

THE  
NUTRITION  
SAFETY NET  
\* \* \* \* \*  
AT WORK FOR  
FAMILIES

A PRIMER FOR ENHANCING THE NUTRITION SAFETY NET  
FOR WORKERS AND THEIR CHILDREN

United States Department of Agriculture  
Food and Nutrition Service  
Food Stamp Program

USDA IS AN EQUAL OPPORTUNITY EMPLOYER AND PROVIDER.

# **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

---

## **INTRODUCTION**

The United State Department of Agriculture (USDA) is committed to ensuring that all eligible households have access to the Food Stamp Program (FSP), a major part of the Federal nutrition safety net.

The FSP provides nutrition assistance to millions of Americans nationwide, and is the cornerstone of our efforts to assist low income families who are making the transition from welfare to work. Unfortunately, too many eligible families leaving cash assistance have overlooked or not used the FSP. Like child care, the Earned Income Tax Credit, and Medicaid, food stamps are an important support for working families. Families with incomes up to 130 percent of the poverty line or \$17,748 for a family of three can be eligible for food stamps and a typical family of three with a full time worker earning the minimum wage can get \$220 a month in food stamps. Simply stated, many low-income families leaving cash assistance don't earn enough to meet all of their expenses *and* purchase healthy and nutritious meals. Thus, the FSP serves a vital role in helping these families achieve and maintain self-sufficiency.

Both before and since the passage of the 1996 welfare reform law, states have taken remarkable action to revolutionize the welfare system. A strong economy, innovative state policies and an unyielding commitment to helping families become self-sufficient have contributed to a dramatic decline in the number of families receiving cash assistance through the Temporary Assistance for Needy Families Program (TANF). Many more low-income individuals are now working to support themselves and their families. Critical to their success in remaining self-sufficient will be the ability to adequately feed their families as well as to access health care and other supports.

USDA is committed to working with our many partners and stakeholders to ensure that policy innovations in TANF do not inadvertently result in diminished access to nutrition assistance for those who still need it. The

## **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

---

dramatic changes in welfare laws and policies, and the challenges and opportunities they continue to present, require that USDA and the states establish new strategies and procedures to ensure that as many children and families as possible retain or obtain nutrition assistance—outside as well as through the welfare system.

### **PURPOSE AND FOCUS OF GUIDE**

This guide is a companion piece to the Department of Health and Human Services' (HHS) excellent March 25, 1999, guidance for Medicaid and the Children's Health Insurance Program (CHIP), entitled "Supporting Families in Transition: A Guide to Expanding Health Coverage in the Post-Welfare Reform World" (see [www.hhs.gov/hcfa](http://www.hhs.gov/hcfa)). Like the HHS guide, this guide focuses on improving access to low-income working families. In the near future, USDA's Food and Nutrition Service (FNS) will issue additional guides on expanding access of other hard-to-serve groups, such as the elderly, people with disabilities, and eligible noncitizens, to the FSP.

**In common with its HHS counterpart, this guide serves three major purposes:**

- 1** It assists state policy makers and others in understanding what the food stamp statute and regulations require of states in terms of food stamp eligibility, application processing, recertification, notice and appeal rights, among other matters. In addition to discussing the requirements as they apply generally to the FSP, it specifically discusses applications and eligibility determinations in the welfare context — that is, when families seek or leave TANF benefits. The guide includes information on how states can, independent of TANF, work within the statute to strengthen their outreach efforts, simplify their application processes, and reach low-income families with children.
- 2** It discusses the food stamp requirements and options that apply in three common scenarios: 1) when families seek TANF assistance; 2) when families leave TANF assistance; and 3) when families have no contact with TANF.

## **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

---

- 3** It points the reader to various sources of funding states can use to pay for outreach, training, and other activities to help bring their systems into compliance with the law, while increasing nutrition coverage for low-income families with children.

### **Organization**

The guide is organized into four sections:

#### **Reaching Families Who Seek Nutrition Assistance**

This section addresses the specific circumstances of families seeking nutrition and TANF assistance and Medicaid and CHIP coverage. It outlines requirements that states must meet when receiving and processing applications from these families, and identifies practices and techniques that states may wish to consider in designing their TANF programs and their application and enrollment processes to ensure maximum participation of families.

#### **Maintaining Nutrition Coverage for Families Who Leave TANF Assistance**

This section focuses on the circumstances of families leaving the TANF system and outlines the requirements and options, and strategies that states may wish to consider in restructuring the FSP to ensure maximum participation.

#### **Reaching Families Outside the Nutrition Safety Net**

This section focuses on the ways states can help low-income families and individuals who are not seeking TANF benefits obtain nutrition assistance through food stamps and health insurance through Medicaid and CHIP. This section also emphasizes the need to reach out to low-income families so they know that nutrition and health coverage is available to them under food stamps, Medicaid, and CHIP.

#### **Funding Opportunities**

The final section identifies sources of funds states can use to pay for outreach, training, and other activities critical to supporting compliance with food stamp requirements and maximizing coverage of low-income families with children.

## **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

---

### **REACHING FAMILIES WHO SEEK NUTRITION ASSISTANCE**

This section outlines the FSP statutory and regulatory requirements states must follow in establishing their application processes, as well as requirements for joint processing of food stamp and TANF cases. To help state officials and others solve implementation problems, this section also identifies administrative and programmatic strategies designed to promote the maximum enrollment of families.

