

Overview of the Working Families Food Stamp Initiative

Importance In an August 2007 speech, Governor Spitzer described the importance of Food Stamps as a support for working families "...all of whom are off welfare, but in need of further support to help them make the next step into economic security."

The Office of Temporary and Disability Assistance (OTDA) Commissioner, David Hansell, reiterated this: "We can all agree that food insecurity is unacceptable in New York."

New York State (NYS) views food security as one issue in maintaining self-sufficiency for all working families whose income is at or below the poverty level. NYS worked with the United States Department of Agriculture (USDA) to ease some of the Food Stamp application and reapplication procedures to help support working families.

Overview This curriculum includes:

- A description of the Working Families Food Stamp Initiative (WFFSI).
 - A description of Categorical Eligibility
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Objectives By the end of this curriculum you will be able to describe:

- The WFFSI.
 - The qualifications for a household to become part of WFFSI.
 - WFFSI advantages to working families.
 - The qualifications for Categorical Eligibility
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Topics Topics included in this module can be referenced on the following pages in this manual:

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The Food Stamp Program as a Support for Working Families

Introduction In 2001, about 52% of eligible individuals in working families participated in the Food Stamp Program. Because eligible working families are participating in the Food Stamp Program at a lower rate than the eligible population as a whole, many are not reaping the benefits of a program designed to be an integral component of the nation's work support system.

Program Participation in New York State Program participation rates are one key measure used by the USDA to evaluate the success of the Food Stamp Program. The participation of New York State families and individuals with earnings who are eligible to participate in the program has traditionally been at a rate lower than the national average. Nationwide in 2005, 57% of the working families eligible to receive food stamp benefits did so. In New York State, only 48% received them.

Nationwide, approximately 30% of all the households participating in the Food Stamp Program were working households. In New York State that number is closer to 22%.

Factors Affecting Participation Eligible working families, particularly those with income between 100% and 130% of poverty, are those least likely to participate in the Food Stamp Program. Research shows that common reasons for this include:

- The complexity of the program and the application process.
 - The “transaction costs” of the application process (the need to take time off from work, etc.).
 - Modest benefit levels received when measured against the intricacies of the program's administrative process and requirements.
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Working Families Food Stamp Initiative

The Working Families Food Stamp Initiative

The Working Families Food Stamp Initiative (WFFSI) aims to address some of the factors adversely affecting participation rates by making it easier for working families to apply for and/or recertify for food stamps. This initiative will involve several changes to the current FS application and recertification process.

- The requirement for face-to-face application and recertification interviews in favor of a phone interview will be waived.
 - The finger imaging requirement will also be waived.
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Qualifying for WFFSI

WFFSI pertains to any Non-Temporary Assistance Food Stamp Program (NTA-FS) applicant or recipient household that has at least **one** adult member who is:

- Working 30 hours per week or more, or
- Earning an average weekly income equal to the federal minimum wage times 30 hours per week.

Additionally, any NTA-FS applicant or recipient household will be qualified to participate if it has at least **two** adult members who are:

- **Each** working 20 hours per week or more, or
 - Earning an average weekly income equal to the federal minimum wage times 20 hours per week.
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Working Families Food Stamp Initiative, continued

Application Screening

Local districts must screen all applications for NTA-FS benefits to see if the applicant household **presumptively** qualifies to participate in the WFFSI using the:

- LDSS-4921 Working Families Food Stamp Initiative Screening Sheet.

No additional verification, beyond the information provided on a signed application, is necessary to establish this eligibility.

Note: Households that qualify for WFFSI **must** be coded as such on WMS. Enter a **W** in the **SPCD** field on Screen 1.

Determining Ongoing Eligibility

Ongoing eligibility for the WFFSI will be based on information that is verified as part of the normal process at recertification. This information includes:

- Earned income, and
- Work hours participation.

Adjustments to ongoing WFFSI eligibility status should be made at recertification based on the earned income and work hours information provided by the household.

Waiver of Face-to-Face Interview

Waiver of Face-to-Face Interview

Any household that qualifies for WFFSI will be offered the option of a telephone interview at application and recertification.

