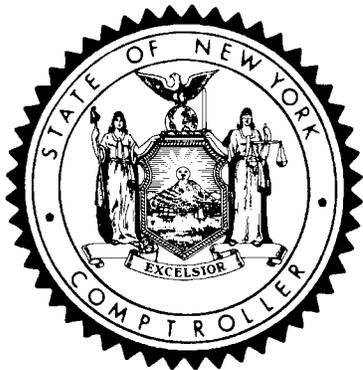


***State of New York  
Office of the State Comptroller  
Division of Management Audit  
and State Financial Services***

**DEPARTMENT OF FAMILY  
ASSISTANCE  
OFFICE OF TEMPORARY AND  
DISABILITY ASSISTANCE**

**OVERSEEING ACCESS TO FOOD  
STAMP BENEFITS**

**REPORT 99-S-45**



***H. Carl McCall***  
*Comptroller*



# State of New York Office of the State Comptroller

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## Division of Management Audit and State Financial Services

### Report 99-S-45

Mr. Brian J. Wing  
Commissioner  
NYS Department of Family Assistance  
Office of Temporary and Disability Assistance  
40 North Pearl Street  
Albany, New York 12243

Dear Mr. Wing:

The following is our report on the Office of Temporary and Disability Assistance's process for overseeing access to food stamp benefits.

This audit was performed pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution and Article II, Section 8 of the State Finance Law. We list major contributors to this report in Appendix A.

*Office of the State Comptroller  
Division of Management Audit  
and State Financial Services*

September 29, 2000

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# Executive Summary

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## Department of Family Assistance Office of Temporary and Disability Assistance Overseeing Access to Food Stamp Benefits

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### Scope of Audit

Administered nationally by the U. S. Department of Agriculture (USDA), the Food Stamp Program (Program) issues monthly benefits redeemable at authorized retail food stores. Eligibility and benefit levels are based on household size, income, assets and other factors. Food stamps can continue for families that leave public assistance and enter the workplace to help them make the transition to self-sufficiency. The Office of Temporary and Disability Assistance (OTDA) oversees the activities of the State's 58 social services districts (districts) which administer the Program on a local basis. The New York City Human Resources Administration (HRA) administers the Program in the New York City district. OTDA is responsible for ensuring districts' compliance with all pertinent Federal and State laws, regulations and guidance. Federal regulations require that each state conduct Management Evaluations (Evaluations) of the administration of the Program at the district level and report the results to the USDA. State regulations require that districts process food stamp applications within 30 days, and screen all applications to identify persons who may be eligible for expedited benefits (benefits provided within five days).

In New York State, the number of food stamp recipients and the amount of food stamp expenditures have declined by 30.6 percent and 27.3 percent, respectively, between 1994 and 1999. Participation in the Program has also declined nationwide. The USDA is concerned that persons eligible for food stamp benefits may not have adequate access to these benefits or may even be discouraged from applying for them. During a 1998 Program access review in New York City, the USDA found that HRA did not provide sufficient access to food stamp benefits, screen applicants for expedited benefits or provide expedited benefits in a timely manner. The USDA also questioned the effectiveness of OTDA's oversight of district compliance. OTDA submitted a corrective action plan in February 1999 which addressed the problems identified in New York City, and established a Management Evaluation Plan (Plan) for the review of Program operations statewide.

Our audit addressed the following question about OTDA's process for overseeing access to food stamp benefits outside New York City for the period October 1, 1998 through March 31, 2000:

- ! Does OTDA effectively monitor districts' administration of the Program to help ensure needy persons have adequate access to food stamp benefits?
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## **Audit Observations and Conclusions**

We found that OTDA has established a mechanism to help ensure that districts provide needy people with adequate access to food stamp benefits. As a result of USDA's oversight and compliance activities in 1998, OTDA developed a Plan for 2000 which addresses various USDA target areas, including customer service. We analyzed the first four of this Plan's completed Evaluations and found they were thorough and generally well-documented. We believe OTDA's continued implementation of its Plan should increase awareness of the availability of food stamps, improve districts' compliance with processing requirements and enhance overall customer service.

Annually, the USDA identifies specific target areas which represent potential weaknesses in the administration of the Program. In response to the areas identified, each state is required to submit an annual Plan detailing how and when it will perform Evaluations to assess districts' Program operations, specifically with regard to the target areas. Customer Service was one of the USDA's ten target areas in 2000. We found that OTDA's Plan for 2000 addresses Customer Service improvements by detailing the goals, performance measure, outcomes and methodology it will use to help ensure that needy people have access to Program benefits. The Plan for 2000 also established a schedule of Evaluations to be conducted during the year in New York City's central office, in 18 local income support/job centers in New York City and in 26 other districts throughout the State. (See pp. 6-8)

To verify that OTDA's Evaluation process is functioning as intended, we audited the first four Evaluations (Fulton, Rensselaer, Schenectady and Ulster Counties) completed in January and February 2000. Generally, we found no significant exceptions with the findings and observations OTDA reported in these Evaluations. However, in a ruling dated July 21, 2000, a Federal judge found that applications for public assistance filed in the New York City district and withdrawn the same day, were not being recorded. This practice wiped out any evidence of applications made by those individuals. OTDA's methodology for conducting evaluations does not identify applications that have not been recorded. We expect that OTDA will address the concerns brought to light in the judge's ruling. We plan on reviewing OTDA's efforts as it relates specifically to New York City. (See pp. 8-10)

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## **Comments of OTDA Officials**

OTDA officials responded that, regarding the concerns relating to New York City, its evaluation of districts' administration of the Program includes observations of districts' reception and waiting area procedures in order to identify any obstacles to Program access. OTDA officials further indicated that it would add, to the district evaluation process, an examination of procedures to respond to pre-application inquiries about Program benefits and for application tracking.

