

Public Hearing on Food Stamps Recertification and Hunger in New York City

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Testimony Prepared by:

Rebecca Widom

Director of Research

Homelessness Outreach and Prevention Project

Urban Justice Center

123 William Street, 16th Floor, New York, NY 10038

<http://www.urbanjustice.org/hopp/>

646-602-5600

Good morning. My name is Rebecca Widom and I am the Director of Research with the Homelessness Outreach and Prevention Project of the Urban Justice Center. The Urban Justice Center serves New York City's most vulnerable residents through a combination of direct legal service, systemic advocacy, and community education. The mission of the Homelessness Outreach and Prevention Project (HOPP) is to advocate for economic justice for no and low income New Yorkers. Using a legal framework, HOPP conducts direct service, litigation, research and policy advocacy to preserve and expand access to public benefits programs and ensure government accountability. Founded in 1984 under the name Legal Action Center for the Homeless, HOPP has become a leader in the field of public benefits advocacy. Thank you for allowing me to testify today.

I. The Food Stamps Program is New York City's and the nation's first line of defense against hunger.

The Food Stamps Program puts food on the table for low income New Yorkers and federal aid in the local economy. The Urban Justice Center's study of the enrollment process found that food stamps could increase household income by an average of 20% for eligible non-participants.¹ The USDA has estimated that each dollar invested in the Program returns nearly two dollars in economic activity.² There is public consensus on the need to increase participation in the Food Stamp Program.

II. Food stamps participation remains low, because of direct and hidden costs of program participation.

Given the benefits and public consensus, why are hundreds of thousands of New Yorkers still eligible for food stamps, but not receiving them? Direct and hidden costs discourage participation. Direct costs include subway fare to get to the food stamps office, document fees (e.g. to replace a lost birth certificate), child care costs and lost wages while waiting in the office. Hidden costs include the time lost that could have been spent on other tasks such as cleaning the

¹ Widom, et al. (2006, January). *A Better Recipe for New York City: Less Red Tape, More Food on the Table*. New York City: Urban Justice Center. Retrieved on November 13, 2007 from http://www.urbanjustice.org/pdf/publications/better_recipe_full_rpt.pdf

² Hanson, K. & Golan, E. (2002, August). Effects of Changes in Food Stamp Expenditures Across the U.S. Economy (Food Assistance and Nutrition Research Report Number 26-6). Washington, DC: Economic Research Service U.S. Department of Agriculture, 1. Retrieved November 13, 2007, from <http://www.ers.usda.gov/publications/fanrr26/fanrr26-6>

house or helping kids with their homework and the emotional impact of humiliating interactions with staff at the food stamps office.

There are two key points where we can look to reduce the costs of participating in the Food Stamps Program: access (the enrollment process where clients first establish eligibility), and retention (the recertification process where they must periodically document ongoing eligibility).

III. There has been some progress on reducing access costs, but much work remains.

In January 2006, the Urban Justice Center released a report analyzing food stamps access for 1,482 outreach clients in New York City.³ We found that the food stamps application process was unnecessarily burdensome. Even knowing how much they could receive—an average of a 20% raise—only 42% of clients enrolled. Working clients were even less likely to enroll, disproportionately affected by direct and hidden costs. However, easing the application process helped increase enrollment rates.

Since then, HRA has made some progress on easing the application process, but much work remains. HRA has expanded office hours by 2.5 hours per week in one office per borough, but we need to ensure that full services including application and recertification interviews are available in all extended hours. HRA has initiated the paperless office system, to improve efficiency and reduce wait times, but needs to expand beyond the pilot stage to serve all clients. HRA has improved publicity for extended-hours offices on their web-site and 311. Finally, HRA has experimented with allowing a few clients to enroll with help from nonprofits instead of office visits, but needs to fully expand the policy waiving face-to-face interviews.

IV. In September of this year, the Urban Justice Center released a report on retention.⁴

This study describes the direct and hidden costs outreach clients encountered in the food stamps recertification process. Over 36,000 Food Card Access Project and Food Force clients have enrolled since 2003. This study analyzes administrative records from HRA following 9,547 of

³ Widom, et al. (2006, January).

⁴ Widom et al. (2007, September). *Keeping Food on the Table: Challenges to Food Stamps Retention in New York City*. New York: Urban Justice Center. Retrieved November 13, 2007 from <http://www.urbanjustice.org/pdf/projects/KeepingFoodOnTheTable.pdf>

these clients for 20 months after they were prescreened as eligible for food stamps. In addition, the study draws on interviews with 88 randomly selected clients.

V. In 20 months of follow-up, most clients received at least 12 months of benefits.

Most clients successfully recertified at least once, and clients like Ms. Lewis⁵ were grateful for the assistance. She told us “It’s a great help. It’s a little, but it’s something for the kids, for me.”

