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Administrative Directive

Section 1

Transmittal:	07-ADM-10
To:	Local District Commissioners
Issuing Division/Office :	Center for Employment and Economic Supports
Date:	December 24, 2007
Subject:	The Working Families Food Stamp Initiative (WFFSI)
Suggested Distribution:	Food Stamp Directors Temporary Assistance Directors Staff Development Coordinators
Contact Person(s):	Food Stamp Policy Bureau – 1-800-343-8859, extension 3-1469
Attachments:	Attachment A: LDSS-4921 WFFSI Screening Sheet
Attachment Available On – Line:	yes

Filing References

Previous ADMs/INFs	Releases Cancelled	Dept. Regs.	Soc. Serv. Law & Other Legal Ref.	Manual Ref.	Misc. Ref.
01 ADM-8 99 ADM-9 04 ADM-1		387.7 387.9(c) 387.19	7 CFR 273.2(e)	FSSB, Sections 4, 5, and 15	

Section 2

I. Summary

- The Governor's Working Families Food Stamp Initiative (WFFSI) pertains to any Non-Temporary Assistance Food Stamp (NTA-FS) Program applicant or recipient household that has at least one adult member who is either:
 - working 30 hours per week or more **or**
 - earning an average weekly income equal to or greater than the federal minimum wage (FMW) times 30 hours per week.
- In addition, any NTA-FS applicant or recipient household that has at least **two** adult members **each** who is:
 - either working 20 hours per week or more **or**
 - earning an average weekly income equal to or greater than the federal minimum wage (FMW) times 20 hours per week also is qualified to participate in the Working Families Food Stamp Initiativeis qualified to participate in the Working Families Food Stamp Initiative (WFFSI).
- As of January 1, 2008, any local social services district that wishes to waive the face-to-face interview for all households that meet the above requirements may do so, as long as they do so for all households qualified to participate in WFFSI. The requirement that local districts **must** waive the face-to-face interview for all households qualified to participate in WFFSI is predicated on and will follow the roll out and full statewide implementation of the phone recertification waiver.
- As of January 1, 2008, members of households that are qualified to participate in WFFSI will no longer be required to be finger imaged, except in New York City where, at the six month mark (in July 2008) after the rollout of multiple expanded locations for households to be finger imaged, the results of an evaluation will be used to determine the disaggregated effectiveness of the Automated Finger Imaging System (AFIS) from other existing anti-fraud and administrative improvement measures in preventing duplicate participation in the Food Stamp Program.
- Except for food stamp (FS) claims that originally were established because of overpayments due to either an Intentional Program Violation (IPV) or fraud, any claims that previously have been terminated may not be re-established against households that qualify to participate in the WFFSI.
- For currently active FS households that qualify to participate in the WFFSI, except for FS claims that were established because of overpayments due to either an IPV or fraud, the entire amount of any existing claims that will not be collected within a three year period at the current rate of recoupment may be compromised.
- In conjunction with the WFFSI, the Office of Temporary and Disability Assistance (OTDA) is in the process of developing an electronic application for the Food Stamp Program and a multi-program eligibility screening tool. In its first phase, this electronic application will be a facilitated application hosted by community partners in the local district.

II. Purpose

The purpose of this Administrative Directive (ADM) is to provide the local districts with information about the Working Families Food Stamp Initiative (WFFSI) and to provide guidance on changes in policy and procedures related to the implementation of this initiative.

III. Background

Two recent Urban Institute studies commissioned by the US Department of Agriculture (USDA) cited eligible working families, particularly those with income between 100% and 130% of poverty, as those least likely to participate in the Food Stamp Program (FSP). The studies both had one central point: it is the complexity of the program and of the application process that keep working families from accessing the program. The “transaction costs” of the application process, such as the need to take time off from work, when measured against the potential modest benefit to be received, discourage working families from filing and following through on applications, particularly when the monthly benefit to be received would be less than \$100.