This is a blanket waiver from the USDA for the WFFSI eligible population; it no longer requires an individual case notation of hardship. However, a WFFSI eligible household may still request and receive a face-to-face interview if they so choose.

Note: The requirement that local districts **must** waive the face-to-face interview for all qualified households is predicated on and will follow the rollout and full statewide implementation of telephone recertifications.

Advantage to WFFSI Households

Waiving a face-to-face interview offers several advantages to the customer.

- Transportation will no longer be a concern – money and time is saved.
 - There will be no need to take time off from work, and, perhaps, lose wages.
 - Applicants will avoid the hassle of having to bring the children to the appointment.
 - Households can avoid any embarrassment about coming into the center to apply for Food Stamps.
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Waiver of Face-to-Face Interview, continued

Challenges for Eligibility Workers and a First-Time Applicant

For the eligibility worker, and for the first-time applicant, there will be several challenges to conducting a telephone interview rather than a face-to-face interview. Among these are:

- Explaining the terms used in the Food Stamp Program, e.g. EBT, AFIS, certification period, Expedited Food Stamps.
 - Describing the documentation requirements e.g. social security numbers for all household members, birth certificates for all household members, and how to submit the documents.
 - Describe how accurate information affects the amount of food stamps the household receives.
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Tips for Helping a First-Time Applicant

Keep in mind, first time applicants will probably be overwhelmed and confused by the complexity of the Food Stamp Program.

- Take your time during the interview. Make sure the client understands what you need. For example, rather than asking “We need to determine your SUA, do you pay heating or cooling expenses?” ask “Do you pay a bill to heat your home or apartment?”
 - Try not to use FS jargon or shorthand. For example, explain what an EBT card is and how benefits are issued, rather than saying “Your EBT card will be issued if...”
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Food Stamp Claims

Claims

Except for FS claims that were established because of overpayments due to either an Intentional Program Violation (IPV) or fraud

- The entire amount of any existing claims that will not be collected within a three-year period at the current rate of recoupment may be compromised for currently active household that are qualified to participate in the WFFSI.
- Any claims previously terminated may not be re-established against households that qualify to participate in WFFSI.

Households who did not recertify for food stamps because of an inadvertent household error or agency error can be encouraged to re-apply

Claims Example

You have a case in which CAMS shows an outstanding claim of \$1,000. This household qualifies for Working Families and you want to compromise the claim so it is collected in a three-year period.

Initial Claim: \$1,000

FS Allotment: \$200 per month

10% Recoupment amount: \$20 per month

Calculate \$20 per month x 36 months (3-year period) = \$720

Subtract \$720 from the initial claim of \$1000 = \$280 compromised.

You would adjust your budget to collect \$720 and compromise \$280.

Categorical Eligibility

Current Categorical Eligibility

Currently, only households whose members **all** receive either Temporary Assistance (both FA and SNA) and/or SSI are categorically eligible to participate in the Food Stamp Program in New York State.

Expanded Categorical Eligibility

Effective January 1, 2008, all FS households that pass the 130% Gross Income Test (GIT) are categorically eligible and workers no longer have to perform the 100% Net Income Test (NIT) or the Resource Test.

Exceptions

Households containing a FS sanctioned individual will still be subject to the 130% GIT, 100% NIT and the Resource Test to be eligible for Food Stamps unless the household includes an aged/disabled member.

Households with an aged/disabled member will need to pass the 200% GIT to be categorically eligible for FS. Households that fail the 200% GIT will need to pass both the 100% NIT and the Resource Test to be eligible for FS

Effective 3/1/09 – households with Dependent Care Expenses will need to pass the 200% GIT to be deemed eligible for Food Stamps. Households that fail the 200% GIT will be deemed ineligible for Food Stamp benefits.

Note: Households with Dependent Care Expenses with 3 or more individuals in the household may not be eligible for a benefit based on the current calculation formula (Maximum Thrifty Food Plan amount for the number of household members – 30% of the FS Net income.)

**ABEL
Codes**

The following is a list of Categorical Eligibility Codes (CE) to be used:

Y: Will still be used for households whose members all receive either TA and/or SSI; including households with Dependent Care expenses.