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# Introduction

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## Background

Administered nationally by the U. S. Department of Agriculture (USDA), the Food Stamp Program (Program) issues monthly benefits redeemable at authorized retail food stores. Eligibility and benefit levels are based on household size, income, assets and other factors. When families move into the workplace and leave the Temporary Assistance for Needy Families (TANF) program, food stamps can be continued to help them make the transition to self-sufficiency. The food stamp income eligibility limits enable families earning up to 130 percent of the poverty level (e.g., for a family of three, 130 percent of \$13,884, increasing to \$14,160 effective October 1, 2000) to qualify for the program. There is no time limit for the receipt of benefits for families with children.

The New York State Department of Family Assistance's Office of Temporary and Disability Assistance (OTDA) oversees and monitors the activities of the 58 social services districts (districts) that administer the Program on a local basis. In the New York City district, the New York City Human Resources Administration (HRA) administers the Program through local income support/job centers. While the districts are directly involved with applicants and recipients, OTDA is ultimately responsible for ensuring compliance with all pertinent Federal and State laws, regulations and guidance.

Federal Food Stamp regulations (Code of Federal Regulations, Title 7, Part 275) require that each state conduct Management Evaluations of its administration of the Program to assess district program operations, to correct deficiencies that exist and to ensure adequate communication about policy and program issues.

New York State regulations require that all applicants who provide the required information must have their applications processed within 30 days. However, particularly needy clients may be eligible for expedited service. State regulations also require that districts screen all food stamp applicants to determine whether they are eligible for expedited service. According to Section 387 of these regulations, individuals who meet the criteria for expedited service must be issued food stamp benefits no later than five calendar days following the application filing date. According to the Welfare Management System, the statewide system for tracking recipient eligibility and benefit payments, 63,339 applications for food stamps were processed during the three-month period ended March 31, 1999; 18,456 (29 percent) of those applications received expedited service.

There has been a dramatic decline in New York State in the number of persons receiving public assistance and food stamps. The table below

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illustrates the decline from calendar years 1994 through 1999 for New York State's Program:

<b>Food Stamp Program *</b>	<b>1994</b>	<b>1999</b>	<b>Change 1994-1999</b>
Recipients	2,177,022	1,511,197	-30.6%
Households	1,017,278	739,643	-27.3%
Expenditures	\$165,607,339	\$120,373,314	-27.3%

\* OTDA calculates the annual figures shown here by adding the actual statewide figures for each month during the calendar year and dividing by 12. Therefore, these figures represent average activity for the calendar year, not activity as of year end.

A significant number of the State's food stamp recipients are in the New York City district. For example, of the 712,205 households that received food stamp benefits totaling \$118.7 million in December 1999, 470,930, or two-thirds, were located in New York City (See *Exhibit A* for county-by-county figures).

Participation in the Program has also decreased nationwide, according to USDA data. In fact, the USDA reports that there is a national concern that individuals who may be eligible for food stamp benefits are either being discouraged from applying for benefits or are hesitant to apply because it is no longer acceptable to receive assistance, even if such benefits may be critical to families' nutritional well-being. Furthermore, the USDA reports that households whose public assistance applications are denied may be required to complete new food stamp applications or may not be notified that they could be eligible for food stamp benefits.

In November-December 1998, the USDA completed a program access review of the Program in New York City. The review was part of the USDA's ongoing Federal oversight process to ensure State and local agencies are complying with all laws and regulations governing the program. The final report, issued February 5, 1999, identified several serious deficiencies in New York City, including the following: 1) Program applications were not accessible to all potentially eligible households or to anyone who requested one; 2) HRA was not consistently screening all applicant households to determine their eligibility for expedited food stamp service, and was not documenting evaluations of eligibility for such service; and 3) HRA was not providing food stamp benefits within seven days, as required by Federal

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regulations (State regulations currently require provision of benefits within five days) for those households determined to be eligible for expedited service. In addition, USDA staff found that nearly one-third of the cases sampled in their review lacked adequate case file documentation. Lastly, the USDA had significant concerns regarding OTDA's effectiveness in working with local districts to ensure program compliance. As a result, the USDA had serious concerns regarding access to the Program in New York City.

The results of the USDA's review culminated in an admission by the HRA's Deputy Commissioner that some of her staff were in fact denying food stamp benefits to eligible persons. Currently, the HRA is subject to a class action suit (*Reynolds v. Giuliani*) brought against New York City by lawyers from the Legal Aid Society and the Welfare Law Center. Among the allegations in this suit are that HRA discouraged and deterred individuals and families from filing applications for food stamps and that New York City failed to determine applicants' eligibility for expedited food stamp benefits.

