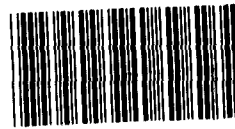


September 1992

SOCIAL SECURITY

Need for Better Coordination of Food Stamp Services for Social Security Clients



147600

Human Resources Division

B-248211

September 25, 1992

The Honorable Patrick J. Leahy
Chairman, Committee on Agriculture,
Nutrition, and Forestry
United States Senate

The Honorable E (Kika) de la Garza
Chairman, Committee on Agriculture
House of Representatives

The Honorable David H. Pryor
Chairman, Special Committee on Aging
United States Senate

This report was prepared in response to a provision in the Food, Agriculture, Conservation, and Trade Act of 1990 requiring that we study certain aspects of the 1977 Food Stamp Act as amended. The Food Stamp Act requires that the Departments of Agriculture and Health and Human Services coordinate the delivery of food stamp services at Social Security Administration (SSA) offices.

The poor in America seeking government services are often confronted by fragmented delivery systems. Often those most in need do not know what services are available to them or how to access them. Many take advantage of only the services offered by the first agency they contact.

The Congress recognized that efforts were needed to better integrate the delivery of food stamp services for applicants to SSA programs. By requiring the coordination of services, the Congress sought to improve Social Security program client participation in the Food Stamp program. In addition, because of the health and mobility limitations faced by many of the elderly, disabled, and blind applying for Supplemental Security Income (SSI), the Congress believed that such persons should be given the convenience of applying for both SSI and food stamps at the same time.

Specifically, we were required to address whether:

- taking food stamp applications for certain SSI applicants and recipients at SSA offices is working adequately,
- Social Security program clients are being adequately informed of the availability of food stamps,

- taking food stamp applications at SSA offices should be expanded to all Social Security program clients, and
- developing a joint ssi/food stamp application is feasible.

We reviewed the policies and procedures for ssi and the Food Stamp program. We also discussed the adequacy of coordination of the ssi and Food Stamp programs with federal and state officials as well as several advocacy groups, such as the American Association of Retired Persons and the Food Research and Action Center.

Further, we coordinated our efforts with another GAO review, which examined different types of initiatives to integrate the delivery of health and human services to poor families. This effort was focused on identifying the features of initiatives that were most successful at linking clients to existing services.

To assess how well the process is working, we sent a questionnaire to state food stamp directors and to a statistical sample of ssi applicants. Appendix I contains a more complete description of our scope and methodology.

We conducted our review primarily between June 1991 and February 1992 in accordance with generally accepted government auditing standards.

Results in Brief

SSA has not adequately carried out its responsibilities under the Food Stamp Act. SSA has taken relatively few food stamp applications for the ssi clients that the Congress wanted to help. A principal reason appears to be a lack of strong commitment by SSA management and staff to carry out the tasks assigned under the Food Stamp Act. Taking food stamp applications is viewed as the responsibility of the states and the Department of Agriculture.

The current application process also results in duplication of SSA's efforts by the states and poor service to clients. For example, SSA is required to complete food stamp applications and forward them to the states within 1 working day. This time requirement often precludes SSA from completing its work. Further, by agreement with the Department of Agriculture, SSA is not required to complete all aspects of a food stamp application. Consequently, states must often recontact and reinterview applicants in order to complete the work begun by SSA.

Currently, SSA attempts to inform clients of food stamp availability by displaying posters and making brochures and applications available in SSA offices. SSA's efforts in this regard have been inadequate. Many offices do not have such displays. This approach also ignores the millions of clients who apply for benefits each year by telephone. Further, many people who visit SSA offices may not notice the food stamp information among all the other information on display.

In our view, SSA's current role in taking food stamp applications should not be expanded to SSA's other programs. The ability to share information common to the SSI and Food Stamp programs was a primary reason for having SSA take food stamp applications. However, the eligibility and, thus, information requirements for the Social Security retirement and survivors and disability insurance programs are vastly different than those of the Food Stamp program. Thus, if expanded, SSA would need to obtain applicant information not common among the programs, a major departure from the original coordination concept.