N: Will now be used for households that are categorically eligible, but all members are not in receipt of TA/SSI. This includes households that pass the 130% GIT or the 200% GIT (aged/disabled & households with Dependent Care Expenses).

A: Is used for households with an aged/disabled member that fail 200% GIT.

S: Is used for households with a FS sanctioned member including those households with Dependent Care Expenses.

Telephone Interviewing

Importance The telephone interview is part of an overall effort to streamline and simplify the FS application/recertification process. By eliminating the requirement for a face-to-face interview both the applicant and the local district benefit.

Benefits of Telephone Interviews

Benefits for the local district include:

- Reduction of overcrowding in waiting rooms.
- More flexibility in scheduling of interviews.
- Fewer cancellations based on bad weather and transportation concerns.
- More time for workers to prepare and organize.
- Less noise, fewer interruptions and distractions.

Benefits for the applicant include:

- Transportation is no longer a concern – money and time saved.
 - Avoid the hassle of having to bring the children to the appointment.
 - No need to take time off from work.
 - Avoid any embarrassment about coming into the agency.
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Objectives

By the end of this curriculum, you should be able to:

- Explain the importance of organizing and preparing for an interview.
 - Identify the communication skills required to conduct an effective interview.
 - Identify the key components of a telephone interview.
 - List the benefits of a telephone interview vs. a face-to-face interview.
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Topics Topics included in this module can be referenced on the following pages in this manual:

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Policy References

- 07-ADM-09 Categorical Eligibility
- 07-ADM-10 The Working Families Food Stamp Initiative (WFFSI)
- LDSS-4921 Working Families Food Stamp Initiative Screening Sheet
- Abel Transmittal 07-3 Information #5

Organizing and Preparing for the Interview

Introduction Preparing for the interview is critical to its success. Preparation can be divided into two areas: preparing the paperwork (gathering forms, accessing systems information, pre-filling documents etc.) and preparing yourself (organizing your thoughts and compiling questions). Being prepared will save you time and possibly the awkwardness of having to call the person back a second time.

Preparing the Paperwork In order to determine what is needed for the interview, an assessment of current information is required. Creating a checklist will assist in the process and eliminate the possibility of missing important information. Consider the following for inclusion:

- Review the application for completeness.
 - Review submitted documentation.
 - Check case record or document repository for existing documentation.
 - Review Clearance Report.
 - Check AFIS.
 - Check CAMS for claims.
 - Begin to pre-fill the Document Requirement Form.
 - Note any inconsistencies or missing information and compile a list of specific questions.
 - Have applicable forms available.
 - Pre-fill demographic information in the interview guide.
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Preparing Yourself Trust is inspired by the sound and sincerity of your voice. It isn't always what you say, but "the way you speak over the phone (that) conveys 85% of your message." Before you pick up the phone:

- Remove any clutter or distractions from your workspace
- Take a minute to relax and de-stress before beginning
- Organize your thoughts and structure the interview

Organizing and Preparing for the Interview, continued

- Remember to slow down and speak clearly.
 - Don't use jargon.
 - Remember to listen and try not to interrupt.
 - Smile.
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Introduction/Opening of the Interview

Introduction The purpose of the interview is to gather accurate and detailed information regarding a household's circumstances. It is very easy to focus on this objective and begin the questioning before laying the proper groundwork and setting the tone.

Take the time to prepare your opening. Consider the perception you'd like to instill. Also think about what information should be provided to prepare the applicant for the interview. It's best to assume the applicant has no prior knowledge of the Food Stamp Program.

Helpful Hints

Consider the following:

- Introduce yourself (title and office).
 - Verify that it's the applicant to whom you are speaking.
 - Establish if it's a convenient time for the interview.
 - Give an estimate of how long it will take.
 - Explain what Food Stamp Benefits are.
 - Explain the purpose of the interview.
 - Explain how benefits are accessed.
 - Explain what can be bought with Food Stamps.
 - Ask if there are any questions before you start.
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Opening the Interview Exercise

Introduction Organizing and planning the interview is the most effective way to achieve the desired outcome. A well prepared introduction is a critical and often overlooked component of a successful interview.

