

GAO

Report to the Chairman, Committee on  
Agriculture, Nutrition, and Forestry,  
U.S. Senate

May 2007

# FOOD STAMP PROGRAM

Use of Alternative  
Methods to Apply for  
and Maintain Benefits  
Could Be Enhanced by  
Additional Evaluation  
and Information on  
Promising Practices



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# Highlights

Highlights of [GAO-07-573](#), a report to the Chairman, Committee on Agriculture, Nutrition, and Forestry, U.S. Senate

## Why GAO Did This Study

One in 12 Americans participates in the federal Food Stamp Program, administered by the Food and Nutrition Service (FNS). States have begun offering individuals alternatives to visiting the local assistance office to apply for and maintain benefits, such as mail-in procedures, call centers, and on-line services. GAO was asked to examine: (1) what alternative methods states are using to increase program access; (2) what is known about the results of these methods, particularly on program access for target groups, decision accuracy, and administrative costs; and (3) what actions states have taken to maintain program integrity while implementing alternative methods. GAO surveyed state food stamp administrators, reviewed five states in depth, analyzed FNS data and reports, and interviewed program officials and stakeholders.

## What GAO Recommends

GAO recommends that the Secretary of Agriculture direct FNS to (1) work with the Economic Research Service (ERS) to enhance their research agendas to include projects that would determine the effects of alternative methods; (2) conduct analyses of data received from states implementing waivers or demonstration projects waiving the face-to-face interview; and (3) disseminate and regularly update information on promising practices states are using to implement alternative methods. FNS and ERS generally agreed with GAO's findings, conclusions, and recommendations.

[www.gao.gov/cgi-bin/getrpt?GAO-07-573](http://www.gao.gov/cgi-bin/getrpt?GAO-07-573).

To view the full product, including the scope and methodology, click on the link above. For more information, contact Sigurd Nilsen at (202) 512-7215 or [nilsens@gao.gov](mailto:nilsens@gao.gov).

# FOOD STAMP PROGRAM

## Use of Alternative Methods to Apply for and Maintain Benefits Could Be Enhanced by Additional Evaluation and Information on Promising Practices

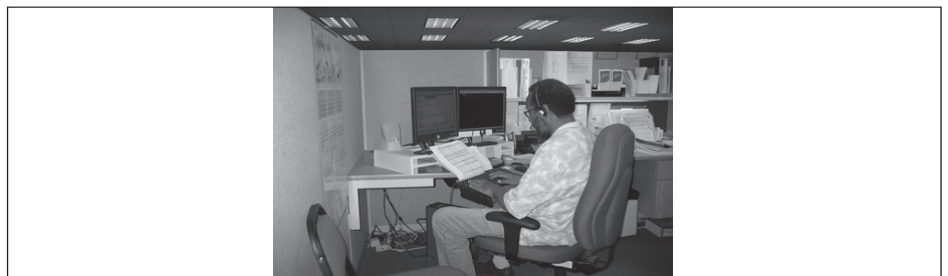
### What GAO Found

All states use mail and about half of states use or have begun developing on-line services and call centers to provide access to the food stamp program. Almost all states allow households to submit applications, report changes, and submit recertifications through the mail, and 26 states have implemented or are developing systems for households to perform these tasks on-line. Almost half of the states are using or developing call centers and states also are allowing households to participate in telephone interviews instead of an in-office interview. States have taken a variety of actions to help households use on-line services and call centers, such as sending informational mailings, holding community meetings, and using community partners.

Insufficient information is available to determine the results of using alternative methods. Few evaluations have been conducted identifying the effect of alternative methods on program access, decision accuracy, or administrative costs. Evaluating the effectiveness of alternative methods is challenging in part because limited data are available, states are using a combination of methods, and studies can be costly to conduct. Federal and state officials reported that while they believe alternative methods can help households in several ways, such as increasing flexibility and efficiency in the application process, certain types of households may have difficulty using or accessing alternative methods. In addition, technology and staffing challenges may hinder the use of alternative methods.

To maintain program integrity while implementing alternative methods, the states GAO reviewed used a variety of strategies, such as using software to verify the information households submit, communicating with other states to detect fraud, or using finger imaging. Although there has been some concern that without frequent in-person interaction with caseworkers, households may not submit required documents on time and thus be denied benefits on procedural grounds ("procedural denials"), GAO's limited analysis of FNS data found no considerable fluctuations in the rate of procedural denials in the five states between fiscal years 2000 and 2005. The states GAO reviewed have instituted several approaches to prevent procedural denials.

### Call Center Caseworker Answering Calls



Source: GAO.

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### Abbreviations

EBT	Electronic Benefits Transfer
ERS	Economic Research Service
FNS	Food and Nutrition Service
FSP	Food Stamp Program
PRWORA	Personal Responsibility and Work Opportunity Reconciliation Act of 1996
QC	quality control
SSI	Supplemental Security Income
TANF	Temporary Assistance for Needy Families
USDA	U.S. Department of Agriculture

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United States Government Accountability Office  
Washington, DC 20548

May 3, 2007

The Honorable Tom Harkin  
Chairman  
Committee on Agriculture, Nutrition, and Forestry  
United States Senate

Dear Mr. Chairman:

Almost 1 in every 12 Americans participates in the federal Food Stamp Program, which helps low-income individuals and families purchase nutritious food, such as meat, dairy products, fruits, and vegetables. In fiscal year 2005, the program, jointly administered by the U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS) and the states, provided about \$29 billion in benefits to nearly 26 million people, about half of whom were children.<sup>1</sup>

Although participation in the program has increased substantially in recent years, about 40 percent of people who were eligible for the program did not participate in 2004, the most recent year data are available. Elderly individuals, non-citizens that may have limited English proficiency, and working families have consistently participated at lower rates than the eligible population as a whole and FNS has targeted these subgroups to increase participation. Even though there are many reasons people may not participate in the program, some research has shown that the administrative burden of applying for and maintaining eligibility for benefits may be a factor, particularly for people who are elderly or who work during the hours local public assistance offices are open. Participation in the program generally requires individuals to submit an application, participate in an interview at initial application and at least annually, provide verification of certain information, report certain changes in household circumstances while receiving benefits, and reapply for benefits at the end of the certification period (recertification). While completing the Food Stamp Program application and recertification process has traditionally involved visiting the local assistance office in person for interviews or to submit applications and other documentation,

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<sup>1</sup> Preliminary FNS data indicate that participation continued to grow to nearly 27 million people receiving about \$30 billion in food stamp benefits in fiscal year 2006.

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states have begun offering alternatives in the last several years, such as mail-in procedures, call centers, and on-line services.

While FNS has allowed states to adopt these new ways of accessing the program, it also has a quality control system in place to monitor program integrity. Under this system, FNS monitors decision accuracy, including how accurately states determine food stamp eligibility and calculate benefits. In addition to monitoring the payment error rate, FNS estimates the rate of cases denied, suspended, or terminated incorrectly, which is called the negative error rate. FNS and USDA's Economic Research Service (ERS) also fund Food Stamp Program research.

To understand what alternative approaches states are using to help households apply for and maintain benefits and what is known about the results of using these methods, we examined: (1) the alternative methods to the traditional application and recertification process states are using to increase program access; (2) what is known about the results of these methods, particularly on program access for target groups, decision accuracy, and administrative costs; and (3) what actions states have taken to maintain program integrity while implementing alternative methods.

To answer these questions, we surveyed food stamp administrators in the 50 states and the District of Columbia<sup>2</sup> to collect information on what alternative methods states are using or planning to use (mail, call centers, on-line services), how performance of these methods is measured, and what is known about the results of using these methods. To augment information from our state survey, we conducted four site visits (Florida, Texas, Utah, and Washington) and one set of semi-structured telephone interviews (Pennsylvania). We selected states that have at least one FNS-approved waiver of the face-to-face interview requirement and reflect some variation in state participation rates. We also considered recommendations from FNS officials, advocacy group representatives, and researchers. For each of the five states we reviewed in depth, we interviewed state officials administering and developing policy for the Food Stamp Program, local officials in the assistance offices and call centers where services are provided, and representatives from community-based organizations that provide food assistance. We analyzed data provided by FNS and the states we reviewed in depth to provide background for our discussions with officials about state trends for

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<sup>2</sup> In this report, we refer to all 50 states and the District of Columbia as states.

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specific measures (participation, payment accuracy, administrative costs, and reasons for denial). We also reviewed FNS reports and related studies. We held discussions with program stakeholders, including officials at FNS headquarters and regional offices, and representatives of advocacy organizations. Appendix I explains our methodology in more detail. We performed our work from September 2006 to March 2007 in accordance with generally accepted government auditing standards.

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## Results in Brief

All states use mail and about half of states use or have begun developing on-line services and call centers to provide access to the Food Stamp Program. Almost all states told us they allow households to submit applications, report changes, and submit recertifications through the mail, and 26 states have implemented or are developing systems to allow households to submit applications, report changes, or submit recertifications on-line. In addition, almost half of the states are using or developing call centers and states are also using flexibility authorized by FNS to increase use of the telephone as an alternative to visiting the local assistance office. For example, FNS has approved administrative waivers allowing 20 states to substitute a telephone interview for the face-to-face interview for all households at recertification without needing to document that coming into the office would be a hardship for the household. States have taken a variety of actions to help households use on-line services and call centers, such as sending informational mailings, holding community meetings, and employing call center staff who speak languages other than English. States are also relying on community-based organizations, such as food banks, to help households use alternative methods. For example, four of the five states we interviewed provide grants to community-based organizations to inform households about the program and help them complete the application process.

Insufficient information is available to determine the results of using alternative methods to provide access to the Food Stamp Program, but federal and state officials reported that despite some challenges, they believe these methods are making it easier for some households to access program benefits. Few evaluations have been conducted to identify the effect of alternative methods on program access, decision accuracy, or administrative costs. FNS has two studies under way that will describe implementation of alternative methods such as on-line services and call centers, but it is unlikely that these studies will use research approaches that would identify the effect of alternative methods. Further, while states reported monitoring the performance of call centers and on-line services, none of the states has conducted evaluations that would identify the effect

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of the alternative methods on program access, decision accuracy, or administrative costs. State officials reported implementing a combination of methods over time, making it difficult to isolate the effect of specific methods. Despite this, federal and state officials said that they believe that giving households alternatives to visiting the food stamp office can help improve access to benefits. For example, in the five states we reviewed in depth, officials and community partners said that allowing telephone interviews is especially beneficial for working families and the elderly because they reduce barriers from transportation, child care, or work responsibilities, as well as the stigma of visiting the assistance office. However, officials and community partners also said that certain types of households, such as those with limited English proficiency, the elderly, and those with mental disabilities, may have difficulty using on-line applications and navigating call center phone systems. The advantages of alternative methods to households also may depend on the technology and staff available. For example, on-line applications without electronic signature capability have limited benefit because households are required to also submit an actual signature through mail, fax, or in person. Further, inadequate numbers of staff and unskilled staff may limit the advantages of alternative methods because households may not be able to receive the information and assistance needed to successfully apply for or maintain benefits.

