

**Food and Nutrition Service  
Northeast Region  
Food Stamp Program**



**New York  
Program Access Review  
November-December 1998**

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The New York State Department of Family Assistance, Office of Temporary and Disability Assistance (OTDA) administers the Food Stamp Program in New York State under an agreement with the USDA Food and Nutrition Service (FNS). OTDA supervises the local administration of the Food Stamp Program through 58 social service districts, including New York City's Human Resources Administration (HRA). OTDA is ultimately responsible for ensuring statewide compliance with all pertinent Federal statutes, regulations and guidance issued by FNS.

The FNS Northeast Regional Office recently reviewed local policies and procedures affecting access to the Food Stamp Program in New York City. This review was part of FNS' ongoing responsibility to ensure compliance by States and local districts with all applicable Food Stamp Program laws and regulations. The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) provided increased flexibility to States in matters affecting local Food Stamp Program operations. However, Section 4 of the Food Stamp Act of 1977, as amended, (FSA) authorizes the Secretary of Agriculture "...to formulate and administer a Food Stamp Program under which, at the request of the State agency, eligible households within the State shall be provided with an opportunity to obtain a more nutritious diet... ." This construction of the Food Stamp Program clearly gives primary responsibility to the Secretary of Agriculture to manage this national nutrition assistance program.

In passing PRWORA, Congress thoroughly reviewed the FSA and made changes to many of its provisions. However, it also made conscious decisions to retain certain requirements. Soon after PRWORA was signed into law, FNS issued implementing memoranda to all State commissioners clarifying the requirements of the FSA, as amended by PRWORA. These memoranda also specified deadlines for implementation of new statutory provisions. State

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agencies were required to continue to comply with all regulatory provisions that were unchanged by PRWORA.

In PRWORA, Congress spoke clearly of its expectations regarding food stamp application processing standards. Section 835 of PRWORA made it clear that the Food Stamp Program would continue to have a distinct set of nationwide application rights and responsibilities.

While PRWORA amended Section 11(e) of the FSA to increase State flexibility with respect to the operation of food stamp offices, it did not change applicants' basic right to apply immediately for food stamp benefits. In fact, PRWORA recodified this right, along with a new emphasis on timely and fair service to applicants. The FSA retains the provision that the State agency shall permit an applicant household to apply to participate in the Food Stamp Program on the same day that the household first contacts a food stamp office in person during office hours. It also provides that all States shall consider an application that contains the name, address, and signature of the applicant to be filed on the date the applicant submits the application. PRWORA amended the FSA to permit State agencies to develop their own application, but the application must contain the information necessary to determine eligibility under the provisions of the FSA. The food stamp application must activate all of the rights, responsibilities, and protections provided a Food Stamp Program applicant under Federal law and regulations.

Where the FSA was unchanged, current food stamp regulations remain in effect. For example, the regulations at 7 CFR 273.2(c)(1) provide that each household has the right to file an application on the same day it contacts the food stamp office during office hours. The State must advise the household that it does not have to be interviewed before filing the application and may file an incomplete

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application as long as the applicant's name and address are recorded on the form, which is signed by a responsible member of the household or the household's authorized representative. The regulations at 7 CFR 273.2(c)(2) provide that State agencies shall encourage households to file an application form the same day the household or its representative contacts the food stamp office in person or by telephone and expresses interest in obtaining food stamp assistance.

The amended version of Section 11(e) of the FSA requires States to provide benefits to destitute households within seven days of the date of application instead of the normal 30-day maximum processing period. Although PRWORA changed the processing time frame for expedited service from five to seven days, it maintained the requirement that State agencies screen all applicant households to measure their eligibility for expedited service.

There have been concerns for several months regarding current Food Stamp Program application policies in New York City. OTDA did review some aspects of HRA's application processes earlier in 1998. It is our understanding that this review was limited to New York City's policy of "protecting the application date" for purposes of determining benefits retroactive to households' original date of application. There is no indication that OTDA expanded their review to examine other questionable areas of application procedures in New York City. The limited scope of the OTDA review, and the apparent continuation of possibly non-compliant certification procedures, caused FNS to undertake an independent review of New York City operations.

