Service Center (ESC) phone number
- g. Information about other nutrition programs
- h. Signs in languages other than English

**2. Signs and posted information are in languages other than English.**

#### B. SERVICES AND DOCUMENTS

**1. Clients can receive the following services and documents at the agency:**

- a. Self-service computers
- b. On-site interviews
- c. FoodShare applications
- d. Six-month review forms
- e. Change reports

**2. Multilingual staff can assist LEP clients in their native language.**

**3. Clients can process their own verification documents, minimizing wait times and maximizing client autonomy and case ownership.**

#### C. SELF-SERVICE TECHNOLOGY

**1. The agency is equipped with the following self-service machines:**

- a. Computers
- b. Printers
- c. Scanners
- d. Fax machines
- e. Copiers
- f. Shredders
- g. Phones

**2. Computers are immediately accessible to clients, with little or no wait time.**

**3. Self-service computer stations have the following features:**

- a. Wheelchair accessibility
- b. Access to websites other than ACCESS
- c. Assistance from staff fully trained on ACCESS
- d. Paper on which to record username/password information

#### D. AGENCY PRACTICES

**1. The agency has established procedures for facilitating customer service and civil rights complaints as well as requests for fair hearings.**

**2. The agency collects data to measure client computer literacy.**

**3. The agency collects examples of ACCESS errors.**

## APPENDIX F

### FOODSHARE OUTREACH AGENCY ASSESSMENT

County: \_\_\_\_\_

Address: \_\_\_\_\_

Type of agency:              Community              IM              Other

	Yes	No	Comments
<b>Signs:</b>			
FoodShare Rights poster			Where?
"And Justice For All" poster			Where?
Are signs in any language other than English?			Which languages?
Are the hours of operation posted?			Where? Permanent or temporary?
Are there signs posted with the phone number to call for a FS interview?			
<b>Computers:</b>			
Are self-service computers available for clients to use to apply for FoodShare?			How many?
Are the computer terminals wheelchair accessible?			
Can clients access websites other than ACCESS (i.e. for verification documents)?			Which sites?
Do the staff offer clients assistance with their applications?			
Are ACCESS cards or something similar handed out for people to write down their user id & password?			
<b>Documents and information:</b>			
Are "I speak" cards or something else similar visibly available?			
Is information about additional nutrition programs available (WIC, school meals, emergency food, etc.)?			Which programs?
Is information on income limits posted or handed out?			

<b>Miscellaneous:</b>			
Is the building wheelchair accessible?			
What is the waiting process for clients? How do they "call" customers?			
<b>Additional Comments:</b>			

Does it seem like clients are getting what they need? Do the staff seem overwhelmed or stressed?

If clients ask staff questions about ACCESS, are staff able to answer them?

This image shows a blank sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.



## APPENDIX G

### FOODSHARE OUTREACH AGENCY STAFF INTERVIEW QUESTIONS

County: \_\_\_\_\_ Address: \_\_\_\_\_

Agency type: ☐ IM ☐ Community: \_\_\_\_\_ ☐ Other: \_\_\_\_\_

Staff name: \_\_\_\_\_ Title: \_\_\_\_\_

1. How many clients does this agency receive on a daily basis (in person)? \_\_\_\_\_
2. How many phone calls does this agency receive on a daily basis? \_\_\_\_\_
3. What percent of all clients are FoodShare clients? \_\_\_\_\_
- a. What percent of the FoodShare clients that call or come in are...

Applying for FoodShare?	%
Completing a renewal?	%
Submitting a change?	%
Other:	%
<b>Total</b>	<b>100%</b>

- b. Of the applicants, what percent had prior knowledge of FoodShare? \_\_\_\_\_
- c. What percent of the clients that come in are...

Not aware that ACCESS exists?	%
Aware of ACCESS but have never used it?	%
Aware of ACCESS and have used it?	%
<b>Total</b>	<b>100%</b>

4. Are there computers, printers, scanners, fax machines, copy machines, or phones available?

- |   |  |
|---|--|
| <input type="checkbox"/> ___ Computers: Staff available to help?    | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Staff use only |
| <input type="checkbox"/> ___ Printers: Staff available to help?     | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Staff use only |
| <input type="checkbox"/> ___ Scanners: Staff available to help?     | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Staff use only |
| <input type="checkbox"/> ___ Fax machines: Staff available to help? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Staff use only |
| <input type="checkbox"/> ___ Copiers: Staff available to help?      | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Staff use only |
| <input type="checkbox"/> ___ Phones: Staff available to help?       | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Staff use only |

Rigged? ☐ Yes ☐ No

☐ \_\_\_ Shredders: Staff available to help? ☐ Yes ☐ No ☐ Staff use only

5. Do clients complete FoodShare interviews on site?

☐ Yes ☐ No

a. IF YES: How do they complete the interview?

