



The Bureaucracy of Benefits:

Struggling to Access **Public
Assistance and SNAP**
in New York City

URBAN
JUSTICE
CENTER



SAFETY NET PROJECT

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About the Authors

The Safety Net Project

The Safety Net Project at the Urban Justice Center advocates for safe and secure housing and fundamental resources like food and cash assistance for underserved and marginalized communities in New York City. We combine legal services, policy advocacy, new media campaigns, and community organizing to advance the movement for economic justice.

The Safety Net Activists

Safety Net Project’s community organizing work is led by the Safety Net Activists, a volunteer group of community members who have personal experience with poverty, homelessness, and the public benefits system, and many of whom are former or current Safety Net Project clients. Since 2014, the Safety Net Activists have organized to improve New York City’s safety net programs, including Public Assistance, SNAP, and the shelter system. The Safety Net Activists’ strategies for change include grassroots organizing, policy advocacy, media campaigns, building relationships with allies, and public education to empower New Yorkers and increase awareness of individual rights.

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Many members of our team at the Safety Net Project contributed to the completion of this report. Writing and research was completed by Kiana Davis, Helen Strom, Craig Hughes, and Zak Aldridge. Claire Thomas, Nina Kayzman, Adriana Mendoza, Shezza Dallal, and Emily Ramos played important roles in survey design, collection, and analysis.

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[NOTE: As This Report Was Being Finalized, NYC Began to Discuss the Culture at HRA Centers...]

ON DECEMBER 7, 2018, JAZMINE HEADLEY, A YOUNG WOMAN OF COLOR, VISITED the Dekalb Job Center with her infant son. Ms. Headley worked as an office cleaner and relied on New York City’s childcare benefits to ensure her son would receive childcare while she tried to earn a living. When her benefits were suddenly cut without notice, she took time off work and traveled to the Human Resources Administration Job Center with her son.

After hours of waiting and asking to speak with a supervisor, Ms. Headley needed to sit down. There were no seats available in the Public Assistance waiting room, so Ms. Headley sat on the floor. As seen in a video that quickly spread across the internet, Ms. Headley was approached and violently engaged by police, clutching her son as Human Resources Administration and New York Police Department officers attempted to wrench him from her arms. She was arrested and held on Rikers Island, and Children’s Services was notified.

In recent testimony before the City Council, Social Services Commissioner Steven Banks said, “What happened at the Human Resources Administration’s DeKalb Center on Friday, December 7, 2018, was completely unacceptable and should never happen again in New York City.”¹

In a *New York Times* interview published on the same day as Commissioner Banks’ testimony, Jazmine Headley said that what had happened to her was “the story of many other people, it’s not just my story.” She continued, “My story is the only one that made it to the surface.”² Ms. Headley’s powerful insight about the commonality of experiences like hers should cause deep concern among municipal officials and serve as an urgent call to action for making reforms.

As our report shows, even under an ostensibly progressive city administration, poor people who seek aid through New York City’s Department of Social Services, or the Human Resources Administration, experience unnecessary bureaucratic barriers at every step. Women — and particularly women of color — bear the brunt of institutional disregard and abuse that occurs in the distribution of public benefits in New York City.

With input from over one hundred Public Assistance and Supplemental Nutrition Assistance Program recipients, we have developed recommendations to reduce the barriers faced each day by those receiving Human Resources Administration-administered benefits. These recommendations by no means address all the institutional issues that conceivably led to what Ms. Headley experienced. But they would take us a long way toward a more responsive and accountable public aid system, drastically improving the everyday experiences of New Yorkers in need.

Executive Summary

This report details many of the challenges that New Yorkers face as they attempt to access Public Assistance (PA) and Supplemental Nutrition Assistance Program (SNAP, also known as Food Stamps) benefits in New York City (NYC). Focusing on the interactions between individuals and the city agency responsible for administering these benefits — the Human Resources Administration (HRA) — this report is intended to highlight the myriad of obstacles that those seeking benefits face and offer recommendations to HRA to improve its processes and procedures for administering these public benefits.

For this report, the Urban Justice Center’s Safety Net Project (SNP) conducted independent research using surveys of SNAP and PA recipients across the five boroughs. In addition, the study aggregated and analyzed:

- HRA constituent complaint data obtained through Freedom of Information Law (FOIL) requests;
- published data on common barriers to SNAP access as reported by NYC non-profit organizations that assist people with obtaining SNAP (compiled publicly by the Food Bank for New York City);
- data published by the Office of Temporary and Disability Assistance (OTDA) on PA and SNAP applications and fair hearings; and
- HRA internal phone audit data obtained through FOIL request.

In 2014, the Safety Net Project published a report examining similar issues, entitled “Culture of Deterrence,” which documented the barriers faced by PA recipients at HRA offices across the City. The current report follows a four-year period of transition at HRA, in which many changes have been made under the leadership of Commissioner Steven Banks to improve PA and SNAP applicants’ and recipients’ access to public benefits. The primary goal of this report is to highlight some of the most prominent and severe issues still faced by PA and SNAP applicants and recipients and provide recommendations to HRA for further improvement of the systems it administers. A substantial history section is included to provide context that will help readers understand the gendered and racialized precedents of the public benefits system, and to shed light on how New York’s benefits administration system has historically been punitive, disrespectful and dehumanizing of those in need of public benefits. We hope to connect this research to larger social movements currently struggling for racial, gender, and economic justice.

While we found some improvements, many of the issues that we identified five years ago continue to present major challenges for constituents seeking to access benefits. Progress in these areas is urgently needed.

Our six main findings are as follows:

1. Constituents are Treated Poorly at SNAP and PA Centers (Centers). Negative interactions and mistreatment by HRA workers continue to be major areas of concern for PA and SNAP applicants and recipients. In 2017, 34 percent of survey respondents

reported that HRA workers “always” or “often” spoke to them in a mean, hostile, or nasty manner at PA Centers. Another 33 percent of respondents stated that they have had this experience “sometimes.”

2. PA Recipients Experience High Rates of Case Closings & Denials. Many benefit recipients have their cases closed or applications denied because of an unnecessarily convoluted application process and confusing HRA notices. When constituents challenge these HRA decisions at state administrative hearings, the cases are generally resolved in the applicant/recipient’s favor, indicating that these denials and closings are often in error or could be resolved earlier in the process by HRA, with less harm to the applicant/recipient.

3. Bronx Centers are Overloaded & Underserved. SNAP and PA Centers in the Bronx have significantly higher proportions of complaints by constituents in comparison to Centers in the other boroughs.

4. Phone Lines at Centers are Neglected. Centers consistently do not comply with HRA’s own phone policy, which requires that phone calls be returned within 36 hours, all phone lines be active, and that accurate voicemail messages are recorded. HRA’s internal audits showed that 64 percent of calls either were not returned and/or experienced connection or voicemail problems.

5. Documentation Errors Occur Frequently. HRA workers consistently fail to provide receipts for, and frequently mismanage, paperwork that applicants/recipients submit. Over 25 percent of SNAP applicants/recipients and over 50 percent of PA applicants/recipients surveyed stated that an HRA worker had lost paperwork that they submitted in 2017.

6. Access to Information and Resources is Limited. HRA fails to successfully inform and screen many PA applicants/recipients for additional HRA grants available to them. Information about these grants is limited and often undisclosed. Constituents stated that they would like to receive more information at HRA offices about these grants, as well as community resources.

This report will illustrate that these six findings are longstanding, rampant, and systemic. They result in hardship for many New Yorkers who are unable to reasonably access the crucial public benefits to which they are entitled and often need to survive.

We propose the following recommendations to HRA to address the findings:

1. Improve Treatment of Constituents at Centers:

- a) train all staff in a trauma-informed approach to service;
- b) hire a social worker to be onsite at each Center;
- c) reduce wait times to under one hour in order to meet with an HRA worker or supervisor; and
- d) redesign the physical space to create a more welcoming and family-friendly environment.

2. Reduce the Number of Case Closings and Denials:

- a) design notices that are more straightforward and coherent;
- b) simplify the PA application process by reducing the number of appointments where possible and providing clearer instructions regarding necessary follow-up appointments; and
- c) provide recipients and applicants with more opportunities to resolve issues before closing or denying their case.

3. Provide Better Service to Benefits Applicants and Recipients in the Bronx:

- a) ensure that services in the Bronx are proportionate to the caseload;
- b) improve workload and working conditions for staff in Bronx Centers; and
- c) strengthen training for staff at Bronx Centers.

4. Improve Job Centers' Phone Systems and Availability:

- a) create accessible rescheduling lines for all appointments; and
- b) adjust workload and staffing to ensure calls are answered and voicemails are returned.

5. Reduce Documentation Errors:

- a) improve technology access;
- b) ensure that constituents always receive document receipts; and
- c) notify constituents if they submit insufficient documentation.

6. Inform Applicants and Recipients of HRA's Additional Grants and Other Community Resources:

- a) retrain all PA workers on the array of HRA grants;
- b) institute new protocol and script requiring workers to review HRA's one-page summary regarding different grants at application and recertification,
- c) institute an information table at Job Centers specifically to provide information about additional resources, constituents' rights, and extra grants; and
- d) designate staff at each PA Center who specialize in benefits for those who are homeless.

Introduction

In 2014, the Safety Net Project published a report highlighting the challenges New Yorkers face while trying to obtain modest public benefits — namely, PA — for themselves and their families. The report, titled “Culture of Deterrence,” described the negative experiences faced by people in New York City trying to apply for or maintain PA, particularly in interactions with HRA. The 2014 report found that constituents overwhelmingly faced:

- a pattern of hostile and confusing communication with HRA workers;
- HRA workers mishandling or losing documentation after submission;
- systemic challenges to communicate or share information with HRA via phone or fax;
- long and unpleasant wait times at Centers; and
- inadequate assistance to limited-English proficiency constituents, domestic violence survivors, and individuals with disabilities.

The main suggestions for HRA published in our 2014 report were to:

- provide better customer service training to its staff;
- increase transparency and accountability measures;
- improve methods for constituents to communicate with HRA (without visiting Centers);
- reduce Center wait times; and
- increase programmatic oversight.