We selected two Job Centers, Queens #53 and Jamaica #54, and began the review on November 9, 1998. Our review included:

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1. Examination of nearly 600 case files in four categories of case actions: open, closed, denied and “diverted” (withdrawn).
2. Interviews with program administrators and staff.
3. Interviews with program applicants who withdrew their job profiles and applications for temporary cash assistance.
4. Observation of daily operations within the two Job Centers.

The results of our review are organized under the following headings:

- A. Impediments to timely application processing.
- B. Imposition of eligibility standards not authorized under the FSA.
- C. Lack of effective State agency oversight of local district operations.

We provided a draft version of our review report to State and City officials at OTDA’s Albany office on January 11, 1999. The exit conference provided an opportunity for all parties to discuss the findings and recommendations included in that draft report. Because of the serious nature of the findings, we asked that the State agency provide us with their formal comments no later than January 19, 1999. Written comments were sent to our office by facsimile transmission on January 19. In addition, both OTDA and HRA wrote to the Office of the Secretary of Agriculture to express their concerns regarding the review and its findings. Throughout this report, we will make reference to OTDA’s and HRA’s comments that were made at the exit conference or in their written responses.

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**A. Impediments to Timely Application Processing**

**FINDING #1:**

- 1. The Job Centers reviewed do not permit households to apply for the Food Stamp Program on the same day the households contact the Job Centers.**
  
- 2. The Job Centers reviewed do not notify households of their statutory right to file a Food Stamp Program application the same day they contact the Job Centers.**
  
- 3. The Job Centers reviewed do not make Food Stamp Program applications readily accessible to potentially eligible households.**
  
- 4. The Job Centers reviewed encourage households to withdraw their job profiles (applications for temporary cash assistance) and treat this as a withdrawal of their application for Food Stamp assistance. Households are not told of their right to apply for Food Stamp benefits independent of other program choices.**

Section 11(e)(2)(B) of the FSA specifies that “the State agency shall permit an applicant household to apply to participate in the Food Stamp Program on the same day that the household first contacts a food stamp office in person during office hours.” (7 U.S.C. 2020(e)(2)(B)). Food stamp regulations at 7 CFR 273.2(c)(1) and (c)(2) confirm this and further stipulate that “State agencies shall encourage households to file an application form the same day the household or its representative contacts the food stamp office in person or by telephone....” The term “encourage” here does not mean recruitment or persuasion. It does mean that States have a responsibility to inform individuals who express interest

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in the FSP, or who have concerns about food insecurity, about the FSP and their right to apply. Additionally, regulations at 7 CFR 273.2(c)(3) specify that “the State agency shall make application forms readily accessible to potentially eligible households.”

The above-cited regulatory requirements guarantee the households’ rights to a wide range of processing timeliness standards, required notification of case actions taken, and fair hearing rights associated with the Food Stamp Program application process.

Denial of the opportunity to timely receive and file an appropriate application form is, in effect, a denial of a wide range of rights afforded to applicants in law and regulations. These rights go beyond the protection of the application date for eventual computation of benefits retroactive to the application date. See 7 CFR 273.2(g) (timeliness standards for application processing); 7 CFR 273.10(g) (certification notices to households); and 7 CFR 273.15(f) (fair hearings, etc.).

At the exit conference, and in subsequent correspondence, both New York City HRA and OTDA have questioned the regulatory requirement that States encourage households to apply for benefits on the same day they come to a local office. While the scope and meaning of this regulatory requirement may be subject to disagreement, there is no question regarding the intent of PRWORA’s requirement that States shall permit an applicant household to apply to participate in the Food Stamp Program on the same day that the household first contacts a food stamp office. PRWORA’s requirement that States provide timely, accurate, and fair service to applicants carries with it a responsibility that States inform households in a reasonable manner of their application rights.

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The full impact of New York City's policy was seen when FNS reviewers analyzed the experience of applicant households who withdrew their job profiles or were diverted from applying for Temporary Assistance to Needy Families (TANF). Unable to file an application that would provide them with official notification of the disposition of their case, many households were not aware of their right to file an application for food stamp benefits independent of any decision regarding their application for TANF. Neither of the Job Centers reviewed by FNS had signs or any other sources of information which explained the application processing standards and the right to file an application on the day of initial contact.