- ☐ Over the phone with a case worker at ESC
- ☐ Over the phone with a case worker at this agency
- ☐ Face-to-face with a case worker at this agency

6. Are there any paper applications available?  
☐ Yes ☐ No  
 a. IF YES: Are they available in other languages?  
☐ Yes ☐ No  
 b. Which languages? \_\_\_\_\_
7. Are there times when you fill out the FoodShare application for clients?  
☐ Yes ☐ No  
 a. IF YES: Under what circumstances? \_\_\_\_\_
8. Are other program forms available?  
☐ SMRFs ☐ Change reports ☐ No
9. Do you collect demographic data on clients?  
☐ Yes ☐ No  
 a. IF YES: What information do you collect? (check all that apply)  
 \_\_\_\_\_  
 b. Is there some way that I could get a copy of these data? \_\_\_\_\_
10. What is the breakdown of the staffing at this site?  
 # Merit: \_\_\_\_\_ # Management: \_\_\_\_\_ # Multilingual: \_\_\_\_\_  
 # Non-merit: \_\_\_\_\_ # Verification: \_\_\_\_\_ Which languages? \_\_\_\_\_  
 # Line: \_\_\_\_\_ # Total: \_\_\_\_\_
11. Who processes verification? Where? How?  
☐ Caseworkers scan them in their offices ☐ Line staff scan them ☐ Other: \_\_\_\_\_
12. What is the procedure for filing a complaint?  
 a. Customer service complaint:  
 b. Civil rights complaint:  
 c. Fair hearing:

**If there are self-service computers available:**

13. How long do clients typically have to wait before they can use a computer? \_\_\_\_\_
14. Do you measure client computer literacy?  
☐ Yes ☐ No  
 a. IF YES: How computer literate are clients?

No computer proficiency	%
Limited computer proficiency	%
Significant computer proficiency	%
<b>Total</b>	<b>100%</b>

15. Are some clients unable to use the computers?  
☐ Yes ☐ No  
 a. IF YES: Why? \_\_\_\_\_

16. Which features do clients use on ACCESS?

- |   |   |
|---|---|
| <input type="checkbox"/> Am I Eligible?                   | <input type="checkbox"/> Apply for Child Care |
| <input type="checkbox"/> Apply for FoodShare              | <input type="checkbox"/> Renew Benefits       |
| <input type="checkbox"/> Apply for Health Care            | <input type="checkbox"/> Check Benefits       |
| <input type="checkbox"/> Apply for Family Planning Waiver | <input type="checkbox"/> Report Changes       |

17. Which screens on ACCESS have you noticed clients struggling with? Why?

---

18. Do you collect examples of ACCESS errors that consistently occur?

- ☐ Yes ☐ No

a. What are the errors you see most frequently?

---

19. Who do you contact at DHS to correct ACCESS problems?

---

20. Has DHS been responsive to your feedback? Have the problems been fixed?

---

21. What do you notice as some of the challenges faced by people using ACCESS?

- |   |  |
|---|--|
| <input type="checkbox"/> No knowledge of how ACCESS works             | <input type="checkbox"/> Do not understand questions           |
| <input type="checkbox"/> Trouble logging on                           | <input type="checkbox"/> System is not in their language       |
| <input type="checkbox"/> Lack of computer skills                      | <input type="checkbox"/> Application is too long and confusing |
| <input type="checkbox"/> Cannot figure out how to navigate the system | <input type="checkbox"/> Other: _____                          |

22. Are there any opportunities for volunteers to help clients use ACCESS?

- ☐ Yes ☐ No

a. IF YES: Would you be interested in having Hunger Task Force help train volunteers?

- ☐ Yes ☐ No

b. Comments: \_\_\_\_\_

23. Hunger Task Force asks questions of ACCESS users using an online survey tool that evaluates whether ACCESS is functioning properly and effectively. We show the results to the state to inform policy changes making ACCESS more effective. Would you be interested in putting those surveys on your computers? We would be willing collect and analyze the data for you at no cost.

- ☐ Yes ☐ No

a. IF YES: To whom should we send the links? \_\_\_\_\_

---

24. Other comments from staff: \_\_\_\_\_

# APPENDIX H

## A. CONTEXTUAL DATA GATHERED

### I. Client Characteristics

The staff interviewed at each site were asked the following questions about their clients:

#### a. What percent of your clients are FoodShare clients?

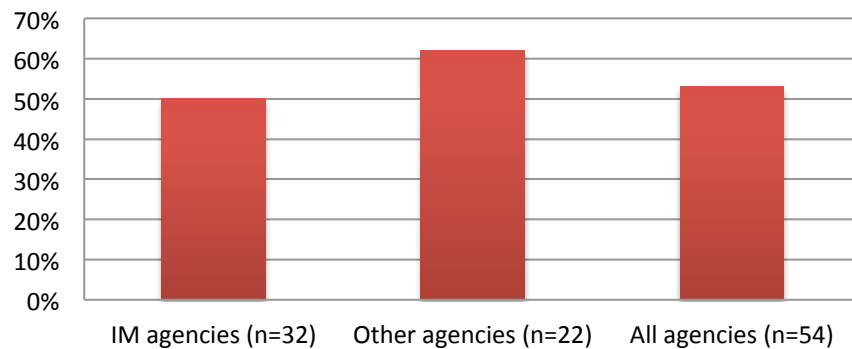


Figure 14. Percentage of FoodShare Clients Statewide (Median)