Shortly before “Culture of Deterrence” was published in 2014, Mayor de Blasio appointed Steven Banks as the new commissioner of HRA. Previously known as an advocate for homeless rights as a Legal Aid attorney and then as the head of the Legal Aid Society, Commissioner Banks has sought to improve HRA's transparency and accessibility. Commissioner Banks has made strides in HRA's staff training, including sensitivity trainings for center workers. He has overseen the adoption of a “Universal Receipt” to be given to all constituents who visit an HRA center, the addition of new Centers in the Bronx, and the creation of new units assigned to resolve problems upon a constituent's request for a state administrative hearing, known as a “Fair Hearing,” to challenge an HRA action regarding their benefits.

Further, under Commissioner Banks, wait times have decreased at many Centers (although as our data will show, further improvement is still needed). Technological advancements at HRA have also enabled more New Yorkers to easily submit documents and access information regarding the status of their PA and SNAP applications and cases. Additionally, Commissioner Banks has sought to limit the impact of harsh benefit reductions (known as “sanctions”) for PA recipients who previously might have experienced significant benefit cuts for a single missed employment-related appointment.

The Safety Net Project and the Safety Net Activists have been involved in and supportive of many of these improvements. The Safety Net Activists have met with HRA leadership on a quarterly basis since 2016 and offered critical feedback on several of the changes noted above, including the Universal Receipt and additional trainings for Center workers.

Despite these improvements, the Safety Net Activists and the Safety Net Project continue to interact with New Yorkers every day who face issues with HRA that cause their public benefits to be denied, cut off, or delayed. This report aims to highlight and examine the extreme burdens that are faced by New Yorkers during the application or general case processes for SNAP and PA. These issues include improperly processed documents,



negative and hostile interactions with Center staff, long wait times and improper service at Centers. Individuals also experience frequent issues with HRA misplacing their documents or failing to properly request needed documentation.

It is also evident that these issues, along with other factors, contribute to what is referred to as the “churning” of PA and SNAP cases — that is, repeated and premature case closures due to bureaucratic obstacles, even though a recipient is still in need of benefits. Our report also highlights the seemingly shrouded nature of HRA’s benefit programs and resources; constituents are often not made aware of the various benefits and services that HRA offers and that are available to them.

As mentioned in the Executive Summary, our report seeks to contextualize the current state of HRA’s PA and SNAP Centers within the broader history of public benefits in the United States and New York City. The barriers to access welfare and food stamps experienced in NYC today are consistent with longstanding governmental and societal efforts to restrict access to public benefits by those portrayed as part of the “undeserving poor,” who are disproportionately people of color and women. As we detail, bureaucratic obstacles and mistreatment have long been used as deliberate tools in order to reduce public benefit caseloads. Furthermore, cultural myths about who is and is not deserving of benefits continue to influence society’s perception of those on welfare and food stamps, and correspondingly, the treatment they receive.

While our 2014 “Culture of Deterrence” report addressed only PA Centers (also known as Job Centers), this report addresses both Job Centers and SNAP Centers. As our data shows, New Yorkers who receive SNAP benefits from HRA face many of the same challenges as those seeking PA. However, because Job Centers and SNAP Centers have different procedures and offices, we have separately analyzed the results for PA and SNAP recipients to illustrate common issues as well as to indicate data unique to each program.

Ultimately, too many New Yorkers still face a culture of deterrence in their efforts to access and maintain public benefits. As the following sections demonstrate, the current HRA administration inherited the difficult task of transforming an agency that had, for decades, focused on creating barriers to benefits access. However, as we show, the process of HRA’s transformation remains incomplete and must continue apace. The housing, food, and health of over 1.7 million New Yorkers each year is at stake.³

A Brief History of Public Assistance

The United States government provides a complex array of public aid to corporations and people of all classes, races, and genders. Public aid can include everything from Medicaid and cash assistance to government investment in public infrastructure. However, “Public Assistance” — generally defined as cash benefits to the poor, or cash assistance — is the program most often conceptualized as “welfare” in popular discourse. PA is also the most stigmatized form of public aid, and those who receive it are often condescended to, disciplined, and denied the most basic levels of dignity as they navigate complex and rule-laden bureaucracies.^{4,5} Public cash benefits, as political scientist Ange-Marie Hancock has aptly observed, are generally conceptualized through a “politics of disgust.”⁶ This societal disgust for those relying on this type of government aid is seen daily in the way benefits assistance is administered in New York City.

Benefits distribution at the state and federal levels has expanded throughout contemporary U.S. history. Nineteenth-century public assistance programs were run by private charities and organizations, often using public funds, as well as at the state and local levels (e.g. city or county).⁷ In the 1920s, state involvement in public aid programs increased with the establishment of pensions to mothers and widows, and later, the implementation of Old Age programs.⁸ With the Great Depression of the 1930s and the corresponding New Deal programs that resulted from mass working class organizing efforts, federal aid programs were expanded and placed into law.⁹

In 1935, the Social Security Act created the contemporary framework for public insurance and public aid programs, and a sharp distinction between the two.¹⁰ Social public insurance programs provided benefits to retirees who had held certain taxed jobs — most significantly, white male industrial workers — while leaving many others — disproportionately women and people of color — without access.¹¹ As Eric Laursen summarized about public insurance in its earliest iteration:

Public-sector jobs were excluded, as were self-employed persons. That left most women out of the program, since so many of them were concentrated in teaching, or government clerical jobs or in domestic service. Agricultural and domestic workers were explicitly excluded, effectively eliminating most of the African-American population. In all, more than 50% of retirees were excluded under the act.¹²

While the Social Security insurance program expanded to include many of those initially left out over the ensuing decades, Public Assistance meanwhile developed as a residual

welfare program for those left over and outside of the social insurance system. Called Aid to Dependent Children (ADC, which later became Aid to Families with Dependent Children [AFDC]), the first federal public aid program was a means-tested benefit to subsidize the income of families where fathers were “deceased, absent, or unable to work.” The racialized and gendered division of benefits and the stigmas attached to both programs developed in the initial Social Security Act have, through present day, informed the ways in which recipients of PA are viewed and treated by government programs.¹³

The 1960s and early 1970s were pivotal years in the development of the national and local welfare systems. As the number of PA recipients grew, newly published reports highlighted adversarial relationships between those trying to access benefits and those working in benefit distribution centers. In New York City many people in need did not obtain benefits due to the culture of “intimidation and deterrence.”¹⁴

In response to these barriers, several groups throughout the 1960s and early 1970s spearheaded a national welfare rights movement to expand access to benefits and push for a livable income. The movement was particularly active in New York City. Combined with an increase in funding for legal services, the welfare rights movement led to a significant increase in the number of New Yorkers receiving PA. As historian Felicia Kornbluh has pointed out, “The most rapid growth in welfare use occurred in the middle to late 1960s. In 1966, over 568,000 people in [New York City] claimed Public Assistance; by 1967, the number had risen to over 700,000. By the end of the decade, over a million people were claiming cash benefits in New York City.”¹⁵ In a major consolidation of former city agencies, NYC Mayor John Lindsay created HRA in August of 1966 to oversee the city’s social services programs.

As the economic crises of the early 1970s set in, benefits available to working class and poor people became a central focus of a developing austerity framework, designed in part to knock people off the benefits rolls and deter potential recipients from seeking PA.¹⁶ The State of New York tightened eligibility for PA and implemented compulsory work programs, while New York City shifted attention toward “fraud control,” opening HRA’s fraud control unit in 1971. The same year, New York City hired 1,000 new workers, as one report noted, “to administer a [new state-required] program requiring employables to be identified and referred to state job centers and then to public service jobs if the state could not find regular jobs for them.”¹⁷ In 1972, Mayor Lindsay aimed for zero growth to the welfare rolls utilizing a strategy focused on, in the words of one *New York Times* report, “cutting people off the rolls as new cases were being opened.” Lindsay was quoted: “I am going to force the welfare system to back up in such a fashion that they are going to hold the line... We are going to cut services, check cases, and get the cheats off the rolls — and the only way to do it is with a fine-ground filter in HRA.”¹⁸ Need for benefits, however, increased as the economic crisis deepened and jobs were lost across New York City.

By the mid-1970s, with the development of the municipal fiscal crisis, New York City teetered on the edge of bankruptcy and the federal government refused to grant necessary aid. Over the next decade, New York’s austerity measures resulted in increased closures of public services such as municipal hospitals, sanitation stations and firehouses in poor and working class neighborhoods.¹⁹ Modern homelessness developed as increasing numbers of families faced destitution. Houses burned without adequate fire services, and individuals faced a steady decline in the availability of single room occupancy units.

Gentrification increased as tax credits incentivized the construction of upscale condominiums. The imposition of tuition and the end of open admissions at the City University of New York in 1975, combined with decreasing availability of living wage jobs, led to increasingly difficult entries into the economy for working-class youth.²⁰

Under the Reagan administration in the 1980s, national poverty increased, as did homelessness. Between 1979 and 1984, the number of poor people in New York City (at or below 100 percent of the federal poverty level) rose from just under 1.4 million to over 1.7 million, disproportionately composed of people of color.²¹ Reagan, to justify attacks on safety net programs, relied on the racist and sexist image of the “welfare queen,” which was defined by the fictional image of single black mothers defrauding the welfare system and living luxuriously on public benefits.²² This racialized and gendered tale of those who received public aid rationalized attacks on PA, despite the fact that the program largely benefitted children, as well as many white people. In New York City, the Koch administration (1978-1989) emphasized stringent control of the welfare caseload throughout the 1980s. A 1987 report noted that New York City had “reduced overpayments to welfare recipients last year to the lowest level in decades,” however, “at the same time reported improperly removing more welfare recipients from the rolls than in recent years.”²³

At the federal level, the passing of the 1988 Family Support Act (FSA), an initiative of Democratic Senator Daniel Patrick Moynihan, altered the AFDC program to more strongly emphasize employment programs and child support efforts. As one welfare scholar has assessed, the changes ushered in through the FSA were largely about “the adoption of a new ‘social contract.’”²⁴ This new social contract, which emphasized “personal responsibility” of benefit recipients over the entitlement to government aid, was solidified during the 1990s.²⁵

The stigmatized, racialized, gendered and punitive framings of welfare recipients that was enforced through the “welfare queen” imagery contextualizes President Clinton’s 1996 reforms in the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA). Known generally as “welfare reform,” PRWORA established many of the rules and regulations of our current welfare system. The law’s emphasis on “personal responsibility” was key to the disciplinary and diversionary approach to benefit programs that would be embraced by policy reformers. This “personal responsibility” framing is used to place blame for economic difficulties, as well as for the challenges in obtaining and maintaining public benefits, on individuals’ actions. The rhetoric of “personal responsibility” has been a key tool in developing and enforcing the onerous bureaucracy this report discusses.

