

APR 24

CLINTON LIBRARY PHOTOCOPY



NATIONAL COUNCIL OF STATE HUMAN SERVICE
ADMINISTRATORS

ECONOMIC SECURITY COMMITTEE
Task Force on Program Simplification and Coordination

L'Enfant Plaza Hotel -- Washington, D. C.
July 20, 1993

A G E N D A

- 9:30 a.m. WELCOME AND INTRODUCTIONS**
Julie Osnes, Food Stamp Director, South Dakota Department of Social Services
- 9:40 a.m. WELFARE SIMPLIFICATION AND COORDINATION**
ADVISORY COMMITTEE REPORT AND ACTIVITIES
Sammie Lynn Puett, Chairman, WSCAC
- 10:30 a.m. BREAK**
- 10:40 a.m. ADMINISTRATION'S PERSPECTIVE ON COORDINATION**
Kathi Way, White House Domestic Policy Council
- 11:15 a. m. LEGISLATIVE UPDATE**
Staff, House and Senate Agriculture Committees
Staff, House Ways & Means Committee
Larry Goolsby, APWA
- 11:30 a.m. AGENCY UPDATE: ACF AND FNS ACTIVITIES**
Current Coordination Activities
Proposed Regulations
Art Foley, Program Development Division, USDA-FNS
Margaret Thiel, Program Development Division, USDA-FNS
Mack Storrs, Director, Division of Policy, OFA, HHS-ACF
- 12:00 Noon ADJOURN**

Time For A Change

Remaking the Nation's Welfare System

*Report of the
Welfare*

*Simplification
and Coordination
Advisory
Committee*

June 1993

Executive Summary

HELP!

Delivery of services to the needy of this Nation has reached a crisis stage. Unless dramatic steps are taken immediately to end the administrative quagmire in local human service offices the entire system stands in danger of collapse.

The conglomeration of separate programs that supposedly comprise our "welfare system" do not form a system at all. Instead, each operates in its own separate orbit, assisting a specific population, without regard to the multiple needs of the families it serves.

Just as "tinkering" with health care programs is insufficient to resolve the Nation's health care crisis, according to First Lady Hilary Rodham Clinton, so is tinkering with welfare programs.

The current programs should be scrapped, in lieu of one comprehensive program with the goal of moving participants toward self-sufficiency.

Now Is the Time for Change!

These are the findings and recommendations of the Welfare Simplification and Coordination Advisory Committee—authorized by Congress in 1990 to examine four major assistance programs—food stamps, Aid to Families with Dependent Children (AFDC), Medicaid, and housing assistance programs.

The Committee was mandated to identify barriers to participation in one or more assistance programs and the reasons for those barriers. It also examined reasons why it is difficult for administrators to provide timely benefits efficiently to all qualified to receive them. The Committee's work culminates in this report to Congress and the cognizant Federal agencies. It recommends actions that could improve the delivery of services among the programs and simplify their rules and procedures.

The bi-partisan Committee met four times during 1992 and 1993, examining the interactions of the current assistance programs from the perspective of program administrators as well as the needy. Members heard from public witnesses, including public assistance recipients, and read statements from many more, attesting to the lack of coordination and simplicity.

The Committee shares the view of many previous workgroups that the Nation's current public assistance system desperately needs to be overhauled. Most of the existing programs do a good job of fulfilling their own missions. However, when viewed together, the "system" is an antiquated and costly conglomeration of programs with separate goals, inconsistent policies, and rules that are so complex that neither clients nor their caseworkers should be expected to understand them. The Committee concurs with the panel of experts working on the Ford Foundation Project on Social Welfare and the American Future that "the best welfare policy offers individuals both an economic opportunity and social protection in a way that minimizes the waste of taxpayers' resources."¹

1. Project on Social Welfare and the American Future: *The Common Good: Social Welfare and the American Future, Policy Recommendations*. (New York: The Ford Foundation, May 1989), p. 1.

Although the recommendations put forth by this Committee follow a long list of similar ones advocated by equally earnest groups, the Committee believes that there is cause for optimism now.

This report, the only one prepared in response to congressional concern, will be presented in the first year of a new Presidential administration. "Ending welfare as we know it," is a prime goal espoused by President Clinton. The recommendations herein comport with that goal.

We submit this report to a Congress with an unprecedented number of freshmen Members. We believe these new Members were elected by people who are fed up with the status quo—who recognize that the current system of aid evolved not by design, but through crisis.

The release of this report also comes at a time when Members are looking to make Congress more efficient by streamlining its structure. The temporary Joint Committee on Organization, which is chaired by Senator David Boren and co-chaired by Congressman Lee Hamilton, is reviewing the committee and subcommittee structure with the goal of consolidating oversight responsibility and eliminating overlap. We will try to impress upon this joint committee the urgency of addressing the fragmented jurisdiction over assistance programs.

During this time of extreme fiscal distress, both the Federal Government and the States are showing an unprecedented willingness to do things differently. The number of States applying for welfare reform waivers in recent years is evidence of the dissatisfaction with the current system, and the receptivity to change.

The time for change is long overdue, and the time for change is clearly NOW!

Barriers

Members read material on the subject of coordination compiled from work completed over the past 2 decades. A myriad of working groups, task forces, and committees have attempted to tackle the problem of welfare complexity, but with little success. That problems exist is well documented. It was not difficult for the



"In the nearly fifty years of its existence, welfare has changed to the point that no one likes this system and a lot of people act as though they don't like those who receive welfare. Change is long overdue!"

— Kay Barker
Gaston County, NC
Testimony before the
Welfare Simplification and
Coordination Advisory Committee
January 8, 1993

Committee to meet its first mandated objective: compiling a list of barriers to effective client service and to participation.

Both "**systems barriers**" pertaining to administration of the programs, and "**client service barriers**" at the delivery level, are identified in chapter VII of this report.

The **systems barriers** stem from the different laws that created each program and the administrative structures that evolved from those laws. The different mission of each program results in differing policies and procedures that hamper coordinated services. While some barriers to efficient operation are as broad in scope as lack of coordinated oversight by the Congress and the Executive Branch, others, such as insufficient use of automation, are more specific.

Client services barriers affect applicants and recipients directly, inhibiting access to program benefits. While lengthy forms and complex rules are the most commonly perceived obstacles to program participation, more subtle barriers, such as the stigma attached to participation, also deter applications. Many people, especially the elderly, view receipt of almost any form of assistance as humiliating. Only 59 percent of persons eligible for food stamps actually received them in 1989.

Previous Efforts

With such obvious and well-documented problems, one might wonder why the barriers were not eliminated years ago. Solutions are not simple and consensus is not easily reached. Chapter IV describes previous attempts at reform and why most have failed.

The **cost of program change** is paramount among the obstacles to reform. Any change in eligibility requirements or benefit levels affects program costs. Given the amount of funds disbursed by the programs, the fiscal magnitude of program changes can be tremendous. For example, raising the AFDC asset limit from the current \$1,000 to the \$2,000 limit of the Food Stamp Program would allow more people to receive AFDC. Such a change would have increased AFDC costs by \$135 million in fiscal year 1992. In addition, since the new AFDC recipients would be categorically eligible for Medicaid, costs for that program would increase dramatically.

Other reasons for inertia in achieving program conformance include tension between State and Federal responsibilities, congressional and Executive Branch inattention to the administrative aspect of coordination, and competing constituencies. An example of an unsuccessful attempt at simplification is President Nixon's proposed Family Assistance Plan of the early 1970's. The plan would have created a national cash welfare system with uniform eligibility and minimum benefit levels that States could supplement. The benefit levels under the proposal would have exceeded the AFDC grants in some States and been lower than the grants in others. The changes were opposed by client advocates from States with high AFDC grants who did not want to see people get less aid, as well as those from States with low grants, who did not want to see more people added to the public assistance rolls. The proposal failed.

*"We want people to get work...we
want them not to lose anything by
getting the work..."*

— Senator Daniel Patrick Moynihan
Congressional Record
June 16, 1988

Guiding Principles

Principles were developed to guide the Committee's deliberations. They were adhered to when recommendations for change were formulated. The shared philosophy of treating persons with respect was an overriding influence. The 10 principles are:

1. *Treat Persons with Dignity and Respect*
2. *Strengthen Families*
3. *Direct Programs to Address the Entire Spectrum of a Family's Needs, Not Just the Discrete Needs of Individuals*
4. *Promote Individual Responsibility*
5. *Empower Persons to Move Off Assistance and Toward Independence*
6. *Make Work More Rewarding Than Assistance*
7. *Allow Flexibility In Programs to Accommodate State, Local, and Individual Differences*
8. *Focus Success Measures On Persons, Not On Processes*
9. *Use Public Funds Efficiently*
10. *Build Partnerships with the Private Sector*

Recommendations

In considering the actions it would recommend to the Congress and the Executive Branch, the Committee discussed a wide range of options. The Committee chose not to ignore issues peripheral to simplification and coordination of the four programs. Broad issues including adequacy of benefits, work incentives, and the dynamics of program interactions were studied as were detailed technical proposals to coordinate policies and procedures.