In response to the USDA's findings of benefit access problems in New York City, OTDA submitted a corrective action plan, dated February 22, 1999. The plan addressed the USDA's recommendations and described OTDA's organizational realignment for the purpose of strengthening its oversight of the Program. Furthermore, the plan included the following statewide actions which OTDA subsequently carried out:

- 1) a statewide, interactive teleconference for district staff discussing application rights, specifically immediate needs and expedited service (held April 20, 1999);
- 2) issuance of an informational letter to all districts reminding them of application processing requirements and filing rights under the Program (issued May 3, 1999);
- 3) issuance of an administrative directive to all districts reminding them of all requirements under expedited processing regulations and mandating the use of a formalized screening form or its approved equivalent (issued September 3, 1999); and
- 4) implementation of New York State's Program Management Evaluation Plan in ten districts.

In November 1999, the USDA conducted a follow-up review of Program access in two local income support/job centers in the New York City district. In April 2000, the USDA provided OTDA with a draft report detailing the follow-up review results. While the USDA reviewers did identify some

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findings in these centers, they also saw improvements in Program access. The report specifically noted the improved State oversight of the districts since the time of the 1998 review and congratulated OTDA for its substantial and continued efforts.

The USDA has also recently completed reviews in Monroe County (September 1999) and Suffolk County (February-March 2000). These reviews were conducted as part of the USDA's nationwide initiative to improve customer service. While the USDA did identify some Program deficiencies where corrective action was needed, they also found that Monroe County did an excellent job ensuring that households have access to the Program. The USDA has not yet issued its final report for Suffolk County.

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## **Audit Scope, Objective and Methodology**

We audited OTDA's oversight of access to food stamp benefits in districts outside New York City for the period October 1, 1998 through March 31, 2000. The objective of our performance audit was to determine whether OTDA effectively monitors districts' administration of the Program to help ensure needy persons have adequate access to food stamp benefits. To accomplish our objective, we interviewed officials from the USDA, OTDA and the four districts where OTDA had completed an evaluation in 2000 (Fulton, Rensselaer, Schenectady and Ulster Counties). We reviewed laws, rules, regulations, policies and procedures applicable to the Food Stamp Program, as well as USDA reports of its reviews of the New York City, Suffolk and Monroe districts. We examined various documents detailing the design, implementation and results to date of OTDA's Management Evaluations for Federal Fiscal Year 2000. This included verifying OTDA's findings and observations at the four districts through observation of application intake and processing procedures, interviews with district officials and a review of ten cases at each district.

We conducted our audit in accordance with generally accepted government auditing standards. Such standards require that we plan and perform our audit to adequately assess those operations which are included within the audit scope. Further, these standards require that we understand OTDA's system of internal control and its compliance with those laws, rules and regulations that are relevant to the operations included in our audit scope. An audit includes examining, on a test basis, evidence supporting transactions recorded in the accounting and operating records and applying such other auditing procedures as we consider necessary in the circumstances. An audit also includes assessing the estimates, judgments, and decisions made by management. We believe that our audit provides a reasonable basis for our findings, conclusions and recommendations.

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We use a risk-based approach to select the activities for audit. This approach focused our audit efforts on those operations that we identified as having the greatest probability for needing improvement. Consequently, by design, we used finite audit resources to identify where and how improvements can be made. Thus, we devoted little audit effort to reviewing operations that may have been relatively efficient or effective. As a result, we prepare our reports on an “exception basis.” This report, therefore, highlights those areas needing improvement and does not necessarily address activities that may be functioning properly.

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## **Response of OTDA Officials to Audit**

Draft copies of the matters presented in this report were provided to OTDA officials for their review and comment. OTDA officials responded that, regarding the concerns relating to New York City, its evaluation of districts’ administration of the Program includes observations of districts’ reception and waiting area procedures in order to identify any obstacles to Program access. OTDA officials further indicated that it would add to the district evaluation process an examination of procedures to respond to pre-application inquiries about Program benefits and for application tracking. Their comments have been considered in preparing this report and are included as Appendix B.

Within 90 days after final release of this report, as required by Section 170 of the Executive Law, the Commissioner of the Office of Temporary and Disability Assistance shall report to the Governor, the State Comptroller, and the leaders of the Legislature and fiscal committees, advising what steps were taken to implement the recommendations contained herein, and where recommendations were not implemented, the reasons therefor.

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# Management Evaluations

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Each state must conduct Management Evaluations (Evaluations) of its administration of the Program. Annually, the USDA identifies specific target areas which represent potential weaknesses or vulnerabilities. In response to the areas identified, each state is required to submit an annual Management Evaluation Plan (Plan) detailing its intentions for the year, including the methodology, Evaluation instruments/worksheets and Evaluation schedule. As described by the USDA, the objectives of the Evaluations are to:

- ! provide a systematic method of monitoring and assessing program operations in project areas (districts);
- ! provide a basis for districts to improve and strengthen program operations by identifying and correcting deficiencies; and
- ! provide the continuing flow of information among the districts, the state and the USDA that is necessary to develop the solutions to problems in program policy and procedures.

Federal regulations require that states conduct Evaluations of small districts (2,000 or fewer food stamp households) once every three years, of medium districts (2,001 - 15,000 households) once every two years and of large districts (greater than 15,000 households) every year. Each state may choose to report its findings to the USDA throughout the year as each district is completed or in one comprehensive report, which the state must submit by October 31 each year.

