

---

# Smart Choices in Hard Times

*Strategies for States, Communities, and Advocates to Reduce Hunger, Stimulate the Economy, and Sustain Recovery*

---



**Food Research and Action Center**

February 2010

**FRAC**  
1875 Connecticut Avenue, NW  
Suite 540  
Washington, DC 20009  
(202) 986-2200 / [www.frac.org](http://www.frac.org)



---

**ABOUT FRAC**

The Food Research and Action Center (FRAC) is the leading national organization working for more effective public and private policies to eradicate domestic hunger and undernutrition. Sign-up for FRAC's weekly News Digest at [www.frac.org](http://www.frac.org).

**ACKNOWLEDGEMENTS**

This report was prepared by FRAC staffers Ellen Vollinger, Crystal FitzSimons, and Madeleine Levin; lead author and contributor for the SNAP/Food Stamp portions, respectively, were consultants to FRAC: Patricia Baker of Massachusetts Law Reform Institute and Lauren Arms Ledwith. FRAC also acknowledges information and technical assistance from the USDA Food and Nutrition Service.

The Food Research and Action Center gratefully acknowledges lead underwriting of this report from Kaiser Permanente. Additional support for our work on the federal nutrition programs in 2009-2010 was provided by:

Anonymous Donors  
Atlantic Philanthropies  
California Endowment  
Annie E. Casey Foundation  
Claneil Foundation  
Evangelical Lutheran Church in America  
General Mills Foundation  
Kraft Foods Foundation  
Land O'Lakes Foundation  
Leaves of Grass Fund

A.L. Mailman Foundation  
MAZON: A Jewish Response to Hunger  
Moriah Fund  
C.S. Mott Foundation  
National Dairy Council/Dairy Management, Inc.  
New Prospect Foundation  
Pritzker Early Childhood Foundation  
Sara Lee Foundation  
Walmart Foundation

---

# Table of Contents

---

<b>Introduction</b> .....	3
<b>Section One: SNAP/Food Stamp Policy Options Especially Effective in Helping Working Families and the Newly Jobless</b> .....	4
Raise the SNAP/Food Stamp gross income threshold and eliminate the asset test through broad-based categorical eligibility .....	4
Increase SNAP/Food Stamp benefit amounts for working families through complete implementation of the dependent care deduction .....	6
Simplify the SNAP/Food Stamp earnings calculations for both wage earners and self-employed households.....	8
<b>Section Two: SNAP/Food Stamp Policy Options Especially Effective in Helping Older Americans and Persons with Disabilities</b> .....	10
Eliminate the SNAP/Food Stamp asset test and shorten the application process through categorical eligibility .....	10
Increase monthly SNAP/Food Stamp benefits for older Americans through proactive promotion of the medical expense deduction.....	12
Encourage the Social Security Administration to meet its obligation to provide SNAP/Food Stamp applications for both SSI and RSDI applicants and recipients .....	14
<b>Section Three: SNAP/Food Stamp Policy Options to Increase Benefits For All Low-Income Households and Reduce Agency Workloads</b> .....	16
Help low-income households avoid the “heat or eat” dilemma by maximizing SNAP/Food Stamp deductible shelter expenses (including utility costs).....	16
<b>Section Four: SNAP/Food Stamp Policy Options for Agency Workload Reduction</b> .....	18
Reduce administrative costs, cut delays and improve the processing of SNAP/Food Stamp applications by reducing the need for interviews.....	18
Use available options and strategies to reduce verification burdens for both SNAP/Food Stamp applicants and caseworkers .....	20
Improve the quality of the SNAP/Food Stamp application process through use of technology options, including Web-based applications and document imaging .....	22
<b>Section Five: Increasing Participation in the Afterschool and Summer Nutrition Programs</b> .....	24
Expanding the Availability of Summer Nutrition.....	25
Expanding the Number of Afterschool Programs that Use Federal Funds to Offer Nutritious Snacks and Meals During the School Year .....	26
<b>Section Six: Increasing Participation by Low-income Children in the School Breakfast and Lunch Programs</b> .....	28
Improve Direct Certification into School Meals of SNAP and TANF Recipient Children.....	30
Ensure that Homeless Children Receive Free Meals .....	31
Require Schools to Offer Breakfast .....	32
Encourage Universal Access and In-Classroom Nutrition Strategies that Maximize Participation .....	33
Successful School Meal Application Campaigns .....	34
<b>Section Seven: Increasing Participation in the Child and Adult Care Food Program</b> .....	36
Increasing Family Child Care Providers’ Participation in the Child and Adult Care Food Program .....	36
Expanding the Number of Homeless and Domestic Violence Shelters that Use the Child and Adult Care Food Program to Feed Children .....	38

---

# Introduction

---

This resource guide describes many of the key options and choices that states, cities, schools and human services programs have to leverage substantial additional federal nutrition benefits for low-income people. The choices focus on the Supplemental Nutrition Assistance Program (SNAP, formerly food stamps), and the National School Lunch, School Breakfast, summer nutrition, afterschool, and Child and Adult Care Food programs.

Making “smart choices” in maximizing the effectiveness of the federal nutrition safety net is especially critical for state and local officials now as families and communities strive to move from a deep recession to a sustained economic recovery. In 2008, even before economic conditions worsened, Census Bureau/U.S. Department of Agriculture data showed that 49.1 million Americans lived in households that faced a constant struggle against hunger. In the last quarter of 2009, 18.5 percent of Americans surveyed by Gallup reported that there had been times in the prior 12 months when they did not have enough money to buy food that they or their family needed, an indicator the Food Research and Action Center (FRAC) refers to as “food hardship.” In December 2009, more than one in six workers was unemployed or underemployed.

In the main, the federal nutrition programs not only feed hungry people and support family well-being, they also act as “economic stabilizers,” kicking in to serve more people during economic downturns such as the current one. The federal nutrition programs are important supports for those seeking work, as well as for those working at low wages in regular jobs or self-employment situations. The federal nutrition benefits available to growing numbers of needy people in a downturn not only cushion the blow for hard-hit families but also stimulate national and local economies. According to USDA research, for example, each one dollar in federal SNAP/Food Stamp benefits generates nearly twice that in economic activity.

Nonetheless, gaps in coverage, inadequate benefit amounts and inefficiencies in delivery are undermining the full potential of federal nutrition programs to help families weather hard economic times, and to boost the economy and sustain recovery. Approximately one

in three people eligible for SNAP/Food Stamps goes unserved. Participation increases in free and reduced-price school meals have lagged behind increases in SNAP/Food Stamp participation during this recession. In some states, failures to adopt available options leaves SNAP/Food Stamp households with lower federal benefit allotments than if they resided in neighboring states. And many states are foregoing available opportunities – some of them actively encouraged by federal rules – to deliver services more efficiently and cost-effectively, compounding the stresses on caseworkers, customers and state budgets alike.

In this package, FRAC presents briefly more than a dozen “smart choices” that are win-win policies for states and communities. If adopted, these strategies will:

- provide nutritious food to many more hungry people, especially children, older Americans, and newly jobless people, and do so in more adequate amounts;
- bring more federal funding into states and communities;
- boost local businesses (e.g., grocery stores) and area employment;
- have zero or very small cost to the state government; and
- help restart economic growth and contribute to a sustained economic recovery in states and the nation.

This guide is designed to assist you in leveraging more assistance through the federal nutrition safety net. Each of the guide’s “smart choice” descriptions refers the reader to additional resources (such as USDA policy memoranda and state policy implementation examples) – typically resources readily accessible on the Internet.

FRAC staff are available to provide additional technical assistance on each choice. We are anxious to assist policymakers, officials, schools, advocates, service providers, businesses, unions, religious leaders, and others in advancing these strategies in states and localities.

## Section One

---

# SNAP/Food Stamp Policy Options Especially Effective in Helping Working Families and the Newly Jobless

---

### Raise the SNAP/Food Stamp gross income threshold and eliminate the asset test through broad-based categorical eligibility.

The SNAP/Food Stamp Program has, in federal rules, assets and gross income tests that are barriers to eligibility even for very needy families. Fortunately states have the options to lift those rules and should choose those options.

The gross income test says households (other than those with elderly or disabled members) must have gross income below 130 percent of the federal poverty line in order to be eligible, even if they have deductions that would bring their net income down to levels at which they would get significant SNAP/Food Stamp benefits. And the assets test (\$3,000 for elderly and disabled households; \$2,000 for other households) similarly is far too low and blocks very needy people from eligibility.

States should take the options to change these rules, a choice encouraged by federal authorities.

USDA's Food and Nutrition Service (FNS) has long had a rule that states need not impose this asset test or lower gross income test on families who receive a cash (or non-cash means-tested) benefit. Households that receive or are authorized to receive services or benefits funded mostly with federal Temporary Assistance for Needy Families (TANF) Program funds or with state TANF maintenance-of-effort funds are therefore deemed *categorically eligible* for SNAP/Food Stamps without regard to the assets or gross income tests. Recent FNS guidance urges states to simplify eligibility through categorical eligibility by providing all SNAP applicants with a benefit funded with TANF dollars. The "TANF-funded benefit" can be anything from child care assistance, employment and training or counseling services, or a referral pamphlet or a toll-free number offering information on TANF-funded services to needy households. In electing "broad-based categorical eligibility," a state can implement favorable eligibility options for virtually all low-income SNAP/Food Stamp households, setting the gross income test at much higher levels. States are generally choosing 185 percent or 200 percent of the federal poverty level and doing away with the assets test.

In its 2009 State Options Report, FNS identified 42 states that have embraced categorical eligibility using either "traditional" or "broad-based" options. In its December 2009 "Broad-Based Categorical Eligibility Chart," FNS identified 27 states and two territories that have elected this option. These include 20 states using the TANF funded brochure, web-based information or a hotline to trigger categorical eligibility; 24 states have totally eliminated the asset test; and 19 states have a substantially higher gross income test.

Under the categorical eligibility option, states can especially help more working families and newly jobless by:

- **Eliminating the asset test.** By providing a TANF-funded benefit, states can simply eliminate the SNAP/Food Stamp asset test for most households. This option allows states to shorten the application forms, reduce verifications, reduce data matches on assets and reduce the state's exposure to quality control errors. Low-income SNAP/Food Stamp applicants tend not to have any meaningful assets in any event. For the relatively few struggling families that do still have assets above the assets test (which has been basically unchanged for 30 years) the removal of the asset test can be particularly helpful for the newly jobless and can ease the verification demands and case processing for both state agencies and households alike.
- **Using a higher gross income test.** States that provide a TANF-funded benefit to households with gross income below 200 percent of the federal poverty level (FPL) can use this same 200 percent

gross income test in the initial test for SNAP/Food Stamp benefits, rather than the lower 130% gross income test. Some states have chosen gross income at 185 percent FPL, 165 percent FPL or other gross income level higher than 130 percent FPL. A higher gross income test – coupled with proactive implementation of the uncapped SNAP/Food Stamp dependent care deduction – will allow the state to reach thousands of working families with high shelter and/or dependent care expenses, families otherwise excluded under the 130 percent FPL gross income test.