Welfare reform changed the benefits landscape. PRWORA dismantled AFDC, thereby ending cash aid as an entitlement. AFDC was replaced with a block-grant, time-limited program, called Temporary Assistance to Needy Families (TANF). With TANF, states receive an annual block grant for funding, regardless of how many people rely on the benefit at any given time. This structure restricts the program from expanding benefit amounts in times of increased economic need. Additionally, it incentivizes states to spend less on PA, as the flexible structure of the block grant allows states to shift funds that are not spent on PA to other purposes determined by the state.²⁶

After PRWORA passed, New York State passed the Welfare Reform Act in December 1997 to conform to the new federal law. The Welfare Reform Act established the Safety Net Assistance

(SNA) program, funded solely through New York State dollars, to provide assistance to those individuals not covered by the Federal Government’s TANF program. SNA provides benefits to households without dependent children or those who reach their five year federal time limit for receipt of benefits under TANF, but continue to need assistance.

In New York City however, Mayor Giuliani, who had already denounced the welfare system as too “user-friendly,” embarked on a campaign “to end welfare by [the year 2000] completely...”²⁷ regardless of New York City’s poverty level or unemployment rate. The Giuliani administration changed the name of welfare offices from “Income Support Centers” to “Job Centers,” and these Job Centers were offered financial incentives to cut their caseload by 10 percent.²⁸ The Giuliani administration worked diligently to divert PA recipients and applicants by, among other things, instituting diversionary and time-consuming mandatory appointments: a single missed appointment led to an application being denied or a case closing.²⁹ By 1997, Mayor Giuliani, in his State of the City speech, celebrated that 220,000 people had been moved off the welfare rolls and 35,000 people were in the municipal workfare program, many in positions which had formerly been unionized public sector jobs.³⁰

This philosophy of “diversion” and deterrence towards PA recipients continued under the Bloomberg administration. A 2008 report by Public Advocate Betsy Gotbaum’s office surveyed constituents about their experiences at HRA Job Centers and concluded that constituents “face a range of obstacles at Job Centers,” including long wait times, documents being misplaced, miscommunication with HRA staff, and lost records of a prior visits.³¹ Despite these findings and two subsequent reports by the Public Advocate’s office in 2009 documenting continued systemic issues with Job Centers, Mayor Bloomberg’s administration declined to take any significant corrective action.³²

In 2014, the same year that the Safety Net Project published “Culture of Deterrence,” Bill de Blasio came to NYC’s mayoral office focused on improving the public benefits system. Mayor de Blasio repeatedly highlighted the importance of enabling individuals to obtain the support they need to move into living wage jobs and escape poverty. He appointed former Legal Aid Society chief attorney Steven Banks to run and reform HRA. Banks, who had spent years bringing lawsuits against HRA for its ineffective treatment of New Yorkers, said at his appointment: “We have to make our government work for New Yorkers who need a helping hand – not against them.”³³

In sum, PA programs in the United States have historically been built on diversionary principles. Diversionary tactics include excessive, duplicative, or unnecessary HRA appointments; condescending or embarrassing experiences when interacting with frontline HRA staff; extensive wait-times for assistance; the use of blame rhetoric (“personal responsibility”) in interactions with PA bureaucracies; and the “churning” and repeated closing of cases without adequate notice or reason. Diversionary practices continue to frame PA programs in New York City and elsewhere, and as our research will show, are experienced daily by PA recipients.

While the de Blasio administration has certainly sought to engage applicants in a more welcoming manner than that of the Giuliani and Bloomberg administrations, our research shows that there continues to be pervasive bureaucratic barriers to opening and maintaining SNAP and PA cases.

Understanding the Role of Race, Gender, and Access in Public Assistance Programs

While eligibility for PA is based on income level, race is a central factor in the distribution of benefits and the stigmatized, punitive and paternalistic framework within which PA programs function.³⁴ Public assistance programs are more intensely monitored and have significantly more onerous application and maintenance requirements than other federal benefit programs. Tellingly, a recent review by the Urban Institute found that “[g]enerally, African Americans and Hispanics are sanctioned at higher rates than non-Hispanic whites.”³⁵

Given the patriarchal structure of the United States, women continue to be delegated most responsibility for raising children, performing housework, and other types of domestic labor. Households headed by women disproportionately access cash aid programs. Historically, cash aid programs have policed the lives of women in various ways, perhaps most notoriously in the 1960s “man in the house rule,” which terminated benefits for families if there was suspicion that an able-bodied man was living in the household.³⁶ The late 1990s welfare reforms focused on pushing adult recipients — largely women — “into low-wage work at a time when the value of the minimum wage was declining sharply.”³⁷ Further, caring for one’s own children is not seen as “work” by the government or in the economy and thus not waged. Accordingly, working class and poor women face the double-shift of finding and retaining low-wage work, while also maintaining responsibility for their unwaged work at home.³⁸ Women often end up also having to go through the onerous process of applying for and meeting the ongoing requirements for public assistance benefits for their families.

A Brief History of Food Stamps

Similar to public assistance, the nation’s first food assistance program originated during the great depression, largely in response to the crisis facing America’s farmers. The goal was to subsidize agriculture, absorb surplus food commodities, and quell unrest by unemployed workers.³⁹ In 1939, President Roosevelt signed the first version of the food stamp program. Called the “Food Stamps Plan,” the program incentivized low-income families to purchase booklets of food stamps by providing an extra \$0.50 towards a designated list of surplus food products for every \$1 the family purchased in stamps. By 1941, approximately four million people purchased food stamps. The program was temporarily terminated in 1943 as the U.S. ramped up military efforts for World War II.⁴⁰

After the war, the federal government sponsored some surplus food distribution, but it was not until 1961, when the Kennedy administration initiated a food stamp pilot program, that the modern program began to form. In 1964, the federal government passed the Food Stamp Act, forcing counties to choose between offering food distribution or the option to purchase stamps.⁴¹ In contrast to the New Deal-era program, food purchased with vouchers no longer had to be designated as surplus.⁴² Areas where the option of vouchers was chosen over direct food distribution saw a decline in recipients, in part because food

stamps (which still needed to be purchased) were unaffordable to the poorest of families.⁴³ As a result of public pressure and protest, and as a way to once again manage food surpluses, food aid was increasingly made available during the 1960s and 1970s.

Some scholars have drawn a correlation between protests by poor people in the mid-1960s and increased availability of food stamps.⁴⁴ In addition to militant unrest from the poor, other efforts simultaneously brought attention to issues of hunger in the same period, including the establishment of a relevant Senate committee in 1969, a White House conference, and a CBS documentary on hunger. In sum, these “incidents of social unrest by poor people and the efforts of hunger activists focused national attention on the hunger issue.”⁴⁵

Particularly important, in 1968, the Citizen’s Board of Inquiry into Hunger and Malnutrition in the United States published *Hunger USA*, a report detailing the widespread hunger and malnutrition across the country. The report concluded that “[f]ederal programs to alleviate the problem have by and large failed... [and] the policies of the agricultural committees of Congress and the Department of Agriculture have discriminated against the needs of the poor and the hungry in the interests of the agricultural producers.”⁴⁶ The Poor People’s Campaign reiterated the recommendation from *Hunger USA*, including “free stamps for the poorest families and reduced-price stamps for all program participants.”⁴⁷

Between 1969 and 1974, the food stamp program saw substantial growth from some 2.9 million to 12.9 million recipients.⁴⁸ Work was included as an eligibility requisite in 1970.⁴⁹ In 1973, food stamps were included in the national Farm Bill for the first time and by 1974, the food stamp program had been expanded to cover all counties nationwide.⁵⁰ Since 1973, the Farm Bill has set national policy for both agriculture (including assistance to agri-business and farmers) and nutrition assistance (food stamps, benefits for pregnant women and newborn children, school lunch, and other programs).⁵¹

Despite major legislative changes, “[t]he reformed Food Stamp Program rapidly grew to a major income maintenance program in the 1970s.”⁵² The Ford administration sought without avail to reduce food stamp benefit levels.⁵³ By 1977 there were some 17 million food stamp recipients, and, as some scholars have pointed out, “[b]udget watchers feared the program was out of control.”⁵⁴ The subsequent Carter administration expanded parts of the program while tightening others.⁵⁵ With Carter’s Food Stamp Act of 1977 and subsequent amendments prior to the Reagan administration, the stamp purchase requirement was ended, allowing more financially impoverished people to access aid,⁵⁶ work-for-benefits efforts were expanded, students faced new work requirements, and undocumented individuals were explicitly denied access to the benefits.⁵⁷ In many ways, the Carter-era reforms initiated conservative elements to the program that would increasingly become salient and codified. By 1981, a record high 22.4 million Americans were receiving food stamps.

Food stamps, like other safety net programs, faced severe cuts in the 1980s under the Reagan and Bush administrations. Between fiscal years 1982 and 1985, the food stamps program was slashed by some \$7 billion dollars. Among other reforms, the Food Stamps and Commodity Distribution Amendments of 1981 implemented a workfare option nationally and facilitated increased access to law enforcement for recipient records.⁵⁸

Further, those convicted of misdemeanors or felonies could now face lengthy disqualifications from food stamp aid.⁵⁹ In the 1982 Omnibus Budget Reconciliation Act, eligibility was narrowed to those under 130 percent of the federal poverty level unless the household included elderly or disabled members.⁶⁰ In 1989, requests for emergency food assistance in major American cities increased by an average of 19 percent from the previous year.⁶¹

In 1996, the PRWORA welfare reform bill implemented new restrictions and cuts to food stamps, eliminating access for almost all legal immigrants, reducing benefit amounts and offering states the option to eliminate food stamp assistance to those convicted of drug felonies.⁶² Pushback against the harmful effects of these restrictions resulted in both the restoration of eligibility for some legal immigrants and modest improvements in benefit levels in 2002.⁶³ Unlike Public Assistance, a proposal to convert food stamps into a block grant program and to further cut food stamp benefits was not approved under PRWORA, likely because the food stamps program is framed as a program for the “deserving” poor, or those who are employed in waged jobs outside the home.