The front door for food stamps is the local agency which, in many cases, also determines eligibility for TANF and Medicaid. Since many states use a joint application form for food stamps, TANF, and Medicaid, proper coordination of the related agencies and their procedures is critical to whether eligible low-income families obtain nutrition coverage. This section will help states ensure that families, regardless of their eligibility for or receipt of TANF benefits, get enrolled in food stamps, Medicaid, or CHIP.

### **Mandatory Application and Enrollment Policies**

The 1996 welfare reform strengthened the access rights of food stamp applicants and recipients. While leaving many of the details up to the states, Congress declared that states must provide “timely, accurate, and fair service.” Below are the basic requirements of the new law:

### **Opportunity to apply**

Food stamp regulations (7 CFR 273.2) require states to provide an opportunity for families to apply for food stamps without delay. When states use joint food stamp-TANF-Medicaid applications or use the state TANF agency to make food stamp eligibility determinations, the TANF agency must furnish the joint application, or a separate food stamp application, immediately upon request. They may not require applicants to wait before providing the application or processing it. In some states, the TANF application or eligibility is delayed because, for example, families receive diversionary assistance, are required to conduct an up-front job search, or face other initial administrative steps. In such instances, the state must make separate food stamp and Medicaid applications available immediately, or make the joint application

## **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

---

available immediately for purposes of determining food stamp and Medicaid eligibility. Only state merit system personnel are authorized to evaluate the food stamp application and determine an applicant's eligibility [7 CFR 272.4(a)].

### **Time frame for eligibility determination**

Federal regulations (7 CFR 273.2) require that states determine food stamp eligibility for most families and children within 30 days from the date of application. When eligible households qualify for expedited service, states must issue food stamps within 7 days of the date of application. The date that a food stamp-TANF-Medicaid (or a separate) application is filed begins the 30-day (or 7-day) "clock" for the food stamp eligibility determination.

A TANF requirement may not delay a food stamp eligibility determination. When a family applies for food stamps, Medicaid, and TANF through a joint application but does not qualify for TANF assistance because of a TANF requirement that does not relate to food stamps or Medicaid, for example, the living arrangements for teens or an up-front job search, the state must make a timely determination of food stamp or Medicaid eligibility based on the joint application. States must grant food stamp eligibility retroactive to the date of application.

### **Determine eligibility for all programs before denial or termination**

Because food stamp eligibility is not based on TANF eligibility, states may not deny or terminate food stamp eligibility to a family or any family member simply because the family is ineligible for TANF due to employment, time limits, and in some cases, TANF sanctions.

### **Determine food stamp categorical eligibility for TANF households**

Under recently updated policy, States need to identify the extent to which families receive benefits under their TANF programs, either in the form of cash assistance *or* services designed to end dependence. Extending categorical eligibility to low-income working families receiving services under TANF will allow them to have modest, serviceable vehicles for maintaining employment

## **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

---

*and* continue receiving nutrition assistance.

### **Exclude diversion payments and reimbursements for work related expenses**

As states craft cash diversion programs to enable families to avoid cash assistance, it's vital to coordinate TANF and food stamp policies. In many cases, the cash diversion payment may be excluded from food stamp income by either of two ways. First, states may exclude many diversion payments under the lump-sum payment rules. Second, if the diversion payment doesn't qualify as a lump sum payment, then states may find such payments qualify for exclusion under the reimbursement rules. Thus, states may develop a more attractive diversion package that guides applicants away from cash assistance, promotes self-sufficiency, and still offers nutrition and health coverage.

### **Food stamp denial notice and appeal rights**

Federal regulations (7 CFR 273.2 and 273.13) require that applicants who are denied food stamp eligibility or individuals who are terminated from food stamps receive notices informing them of the denial, the reasons for the denial, and their appeal rights. With very few exceptions food stamp benefits for current recipients continue during an appeal. These rights apply to all food stamp denials and terminations, including those that flow from joint food stamp-TANF-Medicaid applications.

### **Optional Application and Enrollment Policies**

Under the 1996 amendments to the food stamp law, there is no longer a requirement for a single interview process for food stamp and TANF applications. Nonetheless, many states have continued joint processing to promote efficiency and to assure access to all programs. To facilitate enrollment in food stamps, Medicaid, and CHIP, states should make both joint food stamp-TANF-Medicaid applications and food stamp-only or Medicaid-only applications available in TANF offices. This will assure that families can apply for food stamps, Medicaid, or CHIP, no matter what decision they make about seeking TANF assistance. Some options are:

### **Use joint applications**

TANF offices are a critical site for reaching low-income families. States that use a joint food stamp-TANF-Medicaid application must provide the opportunity to

## **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

---

apply for food stamps and Medicaid without delay, whether the family applies for TANF, receives diversionary payments, or any other assistance. When a family files a joint application, they must be able to choose the programs for which they seek assistance. For example, if a family does not want cash assistance, the application should allow the family to choose only food stamps and Medicaid. The family cannot be told to come back another time or be sent elsewhere to obtain the application.

### **Use separate applications**

If a state does not use a joint application, it must ensure that food stamp applications are available at all TANF sites, even if the applications are actually processed at a different location [7 CFR 273.2(c)(2)].