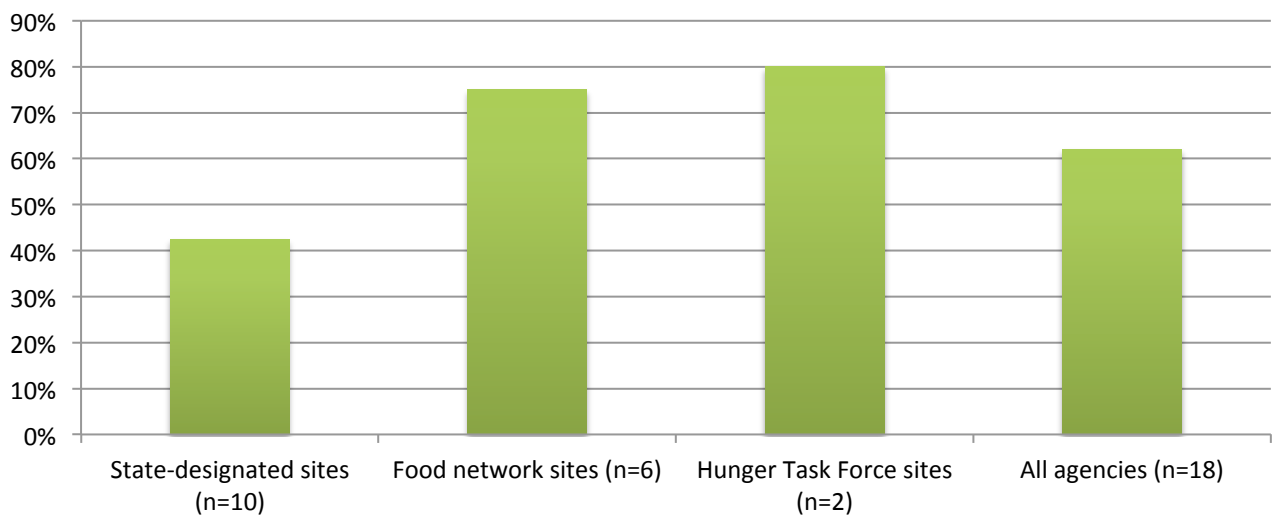


Figure 15. Percentage of FoodShare Clients in Milwaukee County (Median)

Hunger Task Force and Hunger Task Force's food service network self-reported serving a vast majority of FoodShare recipients, while state-designated sites reported that less than 43 percent of their clients were FoodShare recipients.

**b. Of the clients that call or come to the agency in person, which FoodShare-related activities do they perform?**

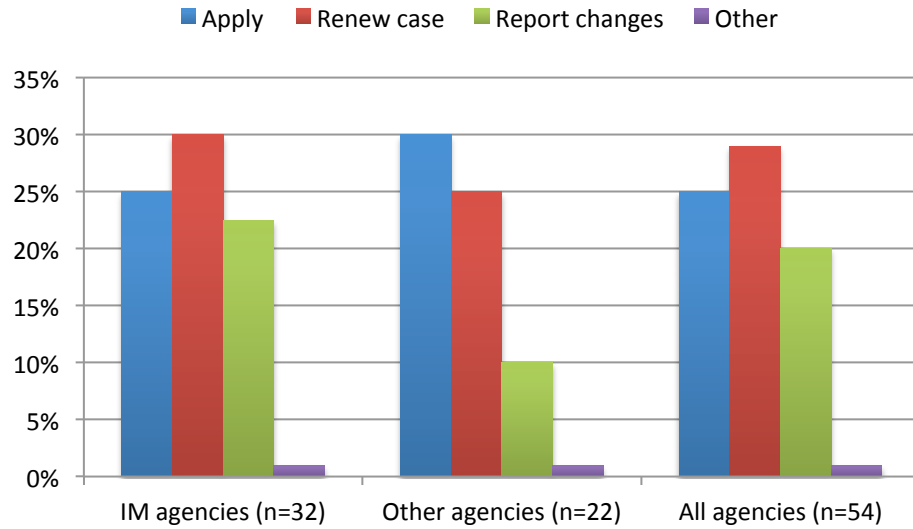


Figure 16. Percentages of Activities Performed by FoodShare Clients at Agencies Statewide (Median)

At IM agencies, clients were more likely to renew existing FoodShare cases than open new cases. At other agencies, more clients opened new cases than renewed existing ones. In general, clients were less likely to report changes, particularly at non-IM sites.