Importantly however, city administrations in the 1990s and early 2000s also sought to reduce the food stamp caseload through diversionary tactics. The food stamp caseload fell by approximately 45 percent — from 1.5 million to 657,000 recipients — between December 1994 and December 2001 due to, in the words of the Independent Budget Office, “[the] policies of the Giuliani administration that made it harder to gain access to food stamps.”⁶⁴ Deterrence practices implemented by the Giuliani administration were challenged in the landmark *Reynolds v. Giuliani* ruling, which resulted in court-ordered oversight of HRA’s provision of immediate need grants and notification practices.⁶⁵



In comparison, the Bloomberg administration eased access to food stamp benefits in large part by emphasizing the program as work support rather than “welfare.” Notably, this definition of “work” meant employment in the waged job market, and not, for example, unwaged care work of raising children. In framing food stamps as a work support program, the Bloomberg administration, however, created or continued other barriers. For example, Bloomberg mandated fingerprinting for food stamp recipients⁶⁶ and refused a waiver that would have eased food stamp requirements for many able-bodied adults.⁶⁷

In an effort to reduce the stigma associated with the term “food stamps”, the program was renamed the Supplemental Nutrition Assistance Program, or SNAP, in the 2008 Farm Bill. The alignment of interests between Congressional members focused on issues related to agriculture and members focused on anti-hunger matters, along with strong corporate involvement in the Farm Bill and the framing of SNAP as a support for “deserving” poor people, has helped preserve the program in recent decades.⁶⁸ As a result, the program has become one of the country’s most effectual safety net programs, lifting 8.4 million people out of poverty in 2015, according to an analysis by the Center for Budget and Policy Priorities.⁶⁹

Despite the program’s effectiveness, however, SNAP has been under significant attack in recent years at the state and federal levels. Opponents of the program seek to portray SNAP recipients as unmotivated and undeserving of aid, using the same rhetoric that has justified restrictions on Public Assistance. Further compounding threats to nutrition assistance, the federal government published a proposed rule change on October 10, 2018 in the Federal Register regarding Public Charge. The rule would cause many immigrant communities to forego vital nutrition assistance benefits in order to preserve their future ability to obtain Legal Permanent Residency (i.e., a green card) or visa. Furthermore, the Trump administration has recently announced a plan to tighten SNAP work rules through executive order.⁷⁰

Public Assistance and SNAP Today

According to federal data for Fiscal Year 2016, there were 2.78 million recipients of TANF aid in the United States. Most are people of color: 36.9 percent identified as Hispanic and 29.1 percent identified as black, while 27.6 percent identified as white.⁷¹ In New York City, 349,761 people received cash assistance as of June 2018; another 6,504 received federal emergency assistance grants. Of these recipients, 46 percent are children. While race data is not available for the full cash assistance caseload, it is available for a subset of the caseload who access TANF, which is composed of households with children under 18 who have received cash benefits for less than 5 years. As of July 2018, TANF included 119,762 people in 50,295 households.⁷² Of the TANF recipients, 49 percent identified as Hispanic, 42 percent identified as black, and six percent identified as white. More than 80 percent of cases included an adult woman, and 30 percent included a child under three years old.⁷³ This data indicates that in New York City, those who interact with the Public Assistance program are overwhelmingly people of color, and most are families with children.

While New York has maintained a far more robust Public Assistance program than most other states, the program fails to reach the majority of families in poverty. Most recent census data shows that in New York State, for every 100 families with children living in poverty, only 42.7 received Public Assistance in 2016.⁷⁴

According to federal data for Fiscal Year 2015, there were over 45 million recipients of SNAP aid nationwide. Seventy-eight percent of SNAP households include a child, an elderly individual, or a person with disability, and 75 percent of SNAP-receiving families have at least one adult who worked in the last year.⁷⁵ The largest number of recipients were children and elderly individuals, who composed 44 percent and 10.6 percent of the SNAP caseload, respectively. More than 90 percent of SNAP recipients were U.S. born. By racial identification, the largest share of SNAP recipients were whites who identified as non-Hispanic, composing 36.7 percent of recipients. African Americans composed 26.1% of the SNAP caseload, while Hispanics of any racial identification composed 17.1 percent.⁷⁶ Today, over 1.8 million people in New York City receive SNAP.⁷⁷

Despite modest benefit amounts, SNAP plays a decisive role in reducing hunger and poverty each year. SNAP has been proven to increase high school graduation rates among children, as well as improve adult earnings and improve health.⁷⁸ Additionally, almost \$5 billion in SNAP benefits are spent at over 18,000 retailers in New York State each year, which helps support businesses and sustain jobs.⁷⁹ It is estimated that during a weak economy, each dollar of SNAP that is spent generates approximately \$1.70 in economic activity.⁸⁰

The benefit levels for both Public Assistance and for SNAP are woefully inadequate. A family of four without any additional income often receives only \$951 monthly in PA for the entirety of their non-food expenses (including rent) and \$642 at most in SNAP benefits. The average SNAP benefit in New York State equates to \$1.52 per person, per meal.⁸¹

Commissioner Steve Banks has been vocal about reforming HRA and increasing accountability to its constituents. While HRA has certainly improved, much work remains to be done. As the following sections will demonstrate, these programs provide modest but crucial assistance to over 1.6 million of the most vulnerable New Yorkers each year, with important implications for health, education, homelessness, and the local economy.

Research Methods

The research in this report relies on a number of different sources. We sought to answer the following questions: What is the current experience of those interacting with HRA in order to secure SNAP and PA benefits? How has this experience changed since 2014? What were the primary barriers that prevented eligible New Yorkers from accessing these benefits in 2017 and 2018?

First, to collect data regarding the experiences of benefits recipients, the Safety Net Activists and the Safety Net Project surveyed SNAP and PA recipients across New York

City.⁸² A total of 137 surveys were collected from SNAP and PA recipients in Manhattan, Brooklyn, Queens, and the Bronx. Sixty-nine of the survey respondents attended SNAP-only centers and fifty of the survey respondents attended PA Job Centers, while the remaining eighteen declined to identify a specific center. The surveys were collected from summer 2017 through early 2018. Survey respondents were solicited at community organizations throughout the five boroughs, primarily food pantries and soup kitchens. All respondents were current SNAP and/or PA recipients and were asked to fill out a survey on paper. The survey was available in both English and Spanish, with eight of the survey respondents choosing to complete the survey in Spanish. These surveys are not intended to be a fully representative sampling of HRA, but rather to gather a sample of experiences of PA and SNAP recipients to highlight some of the current, common problems people face at HRA centers and during interactions with HRA staff. Survey respondents were asked to reflect on their experiences at HRA in the most recent year, and not on previous experiences with HRA. The survey contained eighteen questions about a range of issues, including mistreatment by HRA workers, lost paperwork, wait times at center, receipts and accessibility (Appendix A).

Second, we reviewed and included data from the Food Bank of New York City’s Mediation Model monthly analysis. This analysis includes data on barriers to SNAP access that are reported by non-profit organizations across NYC that assist people in accessing SNAP. We reviewed the publicly-available data from April 2017 through April 2018.

We also utilized complaint data obtained from HRA via a Freedom of Information Law (FOIL) request. The complaint data reported on all complaints submitted to the HRA Centralized Complaint Unit via telephone or online for all SNAP and Job Centers from January 2015 through December 2017. Many HRA recipients are unaware of this mechanism for making complaints; accordingly, the number of recipients who experience difficulties is likely significantly higher than the number of officially recorded complaints. Nevertheless, the complaint data provides important insight into some of the primary problems experienced by people receiving SNAP and Public Assistance and allows for comparisons between service across different offices.

Additionally, we used a FOIL request to obtain data from HRA regarding their internal phone audit systems. HRA’s Family Independence Administration (FIA) Office of Program Monitoring (OPM) uses telephone audits to review the voicemail and callback systems and functionality at each HRA Job Center and SNAP Center. We analyzed the phone audit data from June 2017 through June 2018.

Lastly, we reviewed state data published annually by the Office of Temporary and Disability Assistance (OTDA) regarding Public Assistance caseloads, closings, denials, and fair hearings. Our report uses the most recently available data from the 2017 Annual Legislative Report.

1. Poor Treatment at SNAP and Job Centers

“Staff are sometimes very rude and act as if I don’t have a right to ask for assistance”
— Brooklyn-based survey respondent

Negative interactions with and mistreatment by HRA workers continue to be major areas of concern for constituents. Although our survey results and complaint data show that customer service at Job Centers has improved since we published “Culture of Deterrence” in 2014, the evidence suggests that further improvement is nevertheless necessary.

Thirty-four percent of survey respondents reported that in 2017, HRA workers at Job Centers “always” or “often” spoke to them in a mean, hostile, or nasty manner, and another 33 percent of respondents stated that they “sometimes” have had this experience. This is an improvement from what was reported in the 2014 “Culture of Deterrence” report, in which 45 percent of respondents replied that they had “always” or “often” been spoken to in a mean, hostile, or nasty manner and 36 percent replied “sometimes.” For SNAP centers, just under half of respondents reported that in 2017, SNAP workers spoke to them in a mean, hostile, or nasty manner at least some of the time. Twenty percent of respondents said that SNAP workers often or always spoke to them this way.⁸³

HRA’s complaint data provides further insight on this point. Rudeness, refusal of service, HRA employees’ refusal to identify themselves, language access issues, security staff behavior, gender discrimination, racial discrimination, and sexual orientation discrimination are among the most common types of customer-service related complaints filed against HRA.