- **Reducing reporting requirements by using simplified (semi-annual) reporting with a higher gross income test.** As a general rule, states that elect semi-annual reporting need not act on changes to reduce benefits during the six-month period (e.g., few benefits when family income rise), unless household income exceeds the applicable gross income test. The 130 percent gross income test therefore introduces uncertainty and bureaucratic complexity. By establishing a *higher gross income test* under the categorical eligibility option – for example by using 185 percent or 200 percent of the FPL – more working households can continue on SNAP/Food Stamp benefits and only have to report increases in income above the higher threshold. Recent FNS guidance clarifies that states

have a choice of which gross income level to use during simplified reporting for households on categorical eligibility, either the 130 percent FPL or the higher categorical eligibility gross income standard. States that combine implementation of a broad simplified reporting policy with the higher categorical eligibility gross income limit as the reporting trigger can reduce the frequency of required reporting and SNAP worker action on those reports, reduce confusion around which gross income test applies, and reduce potential payment errors.

Section 4015 of the 2008 Farm Bill expands the group of SNAP/Food Stamp households which qualify for simplified reporting. States that adopted simplified reporting (e.g., moving to quarterly or semi-annual reporting) have significantly reduced the administrative headaches involved in tracking and responding to changes during a certification period. SNAP/Food Stamp households have benefited because they report changes less frequently, and are only required to report if their gross monthly income exceeds the SNAP/Food Stamp gross income test during the semi-annual period. Implementing simplified reporting in combination with broad-based categorical eligibility allows more households to qualify for SNAP/Food Stamps for longer periods, and reduces the state agency's administrative tasks.

#### Resources

Categorical eligibility: 7 C.F.R. § 273.2(j)(2)(i)

Reporting changes: 7 C.F.R. § 273.12(a)(1)

FNS Letter to Regions, Categorical Eligibility Questions and Answers, January 26, 2010

<http://www.fns.usda.gov/fsp/rules/Memo/2010/012610.pdf>

FNS Broad-Based Categorical Eligibility Chart, updated December 18, 2009

<http://www.fns.usda.gov/fsp/rules/Memo/2010/121809.pdf>

FNS Letter to Regions, Categorical Eligibility Questions and Answers, December 15, 2009

<http://www.fns.usda.gov/fsp/rules/Memo/2010/121509.pdf>

FNS Letter to Regions, Improving Access to SNAP through Broad-based Categorical Eligibility, September 30, 2009

<http://www.fns.usda.gov/snap/rules/Memo/2009/093009.pdf>

Testimony of FNS Deputy Administrator Lisa J. Pino, House Agriculture Committee, January 25, 2010

<http://www.washingtonpost.com/wp-dyn/content/article/2010/02/01/AR2010020101531.html>

FNS State Options Report, June 2009, Pages 7 and 9

[http://www.fns.usda.gov/FSP/rules/Memo/Support/State\\_Options/8-State\\_Options.pdf](http://www.fns.usda.gov/FSP/rules/Memo/Support/State_Options/8-State_Options.pdf)

FNS Letter to Regions, Farm Bill Questions and Answers (Set #5), August 25, 2006

<http://www.fns.usda.gov/fsp/rules/Memo/2006/082506c.pdf>

FNS Guidance, Interim Reporting Requirements for Participants Subject to Simplified Reporting, December 8, 2008

<http://www.fns.usda.gov/fsp/rules/Memo/2008/120808.pdf>

# Increase SNAP/Food Stamp benefit amounts for working families through complete implementation of the dependent care deduction.

The amounts that households must spend for certain basics are taken into account (by deducting them from gross income) when determining the level of SNAP/Food Stamp benefits they will receive. This is a common-sense recognition that such funds aren't available to help purchase food. One such cost is dependent care, but until 2008 the dependent care deduction was capped. When deductions are maximized net income is lower and food stamp allotments are higher. Generally, for each added \$10 of deductions from income per month, SNAP/Food Stamp benefits increase \$3 per month.

Section 4103 of the 2008 Farm Bill eliminated the cap on the allowable dependent care expenses households can claim for SNAP/Food Stamp purposes. Congress clearly recognized the substantial costs incurred by working families raising children or caring for elders or disabled adults in the home. Prior to this federal change, SNAP/Food Stamp households could only claim a maximum of \$175 per month in child/adult care expenses (\$200 maximum for children under age two). The uncapped dependent care deduction provides states and community outreach partners with the opportunity to reach additional working households *as well as* to increase benefits for current SNAP/Food Stamp recipients with dependent care costs.

- **Broadly define allowable dependent care expenses.**
  - States should *broadly define* dependent care to include not only private care costs and co-pays for subsidized care, but *also* the cost of pre- and post-school programs, adult-supervised summer and vacation camps, YMCA and Boys/Girls Club activities, as well as the cost of public or private transportation.
  - States should allow the deduction of transportation costs – travel to and from a care provider – on public transportation or via automobile (using the *federal mileage rate* used for federal IRS tax purposes and federal employees including FNS employees).
  - States should remind staff that, even if state child care subsidy programs limit child care to younger children, there is no lower age limit for claiming dependent care costs of a child under age 18 in SNAP/Food Stamps. In other words, the costs of an adolescent participating in after-school adult-supervised activities should be allowed as a claimable expense.
  - States can remind SNAP/Food Stamp staff that the same expansive definition of allowable expenses for children, including day-time care

## Resources

Food and Nutrition Act of 2008 Farm Bill, Public Law 110-246, June 18, 2008 [www.fns.usda.gov/fsp/rules/Legislation/pdfs/PL\\_110-246.pdf](http://www.fns.usda.gov/fsp/rules/Legislation/pdfs/PL_110-246.pdf)

Dependent care deduction: 7 C.F.R. § 273.2(f)(2) and (f)(3)

FNS Memos on Certification Issues in the 2008 Farm Bill (Dependent care at §4013)

Memo #1, issued 7/31/08: [www.fns.usda.gov/fsp/rules/Memo/2008/073108.pdf](http://www.fns.usda.gov/fsp/rules/Memo/2008/073108.pdf)

Memo #2, issued 8/29/08: [www.fns.usda.gov/snap/rules/Memo/2008/082908.pdf](http://www.fns.usda.gov/snap/rules/Memo/2008/082908.pdf)

Memo #3, issued 11/20/08: [www.fns.usda.gov/fsp/rules/Memo/2008/112008.pdf](http://www.fns.usda.gov/fsp/rules/Memo/2008/112008.pdf)

FNS Chart, Verifications Requirements and State Options, July 10, 2009

[www.fns.usda.gov/snap/rules/Memo/2009/verification-requirements.pdf](http://www.fns.usda.gov/snap/rules/Memo/2009/verification-requirements.pdf)

FRAC, SNAP/Food Stamp Tool Kit for Changing Times, October 2008 [www.frac.org/SNAP\\_toolkit\\_changing\\_timesOCT2008.htm](http://www.frac.org/SNAP_toolkit_changing_timesOCT2008.htm)

Massachusetts DTA Field Operations Memo 2007-19, Verification of Dependent Care Expenses, March 15, 2007

[www.masslegalservices.org/node/22687](http://www.masslegalservices.org/node/22687)

Massachusetts DTA Field Operations Memo 2008-49 on Implementation of Farm Bill Provisions, September 22, 2008

[www.masslegalservices.org/node/25918](http://www.masslegalservices.org/node/25918)

Internal Revenue Service 2010 Standard Mileage rates [www.irs.gov/newsroom/article/0,,id=216048,00.html](http://www.irs.gov/newsroom/article/0,,id=216048,00.html)

and transportation costs, should be used where a household incurs costs for the care of a *disabled adult member*, even if that member is not participating in the SNAP/Food Stamp household.

- **Allow households to *self-declare* care expenses.** Self-declaration of dependent care costs can reduce the administrative tasks of tracking and

filing verifications. FNS guidance on implementation of the 2008 Farm Bill confirms that states may allow dependent care expenses to be self-declared unless questionable. States also can work with their child care subsidy agencies to set parameters for typical child care expense amounts for self-declaration, above which verifications might be required. Regional differences might be considered in setting thresholds.

# Simplify the SNAP/Food Stamp earnings calculations for both wage earners and self-employed households.

SNAP/Food Stamp benefits are important work supports for those in regular jobs as well as those who are self-employed. The ranks of the latter include many who were entrepreneurs before the current downturn as well as some newly laid-off workers who have turned to self-employment in a tough labor market. Calculating countable income for the self-employed and regular workers in a way that is not confusing and error-prone for SNAP/Food Stamp workers and households should be a priority for states.

Two issues present particular challenges in this regard. Even though their countable gross income after business expenses typically is quite low, self-employed households often have a difficult time identifying and documenting all of their out-of-pocket expenses. Similarly, for workers in regular paid jobs, the 4.333 weeks per month formula used by most states to calculate income is confusing for SNAP/Food Stamp applicants unaccustomed to government mathematics.

States have options for more simply determining countable self-employment income and converting weekly income to a monthly amount. By adopting simplified methods, a state can reduce significantly the exposure to quality control errors, reduce the need for verifications, help SNAP/Food Stamp households better understand the reporting requirements, and maximize benefits without errors. Two options states should consider:

- **Create a standard self-employment business expense deduction.** Federal SNAP/Food Stamp regulations authorize states to create a standard business expense deduction (from pre-tax gross income) in lieu of requiring households to document actual business expenses. The standard business expense rate can be based on the state's TANF program rules for treatment of self-employment earnings, or based on a standard amount approved by FNS. The household is not always limited to the standard amount; it can still claim business expenses above the threshold if it documents the actual business-related expenses. In its 2009 State Options Report, FNS identified 16 states that have adopted policies to allow a standard business expense deduction for self-employed households. Delaware, Idaho, Washington State and Oklahoma allow a 50 percent of income standard deduction. Another seven states allow a 40 percent deduction. Households are not required to verify the expenses unless they are questionable or unless the household is claiming business expenses more than the standard deduction.
- **Adopt a four-week pay calculation month.** Federal SNAP/Food Stamp regulations direct states to calculate gross income by multiplying the weekly average by 4.333 weeks, unless the state's TANF program uses a different calculation. Pennsylvania's TANF and SNAP/Food Stamp benefits are calculated based on a four-week month. By eliminating that additional one-third of a week, the gross and net income amounts for SNAP/Food Stamp purposes are lower for the household, resulting in higher benefits. Further, a four-week month makes it easier for a household on simplified or semi-annual reporting to know when to report changes in gross income to the SNAP/Food Stamp office.

## Resources

Self-employment expenses: 7 C.F.R. § 273.11(b)(3)(iv) and (v)

Averaging income calculation: 7 C.F.R. § 273.10(C)(2)

FNS State Options Report, June 2009, page 14 [www.fns.usda.gov/FSP/rules/Memo/Support/State\\_Options/8-State\\_Options.pdf](http://www.fns.usda.gov/FSP/rules/Memo/Support/State_Options/8-State_Options.pdf)

Pennsylvania DPW Manual, Chapter 567

(using the four-week month)

[www.dpw.state.pa.us/oimpolicymanuals/manuals/bop/fs/567/567-01.htm#P110\\_5064](http://www.dpw.state.pa.us/oimpolicymanuals/manuals/bop/fs/567/567-01.htm#P110_5064)



## Section Two

# SNAP/Food Stamp Policy Options Especially Effective in Helping Older Americans and Persons with Disabilities

## Eliminate the SNAP/Food Stamp asset test and shorten the application process through categorical eligibility.

Section 1 of this guide reviews the need to eliminate the gross income test and assets test. While those aged 60 or over and persons with disabilities have never been subject to a gross income test under the SNAP/Food Stamp rules, the asset test is often a barrier in their seeking nutrition benefits. Many low-income older Americans have limited assets, but are anxious about losing them and/or providing reams of verification of the status of their assets, so that the assets test is a major barrier to their eligibility. This section focuses on the special need to eliminate the asset test for older Americans.