### **Administrative Strategies and Considerations**

Food stamp rules require state procedures that ensure that eligibility for food stamps is considered when TANF assistance is provided, denied, delayed, or terminated. The following are suggestions for assuring compliance:

### **Change perception of FSP**

It's important to perceive the FSP in the new welfare context. We are working with our many partners and stakeholders to build upon the revolutionary policy innovations in TANF and the success of moving families from welfare to work. While welfare reform did not "delink" food stamps from TANF in the same way it "delinked" Medicaid from TANF, FNS views food stamps as nutrition assistance, not welfare. Just as low-income families obtain health insurance through Medicaid and CHIP, they obtain "nutrition insurance" through the FSP. This new way of thinking could remove many barriers to participation for low-income families with children.

### **Provide food stamp, Medicaid and CHIP outreach to families at TANF sites**

The key to any effort to identify and reach eligible children and families is education and information, and TANF offices and personnel are critical to meeting the nutrition and health goals of these programs. Families who inquire about cash assistance from the state likely want to receive information about food stamps, Medicaid, and CHIP, including how to apply for these programs and

have access to application forms. States must train TANF



## **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

---

agency staff to conduct this outreach and education.

### **Place food stamp and Medicaid/CHIP workers in TANF offices**

Where programs are administered separately, states are encouraged to place food stamp and Medicaid and CHIP eligibility workers at TANF offices to take applications and assist in their preparation. This practice is especially important at sites where, by state or local policy, low-income people are often directed to job searches, receive diversion payments, or otherwise receive assistance that may result in their not filling out an application for TANF assistance.

### **Conduct staff training**

States can send a strong and clear message to their employees about the importance of food stamp, Medicaid, and CHIP eligibility through special staff training, supervisory reviews, and other mechanisms. Such efforts should call attention to the differences between the TANF rules and food stamp, Medicaid, and CHIP eligibility rules, and to the procedures necessary to ensure that food stamp, Medicaid, and CHIP eligibility is considered. States should consider offering similar training to hospitals, clinics, health providers, child care centers, Head Start programs, one-stop centers, WIC offices, community-based organizations, and other programs that come into contact with low-income families and children.

### **Encourage food stamp and Medicaid applications when the TANF application process halts**

States should ensure that the food stamp and Medicaid application process is completed when a family does not qualify for TANF-funded assistance or abandons the TANF application process. Here are some things to consider:



It is important to inform families early in the application process about the different eligibility rules for food stamps, TANF, and Medicaid. States should stress that with food stamps, there is no time limit for families with children. Otherwise, families may not understand that

even if they don't qualify for TANF, their food stamp and Medicaid application can and should be processed, and

## **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

---

could well be approved.

- \* A person who applies for TANF might be required to meet an up-front job search requirement before becoming eligible for cash assistance. Although that person's TANF application might be suspended, he or she should be guided to proceed with the application for food stamps and Medicaid.
- \* A parent might not carry through with a joint application if he or she finds a job, thinking that the family is no longer eligible for nutrition assistance or Medicaid coverage. Rather than just accepting a withdrawal of a TANF-food stamp-Medicaid application, workers should inform the family, either verbally or with a flyer, that all or some of its members might still be eligible for food stamps or Medicaid and encourage the family to continue the application process.
- \* States should make clear in all of their informational materials about TANF that coverage under food stamps, Medicaid, and CHIP does not require welfare eligibility and that, even if families apply for or receive TANF assistance, they are encouraged to apply for food stamps, Medicaid, and CHIP.
- \* For individuals facing language barriers, states must develop culturally-appropriate materials in languages other than English as required for jurisdictions meeting the thresholds set forth at 7 CFR 272.4(b).

### **Scheduling interviews**

A major barrier to working families participating in nutrition and health coverage is the requirement to take off time from work to apply for benefits or to have eligibility redetermined. "Family friendly" scheduling procedures allow, to the extent possible, working parents to schedule appointments outside work hours or days. Thus workers can enroll in the program without missing work.

## THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES

---

### Less intrusive verification procedures

A major barrier to families accessing nutrition and health coverage is the perception that employers and schools will use the knowledge that they have applied for food stamps or Medicaid in some adverse way. Here are some ways states can improve program access without compromising program integrity:

- \* Under food stamp rules, if the applicant has provided adequate documentary evidence of earnings, it's not necessary to contact employers as a matter of routine. If it is necessary to contact the employer, states should train eligibility workers to simply state that they're calling to request verification because the employee has requested "assistance" or "services" from their agency, without revealing the specific programs. Similarly, eligibility workers should contact children's schools only when necessary.
- \* States should train workers involved in pre-certification eligibility investigations to avoid the use of the term "fraud" in connection with their activities unless they are acting on specific evidence in a case. If low-income working families know that employers will ***routinely*** receive a call from the "food stamp fraud unit", they will be reluctant to apply for fear that the employer will consider them untrustworthy or dishonest.

## **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

---

### **MAINTAINING NUTRITION AND HEALTH COVERAGE FOR FAMILIES WHO LEAVE THE TANF PROGRAM**

This section focuses on the statutory and regulatory requirements which states must follow to provide nutrition assistance to adults and children in families leaving the welfare rolls. This section also identifies administrative practices that can increase the likelihood that eligible parents and children who leave welfare will continue to receive food stamps, Medicaid, and CHIP.