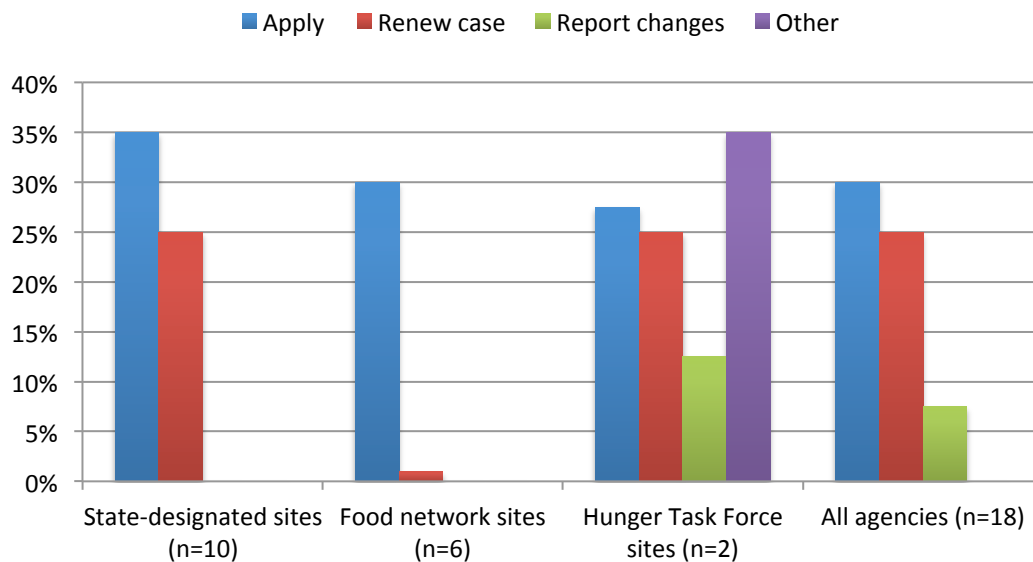


Figure 17. Percentages of Activities Performed by FoodShare Clients at Agencies in Milwaukee County (Median)

At state-designated application assistance sites, clients applied for FoodShare, completed renewals, and submitted changes to their cases at similar rates. In contrast, clients at food

network sites were much more likely to apply for FoodShare than perform any other sort of case-related activity.

**c. Of the clients that apply for FoodShare at your agency, what percent had knowledge of FoodShare prior to coming to the agency?**

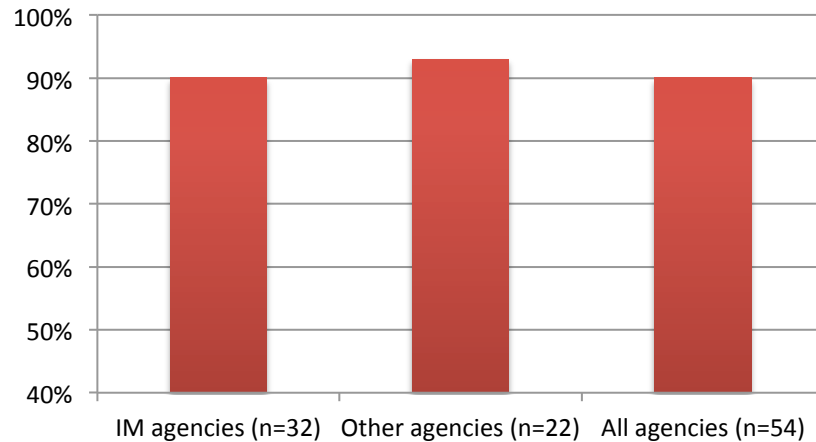


Figure 18. Percentage of Clients with Prior Knowledge of FoodShare Statewide (Median)

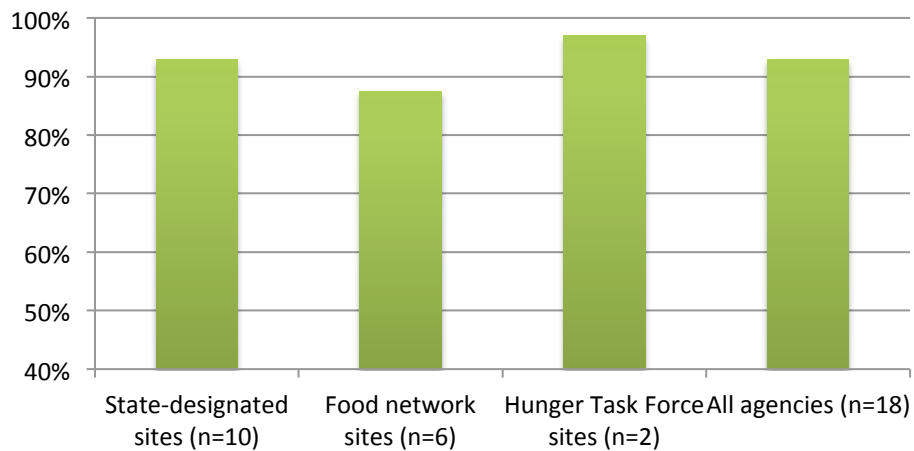


Figure 19. Percentage of Clients with Prior Knowledge of FoodShare in Milwaukee County (Median)

Across the board, the vast majority of clients had heard of FoodShare prior to visiting the agencies assessed in this study.