FNS reviewers found that many clients withdrew their job profile and never exercised their statutory right to formally apply for the Food Stamp Program. Our review of Job Center Activity Logs showed that approximately fifty percent of the clients on the logs had withdrawn their job profile/application for temporary cash assistance. Telephone interviews with clients revealed that clients are frequently encouraged to withdraw their job profiles for reasons that, taken alone, would not result in a Food Stamp Program denial (e.g., the absence of one or more adult household members at the time of the interview, or the assertion by the financial planner that the household could likely secure employment on their own).

Our interviews also indicated that many clients do not realize, and are not told, that their job profile withdrawal is being treated as a withdrawal of their application for food stamp participation. By withdrawing their job profiles, many clients appeared to unknowingly forfeit their right to apply for food stamp benefits as well as their rights to formal notification of disposition of their food stamp application (7 CFR 273.10(g)) and their rights to a fair hearing on the action taken on their application (7 CFR 273.15(f)).



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The practice of deeming a withdrawn job profile to be a withdrawal of the household's request for food stamp assistance runs counter to the FSA, as amended by PRWORA. The FSA clearly requires that States must provide timely, accurate and fair service to applicants for, and participants in, the Food Stamp Program. One of the specific requirements associated with the timely filing of food stamp applications is the provision at 7 CFR 273.2 (c)(6) which requires States to advise applicant households of their right to reapply for food stamp benefits at any time.

Our review found that the multi-program benefit application, DSS-2921 New York City (revision 4/96), is still the required application instrument for the FSP in New York City. According to page IV-F of New York State's Food Stamp Source Book for Regulations (in a version dated November 10, 1995, and provided to us, on request, as current in November 1998), all local districts shall use the State-prescribed DSS-2921 application form. It is the only document that can currently trigger the eligibility determination process through the Welfare Management System (WMS), the automated system which supports benefit determination and issuance.

The Participant Job Profile and Assessment Form, W-680B, does not meet the statutory definition of a Food Stamp Program application found in PRWORA, as it does not contain all of the Food Stamp Program eligibility criteria identified in the FSA. A wide range of informational elements are not included in the W-680B, including information on income, resources, household expenses and several other critical elements of eligibility.

During the exit conference and in subsequent correspondence, OTDA has indicated their intention to explore with HRA the possibility of using the Participant Job Profile and Assessment Form as the approved application form

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in New York City. Amendments to that form and its use would be required to ensure that all necessary information is collected and all pertinent applicant rights are protected. Local offices must make the complete application available to households on the same day they come to the local office. Only the complete application fully informs applicants about eligibility requirements. Households do not have to be interviewed before filing the application and may file an incomplete application as long as the applicant's name and address are recorded on the form, which is signed by a responsible member of the household or the household's authorized representative. (Section 11(e)(2)(B)(iv)).

Financial Planning Unit staff stated that applications (DSS-2921) were only available if an applicant insisted on receiving one and that, regardless of date signed, applications would not be acted upon until the applicant reached an advanced step in the "financial planning/employment planning" process. The Food Stamp Program benefit application is not given to the applicant until day two of the process, after the applicant begins TANF-related employment activities. This policy is formally stated in the "Job Center Trainee Workbook" issued by the Human Resources Administration's Office of Employment Services. Our review of 108 new applicants' cases showed that only households approved for expedited processing were allowed to file an application on the day they came to the Job Center.

In correspondence received after the exit conference, OTDA indicated that the use of the Job Profile and Assessment form "...protects the filing date for applicants." As stated earlier, a broad range of rights flows from the applicant's right to file a food stamp application, not limited to the establishment of a starting point for computing benefits.

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Our review of case information and discussions with applicant households showed that applicants' rights were often denied even when they were provided with a job profile form. In our sample, we found 19 job profiles withdrawn because the applicant left the center without having the opportunity to be seen by the initial interviewer (waiting periods ranging up to six hours were cited by respondents to our telephone survey). Twenty-four job profiles were withdrawn because households did not have complete documentation and verification with them when they applied. Thirty-two job profiles were withdrawn for unknown reasons.

In our sample, sixteen of the cases which were withdrawn ("losing" their application date) were eventually approved for benefits at the same job center. Twenty-one of the withdrawn cases received benefits at another center. In total, thirty-seven households who withdrew their job profiles were later determined to be in fact eligible for benefits after going through the intake process for a second time. No benefits were provided back to the date of the original job profile.