The five states we reviewed used a variety of strategies to maintain program integrity while implementing alternative methods, some of which were in place long before implementation of the alternative access methods. All five states used software to help with verification of household circumstances by, for example, matching state food stamp caseloads against wage reporting systems and other databases to identify unreported household income and assets. Nationwide, about half of the states participate in quarterly matches with other states to detect households receiving food stamp benefits in more than one state at a time. In addition, all five states we reviewed developed special caseworker training on topics such as how to detect misinformation provided by a household over the telephone. State and local food stamp officials told us they believed that using alternative methods had not increased the frequency of fraud and abuse in the program because the verification process is the same whether or not a worker sees an individual face-to-face. There has been some concern that without face-to-face contact with caseworkers, households may not know when or how to submit paperwork or complete other tasks and would thus be denied benefits on procedural grounds (“procedural denials”). However, our limited analysis of FNS data found no considerable fluctuations in the rate of procedural



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denials in the five states between fiscal years 2000 and 2005. To prevent improper procedural denials, the five states we reviewed instituted such approaches as reviewing case actions, correcting addresses for returned mail, and changing automated systems to prevent caseworkers from prematurely denying cases.

To improve USDA's ability to assess the effectiveness of its funded efforts, we are recommending that the Secretary of Agriculture: direct FNS and the Economic Research Service (ERS) to work together to enhance their research agendas to include projects that would determine the effect of alternative methods on program access, decision accuracy, and administrative costs of the Food Stamp Program; and direct FNS to conduct analyses of data received from states implementing waivers or demonstration projects waiving the face-to-face interview and require states implementing waivers or demonstration projects to collect and report data that would facilitate such analyses. Further, to help states implement alternative methods to provide access to the Food Stamp Program, we are recommending that FNS disseminate and regularly update information on states' implementation of alternative methods to the traditional application and recertification process. FNS and ERS generally agreed with our findings, conclusions, and recommendations and cited steps the agency is taking to monitor and evaluate state implementation of alternative access methods. FNS and ERS also provided technical comments, which were incorporated into the report as appropriate.

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## Background

The federal Food Stamp Program is intended to help low-income individuals and families obtain a more nutritious diet by supplementing their income with benefits to purchase eligible foods at authorized food retailers, such as meat, dairy products, fruits, and vegetables, but not items such as soap, tobacco, or alcohol. FNS pays the full cost of food stamp benefits and shares the states' administrative costs—with FNS usually paying slightly less than 50 percent—and is responsible for promulgating program regulations and ensuring that state officials administer the program in compliance with program rules.<sup>3</sup> The states administer the

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<sup>3</sup>Reimbursements for food stamp administrative costs in 44 states are adjusted each year to subtract certain food stamp administrative costs that have already been factored into these states' Temporary Assistance for Needy Families (TANF) grants. As a result, these states receive less than 50 percent of their administrative costs. See GAO, *Food Stamp Program: States Face Reduced Federal Reimbursement for Administrative Costs*, [GAO/RCED/AIMD-99-231](#) (Washington D.C.: July 23, 1999).

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program by determining whether households meet the program's eligibility requirements, calculating monthly benefits for qualified households, and issuing benefits to participants through an electronic benefits transfer system.

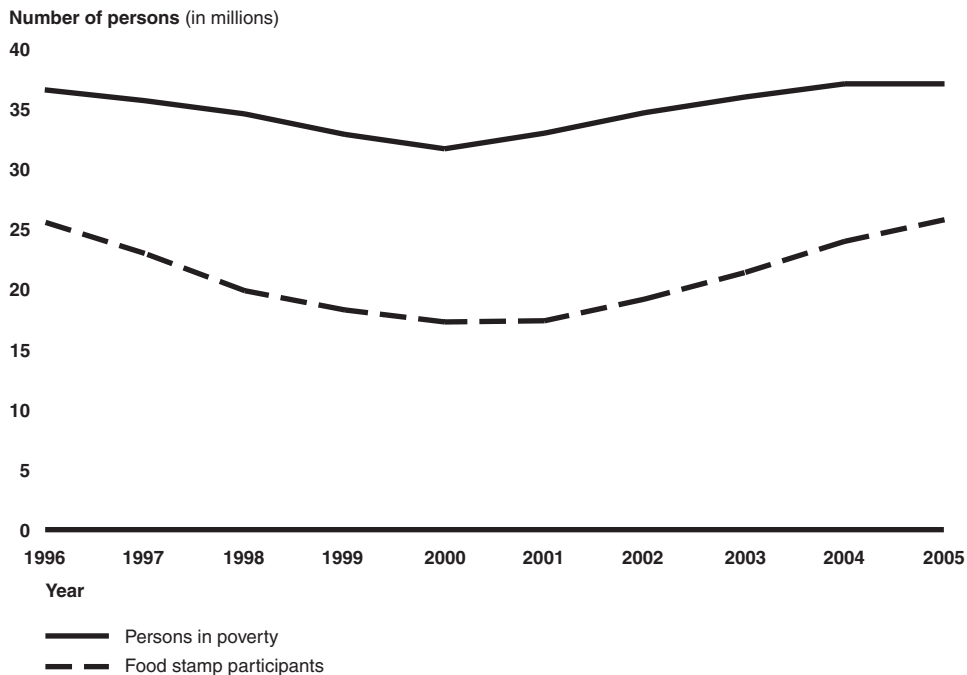
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## Program Participation

In fiscal year 2005, the Food Stamp Program issued almost \$28.6 billion in benefits to about 25.7 million individuals per month, and the maximum monthly food stamp benefit for a household of four living in the continental United States in fiscal year 2007 was \$518. As shown in figure 1, program participation decreased during the late 1990s, partly due to an improved economy, but rose again from 2000 to 2005. The number of food stamp recipients follows the trend in the number of people living at or below the federal poverty level.

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**Figure 1: Food Stamp Participation and Poverty Trends**



Source: GAO analysis of FNS and U.S. Census data.

Notes: Poverty data are by calendar year and participation data are by fiscal year.

Preliminary FNS data indicate that participation will continue to grow to nearly 27 million people receiving about \$30 billion in food stamp benefits in fiscal year 2006.

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In addition to the economic growth in the late 1990s, another factor contributing to the decrease in number of participants from 1996 to 2001 was the passage of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), which added work requirements and time limits to cash assistance and made certain groups ineligible to receive food stamp benefits. In some cases, this caused participants to believe they were no longer eligible for food stamps when TANF benefits were ended.<sup>4</sup> Since 2000, that downward trend has reversed, and experts believe that the downturn in the U.S. economy, coupled with changes in the Food Stamp Program's rules and administration, has led to an increase in the number of food stamp participants.

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## Determination of Eligibility and Benefits

Eligibility for participation in the Food Stamp Program is based primarily on a household's income and assets. To determine a household's eligibility, a caseworker must first determine the household's gross income, which cannot exceed 130 percent of the poverty level for that year as determined by the Department of Health and Human Services, and net income, which cannot exceed 100 percent of the poverty level (or about \$1,799 per month for a family of three living in the continental United States in fiscal year 2007). Net income is determined by deducting from gross income a portion of expenses such as dependent care costs, medical expenses for elderly individuals, utilities costs, and housing expenses.

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## The Process of Applying for and Maintaining Benefits

The application process for the Food Stamp Program requires households to complete and submit an application to a local assistance office, participate in an interview, and submit documentation to verify household circumstances (see table 1). Applicants may need to make more than one visit to the assistance office to complete the application process. After eligibility is established, households are certified eligible for food stamps for periods ranging from 1 to 24 months, depending on household circumstances and state policy. While households are receiving benefits, they must report changes in household circumstances that may affect eligibility or benefit amounts. States may choose to require households to

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<sup>4</sup>As GAO and others have reported previously, following the passage of PRWORA, there is evidence that food stamp participation dropped as eligible recipients did not apply for food stamps because they incorrectly assumed that if they were ineligible for TANF, they were also ineligible for food stamps. See U.S. GAO, *Food Stamp Program: Various Factors Have Led to Declining Participation*, [GAO/RCED-99-185](#) (Washington D.C.: July 1999) for more details.

report changes within 10 days of occurrence (incident reporting) or at specified intervals (periodic reporting). States also have the option to adopt a simplified system, which further reduces the burden of periodic reporting by requiring households to report changes that happen during a certification period only when their income rises above 130 percent of the federal poverty level.<sup>5</sup> Once the certification period ends, households must reapply for benefits, at which time eligibility and benefit levels are redetermined. The recertification process is similar to the application process. Households can be denied benefits or have their benefits end at any point during the process if they are determined ineligible under program rules or for procedural reasons, such as missing a scheduled interview or failing to provide the required documentation.

**Table 1: Process to Apply for and Maintain Food Stamp Benefits**

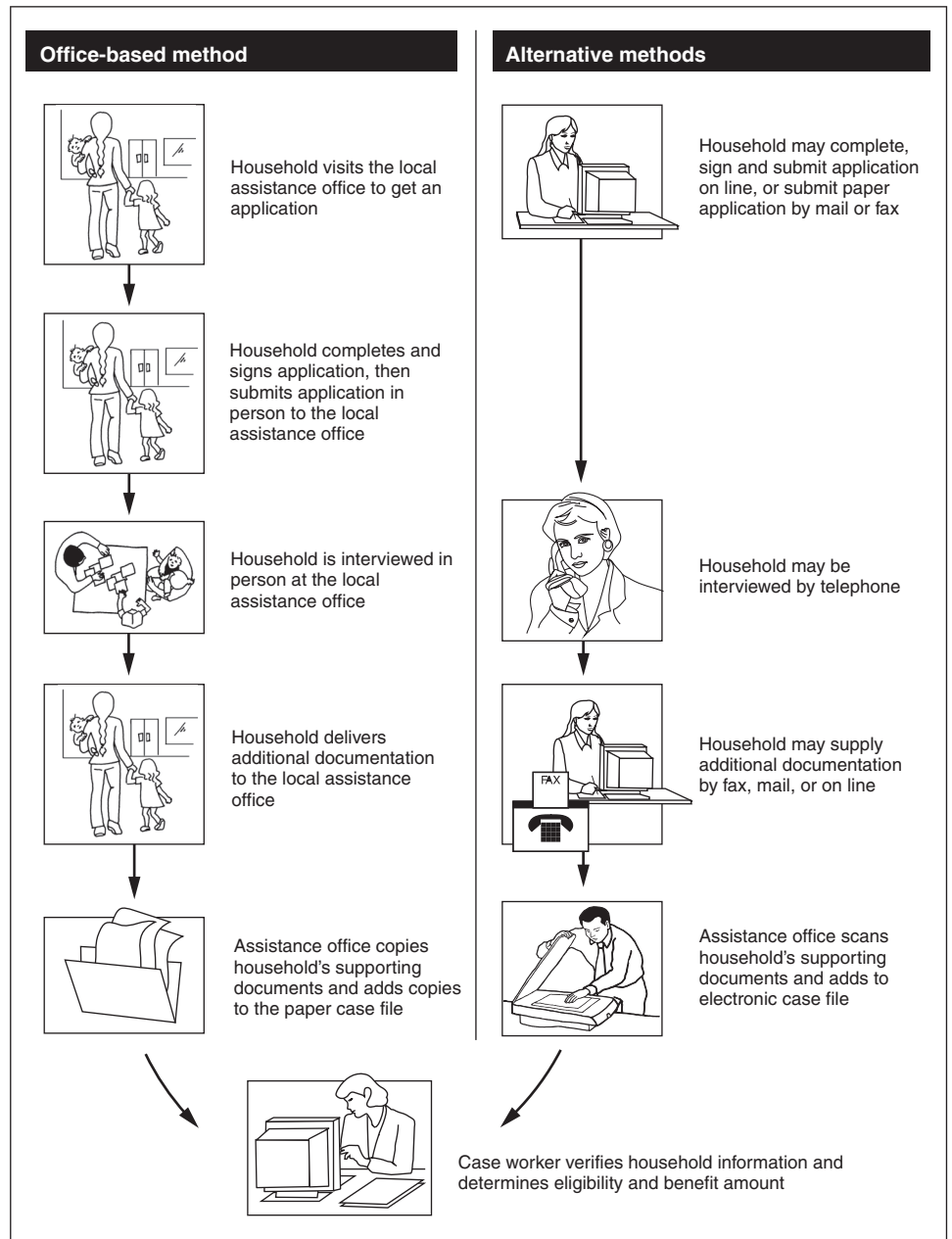
Apply for benefits	While receiving benefits	Recertify for benefits
<ul style="list-style-type: none"> <li>• Complete and submit application to assistance office</li> <li>• Participate in an interview</li> <li>• Submit documentation to verify information provided in the application and interview</li> </ul>	<ul style="list-style-type: none"> <li>• Report changes in household circumstances—such as household composition, income, and expenses—that may affect eligibility or benefit amounts</li> </ul>	<ul style="list-style-type: none"> <li>• Complete and submit recertification application to assistance office</li> <li>• Participate in an interview at least annually</li> <li>• Submit documentation to verify information provided in the application and interview</li> </ul>

Source: GAO analysis of FNS information.