For the Federal fiscal year ended September 30, 2000, the USDA identified ten target areas. One of these target areas, entitled *Customer Service*, includes our audit objective related to providing adequate access to food stamp benefits. The USDA's description of this target area reads as follows:

**Customer Service:** Caseload declines that cannot be explained by changes in policy and economic prosperity have increased the need to 1) ensure that availability of program information by potential recipients particularly households leaving TANF who may not realize that FSP eligibility may likely continue, 2) ensure compliance with case processing standards, including expedited service, and 3) seek improvements in customer service to make the program more accessible particularly for groups such as the elderly, immigrants and working poor for whom normal case processing may create participation barriers. We are asking states to increase their attention to this area of management evaluation and program improvement throughout the fiscal year.

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Other target areas were: *Recipient Claims Management, Payment Accuracy, Electronic Benefit Transfer System, Reinvestment of Quality Control Penalties, State Purchasing of Food Stamp Coupons, Civil Rights, Triennial Reviews of Coupon Issuers and Bulk Storage Points, and Employment & Training.*

In November 1999, OTDA submitted New York State's Plan for 2000 to the USDA. Specific to the Customer Service target area, the Plan included the following:

**Goals:** 1) to ensure the availability of program information to potential recipients particularly households leaving TANF who may not realize Food Stamp Program eligibility may continue, 2) to ensure compliance with case processing standards, including expedited service, and 3) to seek improvements in customer service to make the program more accessible.

**Measure:** Increase in program participation of underserved populations.

**Outcome:** Districts/offices deficient in the area of customer service will implement necessary corrective actions to ensure compliance with Federal and State requirements for separate determinations, case processing standards including expedited food stamps, and program accessibility. Additionally, appropriate statewide corrective actions will be initiated. Best practices identified will be shared across the state to promote program access and participation.

**Completion:** September 30, 2000

OTDA's methodology included on-site Evaluations and observation at the districts, the use of questionnaires, interviews, checklists and test samples of cases to verify compliance with State and Federal requirements. OTDA's plan includes identification of the causes of findings and appropriate corrective actions. It also provides for regular and remedial training, when necessary, and for communicating policies, procedures, findings and best practices, where appropriate.

The Plan included a district Evaluation schedule for 2000 through 2003 (See *Exhibit B* for district-by-district schedule information.) For 2000, OTDA has scheduled Evaluations in 26 districts outside of New York City, in addition to the HRA central office and 18 local income support/job centers in the New York City district. OTDA intends to complete these Evaluations from January through June 2000. OTDA expects to use the remainder of the year to monitor district corrective actions and to summarize the findings for the comprehensive final report which it will submit to the USDA. The Plan also included copies of the interview/observation instruments and the case file review documents which were to be used for the Customer Service area.

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We found that the district Evaluations specify steps which address: application processing, including expedited service; program access, including bi-lingual and special services; notification of former public assistance clients of potential food stamp eligibility; and applicant/client complaint handling procedures, including both civil and non-civil complaints.

To determine whether OTDA was implementing its Evaluation process to ensure districts were meeting Customer Service goals, we analyzed OTDA's Evaluations for Fulton, Rensselaer, Schenectady and Ulster Counties, the first four Evaluations completed in January and February 2000. We verified OTDA's findings by reviewing all Evaluation documentation for the four districts. We also visited the districts, observed application intake and processing procedures, met with district officials and reviewed 10 of the 25 cases reviewed by OTDA at each district.

Overall, we found no significant exceptions with OTDA's findings and observations. We did identify several minor documentation issues when reconciling OTDA's documentation to the corresponding findings reports that were sent to the districts. For example, we found several instances in which OTDA reviewers noted exceptions for specific cases but did not include these cases in the findings letter to the applicable county. We provided OTDA managers with details on these issues and they informed us that they would take steps to improve documentation in the future. However, due to the relatively insignificant nature of these issues, we do not believe the integrity of the Evaluation process is compromised. More importantly, we found that OTDA is identifying deficiencies at the districts which require various levels of corrective action. Examples of OTDA findings are described below:

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### **Fulton County**

OTDA found that the expedited food stamp screening form was missing in several cases. As a result, OTDA could not determine whether the applicants were screened for eligibility for expedited service. In addition, in some cases where the screening form was completed, it was not done on the initial day of application, as required. Failure to screen all applicants, or screen them timely, could result in delayed delivery of benefits to eligible needy families. OTDA also found that, when some cases were found eligible for expedited processing, benefits were not issued within five days. OTDA instructed Fulton County to comply with all expedited processing requirements. OTDA did note that, even though the forms were missing or were not completed on time, the ultimate actions on the cases were correct and district staff made the correct eligibility determinations.

### **Rensselaer County**

OTDA found that, when an applicant originally applies for public assistance, the worker does not always screen the application for expedited processing. This sometimes results in a delay until the application and/or the applicant gets to the non-public assistance unit for processing of their food stamp case. As a result, eligible needy families may not be receiving benefits in a timely manner. OTDA instructed Rensselaer County to modify its procedures to ensure that all applications filed are screened for expedited processing eligibility on the filing date. Further, OTDA noted that there was confusion regarding whether only those applicants identifying a food need are required to be screened on the first day of contact for expedited processing. OTDA instructed Rensselaer County to remind all district workers of the expedited procedures.