The WFFSI is an effort to reduce the transaction costs for working families and individuals associated with applying for and continuing to receive food stamp benefits, while maintaining adequate protections to ensure the continued integrity of the Food Stamp Program.

IV. Goals

OTDA’s goal is to add at least 100,000 households (approximately 215,000 people) to New York’s Food Stamp rolls by the end of December 2008. Since the majority of these households are expected to be enrolled through the WFFSI, achieving this goal would increase the percentage of the State’s FSP recipients with earnings to a level much more in line with the national average (30% of all FS households).

V. Program Implications

Local social services districts (local districts) will be required to screen applications for NTA-FS to see whether the applicant household qualifies to participate in the WFFSI. OTDA has developed the LDSS-4921, Working Families Food Stamp Initiative Screening Sheet, as a tool for that purpose (see Attachment A).

At a date to be determined following the complete statewide implementation of phone recertification interviews for NTA-FS households, households that qualify for the WFFSI will not be required to have a face-to-face interview. Unless the household’s circumstances preclude its possibility, a phone interview must be scheduled instead. However, if a household would prefer a face-to-face interview, they must be given one. Because most districts currently are not routinely conducting most application and recertification interviews by phone, mandatory implementation of this waiver is being deferred until phone recertifications for NTA-FS households are being done in all districts. Eleven districts currently are conducting recertification interviews for all NTA-FS households by phone. Roll-out of phone recertifications in other districts is already underway, and is scheduled to be completed in New York City by July 2008 and fully statewide prior to the end of 2008.

Any district that would prefer not to wait until waiver of the face-to-face interviews for households that qualify for WFFSI is mandatory, may begin conducting application and recertification interviews for such households by phone as of January 1, 2008. OTDA will provide any necessary training and technical assistance to assist districts in facilitating their voluntary early implementation of WFFSI. As noted in prior communications about these projects, any local district interested in immediate or early full implementation of either the WFFSI or phone recertifications is invited either to contact the Food Stamp Bureau at the number provided above or to use the "Contact Us" link on CentraPort to provide the name of a contact person in your district.

VI. Required Actions

A. Application Screening and Presumptive Participation

As of January 1, 2008, local districts must screen all applications for NTA-FS benefits, using the LDSS-4921 Working Families Food Stamp Initiative Screening Sheet or approved local equivalent process, to see if the applicant household **presumptively** qualifies to participate in the WFFSI. No additional verification, beyond the information provided on a signed application, is necessary to establish this presumptive participation.

The WFFSI Screening Sheet **may** be included in application packets, particularly FS-only application packets, and the household **may** (but are not required to) complete the screening sheet and submit it with the application.

If the information provided on a WFFSI Screening Sheet submitted by a household conflicts with earned income and work hours information provided on a signed application, the information on the application should be used to determine presumptive participation and right to a waiver of the face-to-face interview.

Based on the above-described screening, any Non-Temporary Assistance Food Stamp Program (NTA-FS) applicant or recipient household that has at least one adult member who is:

- Either working 30 hours per week or more **or**
- Earning an average weekly income equal to or greater than the federal minimum wage (FMW) times 30 hours per week is presumptively qualified to participate in the Working Families Food Stamp Initiative (WFFSI).

Likewise, any NTA-FS applicant household that has at least **two** adult members **each** who is:

- Either working 20 hours per week or more **or**
- Earning an average weekly income equal to or greater than the federal minimum wage (FMW) times 20 hours per week

also is presumptively qualified to participate in the Working Families Food Stamp Initiative.

B. Waiver of the Face-to-Face Application Interview

The requirement to conduct a face-to-face interview at application for any NTA-FS applicant households that are **presumptively** qualified to participate in the WFFSI is waived in favor of a phone interview. This is a blanket waiver from USDA for all households qualified to participate in the WFFSI. A determination and notation of individual case hardship is not required in order to waive the face-to-face interview for qualified households. The WFFSI household still may request and receive a face-to-face interview if they so choose.