Applicants who complete job profiles and subsequently fail to appear for scheduled interviews are also denied the process required by food stamp regulations. Such cases must be notified that their applications have been denied on the thirtieth day following the date of application. (New York State operates under a waiver granted by FNS which relieves the Food Stamp office of the responsibility of scheduling a second interview when a household fails to appear for their first scheduled interview. This waiver does not eliminate the State's responsibility to issue a notice of denial to such applicants no later than 30 days after the date of application.)

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These circumstances lead us to conclude that the current procedures associated with the completion of the job profile do not reliably protect the application rights of food stamp applicant households.

**RECOMMENDATION #1** : OTDA must act immediately to ensure that:

1. All local offices make Food Stamp Program applications readily accessible to all potentially eligible households.
2. All local offices take appropriate action to timely notify all applicants of their right to file a Food Stamp Program application on the day of their first contact with the food stamp office.
3. All local offices notify applicants of their specific rights to reapply for Food Stamp Program benefits at any time after they withdraw their current application.
4. All local offices process all Food Stamp Program applications, adhering to all of the timeliness standards, notice requirements, and fair hearing rights included in pertinent regulations.

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**FINDING #2: Poor documentation made it impossible to determine if all applicants are adequately screened for expedited service .**

Food stamp regulations at 7 CFR 273.2(i)(2) require that “the State agency’s application procedures shall be designed to identify households eligible for expedited service at the time the household requests assistance.” Section 838 of PRWORA changed the expedited service timeframe in section 11(e)(9) of the FSA from five to a maximum of seven calendar days and eliminated the homeless category from those entitled to expedited service.

We reviewed 108 new applicants’ cases to evaluate HRA’s procedures to screen households for expedited service needs. We found that inconsistent documentation in eligibility files made it difficult to determine if eligible applicants were afforded an opportunity to receive expedited service.

In most cases, we did see that a Form W-138T or S, “Information About An Expedited Food Stamp Interview,” was completed. However, in many cases, this form was not filled out thoroughly. Frequently, this screening form was not used on the date the client first contacted the Job Center.

At the exit conference, State and City officials proposed to amend screening procedures, such that information gathered in the course of the initial interview process would be complete and better document the screening of households for eligibility for expedited service.

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**RECOMMENDATION #2:** OTDA must take immediate action to ensure that:

1. All local offices consistently screen all applicant households to determine their eligibility for expedited food stamp service in accordance with currently applicable standards.
2. All local offices document thoroughly their evaluation of each household for expedited service eligibility.
3. All local offices provide food stamp benefits no later than seven days after the application date for all households determined eligible for expedited service.

**B. Imposition of Eligibility Standards Not Authorized Under the Food Stamp Act**

**FINDING #3: The centers reviewed impose eligibility requirements that exceed the standards set by the Food Stamp Act and regulations.**

Section 5(b) of the FSA states that the Secretary (of Agriculture) “shall establish uniform national standards of eligibility ...for participation by households in the Food Stamp Program ... and no State agency shall impose any other standards of eligibility as a condition for participating in the Food Stamp Program.” (7 U.S.C. 2014(b)).

Our review found that households were frequently denied food stamp benefits for failure to participate in Eligibility Verification Review (EVR) activities or employment related activities. We wrote to OTDA on December 16, 1997, directing that agency to immediately end the practice of denying food stamp applications based solely on failure to attend EVR interviews.

At the exit conference, OTDA officials stated that they had not taken action on this letter, citing disagreement with its contents. No formal response citing their concerns was received from OTDA since the issuance of FNS’ original letter.

The minimum requirements of the TANF application process, as explained to FNS reviewers, entails a meeting with a financial planner, a referral and meeting with an employment planner (which sometimes can be scheduled during the first visit to the job center), a separate appointment at the job center for the intake process (when the Form DSS 2921 is completed), followed by two EVR appointments (one in an HRA office and one in the form of a home visit). This

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procedure is required universally of all applicants. Failure to complete any of these five minimum steps results in the denial of TANF benefits, as well as food stamp benefits and Medicaid assistance. When action is taken to deny all benefits for failure to complete any one of these requirements, households are not notified of their right to pursue their food stamp application independent of their TANF application.