In 2008, Congress wisely recognized the unfairness of counting retirement and pension assets of older Americans, and thus amended the statute to treat tax-preferred retirement and pensions as non-countable assets. Many older Americans have modest liquid assets, savings accounts or former self-employment equipment, for example, that are far from adequate to generate income to meet their needs. Consistent with the intent of Congress, the *categorical eligibility* option (discussed earlier) provides states with the opportunity to more broadly exclude assets from being considered and thereby reach more low-income older Americans and persons with disabilities and simplify the application and verification process.

- **Eliminate the asset test for low-income older Americans and persons with disabilities.** Categorical eligibility provides states with the option to *simply eliminate the asset test* for all SNAP/Food Stamp households – older Americans and persons with disabilities as well as families with children. While categorical eligibility’s technical predicate is households receiving a needs-based TANF-funded

### Resources

Food and Nutrition Act of 2008 Farm Bill, Public Law 110-246, June 18, 2008 [www.fns.usda.gov/fsp/rules/Legislation/pdfs/PL\\_110-246.pdf](http://www.fns.usda.gov/fsp/rules/Legislation/pdfs/PL_110-246.pdf)

Categorical eligibility: 7 C.F.R. § 273.2(j)(2)(i)

FNS Letter to Regions, Categorical Eligibility Questions and Answers, January 26, 2010

[www.fns.usda.gov/fsp/rules/Memo/2010/012610.pdf](http://www.fns.usda.gov/fsp/rules/Memo/2010/012610.pdf)

FNS Broad-Based Categorical Eligibility Chart, December 18, 2009 [www.fns.usda.gov/fsp/rules/Memo/2010/121809.pdf](http://www.fns.usda.gov/fsp/rules/Memo/2010/121809.pdf)

FNS Letter to Regions, Categorical Eligibility Question and Answer, December 15, 2009

[www.fns.usda.gov/fsp/rules/Memo/2010/121509.pdf](http://www.fns.usda.gov/fsp/rules/Memo/2010/121509.pdf)

FNS Letter to Regions, Improving Access to SNAP through Broad-based Categorical Eligibility, September 30, 2009

[www.fns.usda.gov/snap/rules/Memo/2009/093009.pdf](http://www.fns.usda.gov/snap/rules/Memo/2009/093009.pdf)

Testimony of FNS Deputy Administrator Lisa J. Pino, House Agriculture Committee, January 25, 2010

<http://agriculture.house.gov/testimony/111/h012510/Pino.pdf>

FNS State Options Report, June 2009, Pages 7 and 9

[www.fns.usda.gov/FSP/rules/Memo/Support/State\\_Options/8-State\\_Options.pdf](http://www.fns.usda.gov/FSP/rules/Memo/Support/State_Options/8-State_Options.pdf)

FNS Questions and Answers on Certification Policies in the 2008 Farm Bill #2, August 29, 2008 (summary of tax-preferred asset vehicles)

[www.fns.usda.gov/fsp/rules/Memo/2008/120808.pdf](http://www.fns.usda.gov/fsp/rules/Memo/2008/120808.pdf)

FRAC maps of status of broad-based categorical eligibility in states and DC, January 17, 2010

[www.frac.org/pdf/map\\_eliminating\\_asset\\_test.pdf](http://www.frac.org/pdf/map_eliminating_asset_test.pdf) and [www.frac.org/pdf/map\\_raising\\_gross\\_income\\_test.pdf](http://www.frac.org/pdf/map_raising_gross_income_test.pdf)

benefit, USDA has recognized that *all* low-income households can benefit from TANF-funded information and referrals about domestic violence prevention, pregnancy prevention among multi-generational households and other cross-population TANF services. A recent analysis by USDA of states with broad-based categorical eligibility found that the majority of the 27 states and two territories with this option provide TANF-funded informational services and extended categorical eligibility to all SNAP/Food Stamp households, not just families with children. It is also a matter of fairness to treat the households similarly.

- **Shorten the application form for older Americans, reduce verifications and limit exposure to errors.** Eliminating the asset test allows states to significantly shorten the length of the SNAP/Food Stamp application by removing virtually all asset questions (liquid asset questions still are needed for purposes of identifying eligibility for expedited benefits). Eliminating asset tests also reduces the need for verifications and reduces the state's exposure to quality control errors. As a result of categorical eligibility, a number of states have taken the opportunity to substantially shorten the SNAP/Food Stamp application form and even create applications specifically designed for persons aged 60 or over.

# Increase monthly SNAP/Food Stamp benefits for older Americans through proactive promotion of the medical expense deduction.

SNAP/Food Stamp rules allow those aged 60 or over and persons with disabilities to deduct from countable income any medical-related expenses in excess of \$35 per month. By deducting medical expenses, states can lower the countable income and therefore increase the SNAP/Food Stamp benefit.

Advocates report that many states are reluctant to promote the medical expense deduction because of the extra work involved for caseworkers, the complexity of verifications, and the perceived lack of expenses among Medicaid or otherwise insured households. These are not good reasons to fail to inform needy people about possibly higher benefits. States should adopt strategies that can maximize this deduction, potentially minimize work for staff and address the particular process needs of beneficiaries. Too often older and disabled SNAP/Food Stamp household members are confused about what count as deductible expenses, and how to verify them without also compromising privacy about the medications, health supplies or treatments they receive.

In November 2009, FNS reported on a Quality Control sampling of older/disabled households and found that fewer than 10 percent of these households actually report medical expenses, including prescription medicines, health insurance, personal medical care, medical supplies, adult dependent care and more. No households reported transportation for medical care, over-the-counter medicines, equipment or eyeglasses. This merely underscores the potential gain from revisiting this issue for older Americans and persons with disabilities.

Options for states include:

- **Decreasing SNAP/Food Stamp workload and errors through a medical deduction waiver that gives a flat deduction.** In the New England Region, Massachusetts, New Hampshire and Vermont each have received an FNS waiver that allows elder/disabled households to receive a flat medical deduction, relieving the household of having to document detailed medical expenses. Massachusetts allows a \$90 standard deduction for any household that incurs more than \$35 in expenses. Vermont permits a \$138 standard deduction. Iowa, South Dakota, Texas and Wyoming also have implemented a standard medical expense deduction. States have found that the standard deduction saves both SNAP/Food Stamp workers and households the time and energy needed for collecting proofs of fluctuating medical expenses, and it reduces a state's potential for quality control errors due to erroneous calculations. An elder/disabled household with unreimbursed medical expenses that exceed the state's standard deduction should still be allowed to claim actual expenses if the household provides verification of higher expenses.
- **Increase SNAP/Food Stamp benefits by broadly defining allowable medical-related expenses.** As with the dependent care deduction, states should issue guidance reminding SNAP/Food Stamp workers of the broad range of costs that are allowable as deductible unreimbursed medical expenses, and encourage workers to proactively screen for these expenses. Even in states with broad Medicaid coverage, there are many health care and medical transportation expenses paid out-of-pocket. Many older Americans and persons with disabilities pay regularly for over-the-counter medications and health care supplies. They often use buses or taxis or their own cars to get to doctors or pick up medications. In addition to the more typical costs of doctors' visits and insurance premiums or co-payments, states can remind staff that allowable medical expenses include:
  - The cost of vitamins, pain relief, skin treatments, incontinence supplies, dentures, and other health care-related supplies that are prescribed or approved by a health provider.
  - Alternative health costs, including herbal remedies, acupuncture, and other treatments approved by a licensed practitioner.

- Cost of hearing aids, hearing aid batteries, electronic or Internet-based communication devices, eyeglasses and other vision care.
- Postage and telephone costs for mail-order medications.
- Veterinary care, animal food and other costs for a service animal.
- Public or private transportation costs to a doctor's appointment, pharmacy, or medical supply facility. If an older/disabled household uses a private car, state agencies can determine private transportation costs based on the *federal mileage rate* used by FNS staff, which often is higher than many state government mileage rates.
- **Ensure that application and recertification forms affirmatively ask about medical expenses, including transportation, and clarify the scope of required verifications.** It is critically important that SNAP/Food Stamp applications and recertification forms include questions to help an

older/disabled household identify out-of-pocket medical expenses *and* ask if they need assistance with verifications. FNS recently instructed state agencies that they may not presume a household does not want to receive a deduction for unreported expenses if the household is not informed of the range of allowable expenses and ways to verify them. FNS highlights the practices of Louisiana in helping older/disabled households flag potential medical expenses.

Further, federal regulations clarify that only the amount or costs of the unreimbursed medical care need be verified and not the reason for the medical care, unless questionable. Care should be taken to request only those medical expense verifications essential to establishing the amount, and to protect the privacy of older/disabled households, who need not divulge detailed medical information to claim the deduction.

#### Resources

Medical expenses deduction: 7 C.F.R. § 273.9(d)(3)

Medical expense verification: 7 C.F.R. § 273.2(f)(iv)

FNS Regional Letter, SNAP Applications' Statements About Unreported and Unverified Expenses, November 18, 2009

[www.fns.usda.gov/fsp/rules/Memo/2010/111809.pdf](http://www.fns.usda.gov/fsp/rules/Memo/2010/111809.pdf)

FNS SNAP Quality Control Handbook 310, Section 1170

[www.fns.usda.gov/snap/qc/pdfs/FNS\\_310\\_Handbook.pdf#xml=http://65.216.150.153/texis/search/pdfhi.txt?query=medical+expenses&pr=FNS&prox=page&rorder=500&rprox=500&rdfreq=500&rwfreq=500&rlead=500&rdepth=0&sufs=0&order=r&cq=&id=4ace92d211](http://www.fns.usda.gov/snap/qc/pdfs/FNS_310_Handbook.pdf#xml=http://65.216.150.153/texis/search/pdfhi.txt?query=medical+expenses&pr=FNS&prox=page&rorder=500&rprox=500&rdfreq=500&rwfreq=500&rlead=500&rdepth=0&sufs=0&order=r&cq=&id=4ace92d211)

Massachusetts DTA Field Operations Memo 2008-15, Implementation of the Standard Medical Deduction, March 21, 2008

[www.masslegalservices.org/node/23534](http://www.masslegalservices.org/node/23534)

New Hampshire DHHS Food Stamp Policy Manual, SR-07-13, regarding Medical Deduction Policy, October 2007

[www.dhhs.state.nh.us/FSM\\_hm/NEWFSM.HTM](http://www.dhhs.state.nh.us/FSM_hm/NEWFSM.HTM)

American Public Human Services Association, Successful Food Stamp Innovations, June 2006 [www.aphsa.org/Policy/Doc/Successful-Food-Stamp-Innovations.pdf](http://www.aphsa.org/Policy/Doc/Successful-Food-Stamp-Innovations.pdf)

Internal Revenue Service 2010 Standard Mileage rates [www.irs.gov/newsroom/article/0,,id=216048,00.html](http://www.irs.gov/newsroom/article/0,,id=216048,00.html)

## Encourage the Social Security Administration to meet its obligation to provide SNAP/Food Stamp applications for both SSI and RSDI applicants and recipients.