### **Schenectady County**

OTDA found that most, but not all, public assistance and food stamps applicants are screened for expedited processing on the first day of application. OTDA determined that some of applicants who were not screened appear to have been eligible for expedited food stamp benefits. Since they were not screened, they did not receive expedited benefits. OTDA instructed the district to comply with the requirement that all applicants be screened on the day of application.

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## **Ulster County**

OTDA found that the expedited food stamp screening sheet was missing in many cases. OTDA determined, based on the information in the case files, that some of these cases were eligible for expedited benefits and did not receive them. OTDA instructed Ulster County to comply with the expedited processing requirements.

There has been a significant increase in attention to the Program in light of the rapidly declining temporary assistance and food stamp populations, and the USDA's recent findings in New York City. As part of the Evaluation process, the USDA specifically asked the states to increase their attention to customer service and access for 2000. As a result, OTDA has strengthened its Evaluations to further address these issues. Furthermore, to supplement OTDA's Evaluations, the USDA continues to perform on-site, Federal-level reviews in New York State districts. To date, the USDA has completed reviews in Monroe and Suffolk counties in addition to its review of the New York City district. Each review has resulted in the identification of significant issues that need to be addressed by both the individual districts and OTDA.

Based on our audit work, we believe OTDA's Plan and the Plan's implementation are generally achieving the USDA's objectives for monitoring the administration of the Program. However, in a ruling dated July 21, 2000, a Federal judge found that applications for public assistance filed in the New York City district and withdrawn the same day, were not being recorded. This practice wiped out any evidence of applications made by those individuals. OTDA's methodology for conducting evaluations does not identify applications that have not been recorded. To assist in assuring that any audit or evaluation will identify situations where people have been improperly discouraged from applying, or where applications are withdrawn, the local districts should be required to maintain a record of all attempts to seek assistance. We expect that OTDA will address the concerns brought to light in the judge's ruling. We plan on reviewing OTDA's efforts as it relates specifically to New York City.

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## **Recommendations**

1. Require that local districts maintain a record of all individuals seeking public assistance and their ultimate disposition.
2. As part of the Evaluation process, review the level of service provided to all individuals seeking food stamp benefits.

(OTDA officials responded that regarding Recommendation 1, its evaluation of districts' administration of the Program includes observations of district reception and waiting area procedures in order to identify any obstacles to Program access. Regarding Recommendation 2, OTDA officials indicated that it would add to its district evaluation process an examination of procedures to respond to pre-application inquiries about Program benefits and for application tracking.)