While applying for and maintaining food stamp benefits has traditionally involved visiting a local assistance office, states have the flexibility to give households alternatives to visiting the office, such as using the mail, the telephone, and on-line services to complete the certification and recertification process. Alternative methods may be used to support other programs, such as Medicaid or TANF, since some food stamp participants receive benefits from multiple programs. Figure 2 illustrates a traditional office-based system and how states can use a number of alternative methods to determine applicants' eligibility without requiring them to visit an assistance office.

<sup>5</sup>The Farm Security and Rural Investment Act of 2002 (the 2002 Farm Bill) included provisions intended to simplify program administration, such as allowing states the option of using simplified/semiannual reporting systems for most households, not just those with earned income. FNS reported in October 2006 that 47 states have adopted some form of simplified reporting, allowing most households to report changes only when their income rises above 130 percent of the poverty level. A FNS study suggested that simplified reporting policies have contributed to a reduction in the food stamp payment error rate.

**Figure 2: Office-based Method Compared with Alternative Methods of Applying for Food Stamp Benefits**



Source: GAO analysis.

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## Program Integrity

FNS and the states share responsibility for implementing a quality control system used to measure the accuracy of caseworker decisions concerning the amount of food stamp benefits households are eligible to receive and decisions to deny or end benefits. The food stamp payment error rate is calculated by FNS for the entire program, as well as every state, by adding overpayments (including payments higher than the amounts households are eligible for or payments to those who are not eligible for any benefit), and underpayments (payments lower than the amounts households are eligible for). The national payment error rate has declined by about 40 percent between 1999 and 2005, from 9.86 percent to a record low of 5.84 percent. FSP payment errors are caused primarily by caseworkers, usually when they fail to keep up with new information, and by participants when they fail to report needed information. Another type of error measured by FNS is the negative error rate, defined as the rate of cases denied, suspended, or terminated incorrectly. An example of incorrectly denying a case would be if a caseworker denied a household participation in the program because of excess income, but there was a calculation error and the household was actually eligible for benefits. FNS also monitors individual fraud and retailer trafficking of food stamp benefits.<sup>6</sup>

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## All States Use Mail and About Half of States Use or Have Begun Developing On-line Services and Call Centers to Provide Access to the Food Stamp Program

According to our survey, almost all states allow households to submit applications, report changes, and submit recertifications through the mail, and 26 states have implemented or are developing systems to allow households to perform these tasks on-line. Almost half of the states are using or developing call centers and states are also using flexibility authorized by FNS to increase use of the telephone as an alternative to visiting the local assistance office. States have taken a variety of actions to help households use on-line services and call centers, such as sending informational mailings, holding community meetings, and using community partners to assist households.

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<sup>6</sup> For more information on food stamp payment accuracy and trafficking, see *Food Stamp Program: States Have Made Progress Reducing Payment Errors, and Further Challenges Remain*, GAO-05-245. (Washington, D.C.: May 5, 2005) and *Food Stamp Trafficking: FNS Could Enhance Program Integrity by Better Targeting Stores Likely to Traffic and Increasing Penalties*, GAO-07-53. (Washington, D.C.: Oct. 13, 2006).

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Almost All States Allow Households to Apply for Food Stamp Benefits and Maintain Eligibility by Mail and about Half of the States Are Using or Developing On-line Services

Many states are allowing households to apply for food stamp benefits, report changes in household circumstances, and complete recertification through the mail and on-line.<sup>7</sup>

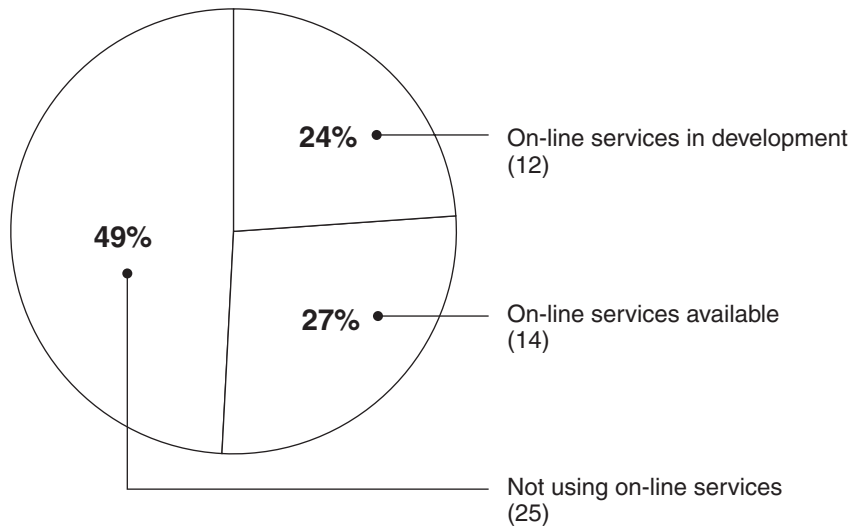
- **Mail-In Procedures.** Results of our survey show that households can submit applications through the mail in all states, report changes through the mail in all but 1 state, and submit recertifications through the mail in 46 states. For example, Washington state officials told us that the recertification process involves mailing a recertification application package to households that they can mail back without visiting a local assistance office.
- **On-line Services.** All states we surveyed reported having a food stamp application available for households to download from a state website, as required by federal law, and 26 states (51 percent) have implemented or are developing Web-based systems in which households can submit initial applications, report changes, or submit recertifications on line (see fig. 3). Most on-line applications were made available statewide and implemented within the last 3 years and states developing on-line services plan to implement these services within the next 2 years. All of the 14 states that reported currently providing on-line services allow households to submit initial food stamp applications on-line, but only 6 states allow households to report changes and 5 states allow households to complete recertification on-line.<sup>8</sup> Of the 14 states that reported using on-line applications, 2 reported they were only available in certain areas of the state. Only two states (Florida and Kansas) reported in our survey that the state closed program offices or reduced staff as a result of implementing on-line services.

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<sup>7</sup> See appendix II for state-by-state information on use of alternative methods.

<sup>8</sup> Utah began piloting an on-line application with electronic signature capability in March 2007. Because this was after the time our survey was conducted, Utah is not included in the 14 states that currently provide on-line services. FNS reported in October 2006 that nine states nationwide allow applicants to submit the application with an electronic signature.

**Figure 3: Number and Percentage of States Making On-line Services Available to Food Stamp Households**



Source: GAO survey.

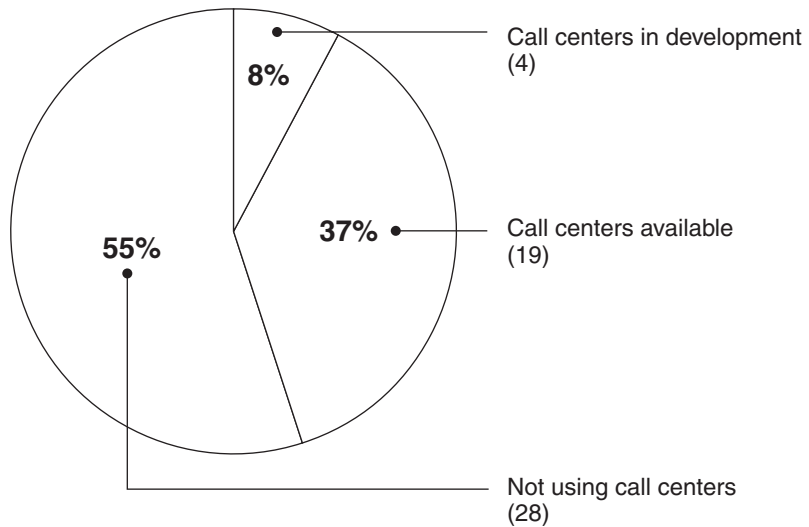
### Almost Half of States Are Using or Developing Call Centers and Using Telephone Interviews as an Alternative to Visiting the Local Assistance Office

Many states are using call centers, telephone interviews, or other technologies to help households access food stamp benefits or information without visiting a local assistance office.

- **Call Centers.** Nineteen states (37 percent) have made call centers available to households and an additional 4 states (8 percent) have begun development of call centers that will be available to households in 2007 (see fig. 4). Households have been able to use call centers in seven states for more than 3 years. Of the 19 states using call centers, 10 reported that call centers were only available in certain areas of the state. Only two states (Texas and Idaho) reported using private contractors to operate the call centers, but Texas announced in March 2007 that it was terminating its agreement with the private contractor (see fig. 10 for more details). FNS officials told us that the Idaho private call center provides general food stamp program information to callers, while inquiries about specific cases are transferred to state caseworkers. Indiana reported in our survey that the state plans to pilot call centers in certain areas of the state in August 2007 using a private contractor and complete a statewide transition in March 2008. Only two states (Florida and Arizona) reported in our survey that the state closed offices or reduced staff as a result of implementing call centers.



**Figure 4: Number and Percentage of States Making Call Centers Available to Food Stamp Households**



Source: GAO survey.

Most states with call centers reported that households can use them to report changes in household circumstances, request a food stamp application and receive assistance filling it out, receive information about their case, or receive referrals to other programs. Only four states reported using their call centers to conduct telephone interviews. For example, local officials in Washington told us that households use their call center primarily to request information, report changes in household circumstances, and request an interview. Telephone interviews are conducted by caseworkers in the local assistance office.

- **Telephone Interviews.** Many states are using the flexibility provided by FNS to increase the use of the telephone as an alternative to households visiting the local assistance office. For example, FNS has approved administrative waivers for 20 states that allow states to substitute a telephone interview for the face-to-face interview for all households at recertification without documenting that visiting the assistance office would be a hardship for the household.<sup>9</sup> In addition to making it easier on households, this flexibility can reduce the administrative burden on the state to document hardship. FNS also

<sup>9</sup> See appendix II for names of states with administrative waivers that allow substitution of a telephone interview for the face-to-face interview.

allows certain states implementing demonstration projects to waive the interview requirement altogether for certain households. States we reviewed varied in terms of the proportion of interviews conducted over the phone. For example, Florida state and local officials estimated that about 90 percent of the interviews conducted in the state are completed over the telephone. Washington state officials estimated that 10 percent of application interviews and 30 percent of recertification interviews are conducted by phone. Table 2 describes the types of flexibility available to states and how many are taking advantage of each.