#### **Mandatory Eligibility Policies**

Here are the “must do’s” for states to follow when denying or terminating cash assistance.

#### **Determine eligibility for all programs before denial or termination**

Because food stamp eligibility is not based on TANF eligibility, states may not deny food stamp eligibility to a family or any family member simply because the family is ineligible for TANF because of employment, increased income, time limits, or, in some cases, a TANF sanction. Further, it is not acceptable for a state to deny a joint application and then advise families to reapply if they think they may be eligible for food stamps. Likewise, states may not deny or terminate Medicaid eligibility unless they have affirmatively explored and exhausted all possible avenues to Medicaid eligibility.

#### **Prevent inappropriate food stamp and Medicaid denials and terminations**

The key to states ensuring that food stamp- and Medicaid-eligible families continue to receive nutrition and health coverage after their TANF benefits have ended is the set of procedures they use to prevent inappropriate food stamp and Medicaid eligibility terminations. In no event should closure of a TANF case ***automatically*** result in closure of a food stamp or Medicaid case, except as noted below.

When a TANF case is closed, often the state will have all the information it needs to determine whether food stamp or Medicaid eligibility for a family should continue. If the family remains eligible for food stamps, the rules don’t allow the eligibility worker to shorten the food stamp certification period and require the household to

## THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES

---

file another application, simply because the cash assistance is ending. The worker will simply rebudget the family's food stamp case, send appropriate notices, and participation will continue until the household's current certification period expires [7 CFR 273.12(f)(4)]. The rules permit eligibility workers to shorten certification periods only in the event the situation is so unclear that the worker needs a new application and interview to evaluate the family's continuing food stamp eligibility [7 CFR 273.12(f)(5)].

### Optional Eligibility Policies

Here are the options states may elect when a family member doesn't comply with TANF requirements.

#### Termination for failure to meet TANF work requirements

States must terminate food stamps for a TANF recipient if they are terminating recipient's TANF assistance because of a refusal to cooperate with TANF work requirements and the recipient is also subject to food stamp work requirements. This sanction extends only to the person violating the TANF work requirement. States may elect to sanction the whole household if the adult head-of-household refuses to cooperate [7 U.S.C. 2015(d)(1)].

#### Food stamp sanction for failure to meet other TANF requirements

States can apply a food stamp sanction to a TANF recipient if the recipient's TANF assistance is reduced or terminated because of a refusal to cooperate with other TANF requirements. This sanction extends only to the person violating the TANF requirement. ***In this instance, states may not sanction the whole food stamp household.***

### Administrative Strategies and Considerations

States may want to consider the following administrative strategies to assure continued participation in food stamps, Medicaid, and CHIP:

#### Educate families about continuing nutrition and health coverage

To maximize the participation of families in food stamps and Medicaid, it's critical that states educate families about these benefits and the steps they need to take to safeguard and facilitate their food stamp and Medicaid eligibility when they leave TANF assistance. For

## **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

---

example, states should advise families to report earnings, instead of simply calling to ask to have their case closed. States should stress that the FSP has no time limit for families with children. Even though working families will no doubt receive a smaller food stamp allotment, continued participation in the program will help them stretch their food dollars. Enrolling the family in nutrition education classes will help them make wise shopping choices.

### **Simplify recertifications**

States can simplify eligibility reviews with waivers from FNS. To avoid time-consuming face-to-face interviews and help working parents avoid missing work, states can allow households keep them informed of changes in their circumstances by mail or telephone. States may simplify the redetermination process by using shortened recertification forms, and clarifying any inconsistencies by telephone or mail. States may also use information from their data systems to populate fields on the recertification form. Households could simply note any changes on the form and return the signed document.

### **Review closed TANF cases**

A state review of closed TANF cases in which food stamp or Medicaid eligibility was not continued may identify families likely to be eligible for nutrition assistance or health coverage. Cases closed in error are entitled to restoration of benefits. At a minimum, this group would likely benefit from receiving informational material on food stamps, Medicaid, and CHIP.

### **Adopt Income Reporting Waivers**

States may now receive waivers to make reporting of income changes easier for working families. FNS is now prepared to approve State agency requests to:

- \* Implement a quarterly reporting system for households with earned income, and allow quarterly reporting of unearned income for such households.
- \* Modify the existing status reporting policy to allow 6-month certification periods as opposed to 3-month certification periods.

## **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

---

- \* Modify the existing status reporting policy to increase the reporting threshold from \$25 to \$100.

## **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

---

### **REACHING FAMILIES NOT COVERED BY NUTRITION ASSISTANCE**

This section highlights strategies to ensure coverage for low-income families who do not come in contact with the TANF system, including effective public information and outreach tools and methods to simplify the application and enrollment process. As states succeed in helping families move to self-sufficiency, more families will remain outside the cash welfare system. Thus, it is critical that states develop and implement new strategies for reaching these families. These strategies will help erase the welfare stigma of food stamps, while providing critical nutrition and health assistance to low-income families with children through the use of food stamps, Medicaid, and CHIP.