The federal Social Security Administration (SSA) has a *statutory obligation* to affirmatively assist Supplemental Security Income (SSI) applicants and recipients with SNAP/Food Stamp applications, as well as to promote SNAP/Food Stamp benefits to recipients of Retirement, Survivors, and Disability Insurance (RSDI, also referred to as Old Age, Survivors and Disability Insurance, or OASDI). SSA receives reimbursement from the U.S. Department of Agriculture Food and Nutrition Service for administrative expenses incurred in taking SNAP/Food Stamp applications for SSI recipients.

Here are some options for state SNAP agencies and anti-hunger community advocates and community groups:

- **Identify the scope of the underserved SSI population.** State agencies that pay a monthly supplement on top of the federal SSI payment (most do) should be able to determine how many SSI recipients in the state are not in receipt of SNAP/Food Stamp benefits. They can do so by conducting an internal data match, and factoring in the living arrangement of each SSI recipient (e.g., whether living alone, or in shared housing, institutionalized, in a group home, or in the household of another). This information can help the state understand the scope and demographics of the potentially underserved SSI population and the best strategies for outreach.
- **Explore a Combined Application Project (CAP) for SSI households.** Twenty-four states currently have pending or approved CAPs that provide SNAP/Food Stamp benefits based on the SSI household information provided and verified by SSA, often without the need for a separate application to the state. The CAP pilots reduce the need for older Americans/disabled households to be interviewed or provide verifications, and also reduce errors for states. Some states use the SSI application and redetermination process to trigger an automatic SNAP/Food Stamp benefit based on the client information provided by SSA. Some states, like Massachusetts and New York, also have done direct SNAP/Food Stamps EBT card mailings to pre-selected SSI households who meet the living arrangement and income requirements, enabling those households to enroll in SNAP/Food Stamp automatically upon using the EBT card for food purchases, and continuing on benefits for 36 months. Other states have developed a modified CAP pilot that involves mailing application information to potentially eligible SSI recipients. USDA
- and FRAC have developed extensive materials explaining how these demonstration pilots work.
- **Ensure SSA District Offices provide a simplified SNAP/Food Stamp application to RSDI and SSI applicants and recipients.** Independent of its obligations to SSI recipients, SSA also has a statutory obligation to inform Social Security beneficiaries of the SNAP/Food Stamp Program and make available a simplified application at the SSA District Office. States and anti-hunger advocates should ensure that SSA offices are making SNAP/Food Stamp applications readily available to Social Security recipients and urge SSA to include information on deductible medical expenses as well as options for applying. Further, eligibility factors verified by SSA (e.g., identity,

### Resources

SSA obligation to take applications for SSI households: 7 U.S.C. § 2020(I)

SSA obligation to RSDI households: 7 U.S.C. § 2020(J) See also 7 C.F.R. § 273.2(k) and § 273.2(1)

FNS State Options Report, June 2009, page 17

[www.fns.usda.gov/FSP/rules/Memo/Support/State\\_Options/8-State\\_Options.pdf](http://www.fns.usda.gov/FSP/rules/Memo/Support/State_Options/8-State_Options.pdf)

FNS Promising Practices Report: Combined Application Projects, Guidance to States for Developing Projects, March 2005

[www.fns.usda.gov/FSP/government/promising-practices/CAPsDevelopmentGuidance.pdf](http://www.fns.usda.gov/FSP/government/promising-practices/CAPsDevelopmentGuidance.pdf)

FRAC, A Guide to the Supplemental Security Income/Food Stamp Combined Application Pilots, January 2004

[www.frac.org/pdf/CAPreport.pdf](http://www.frac.org/pdf/CAPreport.pdf)

Center for Budget and Policy Priorities, Upcoming Medicare Change Is an Opportunity to Enroll Eligible Low-Income Seniors in Food Stamps, September 9, 2009

[www.cbpp.org/files/9-9-09fa.pdf](http://www.cbpp.org/files/9-9-09fa.pdf)

residence, citizenship or immigration status, amount of SSI and RSDI benefits) need not be reverified by the SNAP state agency because SSA is considered a reliable government data source for information.

- **Explore options to reach with SNAP/Food Stamps those RSDI recipients who have Low-Income Subsidy, Medicare Part D benefits.**  
Recent changes in Medicare law require SSA to share

information with Medicaid state agencies about recipients of the Medicare Part D Low-Income Drug Subsidy recipient status, to help states process Medicare Savings Program benefits. This data exchange provides as well a significant opportunity for SNAP/Food Stamp outreach to more low-income RSDI recipients.

## Section Three

# SNAP/Food Stamp Policy Options to Increase Benefits For All Low-Income Households and Reduce Agency Workloads

### Help low-income households avoid the “heat or eat” dilemma by maximizing SNAP/Food Stamp deductible shelter expenses (including utility costs).

Targeted state strategies to reduce the amount of countable net income used in the SNAP/Food Stamp calculation can enable the state to leverage higher benefit amounts for thousands of needy households. One key method is to maximize the shelter deduction by identifying all potential housing and utility costs, screening for new or excess heating or cooling charges, and taking maximize advantage of coordination with the Low Income Home Energy Assistance Program (LIHEAP). Three options include:

- **Adjust the standard utility allowance (SUA).** The SUA is a fixed dollar amount that each state develops to account for energy and utility costs incurred by households as part of the shelter deduction from income, instead of calculating SNAP/Food Stamps on fluctuating amounts presented by each household. (Amounts that household can show they spend in excess of the SUA also are deductible). The SUA is based on the typical household energy costs in the state. States usually develop three SUA amounts, a higher heating/cooling SUA, a non-heating/cooling utility SUA (e.g., cooking gas, electricity) and a phone-only SUA. The appropriate SUA is then added to the rental or mortgage costs of each household, rather than verifying and calculating SNAP/Food Stamp benefits with fluctuating heat and utility costs. Regular federal SNAP/Food Stamp rules require each state to update the SUA annually. A state can get estimates of changes in energy prices by using the Consumer Price Index for All Urban Consumers (CPI-U) or another data source from local utilities that shows changes in utility costs. In 2009, FNS granted a one-time blanket waiver to states to make a biennial adjustment to SUAs in 2010 rather than an annual adjustment, if an annual adjustment would result in a lower SNAP/Food Stamp benefit for households.

#### Resources

Standard Utility Allowance: 7 C.F.R. § 273.9(d)(6)(iii)(B)

Low-Income Home Energy Assistance Act (LIHEAA) program receipt and heating/cooling SUA: 7 C.F.R. § 273.9(d)(6)(iii)(C)

Mandatory verifications: 7 C.F.R. § 273.2(f)(1)

State agency options and deductible expenses: 7 C.F.R. § 273.2(f)(3)

FNS Survey of States' Standard Utility Allowances, effective October 1, 2008

[www.fns.usda.gov/FSP/rules/Memo/SUAAAlpha.htm](http://www.fns.usda.gov/FSP/rules/Memo/SUAAAlpha.htm)

FNS Policy Memorandum, Standard Utility Allowance – Annual Review and Adjustment, Biennial Option Blanket Waiver, August 18, 2009

<http://www.fns.usda.gov/snap/rules/Memo/2009/081809.pdf>

Massachusetts DTA Field Operations Memo 2007-31, April 2007 (announcing a special LIHEAA program benefit for SNAP/FS households)

<http://www.masslegalservices.org/node/22971>

FNS Chart, Verifications Requirements and State Options, July 10, 2009

<http://www.fns.usda.gov/snap/rules/Memo/2009/verification-requirements.pdf>

FRAC, Heat and Eat: Using Federal Nutrition Programs to Soften Low-Income Households' Food/Fuel Dilemma, March 2009

[http://www.frac.org/pdf/heat\\_and\\_eat09.pdf](http://www.frac.org/pdf/heat_and_eat09.pdf)

- **Provide state-funded LIHEAP benefits for SNAP/Food Stamp recipients not getting higher heating/cooling SUA.** Receipt of LIHEAP entitles a SNAP/Food Stamp household to have its shelter costs calculated using the heating/cooling SUA. States like Maine, Massachusetts, Rhode Island, Vermont, New York, Washington, and Wisconsin have encouraged their state LIHEAP agencies to amend LIHEAP State Plans to arrange to make many more households LIHEAP participants by providing a nominal cash LIHEAP benefit directly to SNAP/Food Stamp households not otherwise calculated with the heating/cooling SUA in the shelter deduction. This special LIHEAP benefit simplifies the shelter calculation for the agency and significantly increases SNAP/Food Stamp benefits for thousands of households. It also helps the LIHEAP agency meet its outreach obligations by targeting SNAP/Food Stamp households who may be unfamiliar with regular LIHEAP benefits.
- **Allow self-declaration of shelter expenses.** Under the federal SNAP/Food Stamp rules, certain eligibility factors must be verified at application, such as identity, income, residence, and non-citizen

status. However, information for many allowable income deductions need not be verified unless questionable. States are required to collect information from households on the amount of shelter expenses, but FNS recently confirmed that states are not required to verify the amount of shelter expenses unless the state agency finds the information provided is questionable.

Anti-hunger advocates report that it may be difficult or uncomfortable for a household to secure a written statement from a landlord or property manager verifying shelter costs. It can be especially challenging for households in doubled-up situations. Many states have instructed SNAP/Food Stamp workers that proof of shelter expenses is not mandatory and/or need not be verified unless questionable. Policy guidance to this effect has been issued by, e.g., Arkansas, Florida, Iowa, Maine, Maryland, Missouri and Utah. As with dependent care expenses, the fewer documents a household is required to provide, the fewer documents the SNAP/Food Stamp worker is required to record and file, much less verify, reducing administrative tasks all around.

## Section Four

# SNAP/Food Stamp Policy Options for Agency Workload Reduction

### Reduce administrative costs, cut delays and improve the processing of SNAP/Food Stamp applications by reducing the need for interviews.

States have a number of options to improve SNAP/Food Stamp business practices and reduce the burden on applicants and recipients by reducing the need for face-to-face interviews. FNS is encouraging states to develop such models that enable the state agency to process initial applications efficiently and to reduce unnecessary red tape (causing delays or incorrect interruption of benefits) at recertification. State options include:

- **Pursue a waiver of the face-to-face interview.** Currently 34 states have waivers of the face-to-face interview requirement, and more states are exploring these options at both application and recertification. Recent FNS guidance advises states that they need not document hardship in order to waive the face-to-face interviews. (The state agency may still do a face-to-face interview if determined appropriate, or if requested by the SNAP/Food Stamp household.) FNS reports that over half the states now are exploring call center models, some of which are designed to conduct pre-scheduled or “on-demand” interviews where the household can initiate the phone call at a time that fits its schedule.