Although the development of a joint SSI/food stamp application appears feasible, we believe that combining the relatively short national food stamp application form with the much longer SSI application would provide little benefit in improving process efficiency and client service. Also, state officials told us that combining the two forms would be confusing to both state workers and clients.

To address the current problems in delivering food stamp services to SSA clients and to improve congressional oversight, we believe that the Department of Health and Human Services (HHS) and Agriculture need to develop a plan. In addition, they need to keep the cognizant congressional committees informed about progress made and the possible need for legislative changes.

Background

The Food Stamp program provides low-income households with assistance to obtain a more nutritious diet. Benefits generally are provided in the form of food stamp coupons and are funded by the federal government, while administrative expenses are shared between the federal and state governments. In fiscal year 1991, the program served a monthly average of 22.4 million persons living in 8.9 million households, and benefits paid were \$17.3 billion. The Department of Agriculture's Food and Nutrition Service (FNS) oversees the administration of the Food Stamp

program, while day-to-day operations are carried out through state food stamp offices.

The ssi program provides cash assistance to low-income elderly, disabled, and blind persons. In fiscal year 1991, an average of 5.0 million persons enrolled in the program received \$14.2 billion in federal benefits. In addition to ssi, ssa administers the Old-Age, Survivors, and Disability Insurance (OASDI) programs. About 69 percent of the elderly and 37 percent of the disabled and blind ssi recipients also receive income from OASDI.

To be eligible to apply for food stamps at ssa, ssi applicants and recipients must live in a "pure" ssi household, meaning that all people in the household, including the food stamp applicant, must be ssi applicants or recipients. To simplify ssa's responsibility in taking food stamp applications, the Congress limited ssa's role to only pure ssi households because ssa usually does not collect information on non-ssi household members. In fiscal year 1989, pure ssi households accounted for an estimated 71 percent of all ssi households receiving food stamps. Of these, 92 percent consisted of a single person, receiving an average of \$33 monthly.

Under the law, ssi recipients living in a pure ssi household are categorically eligible for food stamps; this means that these recipients do not need to meet the income and resource limits of the Food Stamp program to qualify for benefits. Further, one- or two-person ssi recipient households are guaranteed a minimum monthly benefit of \$10.

For ssi clients eligible and wanting to apply for food stamps at ssa, field staff are to complete an application and forward it, and any documentation available to verify information on the application, to a state food stamp office within 1 working day.¹ The food stamp office is to accept the application and be responsible for any subsequent contacts with the applicant needed to complete the application or obtain verification, and certification of household eligibility. This shared responsibility for food stamp application and certification between ssa and state food stamp workers is referred to as the joint application process. For other than pure ssi households wishing to apply for food stamps, ssa field staff are to refer such clients to a state food stamp office to make application.

¹The Food Stamp Act requires that food stamp applications be forwarded "immediately" and in an efficient and timely manner. FNS regulations define this to mean 1 working day.

To inform SSA clients of the Food Stamp program, SSA agreed to display food stamp posters in SSA offices as well as make food stamp brochures and applications available for SSA clients. For administering food stamp related services at SSA offices, the Food Stamp Act requires that SSA be reimbursed by the Department of Agriculture for costs incurred. In fiscal year 1991, SSA recorded costs of \$2.9 million relating to both taking food stamp applications and conducting food stamp outreach, most of which was for the latter.

The Process for Taking Food Stamp Applications at SSA Has Not Worked Well

SSA takes few applications in relation to the number of SSI clients served. A major reason appears to be a lack of strong commitment to the process by SSA management and staff. Also, there appears to be resistance to becoming involved in Food Stamp program administration. Further, the process as designed results in duplication of effort and poor service to clients, and the food stamp applications used are unnecessarily complex and lengthy.