### **Administrative Strategies and Considerations**

The long-standing association of food stamps and cash assistance resulted in the perception of food stamp recipients as having no attachment to the labor force. We are fighting to remove this perception of the old system. Under current law, families with earnings of up to 130 percent of the poverty line (\$17,748 for a family of three) may be eligible for food stamps. When families learn that they can receive nutrition assistance and Medicaid coverage without having to receive welfare, they may be less likely to turn to welfare in the first place or to return to the welfare system. Moreover, with the increased use of Electronic Benefits Transfer (EBT) systems, families don't feel they're easily identified as food stamp recipients, as they did when using paper food stamps in grocery stores. We now have an opportunity to disassociate food stamps from welfare and promote food stamps, Medicaid, and CHIP coverage as freestanding supports for low-income working families with children.

State efforts should emphasize the importance of information and outreach, and simplifying the application and enrollment process, as a means of identifying and enrolling eligible low-income families. States may want to consider some or all of the following administrative strategies and other measures to improve outreach and increase coverage of low-income families with children:



## **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

<b>Build partnerships in communities</b>	FNS is committed to strengthening the link between good nutrition and good health. As Medicaid and CHIP serve many of the same populations of low-income Americans as food stamps, we are working closely with our Federal partners at HHS to coordinate our efforts to provide access to these important nutrition and health programs. FNS is committed to working with states and others to increase the number of eligible families receiving food stamps, much in the same way HHS and states are committed to increasing the number children enrolled in Medicaid and CHIP. Likewise, states should build partnerships with other Federal, state, and local agencies and community-based organizations to “leverage” the availability of application sites within easy access of low-income families.
<b>Place food stamp workers in communities</b>	States can enhance the opportunity to apply for nutrition assistance by placing food stamp outreach and eligibility workers in locations where they are likely to interact with low-income families who are eligible for the FSP (for example, hospitals, community and migrant health centers, food pantries and soup kitchens, community action agencies, schools, community colleges, Head Start programs, and one-stop career centers). States may add value to this practice if workers keep a regular schedule, for example, every Wednesday from 4:00 pm to 7:00 pm. Some sites, such as unemployment offices and one-stop career centers, could justify a full time food stamp worker. States may make food stamp informational material and applications regularly available at sites outside of welfare offices even if the site is not staffed with food stamp workers.
<b>Share community resources</b>	Food stamp law permits only authorized state eligibility workers to evaluate the information on the application and supporting documentation and to make eligibility determinations. But other individuals, such as volunteers and employees of other government agencies, may take applications at community locations and perform initial processing activities, including interactions with applicants. Therefore, states can work with a very broad range of public and private organizations to identify

## **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

---

eligible families, educate them about food stamps, Medicaid, and CHIP, and have them help complete applications for a wide range of services. This approach helps promote the program as one that offers nutrition assistance coverage to low-income families generally, not just to families receiving TANF.

### **Improve the availability of application sites**

It is important that states make it easy for low-income families, including working families, to apply for food stamps, Medicaid, and CHIP. Keeping application sites open during evening hours and on weekends makes it more convenient for working families to apply.

### **Educate families**

It is important that low-income families understand that the coverage available under food stamps, Medicaid, and CHIP for families and children is not linked to receipt of TANF assistance. The misconception that food stamp and Medicaid eligibility is linked to TANF, or is subject to time limits, is widespread. Federal, state, and local agencies need to make vigorous educational efforts to correct this belief to maximize participation in food stamps, Medicaid, and CHIP.

### **Conduct nutrition education**

States should continue and expand the many creative programs of nutrition education in operation throughout the country. Such programs help families shop wisely and prepare nutrient-rich meals. In the short term, good nutrition helps ward off the minor ailments that cause low-income workers to miss time on the job and cause children to miss school. In the long term, dollars invested wisely in good nutrition and preventive health measures now will result in vast savings of health care dollars in the future.

### **Conduct outreach**

Providing food stamp informational material to low-income families is a critical state activity. States have used a variety of valuable approaches to help them locate low-income families and facilitate their application for food stamp participation. They include:

## **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

---

- \* implementing a toll-free telephone hotline for application and enrollment information;
- \* placing billboards and posters in places frequented by low-income families;
- \* producing public service announcements for radio and television that highlight the importance of food stamps as a supportive service for low-income working families;
- \* distributing information through other public and private programs designed for low-income families (for example, child care resource and referral agencies, Head Start, food pantries and soup kitchens, one-stop centers, and community-based organizations);
- \* discussing the benefits of the FSP while conducting nutrition education classes;
- \* stationing state eligibility workers in places frequented by low-income families, such as TANF offices, WIC offices, hospitals, and one-stop centers;
- \* working with local community-based organizations to develop creative outreach programs; and
- \* developing partnerships with retail grocers to display or distribute informational materials.

States should also maximize publication of the national food stamp toll-free number, **1-800-221-5689**. Planning is under way at FNS to enhance the system to automatically connect callers with the FSP in their state.

### **Integrate health and social service systems**

States should aim to integrate their programs to ensure that low-income families receiving any of an array of services learn about and apply for nutrition assistance, Medicaid, and CHIP. The recently enacted Workforce Investment Act (WIA) promoted this concept by

establishing an innovative one-stop system designed to provide a comprehensive array of job training, education, and employment services at a single neighborhood center. The WIA specifies several Federal programs and activities that must participate in each local one-stop system. Although not required partners, the food stamp, TANF, and Medicaid programs can link up with one-stop systems as optional partners, enhancing the support available to low-income working families and families making the transition from welfare to self-sufficiency. Several states have taken advantage of this new opportunity. For example, the Kenosha County Job Center in Wisconsin has combined services, including Medicaid, at its job center. Although the one-stop center was initially designed to include services fairly directly related to job training, job-seeking, and education, it evolved to include Medicaid, child support, child care, and Head Start.