As of January 1, 2008, any local district that wishes to waive the face-to-face interview for all households that are presumptively qualified may do so, as long as they do so for all households in the districts that are identified as presumptively qualified to participate in WFFSI. Districts that choose this option are asked to please notify OTDA of their plan to do so (contact the OTDA Food Stamp Policy Bureau at 1-800-343-8859).

The requirement that local districts **must** waive the face-to-face interview for all households qualified to participate in WFFSI is predicated on and will follow the roll out and full statewide implementation of the phone recertification waiver.

C. Determining Ongoing Participation

Ongoing participation in the WFFSI shall be based on earned income and work hours information verified as part of the normal income verification process at application and recertification. Ongoing participation will be based on the earned income and work hours information verified during the normal FS eligibility determination and benefit calculation process. Subsequent adjustments to ongoing WFFSI participation status should be made at recertification based on the earned income and work hours information provided at recertification. The local districts are not required to make any adjustment to participation status during the certification period in response to reported changes in earned income and work hours.

D. Waiver of Finger Imaging Requirement

As of January 1, 2008, members of households that are qualified to participate in WFFSI will no longer be required to be finger imaged, except in New York City (NYC). In order to facilitate ease of access for working families in NYC, the Human Resources Administration (HRA) will increase the number of locations and available hours throughout the city where WFFSI-qualified applicants can be finger imaged. Six months after such expansion (in July 2008), an evaluation of the effectiveness of AFIS in NYC will be completed.

Adult members of households for whom **ongoing** participation in WFFSI has been established are not subject to the finger imaging requirements because the household has verified that it meets the earned income or work requirements necessary for participation in WFFSI.

Any adult members of households that were determined to be **presumptively** qualified to participate in WFFSI at application or recertification screening, but for whom the verified earned income and work hours information submitted at application or recertification showed that the household is not qualified to participate in the WFFSI, the finger imaging requirement should be waived according to the dictates of the county's AFIS Plan of Operation. In all districts in New York State except one, the requirement to submit to finger imaging currently is waived for any member of a household for whom the face-to-face interview has been waived.

E. Claims

Separate from WFFSI, OTDA will be conducting a mass termination of old claims for which there has not been any collection activity within the last three years. This mass termination is necessary to reduce the backlog of such claims that has built up in the Cash Management System (CAMS) since the last mass termination was done in April, 2003. Local districts will be notified of this mass termination before it takes place.

Except for food stamp (FS) claims that originally were established because of overpayments due to either an Intentional Program Violation (IPV) or fraud, any claims that previously have been terminated may **not** be re-established against households that qualify for ongoing participation in the WFFSI has been established.

Except for FS claims that were established because of overpayments due to either an IPV or fraud, the entire amount of any existing claims that will not be collected within a three-year period at the current rate of recoupment may be compromised for currently active FS households that are qualified to participate in the WFFSI.

(Example: A household has an outstanding FS claim of \$1,000 due to an inadvertent household error [IHE]. The current rate of recoupment on the household's grant is \$10 per month. At the current rate of recoupment, the local district would expect to collect \$360 from the household on the claim during the next three years. The remaining \$640 of the claim could be compromised, reducing the amount owed to the \$360 that would be collected at the current rate x 36 months.)

VII. Systems Implications

A. Upstate WMS

For new food stamp recipient households that have been verified as meeting the criteria for ongoing participation in the WFFSI, the worker should place a 'W' in the Special Program Code Indicator Field on Screen 1 of WMS to identify the case as belonging to a household qualified to participate.

For households already in receipt of food stamp benefits, the assessment of the household's continuing participation in the WFFSI should be made as part of the household's next recertification for the FSP. The worker should place a 'W' in the Special Program Code Indicator Field on the LDSS-3209 Authorization Form to identify the case as belonging to a household eligible to participate in WFFSI when processing the case for recertification.