**Table 2: Administrative Flexibility Available to States to Waive the Face-to-Face Interview**

Description of flexibility	Availability	Year available or first approved by FNS	Number of states <sup>d</sup>
Hardship policy <sup>a</sup> Substitute telephone interview for face-to-face interview at application or recertification for all households experiencing a hardship as determined by the state. Hardship must be documented in the case file.	All states	1978	All states
Waiver at recertification Substitute telephone interview for face-to-face interview for all households at recertification without documenting hardship.	States with waivers	1992	20
Waiver at initial certification <sup>b</sup> Substitute telephone interview for face-to-face interview for all households at initial certification without documenting hardship.	States with waivers	2005	3
Combined Application Projects <sup>c</sup> Households can apply for food stamps at the same time they apply for or are recertified for Supplemental Security Income (SSI) with the Social Security Administration. Households are not required to have a separate interview to apply for food stamps.	States with demonstration projects	1995	<ul style="list-style-type: none"> <li>• 10 have implemented</li> <li>• 6 approved or pending approval but have not implemented</li> <li>• 5 more have been invited to submit proposals</li> </ul>
Elderly/Disabled Demonstration Projects Simplify the application process for elderly and/or disabled households in part by waiving the interview altogether.	States with demonstration projects	2002	2

Source: GAO analysis of FNS information.

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<sup>a</sup>These hardship conditions include, but are not limited to: illness, transportation difficulties, care of a household member, hardships due to residency in a rural area, prolonged severe weather conditions, or work or training hours that prevent the household from participating in an in-office interview. States must document hardship. The regulations also allow states to opt to substitute telephone interviews for face-to-face interviews for all households that have no earned income and in which all members are elderly or disabled.

<sup>b</sup>Limited to no more than 50 percent of the statewide caseload.

<sup>c</sup>The Food Stamp Act of 1977 included several access provisions, such as addressing the use of mail, telephone, or home visits for certification and joint food stamps and SSI application processing. Since 1986, federal law has required that applicants for or recipients of SSI must be informed of the opportunity to file a food stamp application at the SSA office when applying for SSI.

<sup>d</sup>See appendix II for specific state information.

- **Other Technologies.** Some states reported implementing other technologies that support program access. Specifically, according to our survey, 11 states (21 percent) have implemented an Integrated Voice Response (IVR) system, a telephone system that provides automated information, such as case status or the benefit amount, to callers but does not direct the caller to a live person. In addition, 11 states (21 percent) are using document management/imaging systems that allow case records to be maintained electronically rather than in paper files.

All five of the states we reviewed have implemented in at least certain areas of their state mail-in procedures, on-line services, call centers, waiver of face-to-face interview at recertification, and document management/imaging systems. Three of the five states (Florida, Texas, and Washington) have implemented an integrated voice response system and two (Florida and Utah) have implemented a waiver of the face-to-face interview at initial application.

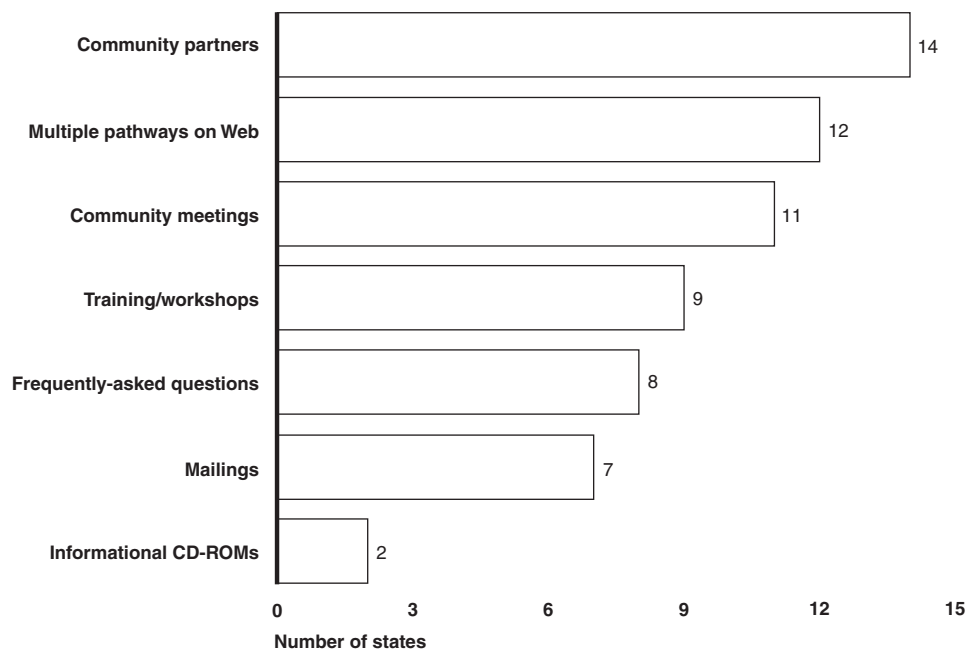
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## States Report Taking Several Actions to Help Households Use Alternative Methods

States have taken a variety of actions to help households use on-line services and call centers, such as sending informational mailings, holding community meetings, and employing call center staff who speak languages other than English as shown in figures 5 and 6.

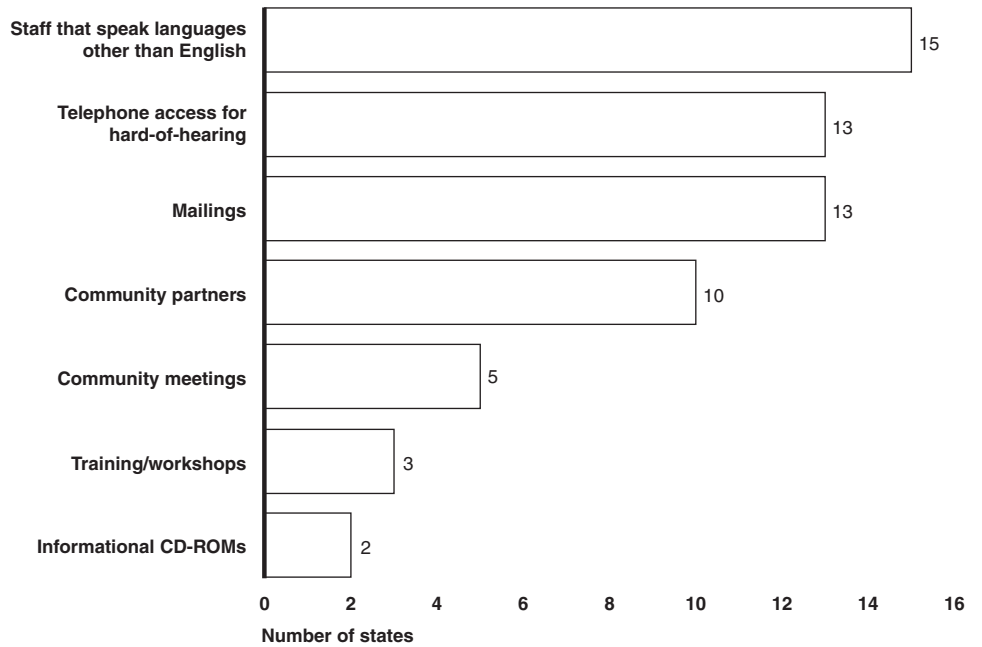
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**Figure 5: Actions Used to Assist Households with On-line Services**



Source: GAO survey.

**Figure 6: Actions Used to Assist Households with Call Centers**



Source: GAO survey.

States are using community-based organizations, such as food banks, to help households use alternative methods. All states implementing on-line services (14)<sup>10</sup> and about half of states with call centers (10 of 19) use community partners to provide direct assistance to households. Among the states we reviewed, four provide grants to community-based organizations to inform households about the program and help them complete the application process. For example, Florida closed a third of its local assistance offices and has developed a network of community partners across the state to help households access food stamps. Florida state officials said that 86 percent of the community partners offer at least telephone and on-line access for completing and submitting food stamp applications. Community partner representatives in Washington, Texas, and Pennsylvania said that they sometimes call the call center with the household or on their behalf to resolve issues. Pennsylvania provides grants to community partners to help clients use the state's on-line

<sup>10</sup> Utah began piloting an on-line application with electronic signature capability in March 2007. Because this was after the time our survey was conducted, Utah is not included in the 14 states that currently provide on-line services.

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services. In addition to the assistance provided by community-based organizations, H&R Block, a private tax preparation firm, is piloting a project with the state of Kansas where tax preparers who see that a household's financial situation may entitle them to food stamp benefits can electronically submit an application for food stamps at no extra charge to the household.

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## Information on Results Is Limited, but States We Reviewed Cite Advantages and Challenges Using Alternative Access Methods

Insufficient information is available to determine the results of using alternative methods to access the Food Stamp Program, but state and federal officials report that alternative methods are helping some households. Few evaluations have been conducted that identify the effect of alternative methods on food stamp program access, decision accuracy, or administrative costs. Although states monitor the implementation of alternative methods, isolating the effects of specific methods is difficult, in part because states typically have implemented a combination of methods over time. Despite the limited information on the effectiveness of alternative methods, federal and state officials believe that these methods can help many households by making it easier for them to complete the application or recertification process. However, technology and staffing challenges can hinder the use of these methods.

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## Few Evaluations Have Been Conducted and Determining the Effectiveness of Specific Methods Can Be Difficult

Few federal or state evaluations have been conducted to identify how using alternative methods, such as on-line applications or call centers, affects access to the Food Stamp Program, the accuracy of caseworker decisions about eligibility and benefit amounts, or administrative costs. Few evaluations have been conducted in part because evaluating the effectiveness of alternative methods is challenging, given that limited data are available, states are using a combination of methods, and studies can be costly to conduct.

## Federal Evaluation and Monitoring

FNS and ERS have funded studies related to improving Food Stamp Program access, but none of these previous studies provide a conclusive assessment of the effectiveness of alternative methods and the factors that contribute to their success (see app. I for a list of the studies we selected and reviewed). Although these studies aimed to evaluate local office practices, grants, and demonstration projects, the methodological limitations of this research prevent assessments about the effectiveness of these efforts. An evaluation of the Elderly Nutrition Demonstration

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projects used a pre-post comparison group design to estimate the impact of the projects and found that food stamp participation among the elderly can be increased.<sup>11</sup> Two of the projects evaluated focused on making the application process easier by providing application assistance and simplifying the process, in part by waiving the interview requirement. However, one of the drawbacks of this study is that its findings are based on a small number of demonstrations, which affects the generalizability of the findings.

Two related FNS-funded evaluations are also under way, but it is unlikely these studies will identify the effects of using alternative methods.<sup>12</sup>

- An implementation study of Florida's efforts to modernize its system using call centers and on-line services involves a descriptive case study to be published in late summer 2007, incorporating both qualitative and quantitative data. The objectives of the study are to: describe changes to food stamp policies and procedures that have been made in support of modernization; identify how technology is used to support the range of food stamp eligibility determination and case management functions; and describe the experiences of food stamp participants, eligible non-participants, state food stamp staff, vendors, and community partners. This study will describe Florida's Food Stamp Program performance over time in comparison to the nation, other states in the region, and other large states. Performance data that will be reviewed includes program participation in general and by subgroup, timeliness of application processing, payment error rates, and administrative costs. However, the study will not isolate the effect of the modernization efforts on program performance.
- A national study of state efforts to enhance food stamp certification and modernize the food stamp program involves a state survey and case studies of 14 states and will result in a site visit report in late summer 2007, a comprehensive report in March 2009, and a public-use database systematically describing modernization efforts across all the states in May 2009. The national study will focus on four types of

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<sup>11</sup> *Evaluation of the USDA Elderly Nutrition Demonstrations*, Scott Cody and James Ohls, Mathematica Policy Research, Inc., May 2005.