Directions Assuming the person to be interviewed has no prior knowledge of the Food Stamp Program, create a script that will set the tone for the interview.

Consider the following:

- How will I introduce myself and the agency I represent?
- How will I clarify the expectations?
- What information should I provide at the start of the interview?
- How will I establish rapport?

Note: *“When you pick up the phone to start the interview process remember this statistic: People develop a perception about you within the first 30 seconds of a phone conversation.”*

References Book 1 (LDSS-4148A) and Book 2 (LDSS-4148B)

Using Effective Communication Skills

Introduction The major difference between a face-to-face interview and a telephone interview is the loss of visual cues. To compensate for the loss, it is essential that our listening and questioning skills be perfected.

Interviewing Techniques Whether using a paper interview guide or data entering information directly into the system, the phrasing of questions is extremely important. When is it appropriate to ask open-ended questions and when are closed-ended questions sufficient. To be an effective interviewer requires a proper balance between the two types of questions. The need for detailed information must be balanced against the need for control and limiting the length of the interview.

Open-Ended Questions Open-Ended Questions: Require the applicant to respond to the question in his own words (no response options). They are used to obtain additional information.

This questioning technique should be used when:

- Resolving inconsistencies.
- Clarification is needed.
- There's missing information.
- Dealing with topics that are error prone
 - Household composition
 - Earned/Unearned income
 - SUA

Examples:

On the application you indicated that you were renting and your monthly rent is \$500.00, but you didn't answer the rest of the questions. Can you tell me what your shelter expenses are?

On the application you indicated that you have child care costs, but your wife is not currently working. Can you explain why you have this expense?

Can you tell me who is living with you?

Using Effective Communication Skills, continued

**Closed-
Ended
Questions**

Closed-Ended Questions: Are those questions that can be answered with a yes/no response. They are used when a quick response is all that's needed.

Examples:

Are you a veteran?

Are you a citizen?

Do you have your birth certificate?

Tip: Avoid asking leading questions.

Phrasing Effective Questions

Directions

Review the application (LDSS-2921/LDSS-4826) and choose at least 5 questions to ask in an open-ended format. Concentrate on the error prone areas: household composition, earned/unearned income and living arrangements/shelter expenses (SUA).

Explain your reasons for choosing these questions.

Active Listening

Active Listening

As previously mentioned, when visual cues are not available listening becomes the only way to check for understanding. Does the applicant understand the question? Am I getting the information that I need?

The best way to ensure mutual understanding is through *Active Listening*. Active Listening is an effective way to get someone to open up and say more.

Active Listening Techniques Include:

- Repeating
- Paraphrasing
- Clarifying
- Summarizing

Remember this is a two way conversation so listen attentively, don't interrupt, ask questions, and take notes!

Verification Requirements

Introduction Determining what needs to be verified as well as what is acceptable verification can be difficult and confusing at times. The verification requirements at application are much different than those at recertification.

Importance Insufficient verification as well as excessive verification will result in a quality control error. It is extremely important that New York State maintains or reduces its current error rate to avoid fiscal penalties.

Acceptable Verification Acceptable verification shall not be limited to any single document and may be obtained through the household or other source.
The household must be given the LDSS_2642 and allowed at least 10 days to provide verification before any action can be given.

Expedited Processing Every effort must be made to obtain the verification within the mandated timeframe (5 calendar days following the date of application), however all verification can be pended except the verification of identity (individual being interviewed).

Verification at Application The following is a list of eligibility factors that must be verified prior to certifying households initially applying:

- Identity of person interviewed.
- Residence.
- Household composition/size.
- Earned income.
- Unearned income.
- Resources*

* Resources of households that are not categorically eligible.

Verification Requirements, continued

Eligibility factors that must be verified before an individual can participate:

- Citizenship/alien status.
- Social security number (SSN) *
- Date of birth (DOB) *

* If SSN and DOB are declared, verification may be pended until recert.