Food stamp regulations at 7 CFR 273.2 hold applicant households responsible for the production of documentation to verify circumstances affecting eligibility, allowing them up to ten days to provide such documentation. When applicant households provide documentation that is not questionable to support the information contained on their application (either at the time of application or within the allowable ten day period), it runs counter to the fair service provision of PRWORA to subject such households to mandatory denial of their applications for failure to meet any one of the five minimum steps of the TANF application process. We acknowledge HRA's desire to enhance Food Stamp Program accuracy by verifying questionable information. However, when applicants present satisfactory documentation of their circumstances, they have met FSP requirements and should not be subject to more rigorous verification procedures.

Of 94 denied applications reviewed, 24 were denied either for failure to attend an EVR session (at an HRA facility or in the applicant's home) [19 cases], or an employment-related activity [5 cases]. These activities include mandatory "cold-calls" to potential employers and other TANF-related employment requirements.

Section 6(d) of the FSA and Federal regulations at 7 CFR 273.7 require each household member who is not exempt to be registered for employment by the State agency at the time of application. This registration may have specific



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employment or training implications based on States' decisions regarding work requirements. However, States must not universally impose requirements that would delay the determination of an individual's eligibility for aid or in issuing benefits to any household that is otherwise eligible. OTDA must ensure that only non-exempt applicant households are subject to FSP denial for failure to meet employment related activity requirements prior to certification of eligibility. At the exit conference, OTDA cited its approval to use the work exemptions of its TANF program rather than Food Stamp Program work exemptions. This approval was granted in accordance with Section 26 of the FSA, which is the legislative authority governing the Simplified Food Stamp Program (SFSP). This legislative authority is limited to households receiving assistance from TANF. A family applying for TANF is clearly not receiving TANF. Consequently, New York cannot use SFSP procedures (i.e., TANF work exemptions) until a household has been approved for TANF. If a household is applying for both TANF and food stamps, the food stamp application must be processed according to the standards of the regular FSP rather than the SFSP.

There must be separate determination procedures in place for households whose Public Assistance (PA) applications are denied (e.g. for failure to comply with TANF-related EVR or employment activities).

We reviewed three months of activity, as recorded on the logs of the two centers. HRA's records showed that no fewer than 48 applicants were denied the right to file a timely application for food stamp benefits because their spouse or other family members did not come to the Job Center with them.

Three households reported that they were denied access to the job center to apply because they had arrived after 11:00 AM. They were directed to return to the center on the following work day.

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**Recommendation # 3:** OTDA must take immediate action to ensure that:

Local offices do not deny food stamp benefits based on eligibility standards that are not specified in FSA and Food Stamp Program Regulations.

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**FINDING #4: When public assistance was denied at the Job Centers reviewed, applicants were required to file new applications at a Non Public Assistance (NPA) center.**

The Food Stamp Program regulations at 7 CFR 273.2(j)(1)(v) state that “households whose PA applications are denied shall not be required to file new food stamp applications but shall have their food stamp eligibility determined or continued on the basis of the original applications filed jointly for PA and food stamp purposes and any other documented information obtained subsequent to the application which may have been used in the PA determination and which is relevant to food stamp eligibility or level of benefits.”

FNS reviewers found several instances where PA was denied and clients were required to file new applications at an NPA center. The New York State Welfare Management System (WMS) does not support NPA case opening actions by workers in Job Centers. Current HRA procedures call for workers to refer applicants to make a separate visit to an NPA office to re-initiate the application process (some NPA offices are co-located with HRA Job Centers).

We wrote to all states on May 11, 1998 reminding them that the requirements of 7 CFR 273.2(j)(1)(v), which apply in these cases, remained in effect after PRWORA implementation.

At the exit conference and in subsequent correspondence, OTDA indicated that discussions were underway with HRA to determine how WMS computer support could be modified to allow for the opening of cases at Job Centers which would then be transferred to HRA’s food stamp-only offices.

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In a related area, we attempted to measure the effectiveness of HRA's practices for continuing food stamp benefits, where appropriate, when TANF benefits were terminated. Inadequate casefile documentation in the "closed" cases sampled prevented us from completing this analysis.

**RECOMMENDATION #4:** OTDA must take immediate action to ensure that:

1. Applicants are not required to file a new application at an NPA center, but should have the already completed application forwarded to an NPA center.
2. Appropriate action is taken to continue uninterrupted food stamp benefits, when appropriate, at the time of TANF benefit termination.