In considering just how specific it wanted to be, the Committee deliberated over an impressive document recently produced by the American Public Welfare Association (APWA) in conjunction with the Food and Nutrition Service of the Department of Agriculture (USDA) and the Administration for Children and Families of the Department of Health and Human Services (HHS). The document, compiled over the past year and a half by program administrators, identifies 57 differences between the Food Stamp and AFDC Programs.

Some of the differences are rooted in statute and only congressional action can eliminate them. Others are disparities in regulations and can be addressed by the Federal agencies. The Advisory Committee recommends that the Clinton Administration immediately review the disparities that are rooted in regulation, not statute, and provide a timely and full response to the Task Force recommendations. This Committee further recommends that the appropriate congressional committees analyze the program differences based in statute, and that the House and Senate subcommittees with jurisdiction over the programs hold joint hearings to develop a legislative reform package to conform the two programs.

The Committee was also impressed by the work of the National Commission for Employment Policy (NCEP) in its October 1991 Special Report entitled *Coordinating Federal Assistance Programs for the Economically Disadvantaged: Recommendations and Background Materials*. The recommendations in this report parallel many of NCEP's recommendations.

The Committee heartily recommends that the White House Domestic Policy Council and Congress review the recommendations contained in the NCEP report for implementation in conjunction with APWA's recommendations and those put forth by this Committee.

■ *Primary Recommendation*

The primary recommendation of the Committee is to **replace the numerous programs that currently serve the needy with one, family-focused, client-oriented, comprehensive program.** The three **key criteria** for the program would be 1) simplicity of design; 2) service tailored to need—three broad, time-based categories of assistance (short-term, extended, and long-term) with a single case manager for each family; and 3) benefits contingent upon progress toward self-sufficiency.

This program would provide a consistent, coordinated, and simplified approach to meeting the interrelated needs of low-income individuals and families while they are working toward self-sufficiency. Service would be tailored to the client through the use of a self-sufficiency plan designed to match the needs of each family member, and the family as a whole, to appropriate services. Although actual service delivery may be provided by separate State and local agencies and private sector organizations, the program would be administered by one agency at the State level. Administration at the Federal level would also be centralized in one agency and legislation would evolve from a single committee in each Chamber of Congress.

Given the complexity of the task, this Committee did not have sufficient time or resources to design the comprehensive program it envisions. This must fall to Congress and the Federal agencies, or a special task force given this single charge. However, the Committee feels strongly that the design concepts must reflect the principles laid out in this report. Integral elements of the program include:

- a single point of entry with one application form;
- common definitions and rules on income, deductions, resources, and nonfinancial eligibility criteria;
- a single eligibility standard (means test) for determining eligibility; and
- partnerships between public and private sector programs to provide coordinated services.

A comprehensive program addressing the multitude of human needs would be simpler to administer than the jumble of programs that currently exist. Common definitions, eligibility requirements, and benefit payments add to the desirability of a comprehensive program. Eliminating duplicative bureaucracies will reduce administrative costs, saving money that can be used, instead, for client services.

If Congress and the Executive Branch seriously wish to bring simplicity and coordination to the public assistance network, the Committee believes this recommendation is inescapable.

"It's time to honor and reward people who work hard and play by the rules. That means ending welfare as we know it — not by punishing the poor or preaching to them, but by empowering Americans to take care of their children and improve their lives. No one who works full-time and has children at home should be poor anymore."

— Governor Bill Clinton and
Senator Al Gore
*Putting People First:
How We Can All
Change America*, 1992

■ **Interim Recommendations**

The Committee recognizes that its recommendation for one comprehensive program will not come about overnight. In the interim, other steps can and should be taken to improve the current state of public assistance and provide immediate relief to program administrators and the needy.

Therefore, the Committee recommends that Congress review the interim recommendations below and take immediate action to implement those recommendations requiring legislative action. Once legislative action has been completed and for those recommendations that do not require legislative action, the Committee recommends that the President direct the White House Domestic Policy Council to take the lead in coordinating implementation among the Federal and agencies.

The interim recommendations are categorized as either "Systems" or "Client Services."

Systems recommendations are:

1. Form a work group of the chairs of the relevant congressional committees to ensure that all legislative and oversight activities involving public assistance programs are coordinated.
2. Ensure that all low-income Americans have access to quality health care.
3. Establish uniform rules and definitions to be used by all needs-based programs in making their eligibility determinations, including:
 - a. common definitions of countable income, allowable deductions, resources, and household composition;
 - b. conversion of food stamp benefits to a flat allowance for AFDC families; and
 - c. establishment of a standard shelter and medical deduction under the Food Stamp Program for non-AFDC households.
4. Expand the demonstration project authority for all programs to allow for the waiver of both statute and regulation. Cost neutrality should not be an overriding criterion for Federal approval of demonstrations or welfare reform initiatives.
5. Allow States to make effective demonstration projects permanent and/or adopt successful systems tested in other States.
6. Modify audit and evaluation procedures to focus primarily on the success of individuals and families in reaching self-sufficiency as the standard for accountability to determine the success of the programs.
7. Establish a uniform implementation timeframe for all regulatory changes and a common date for implementing these changes, including cost-of-living adjustments. Coordination with non-needs-based programs, such as Social Security Administration Programs and Veterans benefits, should be stressed.
8. Encourage States to form public/private partnerships to meet client needs.
9. Combine employment and training programs for the economically disadvantaged into one program.

Client Services recommendations are:

1. Streamline the verification process.
2. Use a single case manager for all public assistance programs and services.
3. Permit the sharing of client information among agencies.
4. Make information on eligibility available in more public places, e.g., libraries and post offices.
5. Develop tables to be used by clients to determine how benefits may be impacted as a result of anticipated changes in household circumstances, such as changes in income and household size.

The Committee's recommendations are discussed in detail in chapter VIII of the report.

The time to act is now. If these issues are once again ignored because of their cost or complexity, we can look forward to years of legislative gridlock, high turnover rates among disgruntled assistance workers and worst of all, lost potential of many, many Americans. ■



Simplification/Coordination Advisory Committee Report

Summary

On July 1, 1993, the Welfare Simplification and Coordination Advisory Committee was slated to release its report recommending improvements in the major public assistance programs including AFDC, food stamps, Medicaid, and low-income housing assistance. The committee was created through a provision of the 1990 farm bill that required it to identify barriers to access and efficient administration caused by program differences and conflicts and to recommend changes to remove those barriers. Sammie Lynn Puett, a former commissioner of the Tennessee Department of Human Services, chaired the committee and three current state and local human service administrators were among its 10 members. The primary recommendation of the report, *Time for a Change: Remaking the Nation's Welfare System*, is a single "comprehensive program" consolidating present low-income programs with the duration of assistance varying by family need. While the single program concept is developed and debated, the group is urging immediate implementation of a number of interim recommendations that can be applied to existing programs. Many of the interim recommendations are consistent with proposals made by APWA.

Background

Simplification and uniformity in public assistance programs were already top concerns of administrators by the time the farm bill came up for reauthorization in 1990. States made a number of specific coordination recommendations for the Food Stamp Program that year, but also urged Congress to require a comprehensive study of ways food stamps and AFDC could be brought into greater conformity. Interest in Congress had also existed for some time; a provision of H.R. 1720, the House welfare reform bill of 1987, would have established a commission to study AFDC-food stamp coordination. The coordination proposal was dropped during the House-Senate conference on the bill. The 1987-88 welfare reform debate resulted in the Family Support Act (FSA) and reflected many recommendations made by the state administrators in the 1986 report, *One Child in Four*. The administrators had also recommended the Family Living Standard (FLS), a nationally mandated, state-specific cash grant that would take the place of AFDC, food stamps, and Low Income Home Energy Assistance Program (LIHEAP) payments; FSA did not include the FLS but did mandate a study of the concept. That study is still in progress.

A coordination study provision similar to the one in H.R. 1720 was included in early versions of the 1990 food stamp reauthorization legislation, and received strong state support. The language remained in the final bill but was expanded in scope to include Medicaid and housing assistance programs. The provision became section 1778 of the farm bill (P.L. 101-624) and established the Welfare Simplification and Coordination Advisory Committee to include between seven and 11 members drawn from administrators, client advocacy groups, and others with expertise in the programs to be addressed. The committee was to report its findings to Congress by July 1, 1993.