<sup>12</sup> In addition to studies that are under way, the fiscal year 2008 Food Nutrition and Consumer Services budget request, which includes FNS, includes \$2 million to support Food Stamp Modernization and Innovation Projects to study the impact of new Food Stamp Program service delivery models on program access, payment accuracy, and administrative costs.

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modernization efforts: policy changes to modernize FSP application, case management, and recertification procedures; reengineering of administrative functions; increased or enhanced use of technology; and partnering arrangements with businesses and nonprofit organizations. The goals of the study include documenting outcomes associated with food stamp modernization and examining the effect of these modernization efforts on four types of outcomes: program access, administrative cost, program integrity, and customer services. This study will compare performance data from the case study states with data from similar states and the nation as a whole, however, this analysis will not determine whether certain modernization efforts caused changes in performance.

USDA has also awarded \$5 million in fiscal year 2006 to 5 grantees in Virginia, California, Georgia and Alabama to help increase access to the program, but there is currently no plan to publish an evaluation of the outcomes of these projects. The participation grants focus on efforts to simplify the application process and eligibility systems and each grantee plans to implement strategies to improve customer service by allowing Web-based applications and developing application sites outside the traditional social services office. Grantees are required to submit quarterly progress reports and final reports including a description of project activities and implementation issues.

Although few evaluations have been conducted, FNS monitors state and local offices and tracks state implementation of alternative methods to improve program access. FNS also collects and monitors data from states, such as the number of participants, amount of benefits issued, participation rates overall and by subgroup, timeliness of application processing, payment errors, negative errors, and administrative costs. FNS regional offices conduct program access reviews of selected local offices in all states to determine whether state and/or local policies and procedures served to discourage households from applying for food stamps or whether local offices had adopted practices to improve customer service. FNS also monitors major changes to food stamp systems using a process where FNS officials review and approve plans submitted by states related to system development and implementation, including major upgrades. States like Texas, Florida, and Indiana that have implemented major changes to their food stamp system, such as moving from a local assistance office service delivery model to call centers and on-line services, have worked with FNS through this process. Figure 7 describes FNS's monitoring of Indiana's plan to implement alternative access methods.



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**Figure 7: FNS Monitoring of Indiana’s Plan to Implement Alternative Access Methods**

FNS has approved Indiana’s plan to begin piloting a new eligibility system, including on-line services, call centers, and document management/imaging system with electronic case records in August 2007, and to implement the system statewide in March 2008. The state plans to outsource to a private contractor the responsibility for collecting application data and verification documents and processing reported changes. The plan includes keeping local assistance offices open in every county and transitioning most of the Indiana Family and Social Services Administration employees to work for the private contractor.

FNS is requiring the state agency to monitor the implementation and operation of the system and FNS plans to conduct on-site visits and review available data to monitor operations. FNS has requested that Indiana submit to them monthly reports and provided suggested reporting elements, but did not require the state to provide any particular data. Examples of the suggested data elements include: total applications filed, the disposition of cases, and amount of benefits authorized. FNS has requested that the state also report on monthly performance as compared to the corresponding period in the previous year. Because FNS has not required the state to submit certain data to them, it is not known at this time what information will be available or how it will be used to evaluate the performance of the state's new system.

Source: GAO analysis.

FNS has also encouraged states to share information about their efforts to increase access among states, but states reported needing additional opportunities to share information. FNS has funded national and regional conferences, travel by state officials to visit other states to learn about their practices, as well as provided states a guide to promising practices for improving program access.<sup>13</sup> The guide contains information about the goal of each practice, the number of places where the practice is in use, and contact information for a person in these offices. However, this guide has not been updated since 2002 and, for the most part, does not include any evidence that these efforts were successful or any lessons that were learned from these or other efforts.<sup>14</sup> In 2004, in response to recommendations from our prior report,<sup>15</sup> FNS compiled and posted 19

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<sup>13</sup> *State Best Practices Improving Food Stamp Program Access*, USDA, FNS, (June 2002).

<sup>14</sup> Advocacy groups such as the American Public Human Services Association and the Food Research Action Center also make information available on food stamp outreach and access in best practices guides, on their Web sites, or through conferences.

<sup>15</sup> *Food Stamp Program: Steps Have Been Taken to Increase Participation of Working Families, but Better Tracking of Efforts Is Needed*, [GAO-04-346](#) (Washington, D.C.: March 5, 2004).

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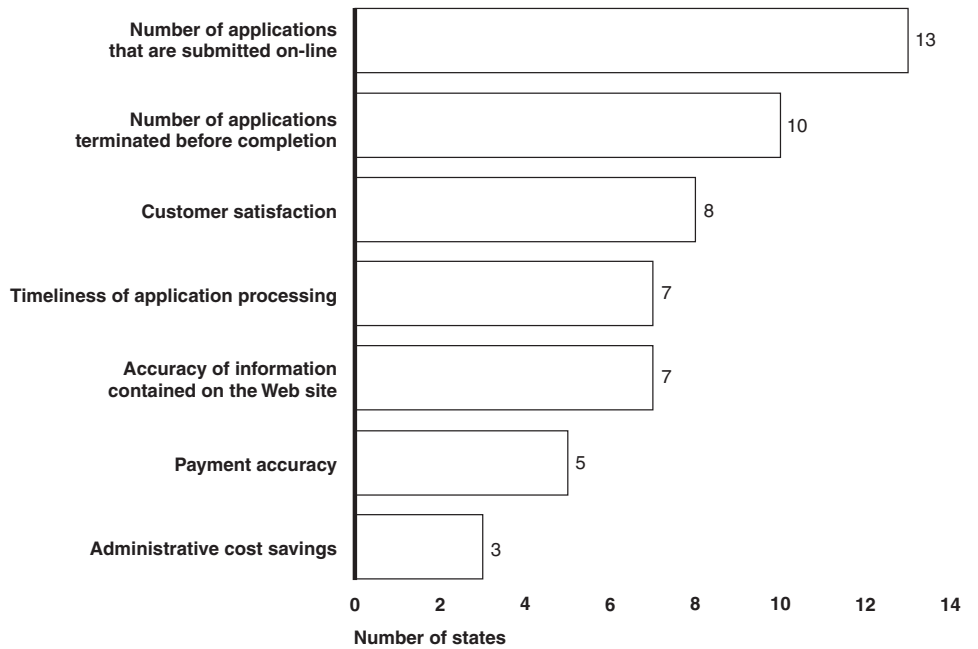
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State Evaluation and  
Monitoring

practices aimed to improve access from 11 states. FNS also has a form available on its website where states can submit promising practices to improve access, but to date, practices from this effort have not been published. In our survey, 13 states (about 25 percent) reported needing additional conferences or meetings with other states to share information.

States also report monitoring use of alternative methods in the Food Stamp Program, but have not conducted evaluations of their effectiveness. In our survey, states reported monitoring several aspects of the performance of on-line services. As shown in figure 8, states most commonly used the number of applications submitted, the number of applications terminated before completion, and customer satisfaction to monitor the performance of on-line services. For example, Pennsylvania state officials monitor performance of their on-line system and meet regularly with community partners that help households submit applications for benefits to obtain feedback on how they can improve the system. Florida state officials told us they use responses to on-line feedback surveys submitted at the end of the on-line application to assess customer satisfaction with the state's on-line services.

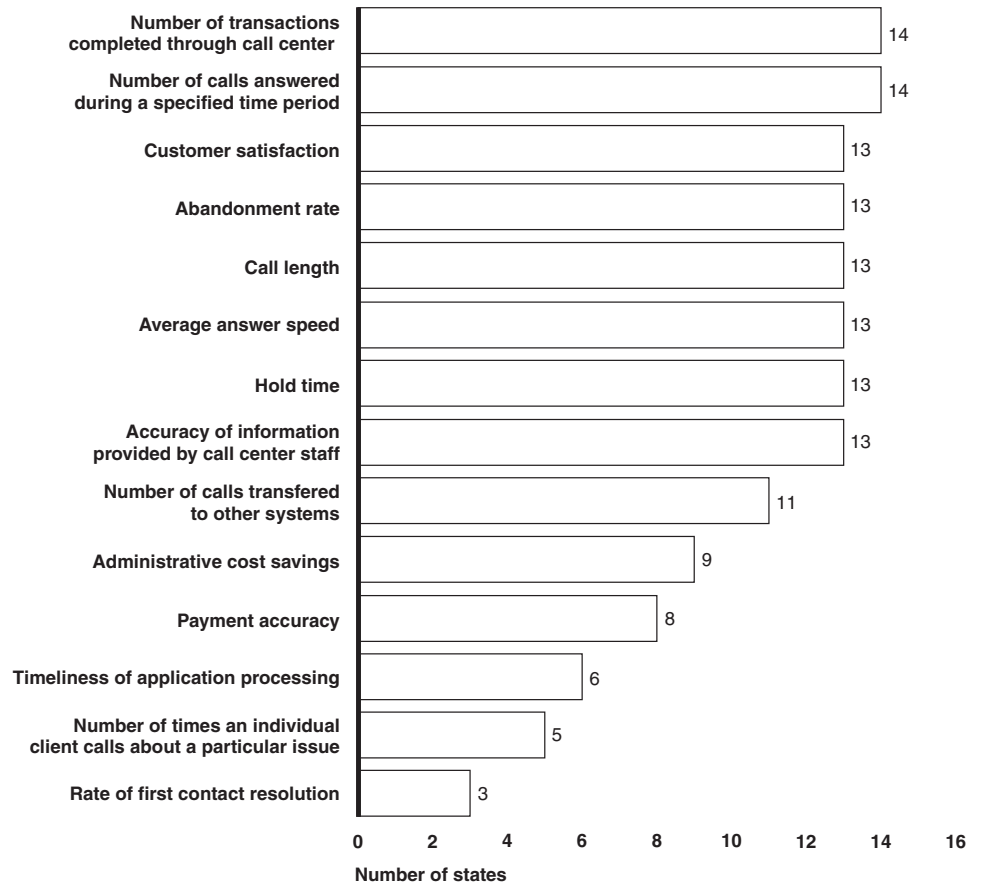
**Figure 8: States' Use of Measures to Monitor Performance of On-line Services**



Source: GAO survey.

States also reported in our survey monitoring several aspects of the performance of their call centers. As shown in figure 9, most states with call centers reported monitoring the volume of transactions and calls to the center, customer satisfaction, the rate of abandoned calls, and the length of time callers are on hold before speaking with a caseworker. For example, Utah officials monitor several measures and added additional staff to the call center after observing increased hold times when they were implementing the call center to serve the Salt Lake City area. In addition, Washington state officials told us that they monitor call centers on an hourly basis, allowing call center managers to quickly increase the number of staff answering phones as call volumes increase.

**Figure 9: States' Use of Measures to Monitor Performance of Call Centers**



Source: GAO survey.