SSA Has Taken Relatively Few Applications

The Congress, advocates for the disabled and elderly, and others have expressed concerns that SSA has done little to assist SSI clients in applying for food stamps. Since inception of the joint application process in 1980, SSA field staff have taken a very small proportion of food stamp applications in relation to the number of SSI clients served. For fiscal year 1991, SSA reported taking only about 37,000 food stamp applications, representing about 1 percent of SSI applicant and recipient work loads.²

Nevertheless, hundreds of thousands of SSI clients are eligible for, but do not apply for, food stamps at SSA. SSA's fiscal year 1990 computer data show that about half of the 2.3 million SSI clients applying for benefits or having their SSI benefits redetermined were not receiving or had not previously applied for food stamps.³ Of these SSI applicants and recipients, we estimate that about 500,000 lived in a pure SSI household and could, but did not, apply for food stamps at SSA. In addition, more than half of these

²The number of food stamp applications reported by SSA includes food stamp recertifications for those SSI clients already receiving food stamps. SSA data do not distinguish between initial food stamp applications and recertifications, although the latter are likely to be small in number.

³The 2.3 million excludes 229,000 clients for whom SSA computer data lacked any food stamp information.

clients are recipients of ssi; thus, they are categorically eligible for food stamps.⁴

The vast majority (95 percent) of the ssi applicants we surveyed said that ssa had not assisted them in applying for food stamps. These ssi applicants included most of those (85 percent) for whom ssa had claimed taking their food stamp application. Table 1 below shows the reasons cited most frequently by the sampled ssi applicants as to why they had not applied for food stamps at ssa.

Table 1: Most Frequently Cited Reasons Why SSI Applicants Did Not Apply for Food Stamps at SSA

Reason	Percent of applicants
SSA staff never asked if I wanted food stamps	41
SSA staff said I must file at a food stamp office	19
I preferred to apply at a food stamp office	8
SSA staff said I could get food stamps quicker by applying at a food stamp office	7
I did not want food stamps	14

As shown above, the sampled applicants said most frequently that they were not asked about food stamps. Far fewer applicants mentioned that they did not want food stamps or preferred to apply at a food stamp office.⁵

Of the applicants told they must file at a food stamp office, such referrals would be appropriate for ssi applicants not living in pure ssi households. Similarly, applicants living in pure ssi households who may qualify for expedited services—generally those who are destitute or homeless—can be told that they may get food stamps quicker by applying directly at a food stamp office. SSA records cannot be used to identify individuals living in pure ssi households or qualifying for expedited services; therefore, we could not assess the appropriateness of these referrals.

Many of those referred, however, did not subsequently apply for food stamps at state offices. About half of the ssi applicants who indicated to us that they were referred or who wanted to apply for food stamps at a state office said that they had not gone to the state to apply for food stamps. For all of the ssi applicants we surveyed, almost two-thirds (63 percent) said

⁴Since SSA does not record the number of SSI clients living in a pure SSI household, the actual number of such clients eligible to apply at SSA is unknown. We based our estimate, therefore, on the best available data describing the characteristics of SSI and food stamp households. Our estimate excludes 229,000 cases for which SSA computer data lacked any food stamp information.

⁵Other responses include those who had already applied (3 percent) or are already getting food stamps (3 percent), those who do not remember (10 percent), and those citing any other reason (7 percent).

that they had not gone to a state office since applying for ssi. Of the one-third that did go, 46 percent said that they went to get other benefits. Thus, it appears that many SSA referrals were not having the desired effect.

To assess the willingness of SSA field offices to take food stamp applications, we visited 31 SSA field offices where we asked if a person whom we described as elderly and living in a pure ssi household could apply for ssi as well as food stamps at the same time. Of the 31 offices we visited, the receptionists at 10 offices said that staff would take both an ssi and food stamp application, while at 21 offices we were told that staff would not take a food stamp application and we were referred to a state office. SSA headquarters had previously notified field offices of the need to ensure that receptionists are aware of SSA's food stamp responsibilities.