**d. To what extent were your clients aware of ACCESS before coming to this agency?**

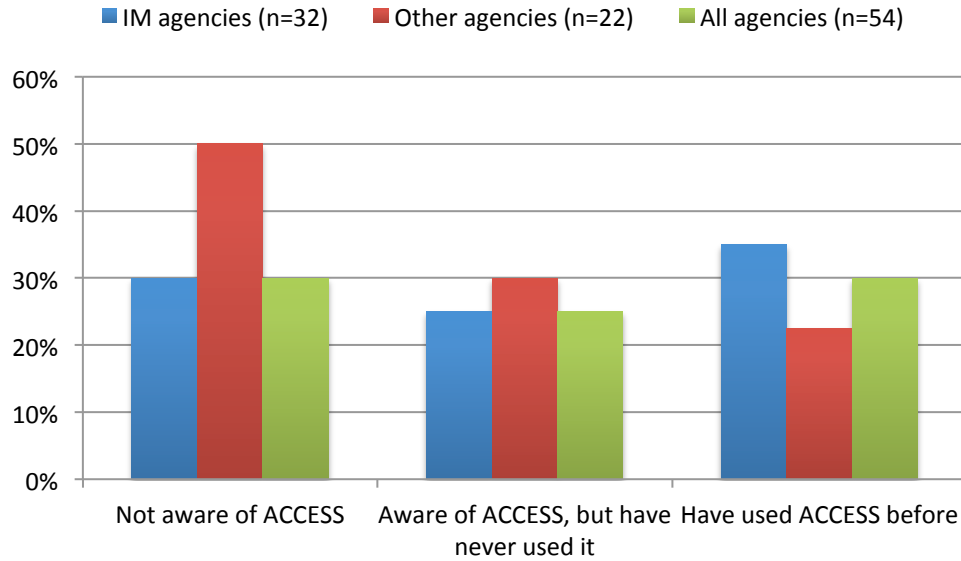


Figure 20. Clients' Familiarity with ACCESS Statewide (Median)

Clients at non-IM agencies were more likely to be unaware of ACCESS than clients at IM agencies.

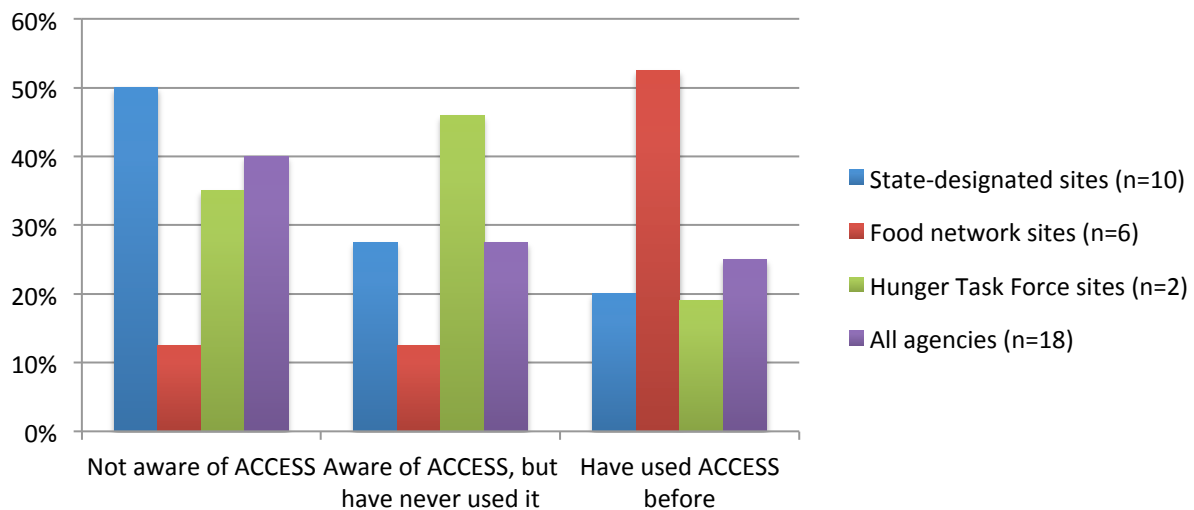


Figure 21. Clients' Familiarity with ACCESS in Milwaukee County (Median)

Clients at food network sites were significantly more likely to have used ACCESS than clients at any other kind of site. By a margin of almost 20 points, Hunger Task Force clients were most likely to have never used ACCESS despite being aware of it. Clients at state-designated application assistance sites were most likely to have never heard of ACCESS.

## 2. Agency Staffing and Procedures

The staff interviewed at each site were asked the following questions about agency procedures:

### a. Are there times when staff fill out the FoodShare application for clients?

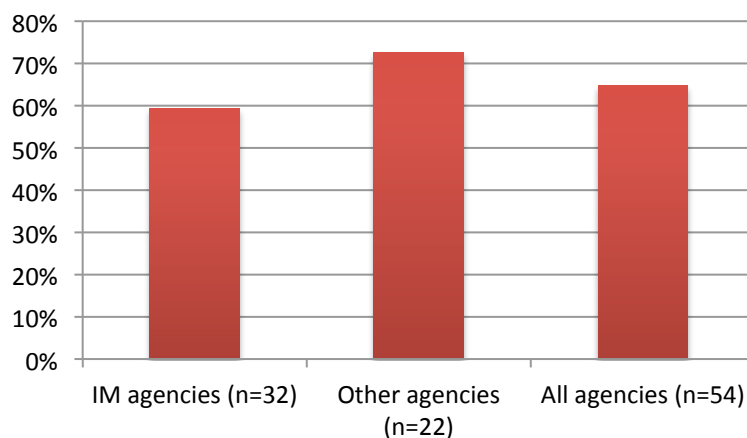


Figure 22. Agencies Completing FoodShare Applications for Clients Statewide

Non-IM agencies were more likely to complete FoodShare applications for clients than IM agencies. Overall, almost 65 percent of agencies indicated that staff sometimes filled out applications for clients.