Eligibility factors that must be verified to exempt an individual from work registration:

- Disability/incapacity.
- School attendance (16 years or older).

The following expenses cannot be allowed as deductions, when calculating the budget, unless verified:

- Shelter expenses.
- SUA: Only that an expense is incurred (minimally, they'll qualify for the phone SUA regardless).
- Medical expenses.
- Dependent care costs.

If verification of the above expenses is not provided, determine eligibility and benefit amount without them.

Verification provided in the 2nd thirty days: Eligibility begins on the 1st day of the month that the verification is provided.

Summary/Recap of the Interview

Introduction The closing of the interview is equally as important as the opening. Whereas people develop a perception about you in the first 30 seconds of a phone conversation, they also form their final opinion in the last 30 seconds. Take the time to summarize, answer questions and explain the next steps.

Closing the Interview Creating a checklist is the best way to conclude the interview in a professional manner. It ensures that the applicant is provided all the necessary information and will also help avoid any misunderstandings regarding the next steps.

Although time is always a factor, people that are new to the Food Stamp Program will need information regarding EBT and how it works. We have created a sample checklist that can be used as a template to follow. See appendix.

Telephone Recertification

Introduction Recertification interviews are now being conducted by telephone for all Non-TA households (case type 31). The telephone recertification process was piloted in 11 districts and is now being rolled out statewide.

Importance Because the telephone interview was successful in the pilot phase for recertification, it is now being expanded to include Working Families at initial application.

**Policy
References**

- CNS Notice Z95 (Notification of Recertification).
 - Verification at Recertification Desk Guide.
 - LDSS-4314: FS Household Composition Desk Guide.
 - LDSS-4908: Upstate FS Change Reporting Desk Guide.
 - LDSS-4902: FS Standard Utility Allowance (SUA) Table.
 - FS Telephone Recertification Interview Guide.
 - CNS Notice Z99 (Missed Interview Notice).
 - Processing Verification Desk Guide.
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Telephone Recertification, continued

Recert. Appt. Notice

The telephone recertification process begins with the “Notice of Recertification” sent to the household. The household is now encouraged to return their completed application as soon as possible.

Once the application is received you will prepare for the interview and attempt to contact the household by phone. The interview should be completed no later than the customer’s scheduled appointment date stated on the Notice of Recertification.

The CNS reason code Z95 will generate the Telephone Recertification Notice and will advise the household of the following:

- Their benefits are about to expire.
- They must complete an interview to continue to receive Food Stamps.
- The consequences of failing to complete the recertification process.
- The scheduled date and time for the interview.

Call Time Request Form: This form is located on page 7 of the Z95 notice. The household must provide the following information:

- Their current phone number.
 - Their choice of day(s) and time(s) to be contacted.
 - Whether opting for a face-to-face interview.
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Preparing for Interview

Case review and preparation are the most important aspects of a successful telephone recertification interview. Various tools have been developed to assist in this area. The tools help identify changes and therefore focus the interview. This will result in the reduction of errors and a more concise interview.

Interview Guide

There are two guides available at this time, the LDSS-4826B or the Telephone Recertification Interview Guide. You have the option of using the guide that best meets your needs. For this training we will use the FS Telephone Recertification Interview Guide.

Telephone Recertifications, continued

Budget Worksheet

Preparation begins with comparing information you currently have on file to the information submitted on the application. Completion of the budget worksheet will assist you in the comparison. By the time this form is completed you will be able to identify any budget related changes that have occurred.

Prep Questions

The questions located on the first page of this guide will assist you in identifying changes that are not budget related. Make notes to prompt yourself to get more information or to request verification if needed. Also note whether the household will be a 6 month or 10 day reporter.

Contacting the Household

After the case has been prepped, you are ready to start the telephone interview. Although there are no federal mandates for the number of attempts to be made, we ask that you follow the recommended format:

- **First Attempt** – The day you receive the application and have prepared the case.
 - **Second Attempt** – The next business day.
 - **Third Attempt** – A suggested time from the call time request form.
 - **Fourth Attempt** The scheduled interview date on the Z95 notice.
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Optional Reminder Notice

Depending on your district's decision, an optional Reminder Notice (CNS Z96) may need to be sent. This notice was developed to encourage households to submit their applications prior to the end of the certification period. This notice is to be sent on the first business day of the last month of certification to any household that has NOT returned their application for recertification.