**Lack of Strong
Commitment by SSA to
Joint Application Process**

A major reason why SSA has taken relatively few food stamp applications is that SSA management and staff have not shown a strong commitment to the joint application process. SSA management has shown little concern over field staff not fulfilling their required roles and devoted little attention to improving the process.

SSA management also has little information on how well field staff comply with SSA's food stamp responsibilities. For example, information is not collected on the number of ssi clients living in pure ssi households or the number of pure ssi households wanting food stamps. In addition, SSA management has no information on the quality of food stamp applications taken by SSA. While each state has a quality assurance program for food stamps and SSA has a quality assurance program for ssi and OASDI programs, no measure of quality exists for food stamp applications taken by SSA.

The accuracy of the management information collected by SSA is questionable. SSA field staff are instructed to record information on the number of food stamp applications taken. Our survey of ssi applicants, however, raises questions about the reliability of this information. The vast majority (85 percent) of the ssi applicants we surveyed for whom SSA recorded taking their food stamp application said that SSA had not taken their application. SSA recognizes that field office staff have improperly recorded the taking of food stamp applications. Specifically, it found that field offices were recording that food stamp applications had been taken in situations where individuals merely indicated an interest in applying.

SSA program officials told us that SSA field staff know that state food stamp workers are ultimately responsible for processing food stamp applications and have little motivation to become involved in a program that is not SSA's responsibility. Pressures in recent years to process increasing SSA work loads have also acted as a disincentive to take time away from SSA programs for the taking of food stamp applications.

In addition, representatives at two SSA regional offices we visited said that there is no incentive for field staff to take food stamp applications; emphasis is on the management of SSA work loads. Also, they said that there are no checks to ensure that staff actually take required applications.

A strong commitment by all parties to improving the process is needed. We found that successful service-integration efforts have historically had a strong commitment by agency managers and staff to meeting client needs, and have worked together well to meet those needs.

Application Process Problems

A goal of the application process is to make it easier for ssi clients to apply for food stamps by allowing them to apply at the same time they apply for ssi. Consequently, regulations attempt to minimize the number of additional state contacts of clients required to obtain food stamps. Regulations permit additional state contacts, such as by mail, telephone, or home visit, when the SSA-taken application is incomplete or contains questionable information. Regulations prohibit states from requiring that ssi clients applying for food stamps at SSA visit a food stamp office or be interviewed a second time.

Virtually all the state officials we surveyed said that they needed to recontact at least some ssi food stamp applicants before they could complete the application processing. Thirty-three states said that most of these clients needed to be contacted at least one more time to complete the applications taken by SSA.

Although prohibited by regulation, 18 states indicated that some of the additional contacts involved in-person interviews at the state offices. Also, 22 states said that most applications taken by SSA were being treated as referrals only; thus, requiring that they interview ssi clients a second time to complete the application.

Merely enforcing state compliance with regulations will not address the underlying problems with the quality of applications taken by SSA.

Moreover, food stamp applications must be completed and verified in accordance with regulations before they can be approved.

One way to possibly improve the joint application process—which may maximize convenience for SSI clients as well as achieve processing efficiencies—would be to have SSA complete and verify applications before they are forwarded to states. Currently, SSA instructions to field staff require that only documentation obtained for SSI purposes at the time of application be made available to states. This is done in order to comply with the requirement that the application be forwarded to the states within 1 working day. Also, to limit SSA's role in the process, field staff are not required to verify non-SSI data needed for food stamp purposes, such as utility and medical expenses. Consequently, by design, the applications sent to states will require additional state work and client contact before they can be completely processed.

Taking on additional responsibilities for completing and verifying food stamp applications would affect SSA staff resources. However, in our view, this additional time should be weighed against possible improvements in services to SSI clients and reductions in state-processing costs.

Food Stamp Applications Are Unnecessarily Complex and Lengthy

The Food Stamp Act requires that a “simple” food stamp application be used for the joint application process. It was envisioned that this application would be no more complex than an FNS-designed national food stamp application. Currently, the applications in use in many states for the joint application process are not simple, but unnecessarily complex and lengthy.