Average Job Center Wait Time:



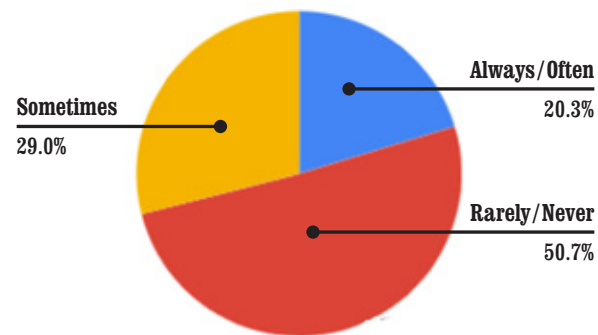
Average SNAP Center Wait Time:



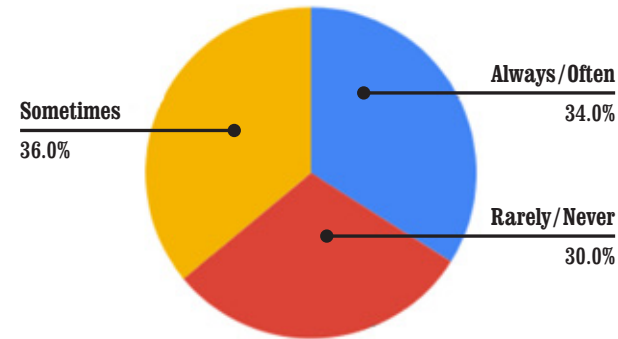
Additionally, our survey asked PA and SNAP recipients to approximate how long, on average, they had to wait at their Center before speaking with a representative. The results that we collected (reported above) varied significantly from the wait times HRA

Survey Responses Regarding HRA Workers' Communication

In 2017, HRA workers at a SNAP center spoke to me in a mean, hostile, or nasty manner:

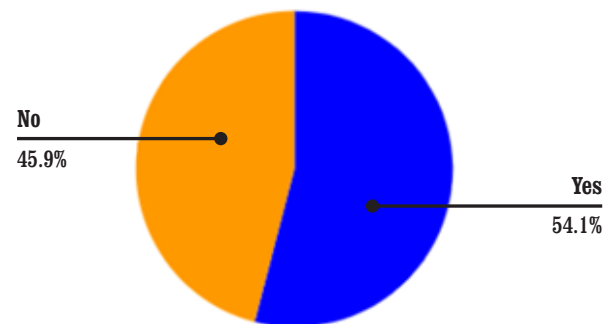


In 2017, HRA workers at Job Centers spoke to me in a mean, hostile, or nasty manner:

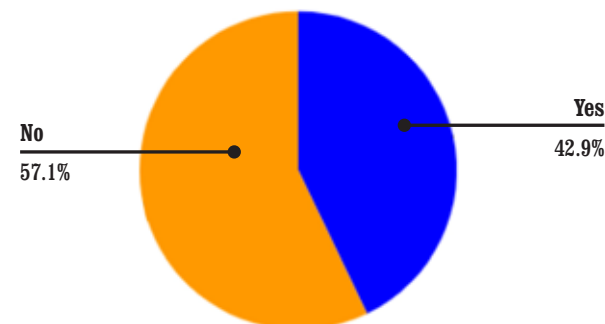


Survey Responses Regarding Disability Access at HRA Centers

If you have a disability, do SNAP centers provide services in a way that is accessible to you?



If you have a disability, do Job Centers provide services in a way that is accessible to you?



publishes on its website,⁸⁴ which reflect average wait times of 51 minutes at Job Centers and 47 minutes at SNAP Centers. We do not know the exact methodology used by HRA to calculate the wait times that it publishes on its website. A possible source of the divergence of the data could be that our survey asked how long respondents waited to speak with a worker or supervisor. HRA data, however, may be averaging wait times for all people who visit an office for any reason, which would include people using self-service scanners in the waiting rooms that only spend a few minutes at the office. If that is the case, one can expect that individuals who need to speak with a staff member experience wait times, on average, far longer than those publicly displayed on HRA's website.

On the issue of access for individuals with disabilities, our report showed that 57 percent of disabled respondents at Job Centers reported that HRA does not provide services in a way that is accessible to them. This is an improvement from the 82 percent who responded no to this question in 2014; however, significant barriers remain.

1 Recommendation 1: Improve Treatment at SNAP and Job Centers

A. Train all staff in a trauma-informed approach to client service.

In collaboration with CUNY's Hunter Silberman School of Social Work, HRA developed a curriculum designed to help workers implement a trauma-informed approach to their work. The curriculum included acknowledging the trauma experienced by HRA's constituents and the need to provide services in a sensitive manner. It also recognized the impact of secondary trauma on HRA staff and the importance of self-care in order to provide responsive services. In a June 2018 meeting with the Safety Net Activists, HRA reported that the pilot training was extremely impactful for the staff involved. We recommend that HRA develop a timeline to train all of its front-line and supervisory staff in the full curriculum by the end of 2019. We also recommend that HRA integrate the full five-day curriculum into its new staff training.

B. Hire a trained social worker to work at each Center.

HRA should hire a licensed social worker on site at every center to assist people with mental health challenges, people with disabilities, or other community members with particularly difficult challenges. This will not only improve general constituent experience, but also reduce burdens for the HRA staff at each Center.

C. Ensure that wait times to meet with HRA staff members and supervisors are under one hour.

While the ability to quickly scan and drop off documents at many Centers is a significant improvement, HRA must significantly reduce wait times for those who visit a Center in order to meet with staff or attend an appointment.

D. Redesign the physical space to create a more welcoming and receptive environment.

The physical environment of Centers can have a significant impact on the constituent's experience. The aesthetics of HRA's waiting rooms are often dreary; chairs, if available, are uncomfortable; and often, there are no accommodations for parents with children. Each Center should include an area designated for children to play. HRA should also change its policy to allow food and drink in all Centers.

2. Public Assistance Recipients Experience High Rates of Case Closings & Denials

“Currently fighting to get my food stamps back as they were cut off with no warning. And my son was removed from my case out of pure speculation”
 —Queens-based survey respondent

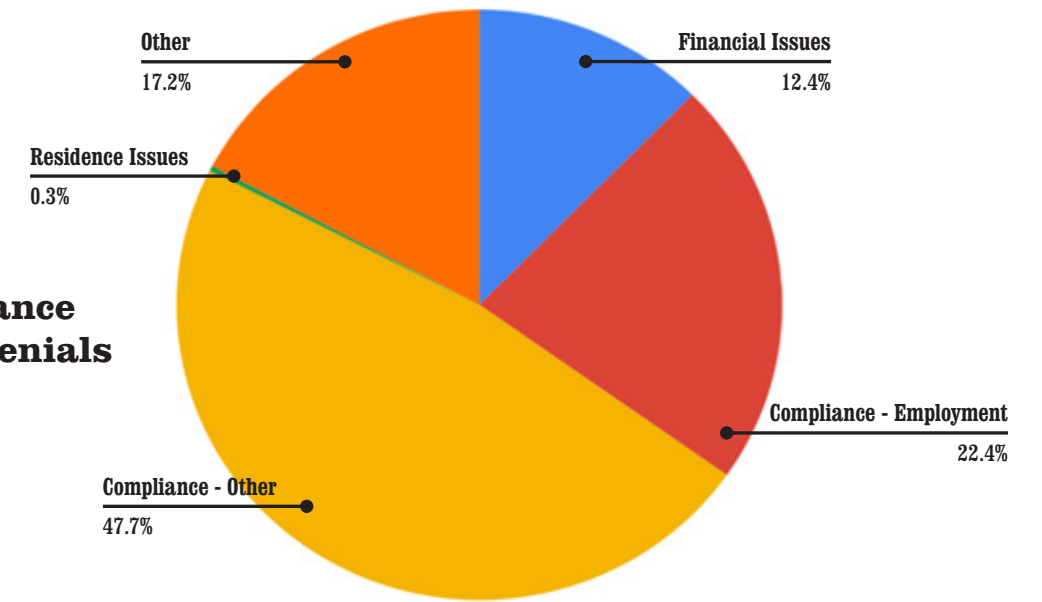
PA applicants and recipients experience an arduous and burdensome process while attempting to obtain or maintain benefits. Cases are routinely denied or closed due to unnecessary bureaucratic obstacles.

New PA applicants generally wait 30 to 45 days from the date of application submission to receive either an “accepted” or “rejected” decision for benefits. After completing an initial application interview at the Job Center, they are required to comply with various appointments and deadlines. Mandatory appointments might include fingerprinting and fraud verification, employment or education assessments, drug and alcohol screenings, child support screenings, and child care assessments. Many of these appointments do not take place at the Centers themselves, but can be scheduled in several different offices in boroughs throughout New York City and scheduled for any time of day. If applicants miss an appointment, they sometimes must return to the Job Center where they initially applied, wait to be seen by a worker, and then reassigned a new appointment. Illustratively, between July 2016 and June 2017, 26.2 percent of all PA applications were denied due to “compliance,” which usually indicates that HRA determined that the applicant failed to return a document or attend an appointment. Sixty-two percent of applications were approved, 4.6 percent were denied due to having income or resources above the limits, and 6.4 percent of applications were denied for “other” reasons.⁸⁵ Notably, 70.1 percent of all denials were attributed to “compliance” issues. Additionally, there were 175,179 PA case closings in NYC during the July 2016–June 2017 period.

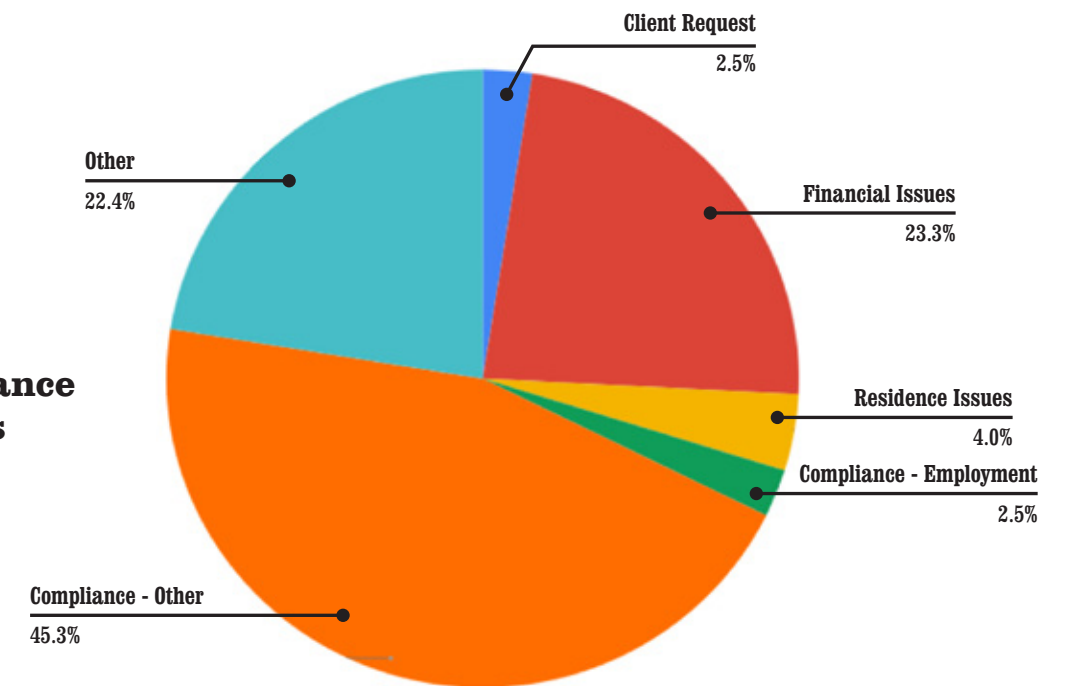
After approval, PA recipients must continue to comply with ongoing appointments and other requirements in order to maintain their receipt of benefits. They must also remain financially eligible, and continue to reside within New York City. Nearly half of PA closings (47.8 percent) from July 2016 through July 2017 resulted from compliance issues, which generally includes a HRA finding that there was a missed appointment or a failure to submit a document or questionnaire. An additional 22.4 percent of case closures were due to “Other” reasons, a category that is not defined in OTDA’s data but might indicate other difficulties in keeping up with PA requirements.

