



FEDERATION OF PROTESTANT WELFARE AGENCIES

**TESTIMONY**  
**Of**  
**The Federation of Protestant Welfare Agencies**  
**Before the**  
**New York City Council General Welfare Committee**

**Oversight: Overcrowding at HRA Food Stamp Centers & Job Centers**

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My name is Liz Accles and I am the Senior Policy Analyst for Income Security and Early Childhood Education at the Federation of Protestant Welfare Agencies (FPWA). I would like to thank Chairwoman Palma and members of the General Welfare Committee for the opportunity to testify today and for your continued leadership on behalf of low-income New Yorkers in need of public assistance seeking to access New York City's cash assistance program.

FPWA is a membership organization with a network of human service organizations and churches that operate over 1,200 programs throughout the New York City metro area. Together we serve over 1.5 million low-income New Yorkers of all ages, ethnicities and denominations each year.

Since 1989, FPWA has led the Economic Justice and Social Welfare Network (EJSWN, formerly called the Welfare Reform Network), which was founded to provide a forum for welfare recipients and advocates to promote and advocate for an adequate and accessible public assistance system. EJSWN is a coalition of over 300 organizations and individuals representing communities across New York City, including social service providers; welfare, hunger, child care and housing advocates; grassroots organizations; legal advocacy groups; and current and former welfare recipients. EJSWN's Policy Advocacy Committee launched the Access to Assistance Campaign, to work to dismantle barriers and increase access to public assistance benefits for eligible New Yorkers.

A survey conducted by the Economic Justice and Social Welfare Network to gather information about barriers faced in the welfare application process are stark, but not surprising. 46% of respondents reported long wait times were a reason for not receiving assistance. Survey respondents indicated the following impacts for applicants who could not access assistance: 36.9% faced eviction/homelessness, 73.8% experienced food insecurity – either did not know how they would feed their families presently or in the immediate future, 32% were unable to maintain or pursue employment, and 27% experience health problems or were unable to receive care.

Members of the Access Campaign also monitored the Northern Boulevard Center and Melrose Center in June and July 2011 and found lines that stretched out the door throughout

the day. A reflection of the inefficiency and counterproductive processes, many of the people waited in line for hours to correct a wrong mailing address or to submit paystubs.

### **HRA Can Control Overcrowding**

HRA faces an overcrowding emergency that is a result of high level of need resulting from a lagging economy in the wake of the Great Recession, the high numbers of required appointments, numerous administrative errors, labor intensive processes for submitting and receiving documentation, inadequate communication systems and the lack of investment in automation and technology.

In several meetings with high level HRA administrators regarding problems applicants and recipients face when trying to get and retain welfare benefits, the response we received was a claim that HRA does not control the front door.

We disagree wholeheartedly. While there are state and federal program requirements there is a great deal left to the discretion of the agency as to how it administers the welfare program. FPWA calls on HRA to use technology more efficiently, eliminate unnecessary call-in appointments, and reduce case churning by minimizing administrative errors. Before initiating a negative case action, HRA should more adequately determine whether good cause exists when an applicant or recipient does not meet a program requirement.

### **Reducing the Extraordinary Numbers of Eligibility Appointments**

A core barrier to assistance and a major cause of overcrowding at welfare centers is the sheer numbers of mandatory eligibility appointments applicants need to attend before receiving an eligibility determination. There are roughly 26 required appointments for applicants with children (20 of which require reporting for seven hour days to a vendor to fulfill application stage work requirements) and 36 for households without children (with 30 that require a full seven hour day). Despite an applicant's best efforts there is the very real fear of missing an appointment and having the application rejected. Many applicants are in crisis with no income for food, face housing crises and health problems, compounding the challenge of meeting onerous requirements.

Numerous follow up appointments are usually required to comply with a variety of additional application requirements such as mandated fingerprinting, reporting to the Bureau of Eligibility Review, and fraud investigations. HRA caseworkers can be disrespectful, intrusive, insulting, but hold a great deal of discretion when determining if an applicant is deemed compliant with requirements. To this point, failure to meet any appointment and not provide “good cause,” where a heavy, sometimes unattainable burden of proof lies on the applicant, results in a case denial.

Over the past decade, the welfare caseload has declined dramatically despite an increase in applications – there was a 35% increase in applications comparing 1997 and 2007. For those same years denials jumped from 26% in 1997 up to 42% in 2007.

### **Use of Technology**

The Bloomberg Administration should invest in more effective uses of technology. Overcrowding could be minimized through the effective use of widely accessible technological advancements.

HRA should create a facilitated enrollment program, online and telephonic application submission, and recertifications for the cash assistance program by duplicating and expanding the successful efforts in the Food Stamp and Medicaid programs, and using the New York States Unemployment Insurance program as a model. This can be achieved through an extended version of Access NYC which would not only screen for benefits eligibility but also allow individuals to actually complete and submit the applications online for a broad range of benefits. An example of an existing model is the Benefits Bank, which is an online facilitated enrollment service that helps people prepare and file applications for public benefits, such as food stamps, child care subsidies, home energy assistance, children’s health insurance, and public assistance. The Benefit Bank has sites in Arkansas, Florida, Kansas, Mississippi, Ohio, North Carolina, South Carolina, and Pennsylvania.

HRA has successfully implemented an automated system for obtaining budget letters. We strongly urge HRA to expand these types of efforts.

## **Eliminating Discretionary appointments**

There are several actions HRA can take to ease overcrowding by eliminating call-in appointments that not required by state and federal law.

- **Bureau of Eligibility Verification** - Although the state law requires fraud detection the city can use other options to meet that requirement rather than requiring multiple in-person meetings.
- **Recertifications** - HRA can also choose to require recertifications no more than one time per year. If income or household composition changes recipients are already required to report this information.
- **Call-in of sanctioned households** -HRA can also eliminate non-mandatory eligibility call in appointments for sanctioned households which often result in case closing.

## **Case Churning**

Since welfare is an income source of last resort, burdensome program requirements lead to case denials or case closures for households that remain in need of assistance and leads to unnecessary cycles of reapplications.

One component of HRA's overcrowding plan called for expanding Center 71 call-ins to include non-durational sanctions on the first day of an employment related sanction. Center 71 has proven to be a case closing mill. Between January 2008 and June 2009, 11,236 of the 11,616 cases transferred to Center 71 were closed. We are concerned that increasing the number of households sent to Center 71 will merely lead to high rates of case closing and therefore churning.

From 2003 through 2008, between 21 percent to 30 percent of New York States' public assistance cases were individuals who had closed public assistance cases for greater than one month and then returned to full public assistance status.<sup>1</sup> New York City's rate was between 25 percent to 33 percent for that same time period. Thus a sizable portion of the

welfare caseload is “churning” likely as a result of deliberate administrative hurdles mentioned earlier or the instability of low-wage employment.

FPWA calls on HRA to take immediate action to address the overcrowding emergency at New York City welfare centers. Failure to act in a timely manner reflects a complete disregard for the households the agency is charged to serve. Thank you again for the opportunity to testify today. FPWA looks forward to working with you to bring about these necessary changes.

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<sup>i</sup> OTDA .