To implement the law, SSA and FNS agreed that SSA regional offices would negotiate with each state whether SSA field offices would use either the FNS-designed national food stamp application or a state-designed application. States generally prefer SSA to use state-designed applications because they are compatible with state-processing requirements.

Twenty of the 45 states responding to our survey said that SSA field offices use either the FNS national food stamp application or a similar state-designed food stamp application. However, the remaining 25 states said that SSA field offices use state multiprogram applications.⁶ Such applications are generally much longer (as much as 37 pages in one state)

⁶Clients applying for eligibility from more than one assistance program can file combined applications, which are used to determine eligibility and benefit levels for several assistance programs at once.

and more difficult to complete than a single food stamp application, such as FNS's national food stamp application (9 pages). In addition, almost two-thirds of the multiprogram applications used for the joint application process are generic, meaning that they do not separately identify information specific to the Food Stamp program.

Although the FNS or similar state-designed food stamp applications may comply with the "simple" application mandate of the law, an application designed specifically for the joint application process would have several advantages. For example, unlike other applications, it would clearly identify SSA as the source of the application and allow SSA to develop uniform instructions for its field staff on how to complete a food stamp application. Currently, SSA has instructions on how to complete the FNS national application, but this is used in only five states. Also, such an application could provide useful information unique to SSI clients, such as whether they live in a pure SSI household and whether they are applicants or recipients. Further, the application could contain a point of contact at SSA for any questions states may have concerning the application.

SSA Program Clients Are Not Adequately Informed of Food Stamp Availability

The Food Stamp Act requires that all applicants and recipients of Social Security programs be adequately informed of the availability of benefits under the Food Stamp program and of a simple food stamp application. The manner in which SSA and FNS implemented this requirement is inadequate. In conjunction with adequately informing SSA program clients, improved referral of clients not applying at SSA may better ensure their participation in the Food Stamp program.

To notify SSA program clients, SSA and FNS agreed that food stamp posters, brochures, and food stamp applications would be displayed in SSA offices. We, as well as SSA, have found that not all field offices have complied. For example, we visited 34 SSA field offices in eight states and the District of Columbia. Fifteen offices did not have a food stamp poster displayed, 25 did not have brochures, and only 3 had food stamp applications available. SSA oversight visits have found similar problems and several reminders have been sent to regional and field offices emphasizing the need to comply with these requirements.

Even if all SSA field offices complied with the requirements, this effort would not adequately inform applicants and recipients of SSA programs of food stamp availability. For example, millions of SSA clients apply for benefits each year by telephone, and accordingly, they have no

opportunity to see the food stamp information at SSA offices. Also, SSA clients visiting an SSA office may not notice the food stamp information among all of the other information displayed there. In addition, the vast majority of clients contact SSA in connection with SSA program business, rather than to apply for food stamps.

To adequately inform SSA program clients of food stamp availability, additional efforts are needed. Among the possibilities is providing a brochure to SSA program applicants and beneficiaries/recipients as part of SSA's routine mail contacts, such as mailing applications for signature and notifying individuals of benefit changes.

Besides adequately informing SSA program clients of food stamp availability, our study suggests that additional procedures might improve food stamp participation of SSA program clients. For example, our survey of ssi applicants shows that about half of those who were referred or who wanted to apply for food stamps at a state office said that they did not apply for food stamps. Perhaps, therefore, rather than simply telling such clients they can apply for food stamps at a state office, program outreach and participation would be enhanced if SSA field staff provided interested clients' names, addresses, and telephone numbers to state offices for their follow-up.

SSA's Role in Taking Food Stamp Applications Should Not Be Expanded to Other Program Clients

We do not believe that SSA's current role in taking applications should be expanded to include all Social Security program clients. Because the ssi and Food Stamp programs are both needs-based, these programs use similar information, such as income and resources, to determine eligibility. The ability to share such common information was a primary reason for having SSA take food stamp applications. However, SSA's OASDI programs are not needs-based, and SSA does not collect information common to the Food Stamp program. Thus, expansion of the current joint application process would be a major departure from SSA's present food stamp/ssi coordination role.

