

Strategies for Helping IMA Manage the Rising Number of Food Stamp/SNAP Cases

Right now, there is an urgent need for the District to ensure that its most vulnerable families are accessing FS/SNAP as swiftly and easily as possible. The current level of Income Maintenance Administration (IMA) staff is too small to process the growing number of households applying or recertifying for FS/SNAP. Over the past two years, DHS eliminated 99 eligibility determination services positions – 72 in the FY 2009 budget and 27 in the FY 2010 budget. These positions should be restored.

D.C. Hunger Solutions applauds the fact that IMA is planning to hire about 30 new intake workers in the next few months. While this investment is a good start, it will take time to advertise for new workers, hire them, and train them – and even then, more workers will still be needed. Therefore, the District must implement existing policies, adopt new policies, and develop systems that can immediately support low-income families and overextended IMA staff, draw in federal funding, streamline program administration, and maximize FS/SNAP benefits.

To that end, D.C. Hunger Solutions proposes the following actions:

1. **Use available federal revenue streams to support the administration of FS/SNAP:** There is federal funding available to help IMA respond to the growing numbers of families in need. The District should ensure that it is tapping into all available federal funding streams that can be used to improve the efficiency of FS/SNAP, hire new staff, and support needed administrative infrastructure improvements (e.g., developing systems for phone interviews, re-programming the computers for the implementation of policies that will help streamline the administrative process.). For instance:
 - The FY 2010 Defense Appropriations Bill (P.L. 111-118) provides \$400 million in additional funding for state FS/SNAP administrative expenses. The extra administrative funds are to be available to states by February 17, 2010 and usable through September 30, 2011. The District is estimated to receive more than one million dollars in these funds. This funding should be used to help hire additional IMA workers and to re-program the computers for policies that will help streamline the administrative process.
 - The 2009 American Recovery and Reinvestment Act (ARRA) included approximately \$500,000 in FS/SNAP administrative monies for Washington, D.C. which were to be spent by September 30, 2009. A second ARRA installment of \$531,000 needs to be spent by September 30, 2010. This money should be used to support administrative improvements to ensure access for customers.

- The D.C. Department of Human Services (DHS) has applied for more than \$40 million in Temporary Assistance for Needy Family (TANF) stimulus (ARRA) funding. While much of this funding will be allocated for TANF cash increases and homeless services, a portion of the funding could be spent subsidizing the training and employment of new FS/SNAP outreach workers who would assist IMA workers by helping applicants complete applications. (For more details: see a Q&A from the Administration on Children and Families (ACF), at http://www.acf.hhs.gov/programs/ofa/recovery/tanf-faq.htm#_subsidized .)
- DHS received two bonus awards in October of 2009 for FS/SNAP. These bonus awards totaled approximately \$800,000. This money should be reinvested in FS/SNAP to improve access.
- DHS has a Community Development Block Grant (CDBG) of approximately \$164,000. D.C. Hunger Solutions supports the agency's plan to use this money to help families access public benefits. IMA should investigate whether IMA can use the CDBG money for FS/SNAP outreach activities to match federal (USDA) FS/SNAP outreach funding – thereby getting an additional 50 percent in USDA matching funding for outreach staff who help customers with application and recertification processes.

2. **Implement current policies that streamline the administration of FS/SNAP:**

DHS has current approved policies at its disposal that can help streamline the FS/SNAP application and recertification processes. These policies should be reviewed to ensure that the District is implementing them to the fullest extent feasible:

- Promotion of phone interviews: IMA should immediately promote and establish clear procedures for phone interviews. The “Combined Application for DC” lets customers know about the availability of phone interviews under “Food Stamp Rules”:

You must have an interview to get Food Stamps. If you need to do an interview by telephone, please let your worker know. We can do phone interviews if you cannot come to DHS because of work. We can also do phone interviews if you are sick or have a sick relative for who you are caring.

While this phone interview option is helpful, there is no system in place for customers who want to ask for a phone interview. The only guidance that IMA provides the general public is on the application where it instructs, “let your worker know.” New applicants do not have a worker

and FS/SNAP families are no longer assigned to a single worker. Additionally, IMA does not provide a number to call to schedule a phone interview, and D.C. Hunger Solutions' experience has been that when calls are fielded at IMA service centers, many of the operators do not know about the availability of the phone interview option or many think it is only available for elderly or disabled applicants.