**Conduct research  
to identify  
potential problems**

States should use some or all of the following methods to measure the effectiveness of their program access and outreach strategies, and make corrections as necessary:

- \* Learn lessons from quality control negative case findings and management evaluation reviews.
- \* Conduct studies and surveys of families on leaving TANF ("leaver" studies) or add food stamp questions to ongoing studies.
- \* Match social security numbers of individuals leaving cash assistance in the prior 6 to 12 months with the current food stamp caseload to gauge the state's effectiveness in continuing nutrition assistance to families moving off of welfare.
- \* Follow-up on cash assistance cases closed for non-financial reasons to make sure that the family is not dropping off the program for reasons that the worker can resolve readily, for example, setting an interview time that doesn't conflict with work hours, or assisting the

## **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

family complete forms.

### **Exemplary State Practices**

The following are examples of actual state practices which encourage access to nutrition assistance and health coverage for low-income families, in or out of the welfare system:

#### **After TANF care**

Massachusetts alerts clients of continued food stamp eligibility when their TANF ends. Massachusetts recently created a brochure that describes some of the services and benefits that may be available to families whose TANF benefits ended. The brochure reminds clients of the availability of food stamps and lists a 1-800 number where families can obtain more information. Workers hand the brochure to clients during the cash assistance exit interview that is held in the month before TANF ends. The state also mails it to clients who have been off cash assistance for two months. In addition, case workers in Massachusetts refer certain households that they are concerned about to the Department of Health for follow-up. The Department of Health conducts follow-up calls and visits to these clients reminding them of the available assistance programs, including food stamps.

#### **After TANF follow-up**

Tennessee follows-up on cash assistance cases closed for non-financial reasons to make sure that the family is not dropping off the program for reasons that a worker can resolve readily, for example, setting an interview time that doesn't conflict with work hours, or assisting the family complete forms.

#### **Common Access Application**

The Georgia Common Access Application (GCAA) Project grew out of former President Jimmy Carter's call for a simpler application process in response to needs expressed by The Atlanta Project communities. With the support of the Atlanta Federal Executive Board, an inter-agency work group revised the 64 pages of individual program applications into the GCAA, a "seamless" 8-page, multi-program application. FNS, the Department of Housing and Urban Development (HUD), the Georgia Department of Human Resources, HHS Administration for

## **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

Children and Families and Health Care Financing Administration, and the Social Security Administration tested the form in Atlanta. Programs included on the application form were food stamps, SSI, AFDC, Medicaid, housing assistance and WIC.

### **Coordination with CHIP**

In South Dakota, when Department of Social Services (DSS) staff provide CHIP outreach, they also discuss the FSP and urge individuals to apply for both food stamps and CHIP.

### **Coordination with food donor community**

New Jersey is currently printing brochures regarding food stamps. These brochures will be on hand in local offices and the state will distribute supplies to food pantries and soup kitchens. The brochure also mentions that households whose TANF benefits are terminated may be eligible for food stamps. New Jersey is also developing a handbook and pamphlet for Work First NJ recipients to explain the various programs, assistance and the individual's responsibilities. The information will also address the various benefits that may be available to the household if its TANF benefits are terminated.

### **Coordination with the School Lunch Program**

In South Dakota, every August the DSS sends food stamp households with school aged children a shortened application form for free school lunches. The shortened form allows the household to apply for free school lunches merely by signing the form and sending it to the school district. The school district knows the household is eligible for free school lunches because only households with an active food stamp case get the shortened form. The state also sends a form to newly approved cases if they apply between September and May.

### **Coordination with the State Labor Department**

In South Dakota, Department of Labor (DOL) employment specialists take TANF applications at the local DOL offices. The state trains employment specialists to take food stamp applications at the same time they take the TANF application. They immediately send the food stamp application to the DSS. The employment specialist schedules an appointment with the food stamp worker

while the applicant is still at the DOL office.

## **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

---

### **Customer Service Standards**

As a result of the Governor's Executive Order which calls for the delivery of effective, efficient and responsive customer services of the highest quality by state governmental agencies, the Louisiana Department of Social Services (DSS) has adopted the State Standard as their Department standard. The state has developed a Customer Service Plan for services and programs administered by DSS employees.

- \* The state recently developed a customer service training packet for all supervisors focusing on customer service and the importance of treating each client with dignity and respect.
- \* The state has distributed videos on customer service which it shows to all employees across the state. While not a statewide initiative, some offices use toys and framed posters to promote the promise of excellent customer service.
- \* In order to evaluate the effectiveness of their efforts, the state provides comment boxes in each parish office and mails out surveys focusing on customer services to all clients participating in the program.
- \* Based on these efforts, Louisiana is able to ensure the client's waiting time in local parish offices is kept to a minimum and ensure that all people requesting assistance from the DSS receive courteous treatment.
- \* The reviewers constantly reinforce the state's commitment to customer service during state-conducted Management Evaluation reviews. The state conducts ongoing evaluations of each parish office's procedures related to program access.