A Joint SSI/Food Stamp Application Is Feasible but Would Offer Little Benefit

The development of a joint ssi/food stamp application form is feasible, but combining a food stamp-only application with the much longer ssi application would, in our view, provide little benefit. The ssi application contains over 50 data items not needed for food stamp purposes, but does not contain all information required of the Food Stamp program, such as certain expenses and living arrangements affecting eligibility.

Of 37 states giving an opinion on this issue, 8 favored the use of a joint application form, and 29 opposed it. Those favoring this option generally saw it as a means to ensure that SSA field staff collect complete food stamp information as well as to increase participation. Those opposed generally believed that it would not be compatible with state forms and would be an unnecessarily complex form for both state and client use. We favor SSA's use of a simple food stamp application as required by the Food Stamp Act.

Conclusions

The coordination of food stamp services for SSA program clients has not worked well. SSA management and staff are the key players in this initiative; however, they have not adequately carried out their responsibilities under the Food Stamp Act. But even if SSA should do so, there are many problems with the current application-taking process. For example, the use of unnecessarily complex food stamp application forms impede the effective and efficient delivery of services.

While addressing the problems disclosed in this report could improve the coordination of food stamp services, the program's history of problems—generally reflective of those of other service integration initiatives—also gives us reason to be guarded about the prospects for overall success. Thus, whether a good faith SSA and FNS effort to make the 12-year-old program work would do so, remains at issue. Nonetheless, such an effort must be made to meet the purposes of the Food Stamp Act.

In our view, therefore, the Secretaries of HHS and Agriculture need to jointly develop and implement a plan for addressing the current shortcomings in food stamp services to SSA program clients. Further, to ensure adequate oversight, they should keep the cognizant House and Senate Committees informed about progress made and the possible need for legislative changes to facilitate, or eliminate impediments to, providing quality service.

Recommendation to the Congress

We recommend that the Congress require the Secretaries of Health and Human Services and Agriculture to jointly develop, within a prescribed time frame, a plan for improving the coordination of food stamp services for SSA program clients. The plan should include implementation time frames and consideration of legislative changes, and should be furnished to the House and Senate Agriculture Committees, Senate Committee on Finance, House Committee on Ways and Means and the Senate Special Committee on Aging. In developing the plan, the Secretaries should solicit

input from states and client advocates, and include consideration of the following:

1. Addressing problems at the application-taking levels, including the possible need to better orient staff and hold them accountable for adhering to coordination requirements.
2. Explore options to the current joint application process, including eliminating the 1-working-day requirement for SSA field staff to complete the food stamp application.
3. Developing a simple food stamp application for national use by SSA field office staff.
4. Taking additional steps to ensure that applicants and recipients of SSA programs are adequately informed of food stamp availability.
5. Strengthening the process for referring SSA clients to state offices to apply for food stamps.
6. Developing methods to monitor how well SSA and states carry out their responsibilities.

**Comments From the
Departments of
Health and Human
Services and
Agriculture**

We requested that HHS provide written comments on a draft of this report. We did not receive its comments within the 30-day period specified by 31 U.S.C. 718. However, we did discuss the report's contents with SSA officials and incorporated their views where appropriate.

The Department of Agriculture's Food and Nutrition Service provided written comments on a draft of this report. FNS agreed with the general assessment of our audit and the concern that the SSI/food stamp joint application process is not accomplishing its goals as the Congress intended. Appendix II contains FNS's comments.

We are sending copies of this report to the Secretaries of HHS and Agriculture, the Commissioner of SSA, and the Administrator of FNS. We will make copies available to other interested parties on request.

The report was prepared under the direction of Joseph F. Delfico, Director of Income Security Issues. If you or your staffs have any questions

regarding it, he can be reached at (202)512-7215. Other major contributors are listed in appendix III.