Because of language issues, literacy issues, lack of awareness about their rights, a sense of futility, or other obstacles, many of those who experience denials or closings of their benefits do not request fair hearings. However, when PA applicants and recipients exercise their rights and challenge actions related to their PA benefits in fair hearings, in 86.7 percent of cases, the issues are resolved by HRA or the outcome of the hearing favors the PA recipient.⁸⁶

Public Assistance Application Denials



Public Assistance Case Closings



Those constituents that request a fair hearing face a lengthy process, which can involve waiting three to four weeks for a hearing date, several weeks to receive a written decision after the hearing, and up to thirty days (and often much longer) for the decision to be implemented. Consequently, constituents endure negative case actions and potential lack of benefits for months at a time for issues that could be resolved by the agency without the need for an administrative hearing.

This data suggests that large numbers of New Yorkers are being churned on and off PA even while they remain eligible and in need of benefits. While the current administration has taken significant steps in the right direction, the systemic structure of bureaucratic requirements and appointments continues to limit access to benefits. Furthermore, both applicants and HRA staff spend precious time repeating laborious application processes and attending costly administrative hearings regarding issues that could be easily fixed through more effective and efficient communication systems.

We recommend that HRA take the following actions to further simplify the application and ongoing PA requirements and provide more opportunities for issues to be resolved prior to case denials and case closures.

2 Recommendation 2: Reduce the Number of Case Closures and Denials.

A. Re-design notices to be more straightforward and coherent.

Many notices that applicants and recipients receive are long and confusing, increasing the likelihood that people will not understand a requirement or miss critical information. Font size and the number of words on the page are particular problems, especially in PA denial notices, LDSS-4013, and Fair Hearing Compliance Notices, W-186C. We recommend that HRA replace the current PA application and denial notices with new notices similar to CNS (Client Notice System) notices used for SNAP acceptances or denials. Notices should include a cover page with large font and minimal text identifying the issue, the action to be taken by HRA, what is needed from the recipient, and the recipient’s rights.

B. Simplify the PA application process, especially with regard to appointments.

The PA application process would be greatly improved if Bureau of Eligibility and Verification (“BEV”) appointments occurred within the Job Center at the time of application, instead of at a later date.⁸⁷ If these appointments cannot happen at the Job Center, they should be allowed in the home borough of each applicant. To the extent that separate appointments are still necessary, we recommend that HRA provide applicants with a clear summary of all of their appointment notices — preferably on a one-page document — when they are present at the Job Center for their face-to-face interview.

C. Provide recipients and applicants with more opportunities to resolve issues before closing or denying the case.

HRA should implement automated notices to recipients before denying or closing a case. This should include phone calls and letters to PA recipients to inform them of missing documents or appointments with an opportunity to comply before closing a case. HRA staff should also proactively offer to resolve issues for constituents through conferences when constituents raise an issue either on the phone or in person at Job Centers. Too many PA recipients are still told to “apply again” or “request a fair hearing” when they communicate to HRA staff about an issue. The high percentage of Fair Hearings decided in favor of constituents demonstrates that HRA could resolve more issues at the initial point of conflict.

3. Overloaded & Underserved Bronx Centers

“They say they are going to do something and they don’t. I have to go to them 2 or 3 times, sometimes more.”
—Bronx-based survey respondent.

The Bronx has the highest percentage of SNAP recipients, but fewer SNAP centers than Manhattan or Queens.⁸⁸ There are only three SNAP Centers and six Job Centers in the Bronx, despite its significantly higher caseloads for both SNAP and PA compared to other boroughs. Furthermore, all of the SNAP centers in the Bronx are among the top five SNAP centers with the highest rates of complaints or, in other words, the highest percentage of cases that submit complaints (“complaints to cases” ratio)⁸⁹:

Borough	SNAP Centers			PA Centers		
	Complaints to case ratio at SNAP Centers (out of every 100 cases)	Number of SNAP-only cases open at any time	Number of SNAP Centers	Complaints to case ratio at PA Centers (out of every 100 cases)	Number of PA cases open at any time	Number of PA Centers
Bronx	10.37	149,302	3	14.25	70,857	6
Queens	8.31	137,837	4	13.71	65,046	4
Manhattan	6.82	80,961	4	13.59	37,614	6
Brooklyn	5.94	124,499	3	9.71	65,42	6

SNAP Centers (Ordered by rate of complaints)	Complaints to case ratio (out of 100 cases)
1. Hunts Point (Bronx)	12.02
2. Crotona (Bronx)	9.84
3. East New York (Brooklyn)	9.68
4. Fort Greene (Brooklyn)	9.23
5. Concourse (Bronx)	9.12

As noted in the charts above, Bronx Job Centers have almost twice the number of PA cases as Manhattan, but the same number of centers to serve constituents. In the most recent census data, the Bronx had the highest number of neighborhoods in extreme or high poverty (52.6 percent) and over 10 percent more of its population was below 150 percent of the federal poverty line than that of Manhattan, Brooklyn, or Queens. Queens had the lowest share of neighborhoods facing extreme or high poverty.

3 Recommendation 3: Provide Better Service to Benefit Recipients in the Bronx.

A. Ensure that services in the Bronx are proportionate to the caseload.

The proportion of Centers and Center staff should directly correlate to the number of cases in each borough. As the data highlights, there are more complaints stemming from constituents of Bronx Centers, than from any other borough. HRA errors such as lost or mismanaged documentation and improper case closings could be mitigated with a more appropriate caseload-to-worker or caseload-to-center ratio. HRA should also publish monthly data reporting the caseload per Center and number of frontline caseworkers at each of its Centers to ensure transparency and adequate services throughout all five boroughs.

B. Improve workload and working conditions for staff in Bronx Centers.

HRA should seek to increase staffing at Bronx Centers and implement measures to improve working conditions in these overloaded offices. Introducing more workers to these Centers would reduce the burden on existing staff, help decrease burnout and high turnover rates among Center employees, and improve Center experiences and case outcomes for benefit applicants and recipients.

C. Strengthen training for staff at Bronx Centers.

Similar to the recommendations listed under *Poor Treatment and Bad Experiences*, this recommendation calls for increased staff training on trauma-informed approach and self-care mechanisms, as well as programmatic trainings. Social workers on site in Bronx Centers could also help workers feel supported in difficult interactions with clients, and reduce tension in these overcrowded Centers.

4. Negligent Operation of Phone Lines

“I haven’t attempted to call HRA this year because it’s never worked”
— Brooklyn-based survey respondent

PA Centers have consistently failed to adequately comply with phone and voicemail requirements, as shown by monthly audits completed by the Office of Research and Program Monitoring (ORPM). The Safety Net Project obtained HRA memoranda through FOIL that outlines HRA Centers’ compliance with phone and voicemail protocol in 2017 and 2018.

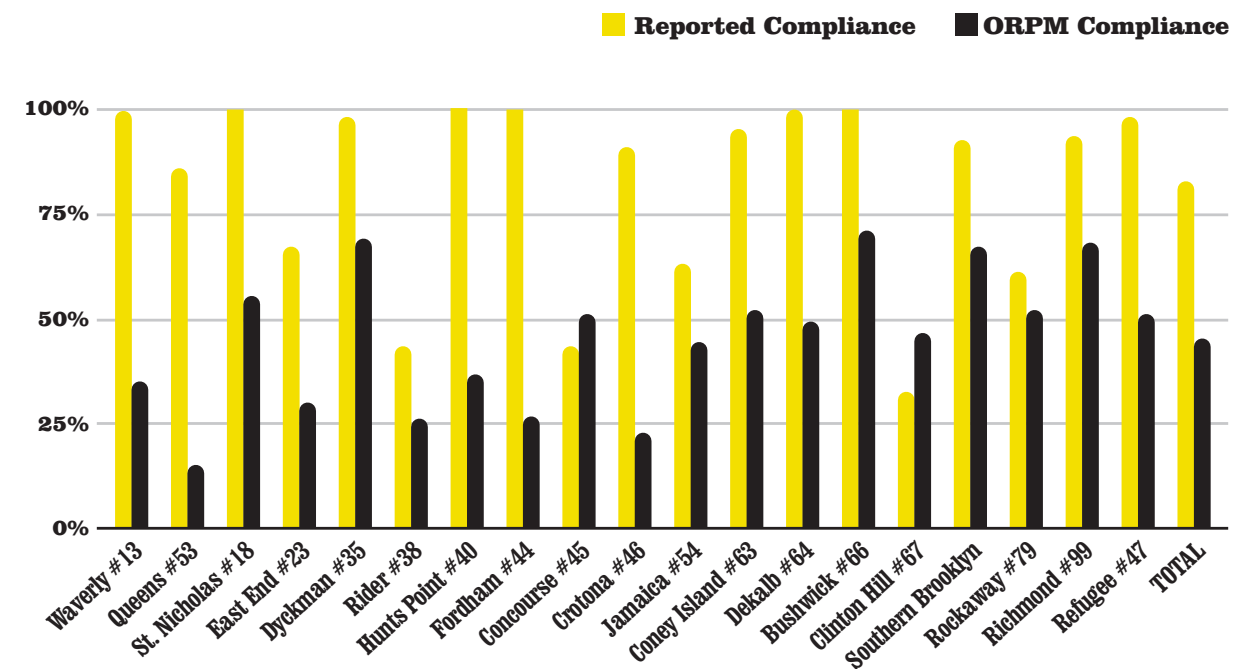
Under Commissioner Banks, HRA has significantly expanded staffing for a centralized call center known as the “HRA Infoline.” This call center represents a marked improvement and has allowed constituents to more easily speak to an HRA representative and to file complaints. However, there continue to be many circumstances in which PA

recipients must contact their local offices, and HRA must address critical gaps in these offices’ phone services.