As states move toward a phone interview systems, key factors to assure the accessibility and responsiveness of such systems are:

  - Are enough SNAP/Food Stamp workers available and phone lines functioning at the time of pre-scheduled or “on-demand” interviews? Is there sufficient backup?
  - Do the state agency procedures ensure that limited-English proficient persons and persons with disabilities are offered interpreters and/or access to updated appropriate communication technology (such as video relay service) to conduct phone interviews?
  - Are households which prefer to have a face-to-face interview at the local office guaranteed that option? (For example, households which wish to discuss sensitive information in person, do not have a phone, or prefer not to use up costly cell-phone or phone card minutes.)
  - Is there a toll-free number for Call Centers or out-of-area offices?
- **Pursue a waiver to eliminate the need for any interview at recertification for targeted households.** In September 2009 FNS granted

#### Resources

Waiver of face-to-face interview: 7 C.F.R. § 273.2(e); 7 C.F.R. § 273.14(b)(3)

FNS Policy Memorandum, SNAP Changes in FNS Approval of Waivers of the Face-to-Face Interview Requirement, February 13, 2009  
[www.fns.usda.gov/snap/rules/Memo/2009/021309.pdf](http://www.fns.usda.gov/snap/rules/Memo/2009/021309.pdf)

FNS State Options Report, June 2009; pages 24 and 25 [www.fns.usda.gov/FSP/rules/Memo/Support/State\\_Options/8-State\\_Options.pdf](http://www.fns.usda.gov/FSP/rules/Memo/Support/State_Options/8-State_Options.pdf)

Massachusetts waiver of recertification interview for elder and disabled households; FNS Waiver Response, September 3, 2009, Waiver #2090055; and Massachusetts DTA Field Operations Memorandum 2009-64A implementing the no-interview at recertification for elder/disabled households, November 23, 2009 [www.masslegalservices.org/node/29015](http://www.masslegalservices.org/node/29015)

FRAC, Access and Access Barriers to Food Stamps: A Guide to the Literature, February 2008 [www.frac.org/pdf/FSPaccess.pdf](http://www.frac.org/pdf/FSPaccess.pdf)

FNS Workload Management Matrix, March 4, 2009 [www.fns.usda.gov/fsp/government/pdf/matrix.pdf](http://www.fns.usda.gov/fsp/government/pdf/matrix.pdf)

FNS Guidance, Certification Policies to Support Workload Management, January 9, 2009 [www.fns.usda.gov/fsp/rules/Memo/09/010909.pdf](http://www.fns.usda.gov/fsp/rules/Memo/09/010909.pdf)

Massachusetts a waiver to eliminate the interview at recertification for older/disabled households without earned income. This is the first waiver of its kind granted to a state agency. Designed by the agency and Massachusetts Law Reform Institute, 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 SNAP/Food Stamp 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 – the phone or face-to-face interview will be scheduled. A core component of this waiver is that the state agency cannot deny or terminate SNAP/Food Stamp benefits without offering and scheduling an interview for the household. FNS has indicated that such a waiver, which includes an evaluation component, is available to other states.

# Use available options and strategies to reduce verification burdens for both SNAP/Food Stamp applicants and caseworkers.

The fewer documents a household is required to provide, the fewer documents the SNAP/Food Stamp worker is required to record and file, much less obtain secondary verification, reducing administrative tasks all around. While the state agency has an obligation to confirm the SNAP/Food Stamp eligibility factors to ensure qualified households receive the correct benefits, the verification process need not be excessive or cumbersome. States should examine existing policies and practices that create barriers for households and reduce tasks for workers and clerical staff.

- **Allow self-declarations for shelter, dependent care and other eligibility factors where permissible.** A number of states allow SNAP/Food Stamp households to self-declare dependent care and shelter expenses, unless questionable. Other eligibility factors also can be self-declared (e.g., household composition, sources of non-countable income, U.S. citizenship, and student eligibility). States can use their quality control data to determine which eligibility factors are more error-prone and align their verification requirements more closely to the more error-prone factors, unless federal regulation otherwise mandates verification. FNS recently issued a helpful chart reminding states which eligibility factors require mandatory verifications and which factors, notably child care and shelter costs, can be self-declared.
- **Ensure SNAP/Food Stamp staff understand the range of alternative verification methods and do not impose excessive verification demands.** Often one document is sufficient to verify multiple eligibility factors. For example, a client ID showing the current address and date of birth can verify identity, residence and age. It is not necessary to have separate documents for each eligibility factor. Many key eligibility factors can be verified by a wide range of documents. For example, federal regulations clearly instruct state agencies to accept any number of documents that can prove household identity or residence, and no single document is required. Eligibility factors that have not changed (e.g., residence, immigration status, shelter costs, medical expenses, dependent care, and unearned income) need not be re-verified at recertification.
- **Issue clear policy on verification needed only to claim deductions as opposed to establishing SNAP/Food Stamp eligibility.** Whether or not a state expands the scope of self-declarations, states can issue guidance that instructs SNAP/Food Stamp workers not to deny eligibility entirely where proof of a claimed deduction is missing (e.g., proof of excess shelter, dependent care, and medical costs). While the

## Resources

Verification requirements: 7 C.F.R. § 273.2(f)(1)

Verification of questionable information: 7 C.F.R. § 273.2(f)(2)

State agency verification options: 7 C.F.R. § 273.2(f)(3)

Collateral contact: 7 C.F.R. § 273.2(f)(4)(ii)

Verifications within 60 Days: 7 C.F.R. § 273.2(h)(2)

FNS Summary Chart, Verifications Requirements and State Options, July 10, 2009

[www.fns.usda.gov/snap/rules/Memo/2009/verification-requirements.pdf](http://www.fns.usda.gov/snap/rules/Memo/2009/verification-requirements.pdf)

FNS Workload Management Matrix, March 4, 2009 [www.fns.usda.gov/fsp/government/pdf/matrix.pdf](http://www.fns.usda.gov/fsp/government/pdf/matrix.pdf)

FNS Regional Letter, SNAP Applications' Statements About Unreported and Unverified Expenses, November 18, 2009

[www.fns.usda.gov/fsp/rules/Memo/2010/111809.pdf](http://www.fns.usda.gov/fsp/rules/Memo/2010/111809.pdf)

Massachusetts DTA Field Operations Memorandum 2006-20, Processing Denied or Closed Food Stamp Households, April 21, 2006

[www.masslegalservices.org/node/22001](http://www.masslegalservices.org/node/22001)

FRAC, Access and Access Barriers to Food Stamps: A Guide to the Literature, February 2008 [www.frac.org/pdf/FSPaccess.pdf](http://www.frac.org/pdf/FSPaccess.pdf)

FNS Regional Memorandum, Improving Program Access to Working Families, April 16, 2002

[www.fns.usda.gov/fsp/rules/Memo/2002/AccessforWorkingFamilies.htm](http://www.fns.usda.gov/fsp/rules/Memo/2002/AccessforWorkingFamilies.htm)

household may end up with lower benefits if a required verification for a deduction is missing, this is not a basis for outright denial of an application or for termination of benefits.

- **Minimize the need for reapplication by reopening denied applications when missing verifications are subsequently provided.** A significant number of SNAP/Food Stamp cases are denied at application or closed at recertification not because households are no longer financially eligible but due to procedural reasons related to lack of receipt of verifications or forms. Current federal regulations require that states give clients up to 60 days to provide from the date of application to provide necessary documents or verifications. However, the state agency is required to make a *determination of fault* in deciding whether the client receives full or partial benefits back to the application date. The fault determination can be burdensome for state agencies to administer.

With increased demand for SNAP/Food Stamp benefits and limited state agency resources, this fault decision becomes even more problematic. Are clients able to contact workers with verification questions or are voice mailboxes full? Could mailed or faxed documents provided by clients have been lost or misplaced in an office processing overwhelming amounts of paper each day?

In recognition of these constraints, states may want to consider simplifying the fault determination process within existing regulatory requirements. Massachusetts uses a procedure for opening a denied application or recertification that eliminates the need for a new application and ensures that the household receives full benefits if the household attempted to complete the application/recertification process. The household is not found at fault if the household provided at least one mandatory verification and an application interview (phone or in-person) was conducted. At recertification, the household must have made an effort to recertify in a timely way. By establishing simple rules for determining whether the client has attempted to

meet basic procedural requirements, substantial administrative headaches for both the SNAP office and clients can be avoided.

To stop the churning of SNAP/Food Stamp cases in the middle of certification periods, 12 states have received “break in service” waivers. These waivers allow a client additional time to respond to a Request for Contact or request for verification during the certification period. The case can be reopened if necessary information is provided within the expanded timeframe. States have requested these types of waivers to reduce the burden on households by reinstating them without doing another interview and reduce administrative tasks on workers. States with “break in service” waivers include: California, Connecticut, Delaware, Illinois, Iowa, Maine, Nebraska, Ohio, Pennsylvania, Utah, Washington State and Wisconsin. In most instances, reopening an existing SNAP/Food Stamp case is far easier for the client and worker than beginning a new application.

- **Ensure application and recertification forms clearly screen for allowable deductions, including medical expenses, costs for home ownership, and self-employment business expenses.** Households may not realize the scope of home ownership expenses that can be claimed outside of the mortgage (such as insurance, real estate taxes, water/sewer fees, and repairs) as shelter costs. This is especially common among older Americans who may be mortgage-free but still pay regular quarterly or annual taxes, insurance and other expenses on their homes. It is also critically important that SNAP/Food Stamp applications and recertification forms include questions to help an older or disabled household identify these expenses and understand how to obtain assistance with verifications. FNS has instructed states that they cannot presume a household does not want to receive a deduction for unreported expenses if the household is not informed of the range of allowable expenses and ways to verify them. As noted in Section 5 above, FNS has highlighted the practices of Louisiana in helping older American/disabled households flag potential medical expenses.

# Improve the quality of the SNAP/Food Stamp application process through use of technology options, including Web-based applications and document imaging.

Filing an application for SNAP/Food Stamp benefits *should* be a “snap”! Congress has always intended that the fundamental right to file an application be barrier-free *and* that any household which contacts a SNAP/Food Stamp office by phone or in person indicating hunger or food insecurity should be encouraged to apply. Federal law further protects a household’s right to file an “incomplete application” by allowing an applicant to initially provide only his/her name, address and signature to start the process. These core principles of the SNAP/Food Stamp application process should be protected and expanded upon as technology opens up new routes to pursue benefits. Additionally, Congress intended the Social Security Administration to play a proactive role in assisting elder/disabled households with SNAP/Food Stamp benefits. Especially in these tough economic times, states should consider a number of key, effective options to meet these aims:

- **Expand access to web-based SNAP/Food Stamp applications.** According to FNS, 25 states currently allow low-income persons directly or through assisting community partners to file SNAP/Food Stamp applications on-line. A majority of these states allow an “electronic signature” in lieu of a hand-written signature. Most on-line applications flow into the state’s computerized eligibility system by pre-populating data fields that eliminate the need for SNAP/Food Stamp workers to re-enter information. On-line applications can ensure timely filing of a SNAP/Food Stamp application and help with tracking timeliness processing. There are multiple benefits for states and consumers. However, states and anti-hunger advocates should ensure that online applications protect a household’s right to file an “incomplete” application at any point. States and advocates should also carefully evaluate and ensure that new technology models allow persons with disabilities and/or limited English proficiency to fully access and file the online application.
- **Encourage filing of joint applications for SNAP/Food Stamps with other government benefits such as joint applications when applying for Unemployment Insurance, Medicaid, subsidized child care, WIC and/or school meals.** Many of these programs collect and verify much of the same information and can often be relied upon as a government data source for verification of key SNAP/Food Stamp eligibility factors. States may wish to explore ways to electronically share – with client permission – the relevant eligibility information and verifications that can be used for SNAP/Food Stamp purposes.
- **Develop document imaging systems to collect and track verifications and reduce paperwork.** Several states have implemented document imaging