Advisory Committee

The committee's membership was not announced until March 1992, when Agriculture Secretary Edward Madigan named 11 persons to the group. Named chair was Sammie Lynn Puett, vice president for public service and continuing education at the University of Tennessee. Puett served as commissioner of the Tennessee Department of Human Services from 1980 to 1985. Three current human service administrators were among the members: Thomas Eichler, secretary of the Delaware Department of Services for Children, Youth and their Families (formerly secretary of Health and Social Services); Mary Deyampert, director of the North Carolina Division of Social Services; and Ray Garcia, director of the Bureau of Program Planning and Development for the Los Angeles Department of Public Social Services. Also on the committee was an eligibility worker, Juan Ramos of Southern Dona Ana County, New Mexico. Other members included antihunger advocates, state legislators, a housing authority director, and a health policy expert.

The committee met four times between May 1992 and March 1993, and heard public testimony from a broad spectrum of groups and many state and local human service agencies. APWA staff made presentations at each meeting and provided a number of documents to the committee. Members also made several site visits to active examples of program coordination, including the Family Independence Program in Washington State, a collaborative housing-human services project in Charlotte, North Carolina, and Delaware's State Service Centers.

Previous Efforts

In writing its recommendations the committee reviewed a number of previous proposals to simplify and coordinate pro-

grams going back over 20 years, most of which led to little or no change. The report's bibliography of books, articles, and studies touching on the issue runs eight pages in length. The committee cited several reasons why change has been so difficult to achieve. One of the most frequent is that alignment of policy requires one program's benefits to rise or fall to match the other's. If no family's benefits are to be cut—which many advocates and members of Congress consider a nonnegotiable condition for program change—then the budget impact of many changes is substantial. Unwillingness to cut any benefits combined with the difficulty of funding benefit increases has spelled political defeat for many proposals. Even when funding increases have been voted, they typically are used to expand particular existing benefits without regard to conformity.

Another reason is that no consensus has ever been reached on whether existing programs should be entirely replaced or kept basically intact while improving or replacing some of their elements. Simplification and coordination have also traditionally been a low priority with both the executive and legislative branches, particularly because of multiple committee jurisdictions and split federal agency responsibilities. Strong constituencies and well organized advocacy networks also exist for each of the several programs, whereas no correspondingly strong push for conformity has heretofore existed.

Much of the inertia in the present system can be traced to its piecemeal development since the 1930s. The committee noted that this patchwork of programs has dealt in each instance with a particular symptom of poverty, and as each was added there was little or no thought given to whether the accumulating programs would interact as a system. The programs' original structures have remained intact and there is no mechanism to remedy present conflicts or prevent new ones. The resulting fragmentation frustrates both caseworkers and those needing assistance. Those who need service from more than one program have no central location to get information; face lengthy, complicated eligibility requirements; and will be served by an array of workers each of whom usually sees only a "piece" of the family. The report quotes Rep. Bill Emerson (R-Mo.), a long-time proponent of "one-stop shopping," as saying that "the ability of those in need to finally receive assistance often reflects more on their stamina than on the efficiency of the programs."

Program Barriers

One of the committee's mandates was to investigate barriers

that prevent or discourage client participation and understanding. The report identifies a number of "client services barriers" including lengthy forms and complex rules and the stigma attached to program participation. It also lists "systems barriers," defined as hindrances to effective administration and including lack of coordinated oversight by Congress and the executive branch and insufficient use of automation. The report also cites insufficient funding, restrictions against state and local experimentation, inadequate program evaluation, and confidentiality restrictions that prohibit needed communication among agencies.

The report criticizes the federal quality control (QC) system for focusing too heavily on regulatory compliance rather than success in promoting client self-sufficiency. The present QC system relies on process measures instead of outcome measures. The report notes that many blame QC for the complexity of the application process and for an environment that forces administrators to focus on avoidance of sanctions and on vigilance against fraud rather than service to clients.

Recommendations

The committee chose to make recommendations that were generally broad in scope and to avoid detailed proposals. It did make reference to and recommend consideration of several existing detailed proposals for program reform, including APWA's December 1992 recommendations to conform and simplify the AFDC and food stamp programs (see *W-Memo*, February 1993). The committee urged immediate consideration by the Clinton administration of APWA's recommendations for regulatory changes, and by Congress of the statutory proposals through joint hearings between the committees with jurisdiction over the two programs.

The committee also cited the work of the National Commission for Employment Policy (NCEP), among whose 1991 recommendations were that Congress should simplify its committee structure and oversight procedures, eliminate conflicting terms and definitions among public assistance programs, and combine into one agency all employment and training programs serving low-income participants.

The committee report describes a number of demonstration projects and waivers under which varying degrees of program simplification and uniformity are being tested, and notes that waiver authority varies considerably from one program to another. The report also discusses variations in the form of benefit

delivery including food stamp cash-out demonstrations and electronic benefit transfer (EBT) systems. While the examples represent a variety of approaches that exhibit some success, the report notes that all have been established in piecemeal fashion and do not represent any national, coordinated effort.

Finally, the committee adopted 10 Guiding Principles it said would shape its final proposals:

1. Treat persons with dignity and respect
2. Strengthen families
3. Direct programs to address the entire spectrum of a family's needs, not just the discrete needs of individuals
4. Promote individual responsibility
5. Empower persons to move off assistance and toward independence
6. Make work more rewarding than assistance
7. Allow flexibility in programs to accommodate state, local, and individual differences
8. Focus success measures on persons, not on processes
9. Use public funds efficiently
10. Build partnerships with the private sector

Single-Program Recommendation

The committee's primary recommendation is to "replace the numerous programs that currently serve the needy with one, family-focused, client-oriented comprehensive program." Such a program must have a simple design; service provided on a short-term, extended, or long-term basis depending on need; and benefits "contingent upon progress toward self-sufficiency." The single program should be administered by a single federal agency and single state agency, although actual service delivery could be carried out through agreements with other agencies. The committee particularly encourages "partnerships between public and private sector programs to provide coordinated services." The program would have a single point of entry with one application form, common definitions and rules for income and other eligibility criteria, and a single means test. The committee believes the single program would reduce administrative costs and be far more accessible to clients. If Congress and the executive branch are serious about simplification and coordination, the committee states, "this recommendation is inescapable."

Clients and their case managers would develop a self-sufficiency plan matched to family needs, with definable goals and deadlines that must be met if assistance is to continue. Those

already having work skills and having only temporary or minor hurdles to self-sufficiency would receive short-term assistance. A second group would receive "extended assistance," defined as help for serious or multiple or serious barriers to self-sufficiency such as illiteracy or lack of training. A final group, those who would likely never become independent (because of disabilities, for example), could receive long-term help.

The committee acknowledged it did not have the time and resources to flesh out its single-program proposal, a task it said should be finished by national policymakers such as the White House Domestic Policy Council. Among the issues it cites as needing further study are whether present levels of assistance are adequate, exactly which programs and which disadvantaged groups should be taken into the single system, whether all benefits would be cash or some remain as in-kind or vendor payments, and whether there should be a national benefit floor to replace the current income stabilizing effect of the Food Stamp Program. The committee also did not specify what the lengths of the short-term and extended assistance time periods should be.

Interim Recommendations

The committee said it recognizes the "tremendous political ramifications" involved in replacing present programs with the single-program concept. It therefore developed interim recommendations it said can be taken in the short term, and urged Congress and the White House Domestic Policy Council to take "immediate action" to implement these recommendations. The committee said the potential financial impact of simplification and coordination should not be used as an excuse to delay needed reforms. Discussion of costs, the group said, should focus on the benefits of long-term gains rather than on upfront costs alone; the committee's recommendations should produce substantial long-term benefits including lower program costs and more individuals and families who become productive, tax-paying citizens.