### **Hi-Tech Access**

Minnesota is considering using modern technology to simplify program access for applicants and recipients who live in remote parts of Beltrami County. The county hopes to be able to do client interviews using video

telephones, one in a remote university extension office,

## **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

---

and the other at the local assistance office at the far end of the county.

### **Housing-nutrition-health collaboration**

The USDA has signed a Memorandum of Understanding with HUD to sponsor several collocation projects throughout the country. One such project is being conducted with the Housing Authority of the City of Charleston, SC. Collocated activities include WIC clinics, food stamp outreach, nutrition education, Farmer's Market Program, and the Summer Food Service Program.

### **"No Wrong Door"**

Delaware recently implemented "No Wrong Door". Under this initiative, persons who apply for one form of assistance at State Service Centers are screened for and referred to other programs. For example, workers ask a parent seeking child mental health services various questions to determine if there are any other needs, including food needs. If a food need exists, the parent would get a referral to the appropriate food stamp office.

### **Outstationing**

Wisconsin outstations eligibility workers in clinics, health centers and community-based organizations so that interested individuals can apply for all assistance programs, including food stamps.

### **Top-down commitment**

The Texas Department of Human Services has demonstrated total agency commitment to the goal of assisting families achieve self-sufficiency, while reinforcing the importance of the nutrition and health safety nets as work supports. The agency just completed an in-depth survey of staff and client attitudes towards "Texas Works", its cash assistance program. The commissioner recently reinforced the importance of food stamps and Medicaid as work supports in a memo to all staff.

### **Don't hide your light under a bushel**

FNS is interested in other examples of state and other efforts to improve and expand program access to eligible low-income families. If you have a "big idea", we want to hear from you. We are committed to sharing best

practices with states and others. See the list at the end of this guide for the FNS contact nearest you.



# **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

---

## **FUNDING OPPORTUNITIES**

This section sets out the funding sources states can use under the food stamp law for outreach activities, systems changes, training, nutrition education, and other investments critical to support compliance with food stamp requirements and to maximize nutrition assistance coverage of low-income families with children and others. The section also includes a general discussion of the payment process and financial policies relating to use of cash and in-kind donations.

## **Overview**

Food stamp law does not limit the amount of money a state can spend on food stamp activities, including efforts to inform people about participating in the FSP and activities to educate low-income families about good nutrition. The Federal government will match such spending dollar for dollar. Moreover, states may “leverage” Federal matching funds with in-kind or cash contributions from outside entities to increase the amount or frequency of services provided to low-income families. However, states can’t use Federal dollars from other agencies to provide matching dollars for food stamp activities without specific statutory authority.

Some examples of creative use of Federal and state dollars for increasing program access for low-income families include:

- \* Use of state reinvestment dollars to fund projects which reduce errors and improve program access, for example, toll-free numbers to access change reporting centers.
- \* Use of enhanced funding dollars to fund FSP improvements and expand outreach and nutrition education activities.
- \* Use of 100 percent Federal state exchange dollars to fund state-to-state travel for learning about innovative techniques and technologies which expand program access.

## **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

---

- \* Use of grants from government agencies and foundations to fund techniques or technologies which improve program access.
- \* Use of TANF "Maintenance of Effort (MOE)" dollars. Recent HHS guidance details many ways states can serve low-income working families with MOE funds.

- Funding Stream** FNS pays the state 50 percent of the state's allowable costs for FSP activities. The state's costs would include expenditure of funds for work it has performed in-house (by state employees) and payments to others for work or services performed (for example, a private nonprofit organization, a for-profit contractor) under a contract or agreement with the state. FNS pays the state; FNS does not pay contractors directly. Here's the process:
- 1 The state files a budget projection (funding request) using Form FNS-366A, Budget Projection with the FNS Regional Office by August 15<sup>th</sup> for the upcoming Federal fiscal year, which begins October 1. States must submit an optional State Plan to fund nutrition education and outreach activities. Upon the regional office's approval of the State Plan and budget projection, FNS makes the funds available.
  - 2 FNS puts the funds in the state's Letter of Credit. If the state is to pay \$100 in costs, it would draw \$50 in state funds and \$50 in Federal funds to cover the state's check or funds transfer.
  - 3 Thirty days following each quarter, the state reports its actual costs to FNS on Form SF-269, Financial Status Report. This report is the claim form for reporting the expenditure of program costs for Federal reimbursement. The state reports total expenditures, the state share of the costs, and the Federal share.

## **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

<b>Financial Policies</b>	Here are some financial policies states should consider in developing non-traditional funding sources.
<b>State cash</b>	Program rules [7 CFR 277.4(c)] provide that the state may use cash contributed or donated by other non-Federal public (state government) agencies and (state government) institutions. States may not use private donations, unless FNS approves a waiver.
<b>State donations</b>	FNS may reimburse a state for the value of in-kind (non-cash) donations provided by state and local government agencies. Examples of allowable in-kind donations are office space, equipment, employee time, etc.
<b>Private, third-party, in-kind donations</b>	FNS cannot reimburse a state for the value of private, third-party, in-kind (non-cash) donations because the state agency receiving the non-cash donation does not expend any funds when it receives the item. The value of goods contributed by private (non-government) third parties is unallowable for Federal reimbursement. Example of in-kind donations are office space, equipment, volunteer time, etc.
<b>Volunteers</b>	The state cannot incur costs for the volunteers' actual work since volunteers, by definition, are unpaid. The state can plan, manage, facilitate, and oversee volunteers' work and may claim the state's costs. The state may reimburse volunteers for their expenses necessary to conduct FSP activities.
<b>Private, third-party, cash donations</b>	FNS will consider waiving 7 CFR 277.4(c) in order to allow private cash donations to the State agency to be used for program costs that would be eligible for Federal reimbursement. The state needs to submit a waiver request if it wishes to use private donations for program costs and receive Federal reimbursement. The waiver request should come in with the optional State Plan, if the state intends to use donations for outreach or nutrition education.