## Resources

- SNAP/Food Stamp application form: 7 C.F.R. § 273.2(b)  
Household’s right to file: 7 C.F.R. § 273.2(c)  
Electronic signature: 7 C.F.R. § 273.2(c)(1)
- FNS On-Line Application Systems Report, June 2009. [www.fns.usda.gov/fsp/applicant\\_recipients/state\\_systems.pdf](http://www.fns.usda.gov/fsp/applicant_recipients/state_systems.pdf)
- FNS State Options Report, June 2009 (page 23) [www.fns.usda.gov/FSP/rules/Memo/Support/State\\_Options/8-State\\_Options.pdf](http://www.fns.usda.gov/FSP/rules/Memo/Support/State_Options/8-State_Options.pdf)
- FNS Policy Memorandum, Household's Review of Information in Automated Systems – February 3, 2009  
[www.fns.usda.gov/snap/rules/Memo/2009/020309.pdf](http://www.fns.usda.gov/snap/rules/Memo/2009/020309.pdf)
- American Public Human Services Association, “Successful Food Stamp Innovations,” June 2006  
[www.aphsa.org/Policy/Doc/Successful-Food-Stamp-Innovations.pdf](http://www.aphsa.org/Policy/Doc/Successful-Food-Stamp-Innovations.pdf)
- FNS Policy Memorandum, On-line Food Stamp Applications, October 16, 2006 [www.fns.usda.gov/fsp/rules/Memo/06/101606.pdf](http://www.fns.usda.gov/fsp/rules/Memo/06/101606.pdf)
- FRAC, Access and Access Barriers to Food Stamps: A Guide to the Literature, February 2008  
[www.frac.org/pdf/FSPaccess.pdf](http://www.frac.org/pdf/FSPaccess.pdf)
- FRAC, SNAP/Food Stamp Tool Kit for Changing Times, October 2008 [www.frac.org/SNAP\\_toolkit\\_changing\\_timesOCT2008.htm](http://www.frac.org/SNAP_toolkit_changing_timesOCT2008.htm)
- FNS Workload Management Matrix, March 4, 2009 [www.fns.usda.gov/fsp/government/pdf/matrix.pdf](http://www.fns.usda.gov/fsp/government/pdf/matrix.pdf)
- FNS Guidance, Certification Policies to Support Workload Management, January 9, 2009 [www.fns.usda.gov/fsp/rules/Memo/09/010909.pdf](http://www.fns.usda.gov/fsp/rules/Memo/09/010909.pdf)

systems that effectively streamline administrative burdens for both case managers and clients. Arizona, Florida, South Carolina, Utah and Washington have successful document imaging models. Many other states are piloting document imaging options. These projects eliminate paper case records by creating scanned images of relevant case record documents which are linked to an electronic case file. Some models utilize a central or regional document imaging center for processing documents; others involve dedicated document imaging units co-located at local SNAP/Food Stamp offices.

With paper case records, lost client documents or misplaced case files are often an issue, especially given how overwhelmed most offices are. A scanned record that can be accessed by appropriate staff eliminates these issues. Document imaging

decreases the amount of person-hours currently spent copying, filing and tracking documents and case records. It also increases client satisfaction with the SNAP/Food Stamp process, since documents are provided once and not asked for again.

Document imaging has resulted in tremendous cost savings for states because fewer copiers are needed and more office space becomes available as electronic files replace case records. Some states are saving even more money through virtual offices that access electronic files from anywhere in the state. Finally, in the event of a disaster, states can respond quickly since electronic files allow for a transparent shift in workload. States should carefully consider the document imaging model that will work best given their existing business processes and technology.

## Section Five

---

# Increasing Participation in the Afterschool and Summer Nutrition Programs

---

Afterschool and summer programs are essential to children’s development, learning, and safety, as well as a key support for parents’ work. But programs across the country are struggling due to public and private dollars disappearing and struggling families having difficulty paying for their children to participate.

Numerous studies document the impact of afterschool and summer programs on improving academic achievement and reducing juvenile crime. When afterschool and summer programs lose funding, services are cut—fewer children are served, often for fewer days—or, even worse, the programs are forced to close their doors completely.

The federal afterschool and summer nutrition programs make available a reliable, entitlement stream of funding for these programs, offering an important fiscal platform that can help them keep their doors open during difficult times and expand in good times. For example, a year-round program serving afterschool suppers during the school-year and breakfast and lunch in the summer would receive \$732 per child in federal nutrition dollars. These dollars help ensure that limited state and local funding for afterschool and summer programs are used to support, expand, and improve services for children instead of being used to purchase food, and that children have access to the nutritious meals and snacks their bodies need.

The nutrition programs also support afterschool and summer programs in numerous other ways. The food acts as a magnet drawing children into the program. It also ensures that children are able to focus and engage throughout the length of the program.

There is significant room to grow participation in the afterschool and summer nutrition programs, primarily because too many afterschool and summer programs do not participate. States can play an active role in encouraging participation.

## Expand the Availability of Summer Nutrition.

The Summer Nutrition Programs (the Summer Food Service Program and the National School Lunch Program) are designed to take the place of the school lunch and breakfast programs during the summer, when hungry children are not in school. They help schools, local public agencies and nonprofits provide meals to low-income children who may not get good nutrition otherwise. Many families do not have the resources necessary to provide adequate nutrition to their children when school meals available during the academic year end as summer vacation begins. The Summer Nutrition Programs help local sites feed children up to two meals per day (receiving a reimbursement of about \$5.00 per child per day if they serve both breakfast and lunch). Each month that 10,000 children are fed every weekday through the Summer Nutrition Programs, more than a million federal dollars come into the community to feed children, help parents, help child-serving programs, and stimulate the economy.

There are several proven strategies to boost participation in the Summer Nutrition Programs:

- **Extend the Length of Programs.** Unfortunately, many Summer Food Programs only operate for a portion of the summer—sometimes for only four or five weeks—while low-income children badly need their services throughout the summer months. States should actively promote expanding the length of summer food service. This makes an enormous difference from a financial as well as nutritional perspective. A program that operates for only four weeks, serving breakfast and lunch to 10,000 children brings in \$1 million in federal funds; operating for 10 weeks would increase the federal funding for the community to \$2.5 million.
- **Serve Both Breakfast and Lunch.** During the summer, children need access to breakfast and lunch, but many sites serve only lunch. States should actively promote serving both meals as a way to increase the amount of nutritious food that children receive and as a way to increase the amount of federal funding per child coming into the state by 50 percent. To ensure that children can be at the sites for breakfast, states should encourage sponsors to serve breakfast later (at 8:30 a.m. as opposed to 7:30 a.m.).
- **Conduct Outreach and Provide Support to Sponsors and Sites.** The winter and very early spring are the best times for states to recruit new sponsors for the following summer, so advance planning can be done. States should recruit schools, local government agencies (such as parks and recreation departments), and nonprofit organizations to sponsor the program at numerous sites throughout their communities. (One sponsor can run the program in multiple sites.) Together, these types of organizations have the capacity to serve the entire community and to substantially increase the number of children participating. States also need to notify families where this program is available in their neighborhoods and how children can participate. This is always important, but especially needed now when the economy is so weak, new areas may be eligible (see below) and many children who never participated in the program before need access to summer meals. Information can be distributed through parent newsletters, schools' communication vehicles, electricity bills, libraries, religious congregations, community bulletin boards (electronic and hard copy), and hotlines to help parents locate the nearest site.
- **Identify Newly Eligible Communities and Promote Participation.** Federal dollars at the maximum rate are available if a summer nutrition site is located in a low-income area—where at least 50 percent of the children are eligible for free or reduced-price school meals. As the recession has caused many more children to be qualified for free and reduced price school meals, more communities are becoming eligible for the Summer Nutrition Programs. States can conduct aggressive outreach in these newly eligible and previously unserved communities to recruit sponsors and sites to participate in the programs, and to inform families that meals are available and how to participate. States should pay special attention to communities in which there are plant closings or employee layoffs.

### Resources

Strategies in Tough Economic Times: Increasing Access to Summer Meals

[www.frac.org/pdf/strategies\\_toughtimes\\_summermeals0509.pdf](http://www.frac.org/pdf/strategies_toughtimes_summermeals0509.pdf)

Summer Food Outreach Toolkit,

[www.frac.org/afterschool/summer\\_toolkit.htm](http://www.frac.org/afterschool/summer_toolkit.htm)

State child nutrition agency contact information,

[www.fns.usda.gov/cnd/Contacts/StateDirectory.htm](http://www.fns.usda.gov/cnd/Contacts/StateDirectory.htm)

# Expand the Number of Afterschool Programs that Use Federal Funds to Offer Nutritious Snacks and Meals During the School Year.

Afterschool programs can obtain federal reimbursement for snacks and meals through the federal National School Lunch Program and Child and Adult Care Food Program. Recent changes in these federal programs help meet the nutritional needs of more low-income children after school and help support afterschool programs, which play an important role in providing educational and enrichment activities during out-of-school time, as well as helping parents work and worry less about their children's after school time.

The snack and supper funds that the federal child nutrition programs offer require no state or local matching funds. While the amount of reimbursement for each snack is modest, the funds add up quickly: if the school year is 180 days, it amounts to nearly \$133 per child each school year. Increasing participation just in snacks by 5,000 children in an area means about \$700,000 per year in new federal funds to feed children and help afterschool providers. Afterschool programs that serve suppers can receive as much as an additional \$482 per child per year. Increasing supper participation by just 3,000 children means nearly \$1.5 million additional federal dollars.

*There are a number of ways that afterschool programs can receive federal reimbursement for snacks and meals. The National School Lunch Program (NSLP) and the Child and Adult Care Food Program (CACFP) provide funding for all snacks served at afterschool programs that are located in low-income areas where 50 percent of the children at the local elementary, middle or high school are qualified to receive free or reduced-price school meals. (NSLP also allows afterschool programs to receive snack reimbursement at tiered rates based upon each individual child's eligibility for free or reduced-price meals if the program is not located in a low-income area.)*

*Afterschool meals are only available through CACFP, not NSLP. In 13 states—Connecticut, Delaware, Illinois, Maryland, Michigan, Missouri, Nevada, New York, Oregon, Pennsylvania, Vermont, West Virginia, and Wisconsin—and the District of Columbia, afterschool programs (in low-income areas) can provide a meal in addition to or instead of a snack on the same area eligibility basis to children through age 18. Afterschool programs (in all states) can provide up to two meals and a snack to children younger than 13, but under this option, the level of program reimbursement is based upon the household income of the children who participate. Therefore, in the 13 states that are included in the afterschool meal program, afterschool programs that are located in a low-income area usually participate under the area eligibility option.*

There are several proven strategies to boost afterschool food participation:

- **Conduct Outreach to Afterschool Programs and Provide Technical Assistance.** States should ensure that all afterschool programs know about the funding available and how to apply. States can promote the program inexpensively, piggybacking on other regular communications with schools, local government agencies, faith-based organizations, and nonprofits that operate afterschool programs. Often these programs are receiving state support in other forms and are on state mailing lists and listservs. State child nutrition agencies also should provide technical assistance to afterschool programs on how to use the nutrition funds.
- **Assure that Publicly-Funded Afterschool Programs Are Using Available Federal Nutrition Funds.** Governors are often instrumental in making state supports for the basic costs of afterschool programs a priority. A budget office or gubernatorial instruction that organizations receiving such state funds to operate afterschool programs participate in the federally-funded afterschool snack and supper programs would substantially increase participation, bring additional revenue into the state, and help ensure that programs receiving state funds are more sustainable. Officials should understand that afterschool programs using state or private funding for food are mistakenly forgoing available federal dollars and thereby unnecessarily spending on food the state or private dollars that can be used to expand services.
- **Decrease Paperwork for Programs that Serve Afterschool Snacks and Meals:** Since this

program is administered at the state level, states have considerable discretion in developing paperwork and administrative requirements. States can re-evaluate their administrative requirements to ensure the smallest possible burden on afterschool programs. For example, states can create an Afterschool Snack and Meal application; can make it easier for schools to operate the Afterschool Meal Program; can design a training on just running the Afterschool Snack and Meal Programs; and can ease the administrative requirements for schools to run the Afterschool Meal Program.