Despite these monitoring efforts, no states reported conducting an evaluation of the effectiveness of on-line services in our survey and only one state reported conducting such an evaluation of its call centers. The report Illinois provided on its call center described customer and worker feedback on the performance of the call center, but did not provide a conclusive assessment of its effectiveness. Seven states implementing Combined Application Projects (CAP)<sup>16</sup> have submitted reports to FNS including data on the number of participants in the CAP project compared with when the project began, but do not use methods to isolate the effect

<sup>16</sup> Combined Application Projects (CAP) allow one-person SSI households to file a shortened food stamp application form and waive the face-to-face interview requirement.

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of the project or determine whether participation by SSI recipients would have increased in the absence of the project. Two of the five states we reviewed said they planned to conduct reviews of their system. For example, Washington is conducting an internal quality improvement review of its call centers. It will compare call center operations with industry best practices and promising new technologies, and will identify the costs, services offered, and best practices used by the call centers.

## Evaluation Challenges

Few evaluations have been conducted, in part because evaluating the effectiveness of alternative methods is challenging. For example, states are limited in their ability to determine whether certain groups of households are able to use alternative methods because few states collect demographic information on households that use their on-line services and call centers. Only six states reported in our survey that they collect demographic information on the households that use on-line services and four states reported collecting demographic information on the households that use call centers. In addition, although FNS is requiring states with waivers to the face-to-face interview to track the payment accuracy of cases covered by these waivers, FNS has not yet assessed the effects of these methods on decision accuracy because it has not collected enough years of data to conduct reliable analyses of trends. Further, evaluations that isolate the effect of specific methods can be challenging because states implement methods at different times and are using a combination of methods. For example, Washington state implemented call centers in 2000, an on-line application and CAP in 2001, and document imaging and a waiver of the face-to-face interview at recertification in 2003. Sophisticated methodologies often are required to isolate the effects of certain practices or technologies. These studies can be costly to conduct because the data collection and analysis can take years to complete. For example, the two studies that we reviewed that aimed to isolate the effects of specific projects each cost over \$1 million and were conducted over more than 3 years. Although evaluating the effects of alternative methods is challenging, FNS is collecting data from states through the waiver process that could be analyzed and previous ERS-funded studies have used methodologies that enable researchers to identify the effect of certain projects or practices on program access.

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## Federal and State Officials Report Alternative Methods Help Some Households Access Food Stamp Benefits, but Technology and Staffing Can Present Challenges

Despite the limited information on the effects of alternative methods, federal and state officials report that alternative methods, such as the availability of telephone interviews, can help many types of households by making it easier for them to complete the food stamp application or recertification process. Some state and local officials and community partners noted, however, that certain types of households may have difficulty using some methods. Moreover, some officials also described how technology and staffing challenges can hinder the use of these methods.

### Advantages of Alternative Methods

According to federal and state officials we interviewed, alternative methods can help households in several ways, such as increasing flexibility, making it easier to receive case information or report changes to household circumstances, or increasing efficiency of application processing. In addition, community partner representatives from some states we reviewed said that the availability of telephone interviews helps reduce the stigma of applying for food stamp benefits caused by visiting an assistance office.

- **Increased flexibility.** Federal officials from the seven FNS regional offices said that alternative methods help households by reducing the number of visits a household makes to an assistance office or by providing additional ways to comply with program requirements. Moreover, all of the states in our survey that currently have on-line services and more than half of the states that currently operate call centers, reported that reducing the number of visits an individual must make to an office as a reason for implementing the alternative methods. For example, in Florida a household may submit an application or recertification through any one of the following access points – on-line, mail, fax, community partner site, or in-person at the local assistance office. Additionally, in certain areas of Texas, it is possible for households to apply for food stamps without ever visiting a local assistance office because the state has made available phone interviews and on-line services. Reducing the number of required visits can be helpful for all households, according to state officials or community partner representatives in two of the states we reviewed.
- **Easier access to case information and ability to report changes.** According to officials in the five states we reviewed, alternative methods, such as call centers, automated voice response systems, or electronic case records, make it easier for households to access information about their benefits and report changes to household circumstances. For example, in Washington, a household may call the automated voice response system 24 hours a day, 7 days a week to

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immediately access case information, such as appointment times or whether their application has been received or is being processed. If the household has additional questions, they can call the call center where a call center agent can view their electronic case record and provide information on the status of their application, make decisions based on changes in household circumstances reported to them, inform them of what verification documents are needed or have been received, or perform other services.

- **Increased efficiency.** State or local officials from four of the states we reviewed said that implementation of document management/imaging systems improves application processing times, while local officials in two of the states said that call centers help caseworkers complete tasks more quickly. Furthermore, about half of the states in our survey that have call centers reported that increasing timeliness of application processing and reducing administrative costs were reasons for implementing them. State officials in Florida said that the document management/imaging system allows a caseworker to retrieve an electronic case record in seconds compared to retrieving paper case files that previously took up to 24 hours, allowing caseworkers to make eligibility decisions more quickly on a case. Additionally, a call center agent can process a change in household circumstances instantly while on the phone. Caseworkers in Pennsylvania said that implementation of a change reporting call center has reduced the number of calls to caseworkers at the local assistance office, which allows them to focus on interviewing households and processing applications more quickly. Officials from four states we reviewed also said that use of a document management/imaging system has resulted in fewer lost documents, which can reduce the burden on households of having to resubmit information.

According to some of the state officials and community partners we interviewed, the availability of alternative methods can be especially beneficial for working families or the elderly because it reduces barriers from transportation, child care or work responsibilities. For example, state officials in Florida explained that a working individual can complete a phone interview during their lunch break without taking time off of work to wait in line at the assistance office. In addition, state officials from three of the states we reviewed that have implemented CAP projects told us that they had experienced an increase in participation among SSI recipients and FNS and officials from two states said that households benefited from the simplified application process. In addition, state officials in Florida said that on-line services help elderly households that have designated

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representatives to complete the application on their behalf. For example, an elderly individual's adult child who is the appointed designated representative but lives out-of-state can apply and recertify for food stamp benefits for their parent without traveling to Florida.

However, some state and local officials and community partners we interviewed said certain types of households may have difficulty using certain alternative methods. For example, community partner representatives in two states that we reviewed said that those with limited English proficiency, elderly, immigrants, or those with mental disabilities may have difficulty using on-line applications. Local officials from Philadelphia said that the elderly and households with very low incomes may have trouble accessing computers to use on-line services and may not have someone helping them. A community partner in Florida told us that sometimes the elderly, illiterate, or those with limited English proficiency need a staff person to help them complete the on-line application. In addition, those with limited English proficiency, elderly, or those with mental disabilities may have difficulty navigating the call center phone system, according to officials from two states and community partners from another state that we reviewed. A community partner representative in Texas said that sometimes he calls the call center on behalf of the applicant because a household may have experienced difficulty or frustration in navigating the phone system.

#### Challenges to Using Alternative Methods

Although officials told us that alternative methods are helpful to many households, challenges from inadequate technology or staffing may limit the advantages of alternative methods. For example, state officials from Texas explained that on-line applications without electronic signature capability have limited benefit because households are still required to submit an actual signature through mail, fax, or in person after completing the on-line application. Texas state officials and community partner representatives told us that the lack of this capability limited its use and benefit to households. By contrast, Florida's application has electronic signature capability and Florida officials reported that, as of December 2006, about 93 percent of their applications are submitted on-line.

Call centers that do not have access to electronic records may not be as effective at answering callers' questions. Officials from Washington state and federal officials from an FNS regional office view the use of a document management/imaging system as a vital part of the call center system. Florida advocates said that households have received wrong information from call center agents and attribute the complaints in part to call center agents not having access to real-time electronic case records.



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Florida recently expanded its document imaging system statewide, which they believe will help address these concerns.

Further, while four of the five states we reviewed implemented alternative methods in part to better manage increasing numbers of participants with reduced numbers of staff, the staffing challenges certain states experienced also limited the advantages of alternative methods. For example, inadequate numbers of staff or unskilled call center staff may reduce the level of service provided and limit the advantages to households of having a call center available to them. Texas and Florida have experienced significant staff reductions at a time of increased participation, which has affected implementation of alternative methods (see figs. 10 and 11).

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**Figure 10: Use of Alternative Access Methods in Texas**

In January 2006, Texas piloted in two counties a call center system run by a private contractor to assist state caseworkers in gathering the client information needed to determine households' eligibility for multiple programs, including food stamps. Initially, the contractor was responsible for a number of tasks such as scheduling interviews, assisting households with applications, gathering verification documents from households, and assembling electronic case records. A March 2006 FNS review of the system found several problems related to the performance of the contractor, such as inefficient application processing, long wait times and a high abandonment rate for individuals using the call center, and contractor call center agents providing incorrect or confusing information to callers. In May 2006, in response to a large backlog of food stamp applications and contractor performance problems, the state took back responsibility for processing food stamp applications, with the exception of receiving the applications, scanning documents, and scheduling interviews. In December 2006, Texas announced a plan to retain some functions originally envisioned to be performed by the private contractor and reduce the terms of the contract. In March 2007, Texas announced that it will terminate the contract with the existing private contractor and expects that all duties currently performed by the private contractor, such as operating the call centers, will conclude no later than November 2007. During the transition, some of the work will continue to be performed by subcontractors while Texas evaluates whether to hire state staff and develop systems for those tasks or use different contractors. Texas plans to assess whether they will continue to outsource some of the administrative support tasks, such as mailing notices and scanning documents.

**Challenges**

- State officials reported that between 2002 and 2006, through budget reductions the state reduced its eligibility staff by one-third while experiencing a 45 percent increase in the number of participants. The new system initially called for an additional reduction in staff and closure of about 100 local assistance offices. When implementation of the new system began, the state sent notices of impending layoffs to state eligibility staff and many of them left their positions as a result. In May 2006 when the state took back responsibility for processing applications, Texas announced that it would retain an additional 1,000 state workers and pay retention bonuses to keep state staff in place. The state also hired more than 900 temporary employees to help offices experiencing high turnover during the transition.
- Texas state officials told us that they underestimated the level of expertise and training the contractor's call center agents needed. For example, call center agents delayed the application process by sending applicants multiple requests for missing information, whereas a state caseworker would have known to use data-matching resources or other means to verify the information.
- In addition, state officials attributed Texas' recent increases in the payment and negative error rates to inexperienced staff handling a large increase in applications following Hurricanes Katrina and Rita.
- Texas also experienced technology challenges because the state's new automated case management system, which was developed several years before the legislative mandate to develop call centers, had to be retrofitted to work within the call center model. The private contractor offered an interim technical solution which was determined to be insufficient.

Source: GAO analysis.

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**Figure 11: Use of Alternative Access Methods in Florida**

Florida began its modernization initiative to save costs following state legislative direction. The initiative included closing about one-third of the local assistance offices and establishing community partnerships to serve as access locations. The state implemented alternative methods gradually by reinvesting funds saved from reducing staff and office leases into technology and training, and investing in community partnerships. The state strongly encourages households to apply on-line by directing individuals visiting the local assistance offices to computers and providing computers and training to community partners. State officials reported that as of December 2006, about 93 percent of applications were filed on-line. In addition, Florida created call centers that provide case and referral information and process reported changes.

**Challenges**

- State officials reported absorbing a 43 percent staff reduction at a time of increasing participation.
- The state has had difficulties providing adequate call center staff to handle the volume of calls. Due to long hold times, households have hung up and not received service, according to community partner representatives. State officials told us that they did not anticipate the large volume of callers when they designed the call center, but that they are working to address the problems.
- Community partner representatives and advocates told us that some community partners do not have the resources or training necessary to assist people with the food stamp application process.
- Florida's payment and negative error rates increased recently, and state officials attribute this in part to fewer staff handling a large increase in applications and disruption following Hurricane Wilma.