"Systems" Proposals

The committee listed the following interim "systems recommendations" that most directly affect state and federal administration:

1. *Congress should form a "work group" of chairs of all relevant committees to ensure programs are coordinated.* The committee identified seven full congressional commit-

- tees that oversee income transfer programs, who together with the chairs of the appropriations committees should ensure that legislation is coordinated across program lines and that conflicting rules are allowed only when a requirement is "unique to the main mission" of one of the programs, such as the parental deprivation requirement in AFDC.
2. *All low-income Americans should have access to quality health care.* The committee urged enactment of a health reform plan so persons on public assistance would no longer fear losing health coverage if they move into the workplace. The plan should be one that does not place additional taxes on employment.
 3. *Uniform rules and definitions should be used by all needs-based programs in making their eligibility determinations.* Programs should to the maximum extent possible have the same definition of countable income, deductions, resources, and household composition; the same rules for exclusions and disregards; and the same procedures for application processing and change reporting. The committee also recommends that food stamp benefits should be converted to a standardized allowance for AFDC families, based on household size and adjusted to make up for low-benefit states. Finally, there should be a standard food stamp shelter and medical deduction for non-AFDC households, with amounts determined through information obtained in demonstration projects.
 4. *Demonstration project authority should be expanded for all programs; cost-neutrality should "not be an overriding criterion" for federal approval.* Flexibility in granting waivers should be expanded; cost should be an important consideration but the government should drop its current requirement for strict cost-neutrality, particularly over a short period of time.
 5. *States should be allowed to implement permanently their own or other states' successful demonstration projects.* The committee believes strongly that the many successful experiments operated at the state and local levels should be allowed to continue rather than having to terminate at a predetermined date.
 6. *Audit and evaluation procedures should have as their standard of accountability the success of families and individuals in reaching self-sufficiency.* Programs should concentrate more on outcome measures rather than process measures as is now almost universally the case. The committee commends the move toward outcome measures in the food stamp and AFDC employment and training programs. The committee does not propose to eliminate all process-based measurement, saying that timeliness and accuracy standards, for example, should be maintained.
 7. *Regulatory changes should have a uniform implementation timeframe as should cost-of-living adjustments, including those of nonneed-based programs like Social Security.* The committee calls for federal program changes to be issued once a year rather in a continuous stream. The group cites cost-of-living adjustments (COLAs) as a particularly disruptive example of uncoordinated practice among the various assistance programs as well as Social Security and SSI. The report suggests a standard implementation date, such as October 1 or January 1, for all COLAs and regulatory changes. It also proposes a 120-day minimum timeframe for allowing states to implement all regulatory actions.
 8. *States should be encouraged to form public/private partnerships.* The committee urges that services provided by the public and private sectors be "intimately linked" so that needy persons can access both systems in a complementary and coordinated manner.
 9. *Low-income employment and training programs should be combined into one program.* The committee recommends that the food stamp employment and training (E&T) program, the AFDC JOBS program, the Department of Labor's JTPA program, and other relevant job training programs be merged into one program under one federal agency.
- ### **Client Service Proposals**
- The committee also recommends the following "client services" proposals:
1. *The verification process should be streamlined.* The committee recommends targeting of verification requirements to households in high-risk categories, a step that would cut administrative costs and reduce the burden on recipients to provide information to multiple offices and workers.
 2. *A single case manager should be used for all public assistance programs and services.* The committee advocates the use of case managers as an integral part of its single-system concept, but also as a change that can be implemented now as well. A single case manager should broker and coordinate services necessary for self-sufficiency, act as liaison to other service providers, and advocate for clients.

3. *Agencies should share client information.* The legitimate needs of agencies to share client information often conflicts with present law governing privacy. The committee urges that a common policy be established under which information could be shared among all programs at the federal, state, and local levels while retaining arrangements that guarantee confidentiality.
4. *Information on eligibility should be available in more public places, such as post offices and libraries.* The committee recommends broader distribution of program information materials so the public can learn about assistance programs before contacting local offices. This would improve program outreach and reduce the number of applications denied or delayed because of misunderstanding and lack of information. The success of this recommendation would be dependent on simpler program requirements and simplified, combined application forms.
5. *Tables should be developed that clients may use to quickly determine the impact of anticipated changes on household circumstances.* It is presently very difficult for clients to know how a change in income or other circumstances will affect their benefits. Tables or charts conveying such information in a clear manner would be very valuable for those wanting to determine, for example, the impact of getting a job.

Disincentives to Work

The report devotes a chapter to the issue of disincentives in welfare programs and the problem of "making work pay." It reviews the various program changes that occur when clients go to work, including the variety of benefit reduction rates (rates at which program benefits decline for each additional dollar earned). The report urges that the relationship between benefits and earnings should clearly make work more attractive. To achieve this the benefit reduction rate must reduce benefits gradually so that as a household approaches the income limit benefits near zero. If benefits are reduced too slowly, the family experiences a "notch"—a sudden end to assistance income when the last few dollars of earned income make the family completely ineligible. If benefits are reduced quickly, on the other hand, families will rationally make the choice to continue on public assistance rather than seek work or increased earnings.

Outlook

Press conferences and congressional staff briefings on the report were held in Washington at the end of June preparatory to its official release July 1, and the report has attracted considerable interest among policymakers. The House Agriculture Committee has already made tentative plans for hearings on issues raised by the report, and will specifically include discussion of APWA's simplification and coordination recommendations. Several observers note the report comes at a time when interest in welfare reform is peaking, and that the anticipated debate over the administration's welfare reform plan may provide opportunities to enact some of the report's recommendations.

The committee emphasized repeatedly throughout the report the urgent need to take these actions at once to relieve pressure on the public assistance system. According to the report, "Delivery of services to the needy . . . has reached a crisis stage," and the "administrative quagmire" in human services must be ended or "the entire system stands in danger of collapse." The committee is cautiously optimistic that its work may actually produce results this time because of its release in the first year of a new administration; the unprecedented number of freshmen members of Congress, many of whom were elected with a mandate for change; the concern in Congress to streamline its operations and fragmented jurisdictions; and the widespread determination at all levels of government to find new ways to deal with fiscal crisis. States will certainly continue to follow the coordination and simplification dialogue with intense interest; as caseloads keep setting new records and as program regulations proliferate, human service administrators will be in the forefront of those seeking relief.

—Larry Goolsby

IN COMING ISSUES OF THE W-MEMO:





A M E R I C A N P U B L I C W E L F A R E A S S O C I A T I O N

Kevin W. Concannon, President
A. Sidney Johnson III, Executive Director

PRIORITY ISSUES

RECOMMENDATIONS FOR AFDC/FOOD STAMP SIMPLIFICATION AND COORDINATION

APWA has identified the following priority areas for AFDC and food stamp simplification and coordination. These proposals should be implemented in law or regulation as quickly as possible. The issues are taken from the package of simplification and coordination recommendations adopted by the National Council of State Human Service Administrators December 10, 1992.

The five areas are not in any rank order; all are equally important. Issue number citations refer to the item number of the detailed chart of recommendations dated 7/14/93.

Budget figures have been supplied by the Food and Nutrition Service and the Administration for Children and Families. "Minimal" budget impact indicates a cost so low that it would not be counted for budget purposes.

* * * * *

I. APPLICATION PROCESS

The initial procedures now required to take and process application information present some of the most time consuming and difficult tasks in administering AFDC and food stamps. States believe current requirements can be greatly streamlined without harm to either the accuracy of case data or to applicants' opportunities to provide necessary information.

Recommendation: Simplify the food stamp program and conform it to AFDC by removing current detailed food stamp requirements and replace them with a policy allowing states to deny an application if the household does not provide requested verification within ten days. Simplify both AFDC and food stamps by allowing states to

choose what information to verify. Make optional use of the federal IEVS and SAVE systems. (Issues 4, 5, and 7)

Change required: regulatory and legislative. *Budget impact:* Food stamps, \$3 million savings; AFDC, minimal.

II. CHANGES AND BUDGETING

Many families, particularly in the Food Stamp Program, hold jobs in which wages change frequently. Participants in both programs also experience frequent changes in their family composition and expenses. States are now required to track these fluctuations closely, a policy that results in repeated contact between the family and the eligibility worker and in numerous changes to the case record. Eligibility workers spend inordinate amounts of time tracking and processing these changes; participants must repeatedly contact workers to report changes; and repeated handling of the case budget contributes to payment errors.

Recommendation: Adopt a proposal regarding estimating earned income and change reporting for non monthly reporting requirements in which adjustments in the budget for anticipated income are tied to a change in the income status, not an arbitrary \$25 as in current food stamp policy. This proposal is close to the AFDC policy used in many states. FNS is considering, but has not issued, new regulations which may address some of these concerns. Conform AFDC to food stamp policy regarding the effective date of changes and supplemental benefits to new members. Conform AFDC to food stamps to allow retrospective budgeting of nonmonthly reporters. Conform AFDC to food stamps to eliminate the 10 day reporting requirement for monthly reporters. (Issues 8, 15-17)

Change required: regulatory. *Budget impact* (available to date): minimal.

III. INCOME AND DEDUCTIONS

Perhaps no aspect of eligibility determination is as complex and time-consuming as the calculation of income and deductions from income. Both programs have highly detailed (and frequently different) rules for determining what and how much income is "counted," that is, used in calculating whether a family qualifies for assistance and if so how much. Once income is determined, many families can have their gross income reduced by a variety of expenses and other items deemed necessary for such important purposes as child care or going to work.