Each Job Center reports its own phone audits every month, after which the ORPM completes identical audits and compares each Job Center’s reported compliance with their own findings. To complete the audits, both the individual Job Center and ORPM call the same ten distinct office phone numbers for the particular Job Center, and track whether the number is functional, the voicemail is accurate, and if their calls are returned within 36 hours. Compliance with protocol requires 1) operating active phone lines, 2) returning calls within 36 hours, and 3) ensuring the correctness of the voicemail script and set-up. Unreturned calls, full voicemail boxes, incorrect voicemail scripts, calls returned beyond the 36 hour window, and phone numbers that are not in service constitute non-compliance.

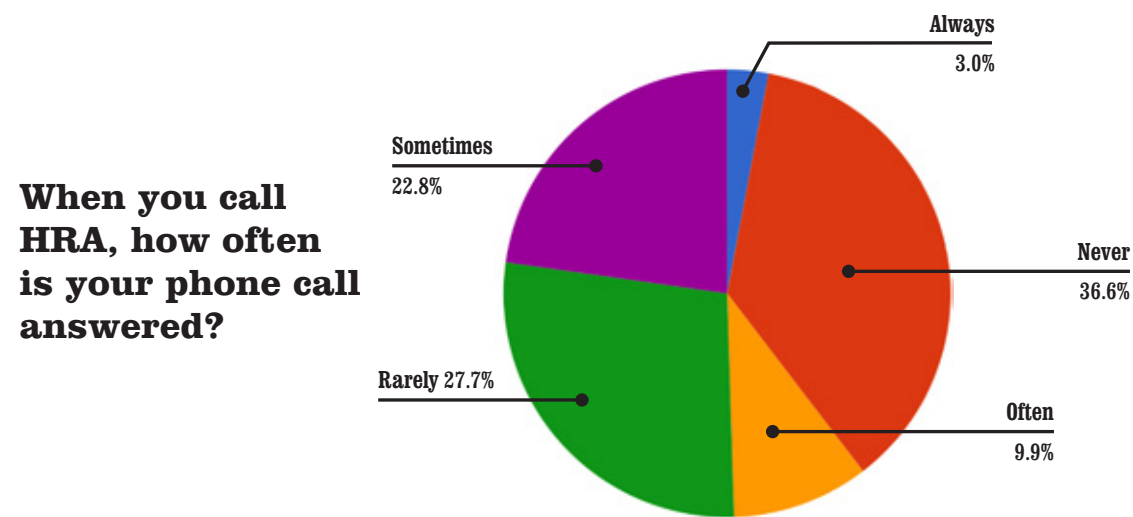
Ten of the nineteen Job Centers were found to have compliance of less than 50 percent, and almost all have grossly over-reported their own compliance with HRA phone protocol. Here are some of the aggregated findings, spanning 12 audits from June 2017 to May 2018:

1. Average compliance from all audits was 46 percent, meaning 64 percent of calls were not returned and/or there was an issue with the voicemail system.
2. On average, Job Centers in the Bronx had an ORPM compliance of 32.8 percent despite self-reporting an average compliance of 75.8 percent.
3. Queens Job Center #53 had the worst overall compliance rate (15 percent), despite reporting 86 percent compliance through 2017 and 2018.



In addition to these audits, Safety Net Activist volunteers called the general numbers publicly listed on the HRA website for all the Job Centers in October 2018 to see if any improvements had been made. At that time, publicly listed phone numbers at Concourse #45, Fordham #44, Hunts Point #40, Rider #38, Clinton Hill #67, Dekalb #64, East End #23, and St. Nicholas #18 had full voicemail boxes.

These audits were also supported by the survey data collected for this report:



This lack of responsiveness is unacceptable for an agency charged with responding to emergency needs, including households facing eviction, homelessness, and lack of food. Constituents are frequently provided with Job Center phone numbers on benefits notices in order to reschedule certain types of missed appointments, resolve urgent benefits problems, or get clarity regarding program requirements. Inability to reach HRA staff can lead to the discontinuance or denial of an individual’s benefits.

In the two years of data collected by the Safety Net Project, it is noteworthy that the *same* recommendation was consistently repeated: “Center has poor performance during this audit period that must be addressed. Center management must reinforce the voicemail policy. The staff may need retraining regarding the Agency protocol of the timeline for returning telephone calls per the PD#12-26-OPE.”

Since HRA’s reinforcement and retraining has not thus far resulted in the needed changes in these outcomes, we recommend that HRA take the following additional actions to improve phone communication.

4 Recommendation 4: Overhaul Job Center Phone Communications.

A. Create accessible rescheduling lines for all appointments.

While constituents are able to reschedule some types of appointments, other appointments can be extremely difficult to reschedule because they rely on Job Center phone lines. All appointment rescheduling should be handled by specialized phone numbers where constituents can reach live HRA staff.

B. Adjust workload and assignments for staff to ensure calls are answered and voicemails are returned.

Informal conversations with HRA staff and administrators indicate that staff do not have time to return voicemails because of their high workloads. Returning phone calls is an essential part of the work; HRA must ensure that its staff have capacity to complete this task on a daily basis, either through increased staffing at Centers or mechanisms to decrease or shift some of the workload for existing staff.

5. Frequent Documentation Errors

“I lost my [belongings that were in] storage because paperwork was misplaced at the HRA Center”
— Manhattan-based survey respondent

Application denials and case closings are very often connected to lost documentation by HRA as well as its excessive requests for documents. Survey results show that HRA workers are inconsistent in giving receipts for submitted documents.

Over 25 percent of SNAP applicants/recipients and over 50 percent of PA applicants/recipients the Safety Net Project surveyed stated that an HRA worker had lost their paperwork in 2017. Over 50 percent of survey respondents indicated that they were not offered a receipt for submitting documents when they visited Centers, and over 25 percent stated they never receive receipts for submitted paperwork.

The ability to self-submit documents using the scanner kiosks in Centers and the Access HRA mobile application has made it easier for constituents to submit necessary documentation to HRA. However, difficulties persist with HRA’s labeling and processing of paperwork, HRA fails to send follow-up requests when they need additional information from constituents, and documents that constituents mail or fax to Centers are often lost or processed too slowly by HRA.

SNAP mediation model data shows that “submitted documents not logged in the system” was regularly one of the top three barriers encountered by recipients/applicants, with 245 reported cases encountering this issue (identified by CBOs) from April 2017 to April 2018.⁹⁰

5 Recommendation 5: Reduce Documentation Errors.

A. Improve technology access.

Install scanners in every Center with clearly labeled instructions in various languages, and include information throughout Centers about the ability to submit documents from home using the Access HRA mobile application.

B. Ensure that constituents always receive document receipts.

Systems have improved so that clients who use kiosks or the mobile application to submit documents get receipts automatically uploaded into their Access HRA account and/or mailed to them (depending on their notification preferences). The HRA staff obligation to provide documentation receipts should be similarly enforced when constituents are engaging with Center workers, including during BEV and other appointments that require documentation submissions.

C. Notify constituents if they submit insufficient documentation.

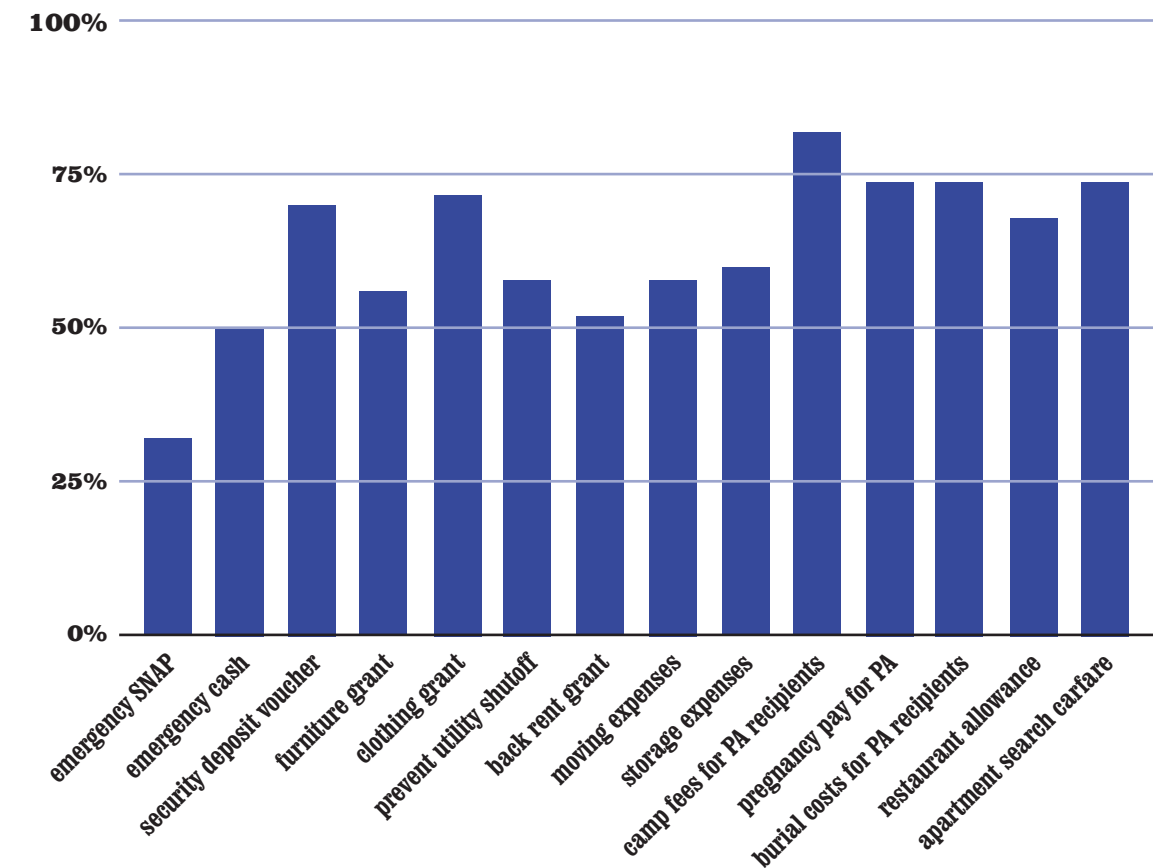
If HRA is still missing documentation, a worker should call the applicant or recipient to advise them of the missing documentation. HRA should send out the documentation receipt for any previously submitted documents and create a new notice (similar to the LDSS-1146) that states, “we received your documents on *(date)*, however we are still in need of *x document(s)* to meet *x documentation requirement(s)*”. HRA should create a new notice to send to constituents in instances when HRA decides a client’s already-submitted document is insufficient to meet a specific document requirement. This new notice should state, “the reason the document you submitted on *(date)* is insufficient to verify *x factor* is because *(reason can include “date on the document is too old/not consec,” “missing signature on letter,” “missing phone number for collateral contact,” “illegible,” etc.)* and include a new due date for the applicant/recipient to submit the necessary document.