Source: GAO analysis.

While some states face challenges implementing alternative methods, Utah state officials said that they have successful call centers because they have implemented technology incrementally over time and because they use state caseworkers experienced in program rules. Utah state officials also reported having relatively low caseloads (180 per worker) compared with Texas (815 per worker, in 2005).

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## States Report Taking Actions to Maintain Food Stamp Program Integrity While Using Alternative Methods

To maintain program integrity while implementing alternative methods for applying and recertifying for food stamps, officials from the states we reviewed reported using a variety of strategies, some of which were in place long before implementation of the alternative access methods. Some states used finger imaging, electronic signatures, and special verification techniques to validate the identity of households using call centers or on-line services. In addition, states use databases to verify information provided by households and to follow up on discrepancies between information reported by the household and information obtained from other sources. Officials in the five states we reviewed did not believe that the use of alternative methods had increased fraud in the program. Further, despite concern that a lack of face-to-face interaction with caseworkers would lead to more households being denied benefits for procedural reasons, such as missing a scheduled interview, our limited analysis indicated no considerable fluctuations in the rate of procedural denials and officials from the states we reviewed reported taking actions to prevent them.

### State Actions to Prevent Improper Food Stamp Payments and Fraud

Some states have taken several actions to prevent improper food stamp payments and fraud while implementing alternative methods. Nationally, states have systems in place to protect program integrity and the states we reviewed described how they prevent improper payments and fraud as they implement alternative access methods.

- **Finger imaging.** Nationwide, four states<sup>17</sup> currently use finger imaging of food stamp applicants to prevent households from applying more than once for benefits. FNS officials commented that the agency has not concluded that finger imaging enhances program integrity and that it may have a negative effect on program access by deterring certain households from applying.
- **Electronic signatures.** FNS reported in October 2006 that nine states use electronic signatures to validate the identity of on-line users of their systems. For example, Florida's on-line application asks applicants to click a button signifying that they are signing the application. Of the states we reviewed, Pennsylvania, Florida, and Washington have on-line services with electronic signatures.<sup>18</sup>

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<sup>17</sup> Texas, California, New York, and Arizona.

<sup>18</sup> Utah also began piloting an on-line application with electronic signature capability in March 2007.

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- **In-depth interview for high-risk cases.** In Florida, a case that is considered to have a greater potential for error or fraud is flagged as a “red track” case, and it receives an in-depth interview to more fully explore eligibility factors. FNS officials commented that Florida uses an abbreviated interview with most households and that their in-depth interview for red track cases may be equivalent to the standard interview process used in other states.
  - **Special training for call center agents.** Call center agents in the five states we reviewed are trained to verify callers’ identities by asking for specific personal information available in the file or in the states’ records. Pennsylvania has developed specialized interview training, including a video, for eligibility workers on conducting telephone interviews of households applying or recertifying for the Food Stamp Program. One element of the training is how to detect misinformation being provided by a household. For example, if records indicate that a household member is currently incarcerated and benefits are being claimed for that person, call center agents are trained to probe for additional information. Similarly, Utah trains telephone interviewers to request more information if needed to clarify discrepancies in the case, such as a household reporting rent payments too high to be covered by the household’s reported income.
  - **Data matching.** States have used data matching systems for many years and all five states we reviewed used software either developed by the state or obtained through a third-party vendor to help with verification of household circumstances. For example, data matching software can match state food stamp caseloads against wage reporting systems and other databases to identify unreported household income and assets. Utah and Washington have developed software that automatically compares information provided by applicants and recipients with information contained in state databases, such as income and employment information. State officials told us that using this software greatly reduces the burden on caseworkers, who would otherwise have to search multiple databases one at a time. In addition to requiring case workers to access state and federal data sources to verify information, Texas contracts with a private data vendor to obtain financial and other background information on food stamp applicants and recipients. After a household has started receiving benefits, states conduct additional data matching, and their systems generate a notice to the caseworker if there is a conflict between what the household reported and information obtained from another source. The information in these notices is investigated to ensure that recipients receive the proper level of benefits. Finally, about half of all states

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participate in the voluntary quarterly matching of their food stamp rolls with those of other states to detect individuals receiving food stamp benefits in more than one state at a time.

Food stamp officials in four of the states we reviewed said that they did not believe the use of alternative methods has increased the frequency of fraud and abuse in the program and officials in one state were unsure and collecting data to help determine whether the frequency of fraud had increased. Texas caseworkers, for example, told us they did not think telephone interviews increased fraud because they believed the verification conducted by caseworkers and the states' data matching system was sufficient. However, we have previously reported on the risk of improper payments and fraud in the food stamp program and since there is always risk of fraud and improper payments, particularly given the high volume of cases and the complexity of the program, it is important that states include additional controls when changing their processes and that states continually assess the adequacy of those controls for preventing fraud.

#### State Actions to Limit Procedural Denials

Some program experts have expressed concern that households would be denied for procedural reasons more frequently if they had less face-to-face interaction with caseworkers, although data have not borne out these concerns and states are taking actions to limit procedural denials. During our site visits, some officials reported examples of procedural denials resulting from alternative methods. For example, community group representatives in Florida said that some households were denied benefits because they could not get through to a call center agent to provide required verification in time. However, they also acknowledged that procedural denials due to not providing verification were frequent prior to the state implementing these methods. In addition, Texas officials said that some households were denied benefits for missing scheduled interviews when the private contractor was late in mailing notices of the interview appointments.

Our limited analysis of FNS data for the five states we reviewed found no considerable fluctuations in the rate of procedural denials between fiscal years 2000 and 2005. However, a household's failure to provide verification documents was the most common procedural reason for denial, suspension, or termination of benefits in the five states we reviewed. States we visited described their efforts to help households use alternative methods and prevent procedural denials for households that are not seen in person by case workers. Examples of actions the states we reviewed took to prevent procedural denials include: reviewing actions taken for

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cases that are denied, training caseworkers on preventing improper denials, routinely correcting addresses from returned mail, and developing automated system changes to prevent caseworkers from prematurely denying a case. For example, Utah trains its caseworkers to inform households of all deadlines, and their application tracking software automatically generates a list of households that have not scheduled an interview. This list is used by caseworkers to send notices to the households. Washington uses its document imaging center staff to process case actions associated with returned mail, including quickly correcting addresses.

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## Conclusions

Over the last several years and for a variety of reasons, many states have changed their food stamp certification and recertification processes to enable households to make fewer visits to the local assistance office. Given our findings, it is important for states to consider the needs of all types of households when developing alternative ways of accessing food stamp benefits. Despite making major changes in their systems, FNS and the states have little information on the effects of the alternative methods on the Food Stamp Program, including what factors contribute to successful implementation, whether these methods are improving access to benefits for target groups, and how best to ensure program integrity. Without up-to-date information about what methods states are using and the factors that contribute to successful implementation of alternative methods, states and the federal government most likely will continue to invest in large-scale changes to their certification and recertification processes without knowing what works and in what contexts. Although FNS is beginning to study state efforts in this regard, these studies are not designed to systematically evaluate whether specific methods contributed to achieving positive outcomes. In addition, FNS has not thoroughly analyzed the data received from states implementing waivers of the face-to-face interview to determine, for example, whether it should allow states to use telephone interviews in lieu of face-to-face interviews for all types of households without a waiver. Further, while FNS is using its Website to disseminate information about promising practices, the information available is not up-to-date, making it difficult to easily locate current information about specific practices. Enhancing the research, collection and dissemination of promising practices could be an important resource for states that want to provide households effective alternatives to visiting local assistance offices to receive food stamp benefits.

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## Recommendations for Executive Action

To improve USDA's ability to assess the effectiveness of its funded efforts, we recommend that the Secretary of Agriculture take the following actions:

- direct FNS and the Economic Research Service to work together to enhance their research agendas to include projects that would complement ongoing research efforts and determine the effect of alternative methods on program access, decision accuracy, and administrative costs. Such projects would reliably identify the alternative methods that are effective and the factors that contribute to their success; and
- direct FNS to conduct analyses of data received from states implementing waivers or demonstration projects waiving the face-to-face interview and require states implementing waivers or demonstration projects to collect and report data that would facilitate such analyses. Such analyses would identify the effect of the waivers on outcomes such as payment accuracy and could help determine whether the use of the waiver should be further expanded or inform whether regulations should be changed to allow telephone interviews for all households without documenting hardship.

In addition, we recommend that the Secretary of Agriculture help states implement alternative methods to provide access to the Food Stamp Program by directing FNS to disseminate and regularly update information on practices states are using to implement alternative access methods to the traditional application and recertification process. The information would not be merely a listing of practices attempted, but would include details on what factors or contexts seemed to make a particular practice successful and what factors may have reduced its effectiveness.

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## Agency Comments

We provided a draft of this report to the U.S. Department of Agriculture for review and comment. We met with FNS and ERS officials on April 16, 2007, to obtain their comments. In general, the officials agreed with our findings, conclusions, and recommendations. They discussed the complexity and variability of state modernization efforts and the related challenges of researching the effects of these efforts. For example, policy changes, organizational restructuring, and the engagement of community organizations in the application process may occur simultaneously with implementation of alternative methods and play a significant role in state and client experiences. Having multiple interrelated factors creates challenges for researching the effects of modernization efforts. Nonetheless, the officials highlighted steps the agency is taking to monitor



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and evaluate state implementation of alternative access methods. First, the officials commented that as modernization evolves, FNS is using its administrative reporting system to consistently and routinely track changes in state program performance in the areas of application timeliness, food stamp participation by subgroups, payment accuracy, and administrative costs. Second, they stated that the two related FNS-funded studies currently underway will be comparing performance data from the case study states with data from similar states; however, this analysis will not determine whether certain modernization efforts caused changes in performance. Third, they stated that FNS plans to analyze data they are collecting from states as part of the administrative waiver process to determine the effect of telephone interviews on payment accuracy. Finally, ERS officials noted that Food Stamp Program access is an area in which the agency continues to solicit research from the private sector as well as other government agencies and that ERS makes data available to support these research efforts. FNS and ERS also provided us with technical comments, which we incorporated where appropriate.

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We are sending copies of this report to the Secretary of Agriculture, appropriate congressional committees, and other interested parties. We will also make copies available to others upon request. In addition, the report will be available at no charge on GAO's Web site at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-7215 or [nilsens@gao.gov](mailto:nilsens@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix III.

Sincerely,



Sigurd R. Nilsen, Director  
Education, Workforce, and  
Income Security Issues

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# Appendix I: Objectives, Scope, and Methodology

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To understand what alternatives states are using to improve program access and what is known about the results of using these methods, we examined: (1) what alternative methods to the traditional application and recertification process are states using to increase program access; (2) what is known about the results of these methods, particularly on program access for target groups, decision accuracy, and administrative costs; and (3) what actions have states taken to maintain program integrity while implementing alternative methods.

To address these issues, we surveyed food stamp administrators in the 50 states and the District of Columbia, conducted four state site visits (Florida, Texas, Utah, and Washington) and one set of semi-structured telephone interviews (Pennsylvania), analyzed data provided by the Food and Nutrition Service (FNS) and the selected states, reviewed relevant studies, and held discussions with program stakeholders, including officials at FNS headquarters and regional offices, and representatives of advocacy organizations. We performed our work from September 2006 to March 2007 in accordance with generally accepted government auditing standards.