Recommendation: Because this issue is so complex, APWA has found it necessary to propose a number of specific recommendations. Briefly, our proposals would completely exclude from consideration several types of income now counted in one or both

programs; conform the two programs in the many detailed areas where they now differ; disregard all educational assistance; and conform the programs with respect to dependent care expenses and the incentive disregards for holding a job.

A particularly difficult issue in this group is that of incentive disregards for wage earners. AFDC and food stamps take substantially different approaches to this issue. Although food stamps is simpler, with its across-the-board deduction of a flat 20 percent, APWA doubts whether this percentage may accurately reflects the true costs of holding a job. Our recommendation is to broaden the work incentive by increasing it to 25 percent. This change would entail some budget costs but is an important support for families trying to achieve self-sufficiency. (Issues 18-20, 31-45.)

Change required: legislative. Budget impact: AFDC, \$15 million; food stamps, \$649 million. Note that almost all costs come from three food stamp issues: the earned income deduction (issue 19), exclusion of HUD utility payments (issue 35), and disregard of the first \$50 of child support payments (issue 45). The latter proposal is contained in the Mickey Leland Act food stamp legislation now in the House reconciliation package.

IV. RECERTIFICATION AND REDETERMINATION

Both AFDC and food stamps provide for renewal or extension of eligibility once a family is receiving assistance. Cases are "redetermined" in AFDC and "recertified" in food stamps through repeating some of the same interview and documentary processes required for initial application. However, the two programs take a fundamentally different approach to this issue: in AFDC, a family is considered eligible continuously until determined otherwise through the redetermination process or other change. In food stamps, a family's eligibility is finite and endures only for the "certification period" assigned based on stability of income and other factors. This fact and other substantial differences have made the recertification/redetermination process extremely cumbersome when any attempt is made to coordinate the handling of both programs for a given family.

Recommendation: Allow an "open-ended" authorization of benefits for all families in both programs, with required reviews of cases at least every 24 months. (Issues 46-47)

Change required: legislative. Budget impact: not yet determined.

V. RESOURCES

Both AFDC and food stamps allow eligible households to have certain resources--an amount of cash on hand and certain items of property, such as their home and personal items. Beyond that simple statement the two programs diverge substantially, and have different rules for both amounts and allowable categories of resources. The issue is a constant source of difficulty for both staff and participants.

Recommendation: In many areas of resource policy our proposal is straightforward and causes minimal budgetary impact. We recommend common definitions of excluded property, like treatment of the value of insurance and burial plans, and the same cash on hand limit. With regard to allowable vehicles, however, our proposal is somewhat more problematic. We believe the simplest and most equitable policy would be the complete exclusion of one vehicle per household, regardless of value, and the counting of the equity value of any other licensed vehicles. However, this change would cost \$280 million in food stamps and \$736 million in AFDC. Nevertheless we support this policy as one that serves the best interests of administrators and clients alike. We note that the Mickey Leland Act now pending in Congress would substantially raise the allowable vehicle value in the Food Stamp Program. (Issues 48-55)

Change required: regulatory and legislative. Budget impact: food stamps, \$280 million; AFDC, \$736 million.

Revised 7-15-93

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
1. ADMINISTRATIVE WAIVER AUTHORITY	DEMONSTRATION WAIVER AUTHORITY PROVIDED IN STATUTE. THERE IS NO ADMINISTRATIVE WAIVER AUTHORITY SIMILAR TO THAT IN THE FOOD STAMP PROGRAM.	7 CFR 272.3(c) ALLOWS WAIVERS OF REGULATORY PROVISIONS FOR EXTRAORDINARY TEMPORARY SITUATIONS, MORE EFFECTIVE AND EFFICIENT ADMINISTRATION OF THE PROGRAM, OR UNIQUE GEOGRAPHIC OR CLIMATIC CONDITIONS.	(1) SUPPORT THE EFFORT OF THE ADMINISTRATION FOR CHILDREN AND FAMILIES TO AMEND 45 CFR TO PERMIT APPROVAL OF ADMINISTRATIVE WAIVERS. (2) AMEND FOOD STAMP ACT TO CONFORM WITH AFDC DEMONSTRATION WAIVER AUTHORITY.	1) GROUP FAVORS RECOMMENDATION BUT WILL DISCUSS DETAILS WITH ADVOCATES. GROUP VOTED TO MAINTAIN FSP AVERAGE BENEFIT LEVEL.	REG	a	a	PROPOSED ACF ADMINISTRATIVE WAIVER ON HOLD.
2. APPLICATION PROCESS: ALIEN/CITIZENSHIP DECLARATION	EACH ADULT MUST ATTEST TO HIS/HER ALIEN OR CITIZENSHIP STATUS. ONE ADULT MAY SIGN FOR ALL CHILDREN.	THE APPLICATION FORM MUST INCLUDE A STATEMENT TO BE SIGNED BY ONE ADULT HOUSEHOLD MEMBER CERTIFYING THAT THE INFORMATION IN THE APPLICATION IS TRUE, INCLUDING INFORMATION ABOUT THE CITIZENSHIP OR ALIEN STATUS OF HOUSEHOLD MEMBERS.	AMEND SOCIAL SECURITY ACT TO ELIMINATE REQUIREMENT THAT EACH ADULT SIGN DECLARATION.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	ALIEN DECLARATION PROVISION IN RECONCILIATION BILL.

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
3. APPLICATION PROCESS: APPLICATION FORM	THE AGENCY SHALL REQUIRE A WRITTEN APPLICATION, SIGNED UNDER PENALTY OF PERJURY, ON A FORM PRESCRIBED BY THE STATE, FROM THE APPLICANT OR AUTHORIZED REPRESENTATIVE.	ACT CONTAINS SPECIFIC REQUIREMENTS FOR APPLICATION CONTENT, MANDATES USE OF A SIMPLIFIED, UNIFORM NATIONAL FORM OR APPROVED SUBSTITUTE, AND REQUIRES A COMBINED APPLICATION FOR PA HOUSEHOLDS AND GA HOUSEHOLDS IF STATE HAS STATEWIDE GA APPLICATION FORM.	FNS AND ACF JOINTLY DEVELOP A GENERIC RIGHTS AND RESPONSIBILITIES DOCUMENT. AMEND FOOD STAMP ACT TO ELIMINATE REQUIREMENTS FOR SPECIFIC APPLICATION LANGUAGE AND REQUIREMENT THAT STATE AGENCIES USE APPLICATION APPROVED BY FNS.	ACCEPTED RECOMMENDATION, SUBJECT TO ADDITIONAL STATE COMMENTS ON PROPOSED LANGUAGE.	LAW	a	a	FNS AND ACF DEVELOPED EASY-TO-READ STATEMENTS OF RIGHTS AND RESPONSIBILITIES THAT ARE GENERIC TO THE EXTENT POSSIBLE. DRAFT STATEMENTS BEING REVISED IN RESPONSE TO COMMENTS.
4. APPLICATION PROCESS: DELAY PROCEDURES	NO CORRESPONDING REQUIREMENT.	REGULATIONS PROVIDE DETAILED PROCEDURES AGENCY MUST FOLLOW IF HOUSEHOLD'S ELIGIBILITY IS NOT DETERMINED WITHIN 30 DAYS AFTER APPLICATION.	FOOD STAMPS SHOULD CONFORM WITH AFDC.	ACCEPTED RECOMMENDATION.	REG	a	n/a	SEE PROCESSING STANDARDS.