However, success at recertification is to be expected. Recertification is designed to be simpler and less costly than enrollment. The City only needs to check on changes since application, not redo the entire process. Further, the complexity of the enrollment process screens out those who would have the most problems navigating the bureaucracy at recertification, so we expect clients who make it to recertification to be more successful than the average New Yorker in need.

VI. Still, most cases were closed at least once in the follow-up period, and 81% of case closures had no finding of financial ineligibility.

The majority of clients in this study (61%) had a case closure at least once within the follow-up period. Further, HRA data indicates that only 19% of these cases were closed for reasons like “excess income” or “excess resources”—reasons that indicate that the client was no longer financially eligible for food stamps. 81% had no finding of financial ineligibility.

Instead, about half of the case closures (53%) were attributed to missed appointments. As in our study of the enrollment process, health problems and work schedules led to missed appointments at recertification. Ms. Cruz, for example a single mom and child care provider from the Bronx, had to leave work and spend \$20 each time she had to visit the food stamps office. She told us “I take care of a girl. I have to leave her with someone when I go out, because I can’t take her with me, because one doesn’t know the time.” Similarly, Ms. Tucker, an elderly woman from Brooklyn explained “No. I didn’t go. I didn’t renew it. I was sick.... I’m aching with pains so much it goes to my head.”

Another 13% of case closures were attributed to missing documents. However, we know that HRA sometimes lost documents and closed cases over documents that clients had taken the time to submit. This was Ms. Ramirez’ experience. She brought everything but her income tax return

⁵ Pseudonyms are used throughout this testimony in order to protect client confidentiality.

to her recertification appointment, and brought tax papers to the office the very next day. A week later, Ms. Ramirez called to check on her case. Her caseworker told her “No, that’s not in the computer.” Similarly, Ms. de la Paz visited HRA on at least three separate occasions. “The social worker hadn’t gotten the paperwork. Three times I called.... What else do they want from me? They have asked me for so much paperwork!”

VII. Most of the closed cases were eventually reopened, but only after clients and the City lost out on federal aid.

Most clients whose cases were closed (57%) ended up reapplying and getting their cases opened again. This suggests that many clients remained financially eligible even after their cases were closed. Unfortunately, the average client missed two or more months of benefits in the process. Understandably, USDA has shown that clients in this position are at increased risk for hunger.⁶ In addition to the human impact and health risks of food insecurity, each time the City also wasted time and money redoing the entire application process.

Ms. Clemen is one such client. She missed her recertification appointment, simply because she could not visit the food stamps office on weekdays. She explained “I have to apply again, because for recertification they don’t see people on Saturday.”

VIII. Recommendations

Since September, the City and State have made some progress on recommendations from our research, still much work remains.

- Expand access to telephone interviews. Ms. Amiri told us “I wish they’d do the same thing [as] with Medicaid. They [Medicaid] just do it through the mail.” Since September, New York City has finally entered the state phone recertification program, at two centers.⁷ Full roll-out of this program remains to be seen.

⁶ Nord, M. (2007, May) *Characteristics of Low-Income Households With Very Low Food Security*. Washington, DC: United States Department of Agriculture, Economic Research Service. p.14. “Food stamp leavers.” Retrieved on November 13, 2007 from <http://www.ers.usda.gov/publications/eib25/eib25.pdf>

⁷ New York City Human Resources Administration. (September 27, 2007.) Policy Bulletin #07-122-OPE “Special Mailing to food stamp telephone recertification households.” Retrieved on November 13, 2007 from <http://onlineresources.wnyc.net/nychra/docs/07-122-ope.pdf>

- Reduce unnecessary verification requirements. The federal government does not require clients to recreate nor caseworkers to review a full set of application documents at recertification. The paperless office system could reduce problems with lost documents, but has not yet been fully implemented across the City and its effectiveness has yet to be proven.
- Require less frequent recertification. New York State can allow for annual recertification, rather than requiring working clients to repeat the process every six months. New York City could apply for an ABAWD waiver in order to avoid requiring visits from clients with no income every three months. Clients would likely miss out on fewer months of benefits.
- Offset direct and hidden costs of applying and recertifying for Food Stamps. New York City is using incentive programs to encourage desired behaviors among poor people. A flat \$10 or \$20 could encourage low income New Yorkers to complete arduous and uncertain enrollment and recertification processes.

IX. Conclusion

Public consensus supports increasing participation in the Food Stamps Program, the nation's premier nutrition program. However, direct and hidden costs discourage participation. HRA must continue to improve its process in order to promote participation in the Food Stamps Program. Addressing barriers at access and retention are both necessary parts of the solution.

Thank you for your consideration of this testimony. The Urban Justice Center looks forward to renewed efforts to reduce hunger and improve participation in the Food Stamps Program.