- **Increase the Number of Children Receiving Meals After School.** In these difficult times, even more children need access to a nutritious meal after school, on weekends, and during school holidays. As mentioned above, thirteen states (Connecticut, Delaware, Illinois, Maryland, Michigan, Missouri, Nevada, New York, Oregon, Pennsylvania, Vermont, West Virginia, Wisconsin) and the District of Columbia are included in the Afterschool Meal Program that makes it easier to serve a meal in addition or instead of a snack. Some of the states are new to the program, while others have had the program for years. Especially those states new to the program need to conduct outreach and aggressively encourage both school and community-based afterschool programs to serve a meal instead of or in addition to a snack. States that have had the program for years need to ratchet up efforts to increase the number of children who receive meals at their programs that

operate after school, on weekends, and during school holidays, and need as well to target lagging geographic areas.

Afterschool programs also can receive federal funding to serve up to two meals and a snack to children younger than 13. (This option is available in all states, but most afterschool programs in low-income areas in Afterschool Meal Program states choose to participate in that program because it is easier to operate.) Very few afterschool programs participate in this option. States should conduct outreach to encourage afterschool programs to participate. In addition, states can alleviate some of the administrative work of the program. For example, each child must be individually qualified to participate, but afterschool programs can get this information from the local schools that have already qualified their students to participate in free or reduced-price school meals. States can encourage schools to share the eligibility information.

- **Involve Other State Agencies Working with Afterschool Programs.** Many states are allocating a variety of funds to support afterschool programs, involving a variety of state agencies in direct contact with these programs. A state can set up an interagency task force (including the child nutrition agency, the licensing bureau and any agencies that distribute afterschool funding) to promote participation in the afterschool nutrition programs.

#### Resources

Outreach Materials for the Afterschool Nutrition Programs, [www.frac.org/afterschool/outreach.htm](http://www.frac.org/afterschool/outreach.htm).

Information on Implementing the Afterschool Meal Program for State agencies, [www.frac.org/afterschool/pdf/implementing\\_afterschool\\_meal\\_program.pdf](http://www.frac.org/afterschool/pdf/implementing_afterschool_meal_program.pdf).

Information for afterschool programs on moving from snacks to suppers, [www.frac.org/afterschool/pdf/moving\\_snack\\_to\\_meal.pdf](http://www.frac.org/afterschool/pdf/moving_snack_to_meal.pdf).

USDA Guidance on Streamlining At-Risk Afterschool Meal Participation for School

Food Authorities Currently Participating in the National School Lunch Program

[www.fns.usda.gov/cnd/care/Regs-Policy/policymemo/2007-2009/CACFP-08-2008.pdf](http://www.fns.usda.gov/cnd/care/Regs-Policy/policymemo/2007-2009/CACFP-08-2008.pdf).

USDA Guidance on Accommodations for Non-Traditional Program Operators (including the Afterschool Snack and Meal Program), [www.fns.usda.gov/cnd/care/Regs-Policy/policymemo/2007-2009/CACFP\\_11-2007.pdf](http://www.fns.usda.gov/cnd/care/Regs-Policy/policymemo/2007-2009/CACFP_11-2007.pdf).

State child nutrition agency contact information, [www.fns.usda.gov/cnd/Contacts/StateDirectory.htm](http://www.fns.usda.gov/cnd/Contacts/StateDirectory.htm).

## Section Six

---

# Increasing Participation by Low-income Children in the School Breakfast and Lunch Programs

---

Like the SNAP/Food Stamp Program, school nutrition programs are especially valuable to states in challenging economic times because of their entitlement structure. They are not limited by fixed appropriations or fixed numbers of participants, but instead are able to grow with the increased need. When people are laid off or face reduced wages, they can apply for school meals and receive immediate help. Schools can add more eligible children without any new federal or state appropriations or legislation.

Increasing participation in school meal programs helps children, families, schools and communities. It helps ensure that students, especially low-income children, eat nutritious meals and begin each school day ready to learn. It helps families stretch their limited food budgets. And federal funds for school meals support schools and communities with growing resources even as states face budget cuts in other programs and contexts.



## Improve Direct Certification into School Meals of SNAP and TANF Recipient Children.

Direct certification can greatly streamline the school meal application process for both families and schools by eliminating the need for paper applications for students from households that participate in SNAP/Food Stamps, Temporary Assistance to Needy Families (TANF), or the Food Distribution Program on Indian Reservations (FDPIR). Schools have the option to certify children in all three groups without a paper application, and must do so for children that receive SNAP/Food Stamps.

Under the direct certification process school districts and the state education agency work with the State SNAP/Food Stamp agency and other agencies to match enrollment data to determine which children can be certified for free school meals without further inquiry into their eligibility. Schools cross-reference their student files (taking precautions to ensure students' privacy) with participant files of the other programs and then notify the eligible households that their children qualify for free school meals.

There are two methods states can use for direct certification. Most states use computer matching of SNAP records against student enrollment lists, which require no action by children's parents. The "letter method," an older system whereby families are required to return a letter from the SNAP agency to the school for direct certification, is still used as the primary method in only one state, while a few use it as a backup system to data matching.

To increase the impact of direct certification and to improve its ability to qualify the growing number of children affected by the recession, state agencies should adopt the following practices:

- **Maintain an effective data matching system that is updated monthly and give local school districts easy access to the data, especially now when SNAP participation continues to increase dramatically each month because of the recession.** Conducting data matches only at the beginning of the school year misses millions of children who become eligible during the school year. In addition, improvements to SNAP (described earlier) including raising the gross income test and counting all dependent care expenses, also mean that many more working families may become eligible for SNAP during the school year and therefore also qualified for free school meals through direct certification.
- **Eliminate the "letter method," whereby families receive a letter of eligibility and must return it to the school before the child begins receiving free meals.** This antiquated practice slows down the process and increases the likelihood that the child will fall through the cracks due to incorrect addresses, language barriers, literacy issues, or other barriers to replying. Instead, eligible families should simply be sent a letter notifying them that their children can receive free meals at school, unless the family chooses to opt out.
- **Work with schools to conduct direct certification for children receiving TANF and FDPIR.** All schools are required to directly certify SNAP recipients, but it is optional for TANF and FDPIR recipients. By focusing solely on SNAP, schools are not identifying all of the children who are automatically eligible for free meals.

### Resources

FRAC Facts on Direct Certification, [www.frac.org/pdf/direct\\_cert\\_facts.pdf](http://www.frac.org/pdf/direct_cert_facts.pdf)

USDA Policy Memo SP 38-2009, [www.fns.usda.gov/cnd/Governance/Policy-Memos/2009/SP\\_38-2009\\_os.pdf](http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2009/SP_38-2009_os.pdf)

Direct Certification in the National School Lunch Program: State Implementation Progress (USDA Report to Congress, October 2009), [www.fns.usda.gov/ora/MENU/Published/CNP/FILES/NSLPDirectCertification2009.pdf](http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/NSLPDirectCertification2009.pdf)

Data Matching in the National School Lunch Program, Approaches to Direct Certification and Direct Verification: Guide for State and Local Agencies, [www.fns.usda.gov/ora/MENU/Published/CNP/FILES/DataMatchingGuide.pdf](http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/DataMatchingGuide.pdf)

## Ensure that Homeless Children Receive Free Meals.

Homeless children are “categorically eligible” for free school meals, which means they do not have to complete a paper application to receive free meals. The McKinney-Vento Act defines a “homeless” child for school meals purposes as a child “lacking an adequate regular nighttime residence.” This includes children: in families sharing housing with other families; living in motels or campgrounds due to the lack of alternative adequate accommodations; living in emergency or transitional shelters; awaiting foster care placement; and living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings.

In order for homeless children to be automatically qualified, the school district’s Homeless Education Coordinator must confirm their status with the school nutrition program. The Coordinator sends a list of names of the qualified students to the school food service director. Too often, this step is neglected and homeless families must navigate the paper application process, which takes longer and frequently is hindered by communication challenges. Moreover, homeless families are coping with so much stress and paperwork for multiple programs that the school meal application may not get filed.

To ensure that homeless children are qualified for free school meals, states should assure that school districts adopt the following practices:

- **Connect and build communication between the school nutrition program and the homeless education program.** Frequent and regularly scheduled communication between these administrative areas within the school district is crucial.
- **Establish clear procedures for teachers to report on children’s status, since teachers are likely to be the first to know about a change in a child’s situation.** Teachers and all staff should know the definition of “homeless,” as well as how to inform the appropriate coordinator so that no child slips through the cracks.
- **Encourage households that take in homeless families to submit a school meal application for themselves.** Frequently these families become eligible for free or reduced-price meals because of the increased size of the household.

### Resources

FRAC Resources on Homeless, Runaway and Migrant Youth,  
[www.frac.org/html/federal\\_food\\_programs/cnreauthor/migrant.htm](http://www.frac.org/html/federal_food_programs/cnreauthor/migrant.htm)

USDA Policy Memo on Categorical Eligibility,  
[www.fns.usda.gov/cnd/Governance/Reauthorization\\_Policy\\_04/Reauthorization\\_04/2004-09-17.pdf](http://www.fns.usda.gov/cnd/Governance/Reauthorization_Policy_04/Reauthorization_04/2004-09-17.pdf)

## Require Schools to Offer Breakfast.

States can mandate that schools participate in the school breakfast program, and about half the states have laws requiring that all schools or some schools (typically those with at least a certain proportion of low-income students) participate in the program. State school breakfast mandates ensure that a greater number of children have access to this important school meal.

States can take the following actions to ensure that as many schools as possible offer the program:

- **Pass legislation or administrative rules that require breakfast programs in all schools with significant numbers of low-income students.** In some states this would mean a mandate for every school while in others it might be schools with 20 percent or more students eligible for free and reduced-price meals.
- **Implement requirements for schools that don't have a breakfast program to report publicly the reasons why.** This may be easier to effect than a mandate and often can result in schools offering a breakfast program after they weigh the costs and benefits.
- **Require school districts to arrange bus schedules to ensure that all children arrive in sufficient time for children to obtain breakfast prior to the instructional day.**
- **In states that do require schools to offer breakfast, track whether schools are complying.** More schools may now be required to offer the program given the growing number of children who qualify for free and reduced-price meals due to the recession.

### Resources

FRAC School Breakfast Scorecard, [www.frac.org/pdf/breakfast09.pdf](http://www.frac.org/pdf/breakfast09.pdf)  
USDA Breakfast Expansion Tool Kit, [www.fns.usda.gov/cnd/breakfast/expansion/default.htm](http://www.fns.usda.gov/cnd/breakfast/expansion/default.htm)

## Encourage Universal Access and In-Classroom Nutrition Strategies that Maximize Participation.

Offering lunch and breakfast free to all students – and offering breakfast in the classroom – are important strategies to maximize school meal participation, especially in schools with high numbers of free and reduced-price children. Such schools often are able to offer “universal” meals (free to all students) without incurring costs beyond federal reimbursements.