IMA needs to develop procedures immediately and publicize them so that customers can apply via a phone interview. IMA would also need to develop a process for customers to submit documents—whether by mailing in copies or setting up “drop boxes” at service centers where customers could just hand in their documents without having to wait. The process should include ways for customers to make copies of their documents (i.e., birth certificates, social security cards, etc.) before submitting them to IMA centers “drop boxes” as well as a way for customers to log in their application and any documents submitted.

This policy will help decrease foot traffic to IMA offices and provide improved customer service.

- Waiver of face-to-face interviews: In 2009, IMA also received USDA approval to waive face-to-face interviews for all recipients at recertification as well as for 50 percent of new applicants. USDA is now allowing states to waive even more face-to-face interviews. This waiver will help reduce foot traffic, but to our knowledge, DHS has not implemented this waiver. Implementation—if done properly—can help ease the burdens that individual caseworkers and applicants face. DHS should share its plan for implementation of this waiver with key stakeholders, take feedback, and develop a timeline for implementation.

As a starting point, IMA could allow eligible customers who mail in completed applications to do phone interviews. Such a system would provide an incentive for customers and social services providers to mail in completed applications so that customers could receive phone interviews instead of having to go to an IMA service center for the interview.

IMA will need to also

- Expansion of certification period: In February 2008, IMA took an important step in helping people access FS/SNAP by opting for the maximum certification period of 12 months for most households. Previously, most people could enroll only for six months before being recertified, discouraging some from applying and placing more administrative burdens on the IMA. IMA should ensure that customers have sufficient information to take advantage of this improved

certification period and make sure that IMA workers have sufficient training to promote and implement this option. For instance, IMA could develop a short video on how to complete the six-month report form that customers must submit. The video could be played in service center waiting rooms, available on the web site, and shared with community groups.

- Implement the Food Stamp Expansion Act: According to the D.C. Food Stamp Expansion Act, IMA is required to implement categorical eligibility (“cat-el”) and Heat and Eat. IMA had anticipated an October 2009 implementation date, but implementation has been delayed.

Categorical eligibility will make more District residents eligible for FS/SNAP by expanding the gross income test to 200 percent of the federal poverty level and eliminating the asset test. Fortunately, at the same time, cat-el will help decrease certain aspects of IMA’s workload, because asset questions will be eliminated. IMA has agreed to implement the cat-el provision of the Food Stamp Expansion Act by March 15, 2010.

Under the Heat and Eat policy, all families will get a LIHEAP benefit and, thus, will be eligible for the maximum standard utility allowance, simplifying the application process. IMA should confirm an implementation date for Heat and Eat with the LIHEAP agency.

Implementation of the Food Stamp Expansion Act needs to be a top priority.

- Issue guidance to clarify that no verification is needed when a family reports no income: With the District’s unemployment rate close to 12 percent, more and more families who have no income are turning to FS/SNAP. Some direct service providers have reported that some caseworkers are requiring households to prove that they do not have a job (e.g., requiring that the applicant bring a letter from a former employer indicating that the applicant no longer works there). This misinterpretation of the income-verification requirement means that some IMA caseworkers are wasting valuable time for both customers and the agency by requiring applicants to prove a negative. DHS can quickly rectify this situation by issuing guidance to workers that there is no need for customers to prove that they do not have any income from employment.

3. Adopt and implement new policies that can help reduce the workload of IMA staff: The District should implement new policies available under federal law and clarify existing policies to ease caseworker workload and improve access by simplifying the application and recertification processes. The following are suggested policies:

- Implement a break-in-service waiver: Under existing policy, if a customer's case is closed (e.g., customer did not mail in a six-month report form or bring in a requested document) and the customer later wants to be reinstated into FS/SNAP, the customer has to file a new application and IMA must start the process all over again. But under the break-in-service waiver, if that customer can get the requested information to IMA within his or her certification period, the case can be reopened without filing a new application. By allowing IMA to use information on file for customers who already have necessary information in the system, this waiver would save time and the verification required for the processing of a new application. (For more information, see: <http://www.fns.usda.gov/snap/government/pdf/matrix.pdf>.)
- Adopt a homeless shelter/utility standard deduction: The standard shelter/utility deduction is a fixed \$143 per month for homeless households with some shelter or utility costs. To use this deduction, the District would only need to verify that a household is homeless and *would not* have to verify shelter or utility costs—saving valuable time and reducing errors that may stem from the difficult calculation of determining the utility and shelter costs of customers who do not have a permanent home. D.C. should implement this policy immediately which will save IMA staff time through the application of a standard deduction. (See D.C. Hunger Solutions at: <http://www.dchunger.org/publications/>.)
- Adopt transitional benefits for families leaving Temporary Assistance for Needy Families (TANF). Transitional benefits are an automatic five-month continuation of food stamp benefits, adjusted for the loss of TANF income. Transitional benefits will help those leaving this program continue to receive food stamp benefits, in most cases provide a larger food stamp benefit amount for these continuing families, and support a difficult transition away from TANF cash assistance. Moreover, providing transitional benefits will increase program accuracy by allowing easy and nearly error-proof determinations for TANF leavers. D.C. should implement this policy and join 19 states, including Virginia and Maryland, which provide transitional benefits to support families as they move off TANF cash assistance. (See D.C. Hunger Solutions at: http://www.dchunger.org/pdf/easychoices_toughtimes_foodstamps.pdf.)
- Implement a standard deduction for self-employment: A standardized deduction eliminates the need for self-employed applicants to verify the numerous costs associated with being self-employed, guaranteeing an appropriate benefit level for these participants through a simplified application process. The District should implement this policy. (See D.C. Hunger Solutions at: http://www.dchunger.org/pdf/easychoices_toughtimes_foodstamps.pdf.)
- Reduce the need for recertification interviews for targeted households: USDA's FNS recently granted a waiver in Massachusetts to eliminate the interview at recertification for elderly/disabled households without earned income. This is the

first waiver of its kind granted to a state agency. This waiver allows the state to skip the recertification interview where the information included in the recertification form is complete and not questionable, and where FS/SNAP eligibility will continue. If the information provided at recertification suggests that the household is no longer eligible—or if the household requests an interview for any reason—a phone or face-to-face interview will be scheduled. D.C. should identify how many households this waiver would apply to and if warranted, consider applying for this waiver.

- Postpone the interview for certain expedited households: USDA has granted a waiver in Florida to allow the state to postpone conducting the interview for expedited households whose identity is established. The interview must still be conducted for such cases prior to recertification, but the waiver allows these cases to be processed more quickly and with fewer state resources. D.C. should consider applying for this waiver.
- 4. Address the District's very high negative error rate for FS/SNAP cases:** The District has a very high negative error rate (52nd out of 53 states). To help address this problem, USDA has convened a task force to review the impact of negative error rates. USDA estimates that 55 percent of households incorrectly denied benefits (at application or recertification) re-apply and are found *eligible* for FS/SNAP. D.C.'s negative error rate translates into more work for the agency (because staff are seeing many people multiple times) and means that eligible people are not getting FS/SNAP. IMA should examine the causes for this high negative error rate and ensure that systems and training are improved so that cases are handled properly the first time.
 - 5. Promote the Change Center:** The role of D.C.'s Change Center could be ratcheted up to help support IMA caseworkers, and IMA should work to promote the use of the Change Center. This center can provide customers with information to ensure that their FS/SNAP benefits continue, provide IMA workers with pertinent information in a timely manner, and reduce the need for customers to report in person to IMA offices. IMA should also record important information related to accessing public benefits that customers can hear if they are placed on hold.
 - 6. Move to online applications:** IMA is working to develop an on-line combined application for benefits (food stamps, Medicaid, TANF), which could significantly help with the influx of people in need if the application were synched with the in-take process for these programs. IMA should create a process where a customer can file on-line and send the application directly to the agency for processing. IMA should solicit the help of social service providers, customers, and advocates to ensure that the online application is user-friendly and connects people to benefits smoothly. The agency should test the on-line application fully before rolling it out.
 - 7. Prioritize getting case files digitalized:** DHS is moving toward electronic case files which will help improve program operations. D.C. Hunger Solutions applauds this

step which will improve FS/SNAP customer service and help IMA better manage its workload.

- 8. Examine process for distributing EBT cards:** Currently, when a household is deemed eligible for FS/SNAP, the household gets a notice. The notice indicates that the household must go to one of two EBT sites to retrieve an EBT card. Many jurisdictions are opting for a more seamless process to distribute EBT cards, such as mailing the cards out with the notice of benefits and instructing customers to call a number to activate the card. DHS should examine whether the current system works (e.g., are newly approved FS/SNAP households calling IMA for guidance on how to pick up their EBT cards) and opportunities for improving the process.
- 9. Support community-based application assistance efforts:** IMA should work with community- and faith-based groups to equip them with tools to provide application assistance to low-income families. Community outreach can play a key role in ensuring customers submit completed applications and have necessary knowledge about the FS/SNAP program and processes.