Table 9. Agencies Completing FoodShare Applications for Clients in Milwaukee County

State-designated sites (n=10)	Food network sites (n=6)	Hunger Task Force sites (n=2)	All agencies (n=18)
7	4	2	13

*Due to the small sample sizes of the site groupings, percentages have not been included in this table.*

Staff completed FoodShare applications for clients at approximately 72 percent of sites in Milwaukee County—marginally higher than the rate for the state of Wisconsin overall.



**b. Under which circumstances do staff fill out FoodShare applications for clients?**

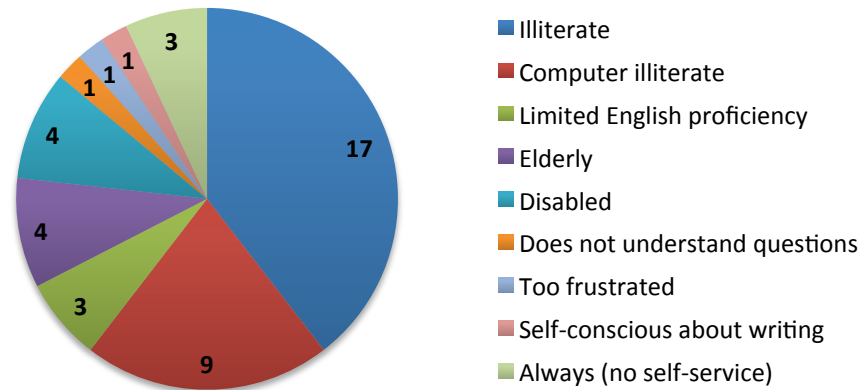


Figure 23. Reasons for Completing FoodShare Applications for Clients Statewide

The most common circumstances mentioned by staff were illiteracy and computer illiteracy; combined, those two answers composed over 60 percent of the reasons given. Staff at several sites cited more than one reason.

### 3. Observations of Clients Using Computers and ACCESS

The staff interviewed at each self-service application assistance site were asked the following questions regarding client ACCESS usage:

**a. Are any clients unable to use the computer(s) for any reason?**

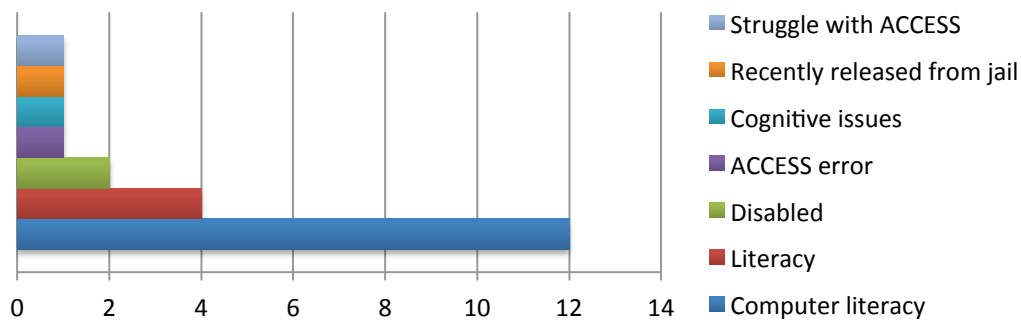


Figure 24. Reasons Clients Were Unable to Use Self-Service Computers Statewide

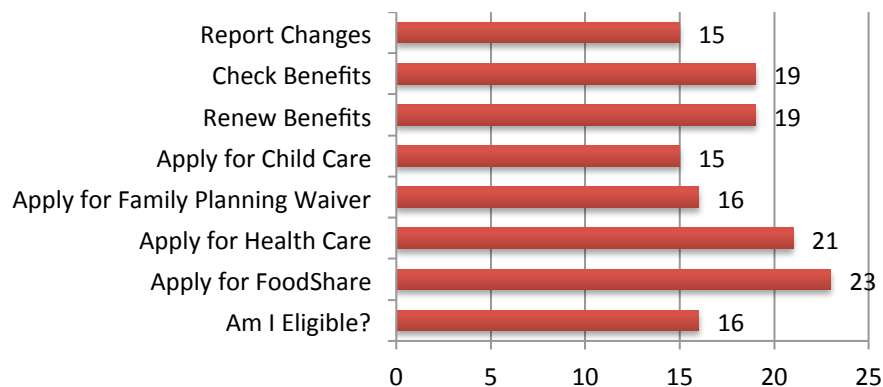
**b. Which ACCESS features do clients use at this agency?**