FNS approval of the waiver may include conditions. The

## **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

state's waiver request should explain the circumstances for the cash donations. The funds must be under the state's control and may not revert back to the donor. The donations must have no restrictions. In other words, the funds cannot be used to reach particular individuals or members of a particular organization. There must be no endorsement of a particular brand or firm over another, or an advertising tie-in. Normally, donors would write a check to the state's General Fund, but rules may vary by state. The state would need to have a way under state law and internal accounting procedures to identify and access those funds.

### **Other Federal Funds**

Funds paid under another Federal assistance agreement are not allowable unless authorized by the Federal legislation. Indian tribal organizations have Federal funds that are generally matchable. The state plans must specify whether Federal funds from another Federal program will be used and under what law (include the citation).

### **Allowable Costs**

States must follow the cost principles in Office of Management and Budget (OMB) Circular A-87. Non-profit organizations must follow the cost principles in OMB Circular A-122. In addition to the standard allowable and unallowable costs in the OMB Circulars, there are specific fundable and non-fundable activities specified in FSP regulations.

### **Interested? Want More Information?**

If you're interested in pursuing a best practice, or just want to talk about improving access, please contact the following FNS staff at headquarters or in one of our FNS Regional Offices. You may also visit the USDA web site and click on FNS to get more information on access issues.

### **Headquarters**

<b>Program Access:</b>	Moir Johnston	703.305.2515
	Patrick Waldron	703.305.2805
<b>Outreach:</b>	Pat Seward	703.305.2428
<b>Nutrition Education:</b>	Alice Lockett	703.305.2476
<b>Funding:</b>	John Bedwell	703.305.2397

## **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

<b>Mid-Atlantic Region</b>	<b>States covered:</b> Delaware, District of Columbia, Maryland, New Jersey, Pennsylvania, Virginia, the Virgin Islands of the United States, West Virginia <b>Contact Person:</b> FSP Director - Joseph Weingart <b>Address:</b> FNS Mid-Atlantic Regional Office, Mercer Corporate Park, 300 Corporate Blvd., Robbinsville, NJ 08691-1598 <b>Phone:</b> 609.259.5025
<b>Mid-West Region</b>	<b>States covered:</b> Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin <b>Contact Person:</b> FSP Director - David Mikelson <b>Address:</b> FNS Midwest Regional Office, 77 West Jackson Blvd, 20th Floor, Chicago, IL 60604-3507 <b>Phone:</b> 312.353.6664
<b>Mountain Plains Region</b>	<b>States covered:</b> Colorado, Iowa, Kansas, Missouri, Montana, Nebraska, North Dakota, South Dakota, Utah, Wyoming <b>Contact Person:</b> FSP Director - Alan Nickels <b>Address:</b> FNS Mountain Plains Regional Office, 1244 Speer Blvd., Suite 903, Denver, CO 80204-3581 <b>Phone:</b> 303.844.0300
<b>Northeast Region</b>	<b>States covered:</b> Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, Vermont <b>Contact Person:</b> . FSP Director - Bob Canavan <b>Address:</b> FNS Northeast Regional Office, 10 Causeway Street, Room 501, Boston, MA 02222-1069 <b>Phone:</b> 617.565.6370
<b>Southeast Region</b>	<b>States covered:</b> Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee <b>Contact Person:</b> FSP Director - Gilbert Camacho <b>Address:</b> FNS Southeast Regional Office, 61 Forsyth Street SW, Room 8T36, Atlanta, GA 30303-3415 <b>Phone:</b> 404.562.1800

## **THE NUTRITION SAFETY NET \* AT WORK FOR FAMILIES**

**Southwest Region**      **States covered:** Arkansas, Louisiana, New Mexico, Oklahoma, Texas  
**Contact Person:** . FSP Director - Esther Phillips  
**Address:** FNS Southwest Regional Office, 1100 Commerce Street, Room 5-C-30, Dallas, TX 75242-9980  
**Phone:** 214-290-9800

**Western Region**      **States covered:** Alaska, Arizona, California, Guam, Hawaii, Idaho, Nevada, Oregon, Washington  
**Contact Person:** FSP Director - Dennis Stewart  
**Address:** FNS Western Regional Office, 550 Kearny Street, Room 400, San Francisco, CA 94108-2518.  
**Phone:** 415.705.1310

### **NONDISCRIMINATION**

The United States Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, gender, religion, age, disability, political beliefs and marital or family status. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's Target Center at (202) 720-2600)

To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 14th and Independence Avenue, SW, Washington, DC 20250-9410 or call (202) 720-5964 (voice and TDD). USDA is an equal opportunity provider and employer.