**C. Lack of Effective State Agency Oversight at Local District Offices**

**FINDING #5: Substantial non-compliance with the FSA and regulations has gone undetected and unaddressed at the local level.**

Our review has found significant instances of non-compliance with the FSA, regulations, and guidance in the operation of the Food Stamp Program in New York City. Most serious among these is the denial of applicants' statutory right to file an application for food stamp benefits on the first day they contact a local office. Several other deficiencies relating to applicants' rights flow from that basic operational deficiency.

We are also concerned about the many reports of rude or unprofessional treatment received at HRA offices that we recorded in the course of our review.

We have forwarded under separate cover some specific case information that OTDA will need to investigate and resolve individual reports of questionable treatment. In those cases where there were possible violations of the Rehabilitation Act of 1973, as amended, the Americans with Disabilities Act, or the Civil Rights Act of 1964, we have referred the specific case information to our agency's Civil Rights staff to determine what further action might be necessary.

Our reviewers also found a widespread recurrence of inadequate casefile documentation in New York City's OTDA offices. The USDA Office of Inspector General noted significant improvement in casefile management between the issuance of two audit reports (Reports 27016-05-HY and 27010-12-HY, dated March 1995 and March 1998, respectively). During this review, however, nearly one third of the sampled cases could not be supported with adequate casefile

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documentation. This was true even after concerted file retrieval efforts by HRA staff over a period of several weeks. This group included cases where no files could be found, others where a “dummy” casefile had been created in the absence of the original casefile, and a number of cases which lacked critical case documents.

OTDA is the agency primarily responsible for the timely and accurate communication of Food Stamp Program guidelines to all of New York State’s local social service districts. OTDA’s responsibilities include technical support to local managers, and the negotiation of appropriate Food Stamp Program modifications, within Food Stamp Program guidelines, to accommodate local needs. Finally, the State agency has ultimate responsibility for regular monitoring of local operations to ensure compliance with Food Stamp Program law and regulations. When OTDA identifies areas of deficiency, it is the agency’s responsibility to report these matters to the local district, elicit effective corrective action plans, and monitor the completion of those plans.

On April 7, 1998, we issued a report on OTDA’s Food Stamp Program operations. That report cited concerns about the effectiveness of OTDA’s Food Stamp Program support and oversight responsibilities regarding local district Food Stamp Program operations. Our specific areas of concern included:

1. The absence of any documentation of regular or targeted oversight of local district Food Stamp Program operations.
2. The absence of documented corrective action activities undertaken when deficiencies were identified at the local district level.

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3. The absence of coordination of mandatory management evaluation activities that would ensure that local district activities (such as New York City's application policy and procedures) would be regularly reviewed.
4. Ongoing delays in Automated System enhancements. While the issue of separate determination of eligibility was not specifically cited in the report, the continuing problem of delays in systems enhancements affects OTDA's ability to modify WMS functions to allow HRA's Job Centers to register non-public assistance food stamp applications without compromising system security.
5. OTDA's vulnerability specifically with regard to oversight of New York City policy and operations.

The findings of our review team on Food Stamp Program access issues in New York City have reinforced FNS' concern in all of these areas. The conditions cited in this report appear to have resulted from a combination of inadequate technical support to local districts during the implementation of welfare reform and a lack of thorough oversight of local district operations.

At the exit conference and in subsequent correspondence, OTDA has referred to this agency's decision to not meet with them and with HRA on matters addressed in this report. The Regional Administrator and staff of the Northeast Regional Office have met on a number of occasions with OTDA and HRA officials during welfare reform implementation . At each of these meetings, USDA's position has been consistently stated.

The vital role of the Food Stamp Program in helping households move toward financial independence involves complex policy decisions at the Federal, State

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and local level. Each of those decisions calls for a thorough and objective discussion of legal and operational ramifications. We have consistently recommended that OTDA request that HRA provide a clear written statement of proposed changes to FSP policy and procedures that would allow for just such a thorough and objective examination. We remain available to support OTDA as they work with local districts to develop effective procedures to carry out the mission of welfare reform.

**Recommendation #5** : OTDA must take immediate action to ensure that appropriate resources are in place to:

1. Provide comprehensive policy and technical support to all local districts to ensure the accurate and fair implementation of food stamp policy in the welfare reform environment.
2. Carry out consistent and effective monitoring of local district operations to ensure compliance with all applicable Food Stamp Program law, regulations, and guidance.
3. Address and correct the recurrence of widespread documentation deficiencies in the operation of New York City's Food Stamp Program.