Lawrence H. Thompson

Lawrence H. Thompson
Assistant Comptroller General

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Abbreviations

FNS	Food and Nutrition Service
GAO	General Accounting Office
HHS	Department of Health and Human Services
OASDI	Old-Age, Survivors, and Disability Insurance Programs
SSA	Social Security Administration
SSI	Supplemental Security Income

Objectives, Scope, and Methodology

The objectives of our study were to address whether (1) taking food stamp applications for certain ssi clients at ssa offices is working adequately, (2) Social Security program clients are being adequately informed of the availability of food stamps, (3) taking food stamp applications at ssa should be expanded to all Social Security program clients, and (4) developing a joint ssi/food stamp application is feasible.

We performed our audit work at ssa headquarters in Baltimore, and at FNS headquarters in Alexandria, Virginia. We talked with responsible officials and reviewed Food Stamp program regulations, operational instructions, and various studies and data relative to our review and the legislative history of coordinating the ssi and Food Stamp programs. We also met with representatives of various advocacy groups, including the American Association of Retired Persons, the Food Research and Action Center, the National Senior Citizens Law Center, the American Public Welfare Association, and Families, USA.

We also performed work within ssa's Chicago, Boston, and Philadelphia regions. Within these regions, we visited officials from ssa regional and field offices and state and local food stamp offices. Our purpose was to obtain first-hand information on how well the joint application process was working.

For the purpose of assessing the quality of ssa food stamp outreach and the willingness of ssa field offices to take food stamp applications, we visited ssa field offices in eight states and the District of Columbia. At 34 offices, we observed whether the reception area had a food stamp poster displayed and whether a food stamp brochure and application were available. At 31 of these offices, we asked the receptionists if a person whom we described as living alone and wanting to apply for ssi could also apply for food stamps.

To obtain the views of the states, we surveyed state food stamp directors by mail in 48 states and the District of Columbia. California and Wisconsin were not surveyed because they did not participate in the joint application process; at the time of our survey, ssi recipients in these states received an amount representing the value of food stamp coupons as part of their ssi state supplemental payment. Forty-five states responded to our survey.

We asked the food stamp directors for basic program data on their food stamp programs. Such data included the number of applications taken, the type of application form used, and the frequency of food stamp

recertifications. We also asked them for their views on certain issues, including how well the joint application process was working and whether development of a joint ssi/food stamp application was feasible and desirable.

We also surveyed by mail a random sample of 400 ssi applicants to determine the extent to which ssa took food stamp applications. We asked whether ssa had taken their food stamp applications and if not, why not; we also asked whether they later went to a state office to apply for food stamps or for any other reason. The sample of 400 applicants was stratified into two groups: 200 for whom ssa recorded taking a food stamp application, and 200 for whom ssa recorded not taking an application.

Our sample was drawn from the universe of persons for whom ssa's computerized supplemental security record indicated that they applied for ssi in August 1991. From the total 92,675 applicants, we excluded from our universe the following number of ssi applicants who we could determine as not eligible to have their food stamp applications taken by ssa or who were already receiving food stamps: 12,485 applicants who lived in California and Wisconsin because ssi recipients in these states received cash in lieu of food stamp coupons; 899 applicants who lived in institutions, such as nursing homes, or lived outside the United States; 35,469 applicants who were already receiving food stamps; and 8,451 applicants for whom ssa's records did not contain information about food stamps. We further excluded 215 applicants because of ssa coding problems, and another 1,472 due to inaccurate mailing addresses.

Due to differences between ssi and Food Stamp eligibility requirements, ssa does not record in its records all situations where ssi applicants would be ineligible for food stamps. In this regard, we could not separately identify in ssa's files ssi applicants living in commercial boarding homes. Similarly, some of the applicants in institutions who we excluded may have been eligible for food stamps because of special food stamp rules.

After exclusions, the remaining universe of 33,684 applicants was made up of 32,085 applicants for whom ssa said that it did not take a food stamp application (stratum 1), and 1,599 for whom ssa said it did take an application (stratum 2). We selected a random sample of 200 applicants from each stratum.