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
5. APPLICATION PROCESS: PROCESSING STANDARDS	A DECISION MUST BE REACHED WITHIN STATE-SET STANDARDS, NOT TO EXCEED 45 DAYS. STATES MUST PROVIDE BENEFITS FROM THE EARLIER OF THE DATE OF AUTHORIZATION OR 30 DAYS FROM APPLICATION. THEY MAY PROVIDE PRORATED BENEFITS FROM THE DATE OF APPLICATION.	CLIENTS MUST RECEIVE BENEFITS RETROACTIVE TO THE DATE OF APPLICATION WITHIN 30 DAYS OF APPLICATION UNDER NORMAL PROCESSING AND WITHIN 5 DAYS FOR EXPEDITED SERVICE.	ALLOW STATES TO DENY APPLICATION IF HOUSEHOLD DOES NOT PROVIDE REQUESTED VERIFICATION WITHIN 10 DAYS.	ACCEPTED RECOMMENDATION TO HAVE FNS MAKE AVAILABLE TO STATES THE OPTION TO DENY CASE AFTER 10 DAYS IF REQUESTED VERIFICATION IS NOT RECEIVED. REINSTATEMENT REQUIRED IF HH COMPLIES.	REG	a	n/a	
6. APPLICATION PROCESS: SCHEDULING SECOND INTERVIEW	CLIENT MUST BE NOTIFIED ORALLY AND IN WRITING OF RIGHTS AND RESPONSIBILITIES. THERE IS NO REQUIREMENT FOR THE AGENCY TO RESCHEDULE A MISSED INTERVIEW.	REGULATIONS REQUIRE AGENCY TO RESCHEDULE INTERVIEW IF CLIENT DOES NOT APPEAR FOR THE ONE ORIGINALLY SCHEDULED.	ELIMINATE REQUIREMENT TO SCHEDULE SECOND APPOINTMENT.	ACCEPTED RECOMMENDATION.	REG	a	n/a	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
7. APPLICATION PROCESS: VERIFICATION	INCOME MUST BE VERIFIED THROUGH IEVS, SOCIAL SECURITY NUMBERS THROUGH SSA, AND ALIEN DOCUMENTS THROUGH SAVE. STATES MAY ESTABLISH OTHER VERIFICATION REQUIREMENTS. DECISIONS RE ELIGIBILITY OR INELIGIBILITY MUST BE SUPPORTED BY FACTS IN THE CASE RECORD.	IN ADDITION TO REQUIRED VERIFICATION THROUGH IEVS AND SAVE, REGULATIONS MANDATE VERIFICATION OF INCOME, ALIEN STATUS, UTILITY AND MEDICAL EXPENSES (WHEN ACTUAL IS CLAIMED), SSN, IDENTITY, RESIDENCY, DISABILITY, AND HOUSEHOLD COMPOSITION (IF QUESTIONABLE)	SIMPLIFY VERIFICATION REQUIREMENTS SO STATES CAN DECIDE WHAT TO VERIFY. MAKE USE OF IEVS AND SAVE OPTIONAL.	ACCEPTED RECOMMENDATION.	LAW	\$-3	a	
8. BUDGETING (PROSPECTIVE): BEST ESTIMATE/ANTICIPATING INCOME	USES BEST ESTIMATE OF INCOME AND CIRCUMSTANCES BASED ON THE AGENCY'S REASONABLE EXPECTATION AND KNOWLEDGE OF CURRENT, PAST AND FUTURE CIRCUMSTANCES. INTERMITTENT INCOME MAY BE PRORATED.	INCOME RECEIVED DURING THE PAST 30 DAYS IS USED AS AN INDICATOR OF FUTURE INCOME, WITH SPECIFIED EXCEPTIONS. IF THE AMOUNT OF INCOME OR DATE THAT IT WILL BE RECEIVED IS UNCERTAIN, IT IS NOT USED. HOUSEHOLDS MAY ELECT TO HAVE INCOME AVERAGED.	ADOPT AFDC POLICY FOR FSP. AFDC POLICY IS LESS ERROR-PRONE AND ALLOWS WORKERS MORE FLEXIBILITY.	ACCEPTED RECOMMENDATION, SUBJECT TO ADDITIONAL STATE COMMENTS ON PROPOSED LANGUAGE.	REG	a	n/a	FNS DRAFTING RULE WITH CHANGES IN PROCEDURES FOR ANTICIPATING INCOME.

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
9. BUDGETING (RETROSPECTIVE): INCOME FROM A TERMINATED SOURCE	INCOME RECEIVED IN THE BEGINNING MONTHS FROM A NONCONTINUOUS SOURCE WHICH WAS COUNTED PROSPECTIVELY IS DISREGARDED IN THE FIRST AND SECOND MONTHS OF RETROSPECTIVE BUDGETING. THE DISREGARD DOES NOT APPLY IF INCOME IS RECEIVED AGAIN FROM A SIMILAR SOURCE.	INCOME RECEIVED IN BEGINNING MONTHS FROM A TERMINATED SOURCE WHICH WAS COUNTED PROSPECTIVELY IS DISREGARDED FOR THE FIRST AND SECOND MONTHS OF RETROSPECTIVE BUDGETING. THE DISREGARD APPLIES UNLESS INCOME WAS RECEIVED AGAIN FROM THE SAME FUNDING SOURCE	DIFFERENCE NO LONGER EXISTS. [FNS COMMENT: MAJOR DIFFERENCE IN LENGTH OF DISREGARD NO LONGER EXISTS. THERE IS A MINOR DIFFERENCE IN THE DEFINITION OF WHAT CONSTITUTES A TERMINATED SOURCE.]	DROPPED.		n/a	n/a	
10. BUDGETING (RETROSPECTIVE): SUSPENSION	IF INELIGIBILITY WILL BE FOR ONE MONTH ONLY, ASSISTANCE MAY BE SUSPENDED IN THE PAYMENT MONTH BASED ON INCOME AND CIRCUMSTANCES IN THE BUDGET MONTH. UNIT MUST GENERALLY BE BUDGETED RETROSPECTIVELY THE MONTH AFTER SUSPENSION.	REGULATIONS GIVE STATES OPTION OF SUSPENDING HOUSEHOLDS PROSPECTIVELY IF INELIGIBILITY WILL EXIST FOR ONE MONTH ONLY. HOUSEHOLDS MUST BE BUDGETED RETROSPECTIVELY THE MONTH AFTER SUSPENSION.	IN BOTH PROGRAMS SUSPEND RETROSPECTIVELY IF THERE IS A ONE-TIME CHANGE IN INCOME WHICH CAUSES INELIGIBILITY. CONTINUE RETROSPECTIVE BUDGETING CYCLE UNLESS THERE IS A CHANGE WHICH BY LAW OR STATE OPTION CAUSES PROSPECTIVE BUDGETING.	ACCEPTED RECOMMENDATION.	REG	a	a	RETROSPECTIVE SUSPENSION INCLUDED IN DRAFT FSP SIMPLIFICATION RULE.

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
11. BUDGETING: CONVERTING INCOME TO A MONTHLY AMOUNT	NO PROVISION, BUT STATES MAY USE CONVERSION IN CALCULATING A BEST ESTIMATE FOR CONSISTENCY WITH FOOD STAMPS.	INCOME RECEIVED WEEKLY MAY BE MULTIPLIED BY 4.3 AND BIWEEKLY INCOME BY 2.15 TO ARRIVE AT A MONTHLY FIGURE, OR THE STATE'S PUBLIC ASSISTANCE CONVERSION FACTOR MAY BE USED.	AMEND AFDC REGULATION TO MAKE CONVERSION FACTORS CONSISTENT WITH FSP REGULATIONS.	DROPPED.		n/a	n/a	DROPPED BECAUSE STATES CAN USE CONSISTENT PROCEDURES WITHOUT REGULATION.
12. BUDGETING: PRORATION OF CONTRACT AND SELF-EMPLOYMENT INCOME	ALLOWS STATES TO AVERAGE OR PRORATE CONTRACT INCOME OVER THE PERIOD OF THE CONTRACT AND SELF-EMPLOYMENT INCOME OVER THE PERIOD THE INCOME COVERS.	REQUIRES ANNUALIZING CONTRACT AND SELF-EMPLOYMENT INCOME RECEIVED IN A PERIOD SHORTER THAN ONE YEAR IF IT IS THE HOUSEHOLD'S ANNUAL INCOME. IF INCOME IS NOT THE HOUSEHOLD'S ANNUAL INCOME, IT IS PRORATED OVER THE PERIOD IT IS INTENDED TO COVER.	NO DIFFERENCE EXISTS BECAUSE AFDC REGULATIONS ALLOW INCOME TO BE PRORATED OVER THE PERIOD THE CONTRACT COVERS OR COUNTED IN THE MONTH IT IS RECEIVED.	NO CHANGE IN CURRENT REGULATIONS IS NEEDED.		n/a	n/a	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
13. CHANGES: EFFECTIVE DATE	CHANGE THAT RESULTS IN OVERPAYMENT OR UNDERPAYMENT IS EFFECTIVE IN THE MONTH OF THE CHANGE.	EFFECTIVE DATE DEPENDS ON TIME FRAMES FOR REPORTING AND ACTING ON CHANGES.	AFDC SHOULD CONFORM TO FSP POLICY ON EFFECTIVE DATE. APPLY TO BOTH PROSPECTIVE AND RETROSPECTIVE BUDGETING. ADOPT AFDC PAYMENT ADJUSTMENT LAG (PAL) QC CONCEPT FOR FSP. ADOPT FSP OVERPAYMENT ESTABLISHMENT AND CLAIMS COLLECTION POLICY FOR AFDC.	ACCEPTED RECOMMENDATION.	REG	\$5c	\$-17	
14. CHANGES: MONTHLY REPORTING AND BUDGETING REQUIREMENTS	MONTHLY REPORTING IS OPTIONAL. HOUSEHOLDS NOT REQUIRED TO REPORT MONTHLY MUST BE BUDGETED PROSPECTIVELY UNLESS WAIVER HAS BEEN GRANTED FOR CONSISTENCY WITH FSP.	MONTHLY REPORTING IS OPTIONAL, BUT PROHIBITED FOR CERTAIN CATEGORIES OF HOUSEHOLDS THAT MUST BE BUDGETED PROSPECTIVELY. OTHER HOUSEHOLDS NOT REQUIRED TO REPORT MONTHLY MAY BE BUDGETED PROSPECTIVELY OR RETROSPECTIVELY.	CHANGE AFDC LEGISLATION TO ALLOW NONMONTHLY REPORTING HOUSEHOLDS TO BE BUDGETED RETROSPECTIVELY.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	WAS IN HR 11.