The universal approach reduces stigma and increases overall participation, so that every child can do better in school. The increased volume of meals produces economies of scale and higher overall revenues, allowing schools to forgo the collection of fees from paying students and still manage their costs.

“Provision 2” is a federal option to make it easier for schools to offer universal meals. It enables schools to reduce paperwork and lower administrative costs while offering meals (breakfast and lunch, or either one) at no charge to all students. Under Provision 2, all students are offered free meals, regardless of income, and schools collect applications for free and reduced-price meals only once every four years. The reimbursement rate for meals for all four years then is based on the percentage of meals served in each category (free, reduced-price and paid) during the “base year.”

Provision 2 schools pay the difference, if any, between the cost of serving meals at no charge to all students and the federal reimbursement for the meals. The increased participation (and increased federal reimbursement) and the significant administrative savings from processing applications only once every several years help offset all or much of the cost differential.

Breakfast in the classroom is an even more successful variant of offering universal meals. It dramatically increases participation by removing barriers, such as tight school bus schedules, or school security lines, or simply students’ desire to play on the playground, that prevent students from arriving at the cafeteria in time for breakfast before the first bell rings. Schools can use a variety of methods to get breakfast to students at the beginning of the school day, including serving breakfast in the classroom, allowing students to serve themselves through “grab and go” carts or kiosks set up in school hallways or cafeterias, or by offering breakfast after first period (typically for middle and high school students) to eat in the beginning of second period. Research has shown that classroom breakfast results in improved test scores, better student behavior and attendance, and decreased tardiness.

States should strongly encourage districts to implement the following practices in schools with large numbers of low-income students to maximize participation in the school meal programs.

- **Utilization of Provision 2.** States should provide easily accessible online materials to help districts utilize the program. States should support the use of Provision 2 through telephone, online and peer technical assistance. School districts need technical assistance to analyze viable options for providing free meals to all students. States can provide spread sheets, organize peer technical assistance among food service directors, and provide training for school nutrition program staff in best practices for offering universal meals.
- **In-classroom breakfast.** States should provide assistance to school districts and schools in strategizing how to do this. States also can help schools obtain start-up funds to support in-classroom breakfast programs as well as other models that encourage high levels of participation in breakfast. States can identify local funding sources to support the expansion of programs and advocate for state and local funds to be designated for this purpose.

### Resources

USDA Provision 2 Resources, [www.fns.usda.gov/cnd/Governance/prov-1-2-3/provision1\\_2\\_3.htm](http://www.fns.usda.gov/cnd/Governance/prov-1-2-3/provision1_2_3.htm)

FRAC Provision 2 Fact Sheet, [www.frac.org/pdf/provision2.PDF](http://www.frac.org/pdf/provision2.PDF)

USDA Breakfast Expansion Tool Kit, [www.fns.usda.gov/cnd/breakfast/expansion/default.htm](http://www.fns.usda.gov/cnd/breakfast/expansion/default.htm)

FRAC Breakfast Outreach Center, [www.frac.org/html/federal\\_food\\_programs/programs/SBP\\_outreach.htm](http://www.frac.org/html/federal_food_programs/programs/SBP_outreach.htm)

## Successful School Meal Application Campaigns.

States should encourage school districts to conduct comprehensive application campaigns at the beginning of the school year, and also to conduct vigorous outreach throughout the year, especially when economic conditions at the national or local level are deteriorating (e.g., local plant closings or layoffs.) Students can become newly eligible for free or reduced-price meals at any time during the school year when a member of the household loses a job or wages, and many families, including those affected by the recession, do not know that they can apply or reapply any time during the school year.

To ensure that newly eligible children are qualified for free school meals, states should conduct frequent direct certification matches (discussed earlier) and also should support school districts' ongoing outreach efforts to potentially eligible families:

- **Provide public service announcements and other media support** that encourages families to complete school meal applications, especially at the beginning of the school year, but also throughout the school year.
- **Simplify the state's model school meal application to make it easier for families to complete.** Also, states should encourage school districts to post their application forms and criteria on school websites and allow parents to submit applications electronically.
- **Translate the model application into all languages spoken by a significant number of families in the state.** Local school districts have limited resources for translation services, and state agencies can relieve them of much of the cost.

### Resources

FRAC's Guide to Collecting School Meal Applications, [www.frac.org/pdf/guide\\_collecting\\_school\\_meal\\_apps.pdf](http://www.frac.org/pdf/guide_collecting_school_meal_apps.pdf)

USDA Income Eligibility Guidelines and Manual, [www.fns.usda.gov/cnd/Governance/notices/iegs/IEGs.htm](http://www.fns.usda.gov/cnd/Governance/notices/iegs/IEGs.htm)

USDA School Meal Application in 25 Languages, [www.fns.usda.gov/cnd/frp/frp.process.htm](http://www.fns.usda.gov/cnd/frp/frp.process.htm)



## Section Seven

---

# Increasing Participation in the Child and Adult Care Food Program

---

### Increase Family Child Care Providers' Participation in the Child and Adult Care Food Program.

The Child and Adult Care Food Program (CACFP) provides reimbursements for meals and snacks in Head Start programs, child care centers, and family child care homes. The maximum reimbursement amounts go to providers or children with incomes below 185 percent of the poverty line or providers in low-income areas.

CACFP also provides crucial nutrition standards, training and monitoring for family child care providers. These providers – many of them low-income women – are operating a valuable child care business in their homes. Expanding the CACFP program to reach more family child care homes will bring much needed nutrition benefits to children in care, improve the quality of care, and inject federal funds into the state's economy.

A home serving six children could receive up to \$6,100 in federal reimbursements for food per year. For each additional 1,000 children participating in the program, about \$1 million per year in federal funds would be injected into the state economy. The federal funding comes without any state match requirement.

In the weak economy, families are hard-pressed to make ends meet as parents experience pay cuts or reductions in work hours. Many of these families have children in child care, and these children need extra support, including plenty of healthy, nourishing food.

Unfortunately, many family child care providers do not know about the Child and Adult Care Food Program. Nationally, only about half of the eligible child care homes participate. There is an enormous potential for increasing the use of this resource. The following are effective state strategies with a proven track record for increasing participation in CACFP.

- **Promoting the use of special CACFP outreach and expansion grants.** fully federally-funded CACFP grants provide funding for sponsoring organizations to conduct outreach to family child care homes in low-income and rural areas. (Sponsors are nonprofit organizations that report to the state and administer CACFP on the local level directly to family child care homes.) The grants allow sponsoring organizations to undertake intensive efforts to reach out in often under-served areas. Many states are underutilizing this funding stream through which federal money can be used to bring more providers into CACFP.
- **Partnering on CACFP outreach with the state's child care subsidy and child care licensing agencies.** Interagency cooperation between the state CACFP agency and the child care subsidy and licensing agencies can bring a broader, more aggressive CACFP outreach campaign to reach providers already connected to state agencies. For example, the child care agency that distributes the Child Care Development Fund and/or TANF child care funds can increase participation in CACFP by distributing CACFP promotional materials along with the child care subsidy check mailed to parents or providers. The state child care licensing agency can include CACFP promotional materials as part of the licensing application and training process for providers.
- **Extending CACFP eligibility to all eligible licensed and regulated family child care.** The CACFP agency can increase participation by extending eligibility to all family child care homes that meet federal, state or local approval standards, not only those that are fully licensed. Many states exempt

many, or all, types of small family child care homes from full licensing requirements, considering them “license exempt” for general purposes. Many of these homes receive subsidies from the state to serve children from low-income families. But some states then turn around and require full licensing

for CACFP. This is self-defeating. Many of these license exempt homes serve very low-income children and need the nutrition as well as child care subsidy funds to serve children well. A number of states extend CACFP eligibility to license-exempt child care, as allowed by federal rules.

#### **Resources**

Child and Adult Care Food Program Outreach and Promotion

[www.frac.org/html/federal\\_food\\_programs/programs/cacfp.html](http://www.frac.org/html/federal_food_programs/programs/cacfp.html)

USDA Policy Memorandum Recommending the Elimination of Unnecessary State Generated Paperwork Requirements

[www.fns.usda.gov/cnd/care/Regs-Policy/policymemo/2007-2009/CACFP\\_05-2007.pdf](http://www.fns.usda.gov/cnd/care/Regs-Policy/policymemo/2007-2009/CACFP_05-2007.pdf)

USDA Paperwork Reduction in the Child and Adult Care Food Program Report

[www.fns.usda.gov/cnd/care/Regs-Policy/policymemo/2007-2009/CACFP\\_02-2007.pdf](http://www.fns.usda.gov/cnd/care/Regs-Policy/policymemo/2007-2009/CACFP_02-2007.pdf)

State CACFP agency contacts

[www.fns.usda.gov](http://www.fns.usda.gov)

# Expand the Number of Homeless and Domestic Violence Shelters that Use the Child and Adult Care Food Program to Feed Children.

The number of homeless children and families is increasing. *Foreclosure to Homelessness 2000, the forgotten Victims of the Subprime Crisis*, a report issued by the National Coalition for the Homeless and other national organizations, details the increase in the number of homeless families. The Child and Adult Care Food Program (CACFP) can be the source of the funds that homeless shelters need to feed children in their care.

Homeless and domestic violence shelters are eligible to receive reimbursements for up to three meals (or two meals and a snack) each day for children up to age 18. Through CACFP, shelters could be eligible to receive up to \$2,200 per child per year. The program reimbursements come completely from federal funds, with no requirement for a state match. Despite the useful resource that CACFP can be, participation in the program is very low and many shelters are unaware of the program. States should take action to increase participation in the CACFP component for children in homeless and domestic violence shelters:

- **Outreach and technical assistance to participating shelters.** The CACFP state agency should work with partners such as homelessness and domestic violence organizations to teach shelters about the program. The state agency can place articles in newsletters distributed to shelter providers, speak at meetings of shelter providers or send mailings to those on the mailing lists of homelessness and domestic violence organizations.
- **Make the program user-friendly for shelters.** Since the program is administered through each state, states should take steps to make the program easier for the shelters that potentially will participate in it. According to a USDA policy memorandum, Accommodations for Non-Traditional Program Operators, states should review program requirements to ensure that they do not place unnecessary administrative burdens on already overworked shelter staff and volunteers.

USDA has made it clear that paperwork should be adapted to meet the special needs of shelters, so that it is easier for shelter personnel to understand and comply with simplified record-keeping requirements including CACFP applications (which should not require management plans), child enrollment/eligibility, and documentation of CACFP and food service-related costs.

## Resources

FRAC CACFP for Homeless Shelters Outreach Tool Kit, including model programs, outreach materials (including newsletter articles, brochures and power point), and newsletter [www.frac.org/html/federal\\_food\\_programs/programs/homeless/homeless\\_index.html](http://www.frac.org/html/federal_food_programs/programs/homeless/homeless_index.html)

USDA Policy Memorandum Accommodations for Non-Traditional Program Operators  
[www.fns.usda.gov/cnd/care/Reqs-Policy/policymemo/2007-2009/CACFP\\_11-2007.pdf](http://www.fns.usda.gov/cnd/care/Reqs-Policy/policymemo/2007-2009/CACFP_11-2007.pdf)