The following table shows the universe, initial sample size, adjustments, and response rate for each stratum.

Table I.1: Characteristics of Strata 1 and 2

	Stratum 1	Stratum 2
Universe	32,085	1,599
Initial sample size	200	200
Misclassified	7	6
Adjusted sample	193	194
Number of respondents	152	138
Deceased, undeliverable, and other nonrespondents	41	56
Response rate (in percent)	79	71

Of those whom SSA indicated that an application was not taken (stratum 1), 159 responded. Seven of the respondents said that they had not been to SSA to apply for SSI, and were removed from the sample. There were 41 deceased, undeliverable, and other nonresponses. The response rate—the number of respondents (152) divided by the adjusted sample size (193)—is 79 percent.

Of those whom SSA indicated that a food stamp application was taken (stratum 2), 144 responded. Six of the respondents said that they had not gone to SSA to apply for SSI, and were removed from the sample. There were 56 deceased, undeliverable, and other nonresponses. The response rate—the number of respondents (138) divided by the adjusted sample size (194)—is 71 percent.

Before mailing the questionnaire to the sampled applicants, we pretested the questionnaire with a sample of applicants who had recently applied for SSI. Based on the pretests, we made appropriate adjustments to the questionnaire.

As we surveyed a sample rather than the universe of applicants in each population, each reported estimate has a sampling error associated with it. The size of the sampling error reflects the precision of the estimate; the smaller the sampling error, the more precise the estimate.

Sampling errors for estimates from this survey were calculated at the 95-percent confidence level. This means that the chances are about 19 out of 20 that the actual number or percentage being estimated falls within the range defined by our estimate, plus or minus the sampling error. With two exceptions, sampling errors for the data shown did not exceed plus or minus 8 percent. On page 6, we reported that about half of the SSI applicants who indicated they were referred or who wanted to apply for

food stamps at a state office said that they had not applied for food stamps. The sampling error for this statistic was plus or minus 16 percent. On page 7, we reported that of the one-third of the ssi applicants who said that they had gone to a state office since applying for ssi, 46 percent said that they went to get other benefits. The sampling error for this statistic was plus or minus 14 percent.

Comments From the Department of Agriculture



United States
Department of
Agriculture

Food and
Nutrition
Service

3101 Park Center Drive
Alexandria, VA 22302

Mr. Joseph F. Delfico
Director
Income Security Issues
Human Resources Division
U.S. General Accounting Office
Washington, D.C. 20548

AUG 28 1992

Dear Mr. Delfico:

This letter is in response to the General Accounting Office (GAO) draft report to Congress entitled "Social Security: Need to Reassess the Coordination of Food Stamp Services for Social Security Clients." The report concludes that the system put in place to provide informational and application services for the Food Stamp Program to Supplemental Security Income (SSI) clients has not worked well.

The Food and Nutrition Service (FNS) agrees with the general assessment of the audit. We and the Social Security Administration (SSA) are concerned that the SSI/Food Stamp Joint Processing system is not accomplishing its goals as Congress intended.

In a cooperative effort with SSA, we have initiated regular joint meetings to better coordinate the services we provide to clients. A prime focus of these meetings is addressing the problems outlined in the report and other issues that may hinder a successful joint processing program. We have already begun discussing alternate methods of serving the needs of our clients.

We would like to thank you for the opportunity to review and comment on this report. We also appreciate your staff's willingness to meet with us to address questions and concerns during the study. If you have any questions concerning our response, please contact Lawrence Albert of my staff at 703-305-2497.

Sincerely,

Betty Jo Nelsen
Administrator

Major Contributors to This Report

**Human Resources
Division,
Washington, D.C.**

**Barry D. Tice, Assistant Director, (410) 965-8920
Tom Smith, Assignment Manager
William E. Hutchinson, Evaluator-in-Charge
John G. Smale, Social Science Analyst
Ellen Habenicht, Evaluator**



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