**Food Stamp Households, Persons and Benefits: December 1999**

Local District	Total			Temporary Assistance			Non-Temporary Assistance		
	Households	Persons	Benefits	Households	Persons	Benefits	Households	Persons	Benefits
Statewide	712,205	1,440,806	\$118,731,713	521,624	971,041	\$83,675,271	190,581	469,765	\$35,056,442
NYC	470,930	928,742	82,821,792	383,884	723,958	64,559,938	87,046	204,784	18,261,854
Rest of State	241,275	512,064	35,909,921	137,740	247,083	19,115,333	103,535	264,981	16,794,588
Albany	7,878	16,577	1,186,459	4,670	8,577	672,699	3,208	8,000	513,760
Allegany	1,866	4,023	256,734	970	1,731	123,459	896	2,292	175
Broome	5,784	11,981	795,468	3,264	5,852	434,893	2,520	6,129	360,575
Cattaraugus	2,786	5,678	350,635	1,193	1,773	129,703	1,593	3,905	220,932
Cayuga	1,917	4,220	283,938	740	1,092	81,820	1,177	3,128	202,118
Chautauqua	5,067	10,800	757,398	2,914	5,289	428,517	2,153	5,511	328,881
Chemung	2,479	5,421	351,164	1,302	2,253	166,860	1,177	3,168	184,304
Chenango	1,555	3,427	233,207	524	831	64,493	1,031	2,596	168,714
Clinton	2,750	5,372	357,074	1,286	1,712	124,430	1,464	3,660	232,644
Columbia	1,271	2,443	167,577	586	879	70,569	685	1,564	97,008
Cortland	1,293	2,851	200,149	615	1,002	75,481	678	1,849	124,668
Delaware	1,129	2,160	135,701	480	633	42,972	649	1,527	92,729
Dutchess	3,462	6,564	474,381	1,792	3,023	247,256	1,670	3,541	227,125
Erie	37,809	78,548	5,719,397	22,996	42,199	3,497,670	14,813	36,349	2,221,727
Essex	1,071	2,106	124,117	481	666	42,622	590	1,440	81,495
Franklin	1,556	3,083	205,951	691	918	65,903	865	2,165	140,048
Fulton	1,591	3,373	235,473	757	1,111	86,889	834	2,262	148,584
Genesee	1,138	2,352	150,904	540	856	64,602	598	1,496	86,302
Greene	1,174	2,375	163,747	573	926	74,985	601	1,449	88,762
Hamilton	144	212	10,635	22	23	1,315	122	189	9,320
Herkimer	1,705	3,648	236,268	707	1,078	77,709	998	2,570	158,559
Jefferson	3,417	7,655	514,904	1,718	2,881	218,235	1,699	4,774	296,669
Lewis	748	1,628	110,997	293	445	31,960	455	1,183	79,037
Livingston	1,403	2,732	187,890	670	1,088	89,074	733	1,644	98,816
Madison	1,360	2,745	181,178	540	655	43,191	820	2,090	137,987
Monroe	26,373	57,973	4,013,020	19,336	38,188	2,878,706	7,037	19,785	1,134,314
Montgomery	1,632	3,647	262,506	599	908	68,451	1,033	2,739	194,055
Nassau	10,078	18,717	1,342,264	6,508	10,968	845,466	3,570	7,749	496,798
Niagara	5,938	12,431	861,429	3,507	6,388	498,872	2,431	6,043	362,557
Oneida	8,923	19,472	1,365,810	4,263	7,603	587,716	4,660	11,869	778,094
Onondaga	12,153	27,810	1,961,350	7,125	14,460	1,076,898	5,028	13,350	884,452
Ontario	1,853	3,543	229,812	881	1,342	101,222	972	2,201	128,590
Orange	7,433	19,031	1,416,027	3,424	7,275	585,316	4,009	11,756	830,711
Orleans	1,155	2,592	179,429	581	1,051	88,247	574	1,541	91,182
Oswego	3,255	7,973	546,758	1,350	2,322	172,199	1,905	5,651	374,559
Otsego	1,128	2,109	134,501	428	496	34,348	700	1,613	100,153
Putnam	455	676	39,653	262	323	19,193	193	353	20,460
Rensselaer	3,626	7,654	538,911	1,742	2,904	217,869	1,884	4,750	321,042
Rockland	4,484	14,272	1,045,529	1,930	3,864	242,741	2,554	10,408	802,788
St. Lawrence	3,341	6,920	456,641	1,809	2,999	221,865	1,532	3,921	234,776
Saratoga	2,533	5,040	357,521	811	911	65,025	1,722	4,129	292,496
Schenectady	3,660	8,053	546,375	1,734	2,964	219,918	1,926	5,089	326,457
Schoharie	689	1,365	90,199	268	346	22,561	421	1,019	67,638
Schuyler	403	869	54,233	172	266	20,201	231	603	34,032
Seneca	824	1,583	95,088	313	439	28,411	511	1,144	66,677
Steuben	2,832	6,255	415,000	1,442	2,477	195,492	1,390	3,778	219,508
Suffolk	14,938	29,024	2,081,785	9,466	16,453	1,263,692	5,472	12,571	818,093
Sullivan	1,877	3,803	300,053	927	1,413	124,525	950	2,390	175,528
Tioga	950	2,202	142,586	453	747	57,259	497	1,455	85,327
Tompkins	1,868	3,754	251,897	959	1,535	109,707	909	2,219	142,190
Ulster	3,686	6,831	464,995	2,017	3,107	232,111	1,669	3,724	232,884
Warren	1,487	2,910	196,369	670	955	67,693	817	1,955	128,676
Washington	1,402	2,835	196,513	614	895	69,662	788	1,940	126,851
Wayne	2,039	3,859	258,376	985	1,532	119,514	1,054	2,327	138,862
Westchester	16,485	34,127	2,489,694	12,294	23,685	1,863,627	4,191	10,442	626,067
Wyoming	720	1,456	98,401	284	414	31,998	436	1,042	66,403
Yates	702	1,304	85,850	262	360	27,521	440	944	58,329

**New York State Food Stamp Program  
Management Evaluation Schedule**

<b>FFY 2000</b>	<b>FFY 2001</b>	<b>FFY 2002</b>	<b>FFY 2003</b>
<b>Outside New York City</b>			
<b>Large Districts (15,001 or more households)</b>			
Erie, Monroe, Suffolk, Westchester	Erie, Monroe, Suffolk, Westchester	Erie, Monroe, Suffolk, Westchester	Erie, Monroe, Suffolk, Westchester
<b>Medium Districts (2,001 - 15,000 households)</b>			
Cattaraugus, Chautauqua, Chemung, Niagara, Oneida, Orange, Oswego, Rensselaer, Rockland, Schenectady, Steuben, Ulster	Albany, Broome, Cayuga, Clinton, Dutchess, Jefferson, Nassau, Ontario, Onondaga, St. Lawrence, Saratoga, Wayne	Cattaraugus, Chautauqua, Chemung, Niagara, Oneida, Orange, Oswego, Rensselaer, Rockland, Schenectady, Steuben, Ulster	Albany, Broome, Cayuga, Clinton, Dutchess, Jefferson, Nassau, Ontario, Onondaga, St. Lawrence, Saratoga, Wayne
<b>Small Districts (2,000 or fewer households)</b>			
Allegany, Chenango, Cortland, Essex, Franklin, Fulton, Hamilton, Madison, Putnam, Yates	Greene, Lewis, Otsego, Schoharie, Schuyler, Seneca, Sullivan, Tioga, Tompkins, Washington	Columbia, Delaware, Genesee, Herkimer, Livingston, Montgomery, Orleans, Warren, Wyoming	Allegany, Chenango, Cortland, Essex, Franklin, Fulton, Hamilton, Madison, Putnam, Yates
<b>New York City</b>			
Central Office	Central Office	Central Office	Central Office
Income support/job centers:  Bergen, Brighton, Concourse (two offices), Coney Island, Crotona, Dyckman, East End, East Harlem, Greenwood, Hamilton, Linden, Long Island City, Midwood, RTC, Union Square, Washington Heights, Waverly	Income support/job centers:  Bayridge, Boro Hall, Brownville, Bushwick, Clinton, Colgate, Covello, Dekalb, Euclid, Flushing, Fulton, Greene, North Brooklyn, Queensboro, Rider, Rockaway (two offices), T.E.N.	Income support/job centers:  Fordham, Greenland, Homebound, Jamaica (two offices), Kingsbridge, Melrose, New Ulrecht, Queens, Richmond, St. George, St. Nicholas (two offices), Tremont, Williamsburg, Willis, Yorkville	Income support/job centers:  Bergen, Brighton, Concourse (two offices), Coney Island, Crotona, Dyckman, East End, East Harlem, Hamilton, Linden, Long Island City, Midwood, RTC, Union Square, Washington Heights, Waverly