B. New York City WMS

A new suffix level field is being added to the NYC WMS database called the Working Families Food Stamp Initiative (WFFSI) Indicator. Coding for this field will be system generated, based on the earned income and hours worked data entered in the FS budget on WMS. For new food stamp recipient households that have been verified as meeting the criteria for ongoing participation in the WFFSI, a 'W' will be placed in the WFFSI Indicator on WMS to identify the case as belonging to a household qualified to participate.

For households already in receipt of food stamp benefits that are qualified to participate in the WFFSI, a 'W' was placed in the WFFSI Indicator as part of the mass re-budgeting for food stamp changes effective October 1, 2007.

The 'W' can be seen on Case Inquiry Screen "NQCS02-Case Composition-Suffix Summary" and Case Inquiry Screen "NCCS3A-Current Case Composition-Historical Suffix Information."

C. Measuring the Net Increased Enrollment Goal

Net increases of participating food stamp households including those with a WFFSI indicator, will be tracked for the period July 1, 2007 through December 31, 2008 towards the total enrollment goal of 100,000 households and 215,000 individuals.

VIII. Additional Information

A. Phone Recertification Interviews for NTA-FS Households

As stated above, implementation of the requirement that all districts waive the face-to-face interview at application and recertification for all households that qualify to participate in WFFSI is predicated on the statewide implementation of the requirement to conduct phone recertifications for all NTA-FS households. New York State is implementing phone recertifications under a separate waiver from USDA. The pilot phase of the phone recertification implementation has been completed. Statewide rollout is continuing and will be completed in New York City by July 2008 and all districts statewide by the end of 2008. The tentative roll out schedule currently is being developed.

It is our expectation that after a few months experience conducting phone recertification interviews, a local district will implement the waiver of the face-to-face interview at application in favor of a phone interview for all households qualified to participate in WFFSI.

Once statewide implementation of the phone recertification waiver is complete and all local districts have been doing phone recertification interviews for all NTA-FS households for a period of at least two months, we will require social services districts to also waive the face-to-face interview at application in favor of a phone interview for all households qualified to participate in WFFSI.

We also remind the local districts that for households that are not presumptively qualified to participate in the WFFSI they may waive the face-to-face interview, on a case-by-case basis, for **any** applicant household based on hardships such as, but not limited to, employment, dependent care needs, lack of or cost of available transportation or illness. And we remind the local districts that any household whose adult members all are either elderly or disabled are eligible for a waiver of the face-to-face interview, and that the face-to-face interview must be waived for these households if they so request.

B. Upstate Facilitated Electronic Food Stamp Application

OTDA currently is in the process of developing an electronic food stamp application and multi-program benefit screening tool. In the first phase of implementation of this electronic application, it will be a facilitated application, that is, it will be one that will be hosted by community organizations who will work with prospective applicant households to complete and file the application and all necessary accompanying documentation. **Any household** applying for the FSP may file an electronic application. The filing of electronic applications will not be restricted to households meeting the requirements to participate in WFFSI.

Several districts from among the local districts that already have implemented phone recertification interviews for all of their NTA-FS households have agreed, in partnership with community organizations chosen by the local districts, to be the first districts to implement the facilitated electronic food stamp application. These districts, in conjunction with these community partners have been involved in the design and development of the requirements for the electronic application.

Since one of the primary purposes of the electronic application process is to reduce the need for people to go to their local district office to file an application and be interviewed, the roll-out of the facilitated electronic application to other districts also will follow the phone recertification implementation schedule.

C. New York City Facilitated Electronic Food Stamp Application

In conjunction with FoodChange and the New York Coalition Against Hunger (NYCAH), the New York City Human Resources Administration (HRA) implemented a facilitated electronic food stamp application process based on HRA's Paperless Office System (POS) application. Plans for expansion of this facilitated application process to other community partners in New York City currently are being developed.

IX. Effective Date – January 1, 2008.

Issued By
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