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
15. CHANGES: NOTICE OF ADVERSE ACTION	ADVANCE NOTICE NOT REQUIRED WHEN, AMONG OTHER REASONS, MAIL IS RETURNED WITHOUT A FORWARDING ADDRESS.	NOTICE OF ADVERSE ACTION REQUIRED BY 7 CFR 273.13 NOT REQUIRED WHEN, AMONG OTHER REASONS, THE HOUSEHOLD VOLUNTARILY REQUESTS IN THE PRESENCE OF A CASEWORKER THAT ITS PARTICIPATION BE TERMINATED.	CONFORM TO FSP POLICY RE TOLL-FREE NUMBER AND LEGAL AID REFERRAL ON NOTICE, MASS CHANGES, AND VOLUNTARY TERMINATION OF PARTICIPATION. CONFORM TO AFDC POLICY RE RETURNED MAIL.	COMMITTEE RECOMMENDED DROPPING ISSUE OF TOLL-FREE NUMBER AND LEGAL AID INFO. ACCEPTED OTHER RECOMMENDATIONS.	REG	a	a	PROVISION REGARDING RETURNED MAIL INCLUDED IN FSP PROPOSED SIMPLIFICATION RULE.
16. CHANGES: REPORTING REQUIREMENTS	RECIPIENTS MUST REPORT PROMPTLY ALL CHANGES IN INCOME, RESOURCES AND OTHER CIRCUMSTANCES AFFECTING ELIGIBILITY OR BENEFITS AS THEY BECOME AWARE OF THEM AND ALSO ON MONTHLY REPORT IF MONTHLY REPORTING IS REQUIRED.	MONTHLY REPORTING HOUSEHOLDS NEED NOT REPORT CHANGES OUTSIDE MONTHLY REPORT FORM. CHANGE REPORTERS MUST REPORT CHANGES IN INCOME AND MEDICAL EXPENSES OF MORE THAN \$25, HOUSEHOLD COMPOSITION, RESIDENCE, LIQUID RESOURCES, AND VEHICLES WITHIN 10 DAYS.	HOUSEHOLD/ASSISTANCE UNIT REQUIRED TO REPORT ONLY CHANGES IN SOURCE OF INCOME, RATE OF PAY, EMPLOYMENT STATUS, CHANGE OF ADDRESS, HOUSEHOLD/UNIT COMPOSITION. CHANGE AFDC REGULATIONS TO REQUIRE MONTHLY REPORTERS TO REPORT CHANGES ONLY ON MONTHLY REPORT.	ACCEPTED RECOMMENDATIONS.	REG	b	b	SIMILAR CHANGE IN REPORTING REQUIREMENTS FOR EARNINGS IN FSP DRAFT RULE.

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
17. CHANGES: SUPPLEMENTAL BENEFITS FOR NEW MEMBERS	NEW PERSON IS TREATED AS AN APPLICANT AND ADDED THE DATE HE/SHE ENTERED THE HOUSEHOLD OR DATE DETERMINED ELIGIBLE. SUPPLEMENTAL BENEFITS ARE ISSUED.	SUPPLEMENTAL BENEFITS MAY BE ISSUED FOR A NEW MEMBER IN MONTH OF REPORTED CHANGE UNDER PROSPECTIVE BUDGETING. SUPPLEMENTAL BENEFITS MAY NOT BE ISSUED UNDER RETROSPECTIVE BUDGETING FOR MONTH OF CHANGE, BUT ALLOTMENT MAY BE INCREASED IF NOT ALREADY ISSUED.	CONFORM AFDC TO FOOD STAMP POLICY.	ACCEPTED RECOMMENDATION.	REG	a	d	PROPOSAL TO ALLOW CONSISTENCY WITH AFDC INCLUDED IN DRAFT FSP PROPOSED REGULATION.
18. DEDUCTIONS: DEPENDENT CARE	FOR FULLTIME WORKERS AND JOBS PARTICIPANTS: ACTUAL COSTS UP TO \$175 PER MO. PER DEPENDENT CHILD 2 AND OVER OR INCAPACITATED ADULT LIVING IN SAME HOME AND RECEIVING AFDC AND UP TO \$200 PER MO. PER CHILD UNDER 2. STATE MAY SET LESSER AMOUNT FOR PARTTIME.	ACTUAL NOT TO EXCEED \$160 PER CHILD OR OTHER DEPENDENT WHEN CARE IS NEEDED TO ACCEPT OR CONTINUE EMPLOYMENT, OR TRAINING OR EDUCATION THAT IS PREPARATORY TO EMPLOYMENT.	SET LIMITS AT \$175 PER INDIVIDUAL (\$200 FOR CHILDREN UNDER TWO). ALLOW DEDUCTION FOR SEEKING EMPLOYMENT, EMPLOYMENT, OR ATTENDING TRAINING OR SCHOOL. SUBTRACT DEDUCTION FROM HOUSEHOLD OR UNIT'S INCOME AFTER OTHER DEDUCTIONS HAVE BEEN SUBTRACTED.	DECIDED TO DELETE LAST SENTENCE. RECOMMENDED THAT AFDC CAPS FOR DEPENDENT CARE BE USED AND DEDUCTION BE ALLOWED FROM UNEARNED INCOME FOR TRAINING/EDUCATION IN BOTH PROGRAMS.	LAW	\$1	b	IN LELAND BILL.

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
19. DEDUCTIONS: EARNED INCOME DEDUCTION	DISREGARDS \$90 OF INDIVIDUAL'S EARNINGS. \$30 AND ONE-THIRD OF REMAINDER DISREGARDED IN 4 CONSECUTIVE MONTHS. THEN \$30 DISREGARDED IN 8 CONSECUTIVE MONTHS. NOT ALLOWED AGAIN UNTIL PERSON OFF AFDC FOR 12 CONSECUTIVE MONTHS.	DEDUCTS 20 PERCENT OF ALL EARNINGS.	DEDUCT 25 PERCENT OF GROSS EARNED INCOME IN ANY MONTH THE HOUSEHOLD OR ASSISTANCE UNIT HAD EARNINGS AS EARNED INCOME DEDUCTION FOR BOTH PROGRAMS.	WORK INCENTIVES NEED FURTHER CONSIDERATION.	LAW	\$298	b	
20. DEDUCTIONS: EARNED INCOME DEDUCTION PENALTY	\$90, \$30 AND ONE-THIRD, DEPENDENT CARE DISREGARDS NOT ALLOWED IF INDIVIDUAL VOLUNTARILY QUIT OR FAILED TO ACCEPT JOB, RETURN MONTHLY REPORT TIMELY, OR REQUESTED CASE TO REPORT. TERMINATION TO AVOID RECEIVING \$30 AND ONE-THIRD DISREGARD FOR 4 CONSECUTIVE MONTHS.	WHEN CALCULATING OVERISSUANCE, EARNED INCOME DEDUCTION IS NOT ALLOWED ON PORTION OF EARNED INCOME HOUSEHOLD MEMBER WILLFULLY FAILED	DO NOT ALLOW EARNED INCOME DEDUCTION IN ANY MONTH THE INCOME WAS NOT REPORTED BY THE HOUSEHOLD OR ASSISTANCE UNIT, WHETHER THROUGH INTENTIONAL PROGRAM VIOLATION OR INADVERTENT CLIENT ERROR. DISALLOWANCE AFFECTS CALCULATION OF OVERPAYMENTS, NOT BENEFITS.	ACCEPTED RECOMMENDATION.	LAW	\$-1	a	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
21. DEDUCTIONS: EXCESS MEDICAL DEDUCTION	N/A	A DEDUCTION IS ALLOWED FOR THAT PORTION OF MEDICAL EXPENSES IN EXCESS OF \$35 PER MONTH INCURRED BY ANY HOUSEHOLD MEMBER WHO IS ELDERLY OR DISABLED.	AUTHORIZE A TWO-TIERED STANDARD FOR EACH STATE TO BE CALCULATED BY EACH STATE AND APPROVED BY FNS.	AGREED TO RECOMMEND THAT MEDICAL DEDUCTION BE ELIMINATED AND THAT HOUSEHOLDS ADVERSELY AFFECTED BE COMPENSATED BY OTHER CHANGE, POSSIBLY IN MINIMUM BENEFIT LEVEL.	LAW	\$-87	n/a	
22. DEDUCTIONS: STANDARD SHELTER DEDUCTION	N/A	A DEDUCTION IS ALLOWED FOR ACTUAL SHELTER EXPENSES IN EXCESS OF 50 PERCENT OF THE HOUSEHOLD'S NET INCOME UP TO AN ANNUALLY UPDATED CAP, CURRENTLY SET AT \$194. HOUSEHOLDS CONTAINING AN ELDERLY OR DISABLED MEMBER ARE NOT SUBJECT TO THE CAP.	ELIMINATE THE REQUIREMENT TO REPORT CHANGES IN SHELTER DURING THE CERTIFICATION PERIOD. LET EACH STATE DEVELOP A STANDARD SHELTER EXPENSE USING FNS-DEVELOPED GUIDELINES. HOUSEHOLD WOULD VERIFY TO GET ACTUAL IF HIGHER.	ACCEPTED RECOMMENDATION RE NO REQUIRED REPORTING OF CHANGES IN SHELTER DURING CERT PERIOD. RECOMMENDED FNS ALLOW STATES TO CONDUCT DEMO PROJECTS USING STANDARD SHELTER EXPENSE.	LAW	b	n/a	MODIFICATION OF CURRENT DEMONSTRATION PROJECT AUTHORITY NEEDED TO ALLOW DEMONSTRATION PROJECTS WHICH USE STANDARD AND DO NOT ALLOW HOUSEHOLD OPTION TO USE HIGHER ACTUAL COSTS.