6. Limited Access to Information and Resources

“[The staff] often aren’t aware or pretend to be unaware of the grants and job opportunities available.”
—Brooklyn survey respondent

Presently, most PA recipients do not know about many of the various grants that are available to them through HRA. At the time of applying for PA benefits, this information is not presented to them, although many would be eligible and greatly benefit from additional services. When asked if PA recipients had heard of emergency cash (immediate needs) grants available to applicants facing emergency needs, only half responded ‘yes’ in the Safety Net Project surveys. Over 60 percent of survey respondents had never heard of

Percentage of Public Assistance Survey Respondents Who Have Never Heard of HRA Emergency or Extra Grants



security deposit grants, clothing grants, camp fees, pregnancy allowances, burial grants, restaurant allowances, or apartment search carfare for households living in New York City’s shelter system. These emergency grants can make a huge difference for families facing eviction and utility turn-offs, seeking to secure apartments while in a shelter, as well as those who have faced recent natural or other unexpected disasters.

Additionally, information regarding other services and grants available to SNAP and PA applicants and recipients is not offered during interactions with HRA. Examples include information on food pantries, legal assistance, and additional HRA vouchers. Safety Net Project survey respondents overwhelmingly reported that they would like to receive the following information at Centers (percentage is the number of respondents who chose “interested”):

Legal Assistance: 80 percent of SNAP Center and 82 percent of Job Center respondents

Food Pantries: 66 percent of SNAP Center and 76 percent of Job Center respondents

Rent Increase Exemptions: 58 percent of SNAP Center and 67 percent of Job Center respondents

Civil Service Exam Fee Waiver: 62 percent of SNAP Center and 73 percent of Job Center respondents

6 Recommendation 6: Inform Applicants and Recipients of All Additional HRA Grants and Selected Community Resources.

A. Re-train all Job Center workers on the array of HRA grants.

Provide comprehensive re-training to workers on all HRA additional grants and ensure that workers conducting eligibility interviews ask constituents if they are aware of and in need of the grants available to them. HRA must make sure all Center workers understand the array of HRA grants and general eligibility for programs, and that recipients are screened for all applicable grants at each application and recertification.

B. Institute new protocol and script requiring workers to review HRA's one-page summary regarding different grants at application and recertification.

HRA has a flyer that summarizes extra grants available to PA recipients, called Cash Assistance Additional Allowances, Form W-137C. This flyer is supposed to be included in all application packets. However, because benefit applicants receive hundreds of papers as part of the application packet, this information is easily missed. HRA should add language directly to the initial application and annual recertification scripts where workers emphasize this form and briefly review the list of additional grants with constituents.

C. Institute an information table at Job Centers specifically to provide information about additional resources, constituents' rights, and extra grants.

Similar to Housing Court Answers, this table would provide general eligibility information on grants and other resources (i.e. legal service providers, food pantries, housing applications, etc). We do not propose this to be a new resource for case conferencing or general case actions.

D. Designate staff at each center who specialize in benefits for those who are homeless.

This will ensure that homeless New Yorkers are screened and issued extra grants for which they qualify, such as automated storage payments (for those in DHS shelters), apartment search carfare, and restaurant allowances. This will foster smoother transitions for families entering the shelter system for the first time, as well as provide resources on moving-related grants that these households can apply for when they locate new permanent housing.⁹¹

Conclusion

In highlighting the serious and complex ways the New York City public benefits system thwarts and hinders applicants and recipients from seamlessly receiving the assistance and support they need, this report aims to foster continued change within HRA. HRA has the authority to implement each recommendation put forth in this report, which would drastically improve New Yorkers' experiences navigating and accessing the benefits they so desperately need.

Ensuring that New Yorkers feel welcomed, respected, and able to easily access information and services is more important now than ever before under a hostile and hateful federal administration that continues to attack safety net programs and immigrants. HRA Centers are a key location where New York City can show that it truly values, respects, and seeks to uplift all of its residents, regardless of economic class, immigration status, race, or gender.

Many of the barriers to accessing benefits that we highlighted in this report do not reflect the ideas that Commissioner Banks and Mayor de Blasio both espouse. In 2014, the Safety Net Project's "Culture of Deterrence" report concluded by quoting the then-recently appointed Commissioner Steve Banks: "[HRA] should be a helping hand. Unfortunately, over the years, it hasn't been a helping hand for people that desperately need help... [I want] to make sure the agency fulfills the mission that it has."

While HRA has made strides – some very significant – to improve its operations and treatment of clients since SNP's publication of that 2014 report, the data in this report reflect that there is still much more work to be done. It is imperative to the moral and economic wellbeing of New York City that changes are adopted imminently to improve the public benefits system.

Endnotes

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86. 86.7 percent reflects the percentage of Fair Hearing Issues decided with outcomes that reflect agency resolution of the issue or the client being affirmed through the fair hearing process. The data used covers Public Assistance issues (Family Assistance or Safety Net Assistance) in all of New York State and is from

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87. BEV appointments are mandatory appointments that many applicants must attend so that HRA can further verify various elements of their eligibility in consultation with access to various computer databases. Under Commissioner Banks, HRA announced the creation of BEV offices in boroughs other than Brooklyn however, due to ongoing renovations, many clients in other boroughs continue to be referred to Brooklyn for BEV appointments.

88. On 9/14/18, HRA closed two Brooklyn SNAP centers, and has not announced any plans to open new centers. Only three SNAP centers remain in Brooklyn.

89. The complaints to case ratio was calculated using data obtained by FOIL regarding the number of complaints filed at each SNAP and Job Center each month from Jan 2015 through Dec 2017 and the number of benefits recipients with cases at each Center for each corresponding month. This data was then added and averaged over the course of the year. The final complaints to case ratio indicates the number of formal complaints made through the Central Complaint Unit per 100 cases over the course of a given year. For example, at the Hunts Point SNAP Center, there were an average of 12.02 complaints made over the course of the year for every 100 cases assigned to that Center.

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91. For many years prior to 2015, HRA required all homeless individuals and families, regardless of location, to attend one Job Center in Long Island City, the East River Job Center. This policy created severe hardship for some of the most vulnerable New Yorkers. We applaud HRA’s action to move homeless individuals back to their geographic home areas which has been a huge improvement. This recommendation does not recommend a return to centralization but recommends that HRA add additional support for these individuals at their home centers.

Appendix A: HRA Job Center Questionnaire

The Urban Justice Center is a non-profit organization and is not affiliated with the New York City Human Resources Administration (HRA). This data will be used to raise awareness about the condition of HRA Job Centers in the city, and you will remain anonymous unless you choose to provide us with your information.

1. What borough do you live in? Bronx Brooklyn Manhattan Queens S.I.

2. What benefits do you receive? Public Assistance (Cash or Rental Assistance) SNAP

3. What center do you normally go to? _____

4. In 2017, how long on average did you wait at your job center before speaking with a representative? _____

5. In 2017, has a HRA worker ever lost paperwork that you provided to them? Yes No

6. In 2017, when you provide your center with paperwork, how often are you given a receipt?
 Always Often Sometimes Rarely Never

7. If you have been to HRA since April, have you been offered a receipt when visiting your Center? Yes No
If yes, did it include the reason you were there? Yes No

8. In 2017, have HRA workers spoken to you in a mean, hostile, or nasty manner?
 Always Often Sometimes Rarely Never

9. If English is not your primary language, does HRA communicate with you in a language you can understand?
 Yes No Not applicable – I speak English.

10. If you have a disability, does HRA provide services in a way that is accessible to you?
 Yes No Not applicable, I do not have a disability.

11. Rate the cleanliness of your center? Excellent Good Fair Poor

12. Do you feel safe at your center? Yes No

13. In 2017, when you have a question(s) about your case or an appointment, do the workers provide you with answers that you can understand and directions on where you need to go? Always Often Sometimes Rarely Never

14. In 2017, have you tried to call your center to speak with a worker? Yes No

15. If you answered yes to question 14, how often has your phone call been answered (on average)?
 Always Often Sometimes Rarely Never

16. Would you like the Center to provide information regarding:

Legal Assistance Yes No Food Pantries Yes No

Rent Increase Exemptions: SCRIE Yes No DRIE Yes No

Civil Service Exam fee waived with EBT Card: Yes No

17. If you have a voucher such as LINC, FEPS, SEPS, or City FEPS, have you been able to get help with issues regarding your housing voucher at the Center? N/A Yes No

18. Have you heard that you might be entitled to HRA's Extra or Emergency Grants?

(Please check the box next to your answer)

Extra/Emergency Grants	Yes, I've heard of it.	No, I've never heard of it.
Emergency Food Stamps	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Emergency Cash	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Security Deposit Voucher	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Furniture Grant	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Clothing Grant	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Utility Payments to Prevent a Shut Off	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Back Rent	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Moving Expenses	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Storage Expenses	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Camp Fees for PA Recipients	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Pregnancy Allowance for PA Recipients	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Burial Costs for PA Recipients	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Restaurant Allowance if you don't have access to a kitchen	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Apartment Search Carfare if you live in a DHS shelter	<input type="checkbox"/> Yes	<input type="checkbox"/> No

19. Please share additional comments about your experiences at HRA Job Centers below:

20. Contact information (optional):

Name: _____ Telephone: _____

Email: _____