Please note: If the application is returned AFTER the scheduled interview date and time listed on the Z95 notice, you MUST send out a new appointment date and time to the household.

Telephone Recertifications, continued

The Interview The interview guide contains 12 questions, but all may not apply depending on the specific household circumstances.

The first 5 questions **must** be asked of all households. The remaining questions are based on responses to certain questions and household circumstances.

Once the interview is complete, you will need to cover certain information with the household based on their reporting requirements and the length of their certification period.

We suggest that you cover the following at the close of each interview:

- Length of their certification period.
 - Their 130% threshold amount.
 - The type of reporter they are.
 - What changes they need to report.
 - When they need to report changes.
 - Any verification needed to make an eligibility determination.
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Verification at Recert

After the interview has been completed verification may be required to make an accurate determination of eligibility.

Unchanged information shall NOT be verified unless the information is incomplete, inaccurate, inconsistent or outdated.

Note: Each district must determine the criteria for outdated information and it must be applied consistently throughout the district.

Changes that **MUST** be verified:

- Income: The source or the amount has changed by more than \$50.00.
- Medical expenses: The amount has changed by more than \$25.00.
- Dependent care costs: The provider or the amount has changed.
- Shelter costs: Have moved or the amount has changed.
- SUA: Have moved (only must verify that an expense is incurred).

Telephone Recertifications, continued

SSN and DOB must be verified for:

- New household members.
- Household members where verification had previously been pended.

Verification provided in the 2nd thirty days: Eligibility begins on the date the verification is provided.

Please note: Depending on the information requested, you may not be able to close the case due to failure to provide verification. You may have to determine eligibility and calculate the benefit amount without the allowance/deduction until verified.

Case Processing

After the application is filed, the interview conducted and verification provided, the case can be recertified. If any step in the process is not completed, the case cannot be recertified and further action is required.

Application not submitted: The case is closed at the end of the certification period using CNS reason code Y10 and notice indicator = N.

Interview not completed: Providing every attempt has been made to contact the household and the scheduled appt. date has passed, a *Missed Interview Notice* **must** be sent. This notice is generated using CNS reason code Z99. The notice advises the household to contact the agency and reschedule the appt. Should there be no response prior to the end of the certification period, the case should be closed using CNS reason code Y10 and notice indicator =N.

Tracking Application

A tool that was developed to assist in the managing of recertifications is the *Food Stamp Recertification Tracking Application (FSRT)*. This application can be accessed through Centraport

To properly use the application requires entry in the following fields:

Application Return Date: The date the application was received by the district must be entered for each case on the recert list. Failure to enter the date can cause an improper notice (Reminder Notice) to be issued to the household.

Telephone Recertifications, continued

- Interview Scheduled Date: This is an optional field. You can place the Z95 scheduled appointment date in this field or if the client has specified a certain date and time they wish to be contacted. Depending on the date entered in this field the mandated Z99 (Missed Interview Notice) may be suppressed.
- Interview Complete Date: The date the interview is completed must also be entered. Failure to enter this date can cause an improper notice (*Missed Interview Notice*) to be issued to the household.
- Pending to Date: This is an optional field that allows cases with pending verification to be monitored. The date by which the verification is to be provided is entered in this field.

In an effort to facilitate the telephone recert process, we have automated the following notices:

Z96 – Provided no application return date is entered, at the beginning of the last month of certification, a *Reminder Notice* will automatically be issued to these households.

Z99 – Provided an application has been returned AND no interview has been completed, the federally mandated *Missed Interview Notice* will be sent to these households. There is an indicator on the FSRT to advise you if a notice has been sent to the household.

To make the tracking application useful to both workers and management, we have given users the ability to sort based on the following:

- Case number.
- Case name.
- Phone number.
- Application received date.
- Scheduled interview date.
- Interview completed date.
- Pending information date.