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# Major Contributors to This Report

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William Challice  
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Michael Sawicz  
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Mary Roylance  
Laura Wands  
Nancy Varley



George E. Pataki  
Governor

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(518) 474-4152  
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Brian J. Wing  
Commissioner

September 20, 2000

Dear Mr. Challice:

**RE: 99-S-45**

I am responding to your draft report of findings regarding the Office of Temporary and Disability Assistance's (OTDA's) oversight of access to food stamp benefits. I am pleased that your auditors found that OTDA's supervision of local districts' administration of the Food Stamp Program effectively helps to ensure that eligible households have access to benefits.

Our comments concerning specific findings cited in the draft report are provided as follows:

**Recommendation #1:**

Require that local districts maintain a record of all individuals seeking public assistance and their ultimate disposition.

**Response:**

The scope of the audit was OTDA's oversight of food stamp access outside New York City for the period October 1, 1998 through March 31, 2000. Given the scope of the audit, we were surprised by this first recommendation which, the reviewers wrote, was compelled by a July 2, 2000 ruling in Reynolds v. Gulliani, a lawsuit pertaining only to New York City. In the July 2, 2000 ruling, the New York City Human Resources Administration (HRA) was cited for not recording applications for assistance that were filed and withdrawn on the same day. Although this ruling is not germane to the scope of your audit, I would point out that districts are neither required nor permitted to maintain electronic records of individuals who withdraw their applications for assistance. A paper copy of a signed application withdrawal is retained but, for reasons of confidentiality, districts are obligated to expunge electronic records of the individual's application and subsequent withdrawal of that application. I also would comment that the reviewers' rationale for increasing districts' record keeping burden in order to identify situations where people may have been discouraged from applying for assistance is not persuasive. OTDA's annual process for evaluating local districts' administration of the Food Stamp Program emphasizes program access, and includes observation of districts' reception and waiting area procedures in order to identify any obstacles to program access. For your reference, I am enclosing a copy of the 2000 Food Stamp Management Evaluation (FS ME) review instrument, which demonstrates our focus on program access.

**Recommendation #2:**

As part of the evaluation process, review the level of service provided to all individuals seeking food stamp benefits.

*"providing temporary assistance for permanent change"*

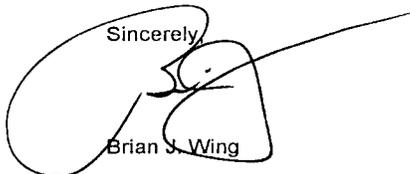
**Response:**

As part of our ongoing evaluation process, OTDA will develop the 2001 FS ME plan to ensure that the review instrument and observations capture detailed information regarding customer service. Examples of areas for increased examination will include procedures for responding to pre-application inquiries about program benefits and for application tracking.

**Additional comments:**

- Under Introduction – Background, first paragraph, the Food Stamp Program gross income limit for the review period was \$13,884 per year for a family of three. This amount will increase to \$14,160 effective October 1, 2000.
- In the same section, fourth paragraph, fourth sentence, please note that expedited food stamp benefits must be issued within five calendar days after the application filing date, which is not necessarily their first contact with the local district.

Thank you for the opportunity to comment on your draft report of findings in this audit. If you have any questions, please contact Steve Ptak at (518) 473-1469.

Sincerely,  
  
Brian J. Wing

Enclosure

William Challice  
Management Audit Group  
Division of Management Audit and  
Financial Services  
NYS Office of the State Comptroller  
123 William Street  
21<sup>st</sup> Floor  
New York, NY 10038-3804



I. Interview with Director

Yes No NA

A. Application Processing

- 1) a. Is the filing date for food stamps the date an application is received?  Yes  No

\_\_\_\_\_  
\_\_\_\_\_

- b. Is an application accepted if it contains only a name, address (if they have one) and signature?  Yes  No

- 2) In circumstances where an individual cannot represent him/herself, do you request that they provide an authorized representative?  Yes  No

Other arrangements: \_\_\_\_\_  
\_\_\_\_\_

- 3) In those instances where the individual has special circumstances (homebound etc.), what method is used by the local district to conduct an interview?  Yes  No

- [ ] Home Visit  
[ ] Telephone  
[ ] Other (Please describe) \_\_\_\_\_

\_\_\_\_\_

- 4) Are there internal controls in place to ensure that all FS applicants are approved or denied within 30 days of application filing?  Yes  No