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## Survey of State Food Stamp Administrators

To learn about state-level use of alternative methods to help households access the Food Stamp Program, we conducted a Web-based survey of food stamp administrators in the 50 states and the District of Columbia. The survey was conducted between December 2006 and February 2007 with 100 percent of state food stamp administrators responding. The survey included questions about the use of alternative methods to provide access to the program, including mail-in procedures, call centers, on-line services, and other technologies that support program access. In addition, we asked about the reasons for implementing these methods, whether states had conducted evaluations of the methods, what measures states used to evaluate the performance of the methods, and additional assistance needed from FNS.

Because this was not a sample survey, there are no sampling errors. However, the practical difficulties of conducting any survey may introduce nonsampling errors, such as variations in how respondents interpret questions and their willingness to offer accurate responses. We took steps to minimize nonsampling errors, including pre-testing draft instruments and using a Web-based administration system. Specifically, during survey development, we pre-tested draft instruments with officials in Washington, Arizona, Utah, and Wisconsin in October and November 2006. In the pre-tests, we were generally interested in the clarity of the questions and the

flow and layout of the survey. For example, we wanted to ensure definitions used in the surveys were clear and known to the respondents, categories provided in closed-ended questions were complete and exclusive, and the ordering of survey sections and the questions within each section was appropriate. We also used in-depth interviewing techniques to evaluate the answers of pretest participants, and interviewers judged that all the respondents' answers to the questions were based on reliable information.

On the basis of the pre-tests, the Web instrument underwent some slight revisions. A second step we took to minimize nonsampling errors was using a Web-based survey. By allowing respondents to enter their responses directly into an electronic instrument, this method automatically created a record for each respondent in a data file and eliminated the need for and the errors (and costs) associated with a manual data entry process. To further minimize errors, programs used to analyze the survey data were independently verified to ensure the accuracy of this work.

After the survey was closed, we made comparisons between select items from our survey data and other national-level data.<sup>1</sup> We found our survey data were reasonably consistent with the other data set. On the basis of our comparisons, we believe our survey data are sufficient for the purposes of our work.

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## State Site Visits and Structured Interviews

We conducted four site visits (Florida, Texas, Utah, and Washington) and one set of semi-structured telephone interviews (Pennsylvania). We selected states that have at least one FNS-approved waiver of the face-to-face interview requirement and reflect some variation in state participation rates. We also considered recommendations from FNS officials, advocacy group representatives, or researchers. We made in-depth reviews for each state we selected. We interviewed state officials administering and developing policy for the Food Stamp Program, local officials in the assistance offices and call centers where services are provided, and representatives from community-based organizations that provide food assistance.

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<sup>1</sup> We compared our Web-based survey data to data reported by FNS in the *2006 State Options Report*.

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## Reviews of FNS Data and Relevant Studies

To supplement the information gathered through our site visits and in-depth reviews, we analyzed data provided by FNS for the states we reviewed. These analyses allowed us to include state trends for specific measures (Program Access Index, monthly participation, payment accuracy, administrative costs, and reasons for benefit denials) in our interviews with officials. To review the reasons for benefit denials, we used FNS's quality control (QC) system data of negative cases used in error rate calculations. Specifically, we looked at the number and percentage of cases denied, terminated, or suspended by the recorded reason for the action in the five states we reviewed for fiscal years 2000 through 2005. Though our data allowed us to examine patterns in these areas before and after a method was implemented, we did not intend to make any statements about the effectiveness of methods implemented in the states we visited and reviewed. Instead, we were interested in gaining some insight through our interviews on how alternative methods may have affected state trends. Based on discussions with and documentation obtained from FNS officials, and interviews with FNS staff during site visits, we determined that these data are sufficiently reliable for our limited review of state trends.

In addition, we selected and reviewed several studies and reports that relate to the use of alternative methods to increase food stamp program access. These studies included food stamp participation outcome evaluations that were funded by FNS and the Economic Research Service (ERS) and focused on practices aimed to improve access to the Food Stamp Program. To identify the selected studies, we conducted library and Internet searches for research published on food stamp program access since 1990, interviewed agency officials to identify completed and ongoing studies on program access, and reviewed bibliographies that focused on program access concerns. For each selected study, we determined whether the study's findings were generally reliable. Two GAO social science analysts evaluated the methodological soundness of the studies, and the validity of the results and conclusions that were drawn.

The studies we selected and reviewed include:

- U.S. Department of Agriculture, Economic Research Service, *Food Stamp Program Access Study: Final Report*, by Bartlett, S., N. Burstein, and W. Hamilton, Abt Associates Inc. (Washington, D.C.: November 2004).
- U.S. Department of Agriculture, Economic Research Service, *Evaluation of the USDA Elderly Nutrition Demonstrations*, by Cody,

S. and J. Ohls, Mathematica Policy Research, Inc. (Washington, D.C.: May 2005).

- U.S. Department of Agriculture, Food and Nutrition Services, Office of Analysis, Nutrition and Evaluation, *Evaluation of Food Stamp Research Grants to Improve Access Through New Technology and Partnerships*, by Sheila Zedlewski, David Wittenburg, Carolyn O'Brien, Robin Koralek, Sandra Nelson, and Gretchen Rowe. (Alexandria, Va.: September 2005).
- U.S. Department of Agriculture, Food and Consumer Service, *Evaluation of SSI/FSP Joint Processing Alternatives Demonstration*, by Carol Boussy, Russell H. Jackson, and Nancy Wemmerus. (Alexandria, Va: January 2000).
- Combined Application Project Evaluations submitted to FNS by seven states: Florida, Massachusetts, Mississippi, North Carolina, South Carolina, Texas, and Washington.

# Appendix II: State-by-State Use of Alternative Methods and Waivers of the Face-to-Face Interview

State	Mail-in procedures			On-line services	Call centers	Face-to-face waiver at application	Face-to-face waiver at recertification	CAP	Elderly demonstration project
	Submit application	Report changes	Submit recertification						
Alabama	●	●	●						
Alaska	●	●	●						
Arizona	●	●	●	●	●				
Arkansas	●	●	●				✓		
California	●	●	●				✓		
Colorado	●	●	●						
Connecticut	●	●	●	◆			✓		
Delaware	●	●	●	●			✓		
District of Columbia	●	●			●				
Florida	●	●	●	●	●	✓	✓	✓	✓
Georgia	●	●		◆	●				
Hawaii	●	●	●						
Idaho	●	●	●	●	●				
Illinois	●	●	●	◆	●		✓		
Indiana	●	●	●	◆	◆	✓	✓		
Iowa	●	●	●	◆	●				
Kansas	●	●	●	●	◆				
Kentucky	●	●		◆				▲	
Louisiana	●	●	●				✓	▲	
Maine	●	●	●						
Maryland	●	●	●	●	●				
Massachusetts	●	●	●	●	◆		✓	✓	
Michigan	●	●	●						
Minnesota	●	●	●						
Mississippi	●	●	●	◆				✓	
Missouri	●	●	●						

**Appendix II: State-by-State Use of Alternative Methods and Waivers of the Face-to-Face Interview**

State	Mail-in procedures			On-line services	Call centers	Face-to-face waiver at application	Face-to-face waiver at recertification	CAP	Elderly demonstration project
	Submit application	Report changes	Submit recertification						
Montana	●	●	●						
Nebraska	●	●	●						
Nevada	●	●	●		●				
New Hampshire	●	●	●	◆	●				
New Jersey	●			●				▲	
New Mexico	●	●	●				✓		
New York	●	●	●	◆	●		✓	✓	
North Carolina	●	●	●				✓	✓	
North Dakota	●	●	●						
Ohio	●	●	●		●		✓		
Oklahoma	●	●	●		◆				
Oregon	●	●	●						
Pennsylvania	●	●	●	●	●		✓	✓	
Rhode Island	●	●	●	◆					
South Carolina	●	●	●				✓	✓	✓
South Dakota	●	●	●				✓		
Tennessee	●	●	●	◆	●		✓		
Texas	●	●	●	●	●		✓	✓	
Utah	●	●	●	◆	●	✓	✓		
Vermont	●	●	●						
Virginia	●	●	●	●	●			✓	
Washington	●	●	●	●	●		✓	✓	
West Virginia	●	●	●	●	●				
Wisconsin	●	●		●					
Wyoming	●	●	●						
<b>Total</b>	<b>51</b>	<b>50</b>	<b>46</b>	<b>26</b>	<b>23</b>	<b>3</b>	<b>20</b>	<b>13</b>	<b>2</b>

- ✓ State has implemented project or waiver
  - ▲ Project approved, not yet implemented
  - Services available to households within the state
  - ◆ State has begun development of a call center or on-line services
- Source: GAO survey and FNS.

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# Appendix III: GAO Contact and Acknowledgments

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## GAO Contact

Sigurd R. Nilsen (202) 512-7215 nilsens@gao.gov

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## Acknowledgments

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# Related GAO Products

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*Food Stamp Program: FNS Could Improve Guidance and Monitoring to Help Ensure Appropriate Use of Noncash Categorical Eligibility.*

[GAO-07-465](#). Washington, D.C.: March 28, 2007.

*Food Stamp Program: Payment Errors and Trafficking Have Declined despite Increased Program Participation.* [GAO-07-422T](#). January 31, 2007.

*Food Stamp Trafficking: FNS Could Enhance Program Integrity by Better Targeting Stores Likely to Traffic and Increasing Penalties.*

[GAO-07-53](#). Washington, D.C.: October 13, 2006.

*Improper Payments: Federal and State Coordination Needed to Report National Improper Payment Estimates on Federal Programs.*

[GAO-06-347](#). Washington, D.C.: April 14, 2006.

*Food Stamp Program: States Have Made Progress Reducing Payment Errors, and Further Challenges Remain.* [GAO-05-245](#). Washington, D.C.: May 5, 2005.

*Food Stamp Program: Farm Bill Options Ease Administrative Burden, but Opportunities Exist to Streamline Participant Reporting Rules among Programs.* [GAO-04-916](#). Washington, D.C.: September 16, 2004.

*Food Stamp Program: Steps Have Been Taken to Increase Participation of Working Families, but Better Tracking of Efforts Is Needed.*

[GAO-04-346](#). Washington, D.C.: March 5, 2004.

*Financial Management: Coordinated Approach Needed to Address the Government's Improper Payments Problems.* [GAO-02-749](#). Washington, D.C.: August 9, 2002.

*Food Stamp Program: States' Use of Options and Waivers to Improve Program Administration and Promote Access.* [GAO-02-409](#). Washington, D.C.: February 22, 2002.

*Executive Guide: Strategies to Manage Improper Payments: Learning from Public and Private Sector Organizations.* [GAO-02-69G](#). Washington, D.C.: October 2001.

*Food Stamp Program: States Seek to Reduce Payment Errors and Program Complexity.* [GAO-01-272](#). Washington D.C.: January 19, 2001.

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**Related GAO Products**

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*Food Stamp Program: Better Use of Electronic Data Could Result in Disqualifying More Recipients Who Traffic Benefits.* [GAO/RCED-00-61](#). Washington D.C.: March 7, 2000.

*Food Assistance: Reducing the Trafficking of Food Stamp Benefits.* [GAO/T-RCED-00-250](#). Washington D.C.: July 19, 2000.

*Food Stamp Program: Information on Trafficking Food Stamp Benefits.* [GAO/RCED-98-77](#). Washington D.C.: March 26, 1998.

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