Figure 25. Features Reported Used By Clients at Agencies Statewide

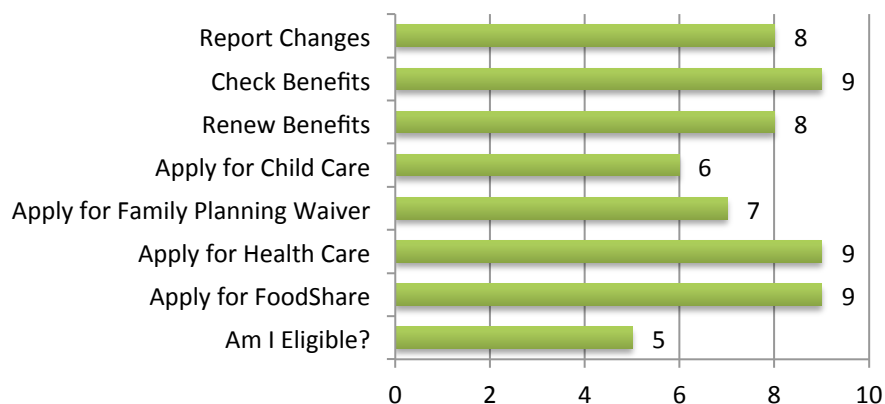


Figure 26. Features Reported Used By Clients at Agencies in Milwaukee County

Throughout Wisconsin and in Milwaukee County, sites reported that clients utilized all features on ACCESS at approximately similar rates. Applying for FoodShare, applying for health care, and checking benefits were the most popular features by a narrow margin.

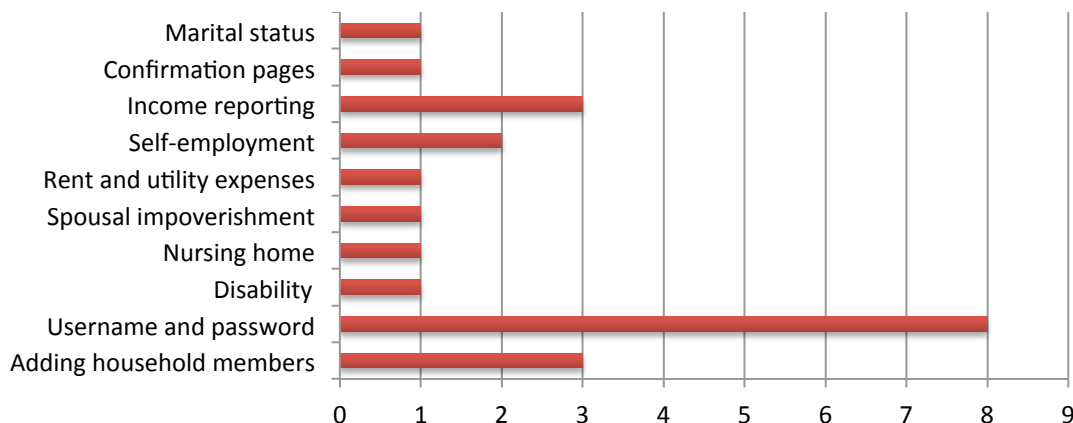
**c. On which ACCESS screens have you noticed clients struggling?**

Figure 27. ACCESS Screens Reported As Challenging for Clients Statewide

The aspect of ACCESS most commonly cited as challenging for clients was the username and password. Interviewed staff reported that many clients, particularly those unfamiliar with computer or Internet use, struggled with the page requiring clients to create a username and password for login. In addition, staff expressed that many returning clients often had difficulty remembering the usernames or passwords they had used before. Because ACCESS does not offer a feature allowing clients to reset their passwords, many clients would make several incorrect attempts before the system locked them out of their accounts.

**d. In general, what kinds of challenges have you noticed being faced by people using ACCESS?**

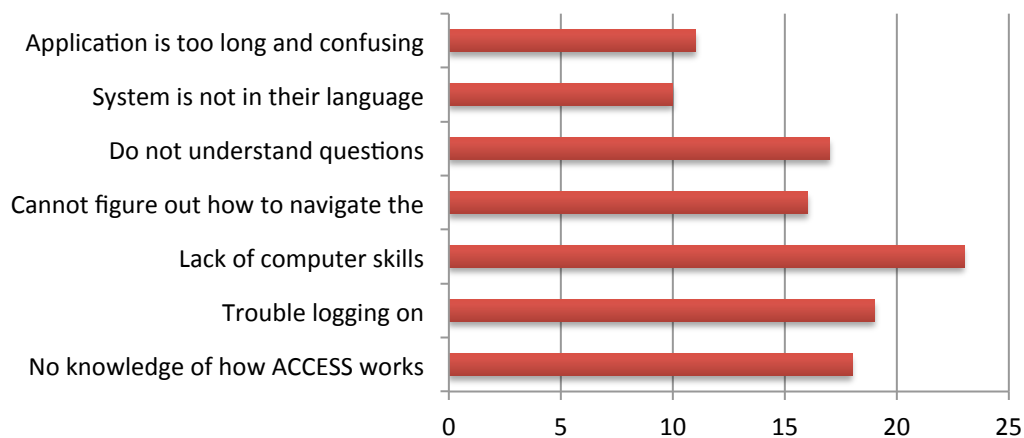


Figure 28. General Challenges Faced by ACCESS Clients Statewide

## APPENDIX I

# YOUR FOODSHARE RIGHTS

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### You have the right to:

- Apply today and get help applying.
- Get FoodShare benefits (or be notified if you are not able to enroll in the program) within 30 days from when you apply.
- Get FoodShare benefits within seven days if you have little or no money and you qualify for the program.
- Have a fair hearing if you do not agree with any action taken on your case.

Apply today at [access.wi.gov](https://access.wi.gov) or your local county or tribal agency. For help, call 1-800-362-3002.



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## APPENDIX J

<p>Kuv xav tau ib tug Hmoob pab txhais lus rau kuv.</p> <p><b>I need a Hmong interpreter</b></p>	<p>ខ្ញុំត្រូវការអ្នកបកប្រែភាសាខ្មែរ</p> <p><b>I need a Khmer interpreter.</b></p>
<p>ຂ້າພະເຈົ້າ ຕ້ອງການ ລ້ານແປພາສາລາວ</p> <p><b>I need a Lao interpreter</b></p>	<p>Мне нужен русский переводчик.</p> <p><b>I need a Russian interpreter.</b></p>
<p>Turjumana afan Oromiffa enbarbana.</p> <p><b>I need an Oromiffa interpreter.</b></p>	<p>Ja treban Srpsko-Hrvatskog prevodioca.</p> <p><b>I need a Serbo-Croatian interpreter.</b></p>
<p>Waxaan u baahnahay turjubaan Somali ah.</p> <p><b>I need a Somali interpreter.</b></p>	<p>Necesito servicios de intérprete en español.</p> <p><b>I need a Spanish interpreter.</b></p>
<p>Tôi cần thông dịch viên tiếng Việt.</p> <p><b>I need a Vietnamese interpreter.</b></p>	<p>انا احتاج مترجم عربي</p> <p><b>I need an Arabic interpreter</b></p>
<p>ကျွန်တော် မန်မာစကားပြန် တစ်ယောက် လိုနေပါတယ်။ ကျွန်မ မြန်မာစကားပြန် တစ်ယောက် လိုနေပါတယ်။</p> <p><b>I need a Burmese interpreter</b></p>	

## APPENDIX K

**ACCESS**

**My FoodShare Account**



[www.access.wisconsin.gov](http://www.access.wisconsin.gov)

ACCESS User ID:    ACCESS Password:

FoodShare Case Number/ACCESS Tracking  
Number: \_\_\_\_\_

Answer to Security Question: \_\_\_\_\_

\_\_\_\_\_  
Email [foodshareinfo@hungertaskforce.org](mailto:foodshareinfo@hungertaskforce.org)  
with questions.

## ENDNOTES

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<sup>1</sup>U.S. Government Accountability Office. (2007). *Use of Alternative Methods to Apply for and Maintain Benefits Could be Enhanced by Additional Evaluation and Information on Promising Practices*.

<sup>2</sup>U.S. Census Bureau. (2010). *American Community Survey* [Data file]. Retrieved from <http://www.census.gov/acs/www>

<sup>3</sup>Food Research and Action Center. (2011). *Food Hardship in America 2010: Households with and without Children*.

<sup>4</sup>U.S. Census Bureau. (2011). 2010 Census. Retrieved from <http://2010.census.gov/2010census/>

<sup>5</sup>Wisconsin Department of Health Services. (2012). *FoodShare Unduplicated Recipients Served by Agency by Calendar Year*. Retrieved from <http://www.dhs.wisconsin.gov/em/rsdata/unduplicatedrecipients/fs-unduplicated-recipients-cyl1.xls>

<sup>6</sup>U.S. Department of Agriculture, Food and Nutrition Service. (2008). *Food and Nutrition Act of 2008*. Retrieved from: [http://www.fns.usda.gov/snap/rules/Legislation/pdfs/PL\\_110-246.pdf](http://www.fns.usda.gov/snap/rules/Legislation/pdfs/PL_110-246.pdf)

<sup>7</sup>U.S. National Archives and Records Administration, Office of the Federal Register. (2012). Retrieved from: <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&rgn=div5&view=text&node=7:4.1.1.3.20&idno=7>

<sup>8</sup>Foley, A.T. (2010). Memorandum: *Federal Support for Enrolment and Application Processing Costs – Supplemental Nutrition Assistance Program*.

<sup>9</sup>Hunger Task Force. (2010). *“Doubling Down” in Milwaukee – A Report by Hunger Task Force*.

<sup>10</sup>U.S. Department of Agriculture, Food and Nutrition Service. (2010). *Enhancing Supplemental Nutrition Assistance Program Certification: SNAP Modernization Efforts*.

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