Describe \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- |  | Yes                      | No                       | NA |
|--|--------------------------|--------------------------|----|
| 5) Does your county have special procedures for non-English speaking households? If yes,   | <input type="checkbox"/> | <input type="checkbox"/> |    |
| • What are these? _____  |                          |                          |    |
| • If available, obtain copies _____  |                          |                          |    |
| 6) Do you accept an application from an authorized representative on behalf of a FS applicant?   | <input type="checkbox"/> | <input type="checkbox"/> |    |
| 7) Are all PA FS applicants screened using the Expedited Screening Sheet (DSS-3938) on the 1 <sup>st</sup> day of contact?                             | <input type="checkbox"/> | <input type="checkbox"/> |    |
| 8) Are all NPA FS applicants screened using the Expedited Screening Sheet (DSS-3938) on the 1 <sup>st</sup> day of contact?                            | <input type="checkbox"/> | <input type="checkbox"/> |    |
| 9) Is a food stamp eligibility interview conducted for those individuals found eligible to receive expedited processing? If no, what is the procedure? | <input type="checkbox"/> | <input type="checkbox"/> |    |
| _____  |                          |                          |    |
| _____  |                          |                          |    |
| 10) How is the expedited food stamp benefit calculated? Note any deficiencies in the benefit calculation process.                                      | <input type="checkbox"/> | <input type="checkbox"/> |    |
| _____  |                          |                          |    |
| _____  |                          |                          |    |
| _____  |                          |                          |    |
| 11) Are expedited benefits issued to eligible households if only verification of identity has been provided?   | <input type="checkbox"/> | <input type="checkbox"/> |    |
| B) Complaint Procedures  |                          |                          |    |
| 1) How are complaints recorded/tracked?  | <input type="checkbox"/> | <input type="checkbox"/> |    |
| _____  |                          |                          |    |

- |   | <i>Yes</i>               | <i>No</i>                | <i>NA</i> |
|---|--------------------------|--------------------------|-----------|
| 2) a. Are civil rights and non civil rights complaints recorded/tracked separately?                                     | <input type="checkbox"/> | <input type="checkbox"/> |           |
| b. Are separate logs maintained   | <input type="checkbox"/> | <input type="checkbox"/> |           |
| 3) How many civil rights complaints were processed last year?   | <input type="checkbox"/> | <input type="checkbox"/> |           |
| a. How many were resolved?  |                          |                          |           |
| b. How timely are they investigated?  |                          |                          |           |
| (ask to see files)  |                          |                          |           |
| 4) How are individuals/organizations informed of the local district complaint procedures?                               |                          |                          |           |
| _____   |                          |                          |           |
| _____   |                          |                          |           |
| 5) Has the local district developed and/or posted other notices regarding complaint procedures? (if yes, obtain copies) | <input type="checkbox"/> | <input type="checkbox"/> |           |
| 6) Have written complaint procedures been developed?  |                          |                          |           |
| • For civil rights complaints?  | <input type="checkbox"/> | <input type="checkbox"/> |           |
| • For non-civil rights complaints?  | <input type="checkbox"/> | <input type="checkbox"/> |           |
| (If yes, obtain copies)   |                          |                          |           |
| 7) How is Management Review of complaints, (to determine if there are problems/patterns) accomplished?                  |                          |                          |           |
| _____   |                          |                          |           |
| _____   |                          |                          |           |

II. Observation

	<i>Yes</i>	<i>No</i>	<i>NA</i>
1) Are applications provided on the 1 <sup>st</sup> day of contact?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are applications available during all business hours?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<hr/>			
2) Are all applicant's being screened for expedited eligibility?	<input type="checkbox"/>	<input type="checkbox"/>	
3) Are customers being treated in a courteous manner?			
4) Is the reception desk staffed at all times?	<input type="checkbox"/>	<input type="checkbox"/>	
5) Are the following forms provided in the application packet?			
• Application (DSS-2921)	<input type="checkbox"/>	<input type="checkbox"/>	
• How to Complete the Application (DSS-2921-I)	<input type="checkbox"/>	<input type="checkbox"/>	
• What You Should Know About Your Rights and Responsibilities Book 1 (DSS-4148A)	<input type="checkbox"/>	<input type="checkbox"/>	
• What You Should Know About Social Services Programs Book 2 (DSS-4148B)	<input type="checkbox"/>	<input type="checkbox"/>	
• What You Should Know if You Have an Emergency Book 3 (DSS-4148C)	<input type="checkbox"/>	<input type="checkbox"/>	
• New Information About Public Assistance and Food Stamps (LDSS-4148D)	<input type="checkbox"/>	<input type="checkbox"/>	
• New Information About Public Assistance and Food Stamps (LDSS-4148E)	<input type="checkbox"/>	<input type="checkbox"/>	
6) Are the following posters in client waiting areas?			
Food Stamp Rights, FNS-183 December 1978	<input type="checkbox"/>	<input type="checkbox"/>	
Food Stamp Complaint Procedures	<input type="checkbox"/>	<input type="checkbox"/>	
And Justice for All Form AD-475-B November 1985	<input type="checkbox"/>	<input type="checkbox"/>	