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
23. ELIGIBILITY: ALIEN STATUS	ALLOWS PARTICIPATION BY ALIENS ADMITTED FOR PERMANENT RESIDENCE OR PERMANENTLY RESIDING UNDER COLOR OF LAW (PRUCOL).	FOOD STAMP ACT LIMITS ALIEN PARTICIPATION TO THOSE ADMITTED UNDER SPECIFIED SECTIONS OF THE IMMIGRATION AND NATIONALITY ACT.	ADOPT AFDC PRUCOL PROVISION FOR FSP.	ACCEPTED RECOMMENDATION.	LAW	a	n/a	ACF AND FNS TO EXPLORE COMMITTEE REQUEST TO CLASSIFY ALIENS BY TYPE OF DOCUMENTATION.
24. ELIGIBILITY: CERTIFIED UNIT	ASSISTANCE UNIT CONSISTS OF DEPENDENT CHILDREN UNDER 18 (OR 18 IF IN SCHOOL AND WILL FINISH BEFORE 19) DEPRIVED OF PARENTAL SUPPORT AND LIVING IN THE HOME OF THE PARENT OR SPECIFIED RELATIVES. THE NEEDS, INCOME AND RESOURCES OF ALL IN UNIT ARE INCLUDED.	HOUSEHOLD USUALLY CONSISTS OF PERSONS WHO PURCHASE AND PREPARE MEALS TOGETHER. PARENTS AND CHILDREN AND SIBLINGS MAY NOT BE SEPARATE HOUSEHOLDS UNLESS THE PARENT OR SIBLING IS OVER 60 OR DISABLED OR THE CHILD OR SIBLING HAS A MINOR CHILD.	RECOMMENDS NO CHANGE IN DEFINITIONS OF CERTIFIED UNIT BECAUSE OF FUNDAMENTAL DIFFERENCES IN THE PROGRAMS. POSSIBLE ANSWER WOULD BE USE OF STANDARDIZED ALLOTMENTS FOR JOINT FSP/AFDC HOUSEHOLDS.	ACCEPTED RECOMMENDATION. STANDARDIZED ALLOTMENTS OPTION DROPPED.		n/a	n/a	LELAND BILL CONTAINS CHANGES IN FOOD STAMP HOUSEHOLD DEFINITION.
25. ELIGIBILITY: CHILD SUPPORT ASSIGNMENT AND COOPERATION	ASSIGNING TO THE STATE AGENCY ANY RIGHTS TO CHILD OR SPOUSAL SUPPORT AND COOPERATING WITH THE CHILD SUPPORT COLLECTION AGENCY IN ESTABLISHING PATERNITY AND OBTAINING SUPPORT PAYMENTS ARE CONDITIONS OF ELIGIBILITY.	NO COMPARABLE PROVISION.	CHILD SUPPORT COOPERATION SHOULD BE STATE OPTION. SAME GOOD CAUSE CRITERIA AS AFDC. DISREGARD FIRST \$50 OF CHILD SUPPORT. PROVIDE FEDERAL FINANCIAL INCENTIVES AND FFP AT CHILD SUPPORT FFP LEVEL. WAIVE INITIAL FEE.	ACCEPTED RECOMMENDATION THAT IN FSP: 1) FAMILIES BE ENCOURAGED TO COOPERATE WITH CHILD SUPPORT. 2) OPPOSE LEGISLATION TO REQUIRE COOPERATION WITH CHILD SUPPORT. 3) DISREGARD \$50.	LAW	n/a	n/a	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
26. ELIGIBILITY: POTENTIAL SOURCES OF INCOME	AGENCY MUST ESTABLISH AND CARRY OUT POLICIES WITH REFERENCE TO APPLICANTS' AND RECIPIENTS' POTENTIAL SOURCES OF INCOME THAT CAN BE DEVELOPED TO A STATE OF AVAILABILITY.	THERE IS NO REQUIREMENT THAT APPLICANTS OR RECIPIENTS APPLY FOR OTHER ASSISTANCE AS A CONDITON OF ELIGIBILITY.	REVISED POSITION PAPER RECOMMENDED LEGISLATIVE CHANGE TO FOOD STAMP ACT TO ENCOURAGE, BUT NOT REQUIRE, APPLICANTS TO APPLY FOR OTHER POTENTIAL SOURCES OF INCOME. NO CONSENSUS WAS REACHED ON THIS ISSUE.	CONSENSUS NOT REACHED.		n/a	n/a	DROPPED.
27. ELIGIBILITY: RESIDENCY REQUIREMENT	ASSISTANCE UNIT MUST RESIDE IN THE STATE, BUT THERE IS NO DURATIONAL REQUIREMENT.	HOUSEHOLD MUST RESIDE IN THE PROJECT AREA IN WHICH IT APPLIES, BUT THERE IS NO DURATIONAL REQUIREMENT.	FS ACT IS FLEXIBLE ENOUGH TO ALLOW STATES TO CONFORM FOOD STAMP POLICY TO AFDC POLICY WITHOUT A REGULATORY CHANGE. CURRENT REGULATIONS SHOULD REMAIN IN PLACE SO AS NOT TO PENALIZE STATES THAT DO NOT HAVE SYSTEMS NEEDED TO IMPLEMENT POLICY.	ACCEPTED RECOMMENDATION.	REG	a	n/a	OPTION FOR STATE RESIDENCY IN PROPOSED FSP SIMPLIFICATION RULE.

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
28. ELIGIBILITY: SOCIAL SECURITY NUMBERS	APPLICANT MUST PROVIDE SSN OR APPLY FOR ONE.	APPLICANT MUST PROVIDE NUMBER OR APPLY FOR ONE, BUT GOOD CAUSE ALLOWED FOR FAILURE TO APPLY.	CHANGE AFDC REGULATIONS TO INCLUDE FSP GOOD CAUSE CRITERIA.	LEAVE EACH PROGRAM AS IS.		n/a	n/a	DROPPED.
29. ELIGIBILITY: STRIKER DEFINITION	FAMILY INELIGIBLE IF ANY CARETAKER RELATIVE IS PARTICIPATING IN A STRIKE ON THE LAST DAY OF THE MONTH. INDIVIDUAL'S NEEDS NOT INCLUDED IF INDIVIDUAL IS ON STRIKER LAST DAY OF THE MONTH.	HOUSEHOLD IS INELIGIBLE IF ANY MEMBER IS ON STRIKE UNLESS THE HOUSEHOLD WAS ELIGIBLE PRIOR TO THE STRIKE OR THE STRIKING MEMBER WAS EXEMPT FROM WORK REGISTRATION THE DAY PRIOR TO THE STRIKE.	ELIMINATE STRIKER PROVISIONS. STRIKER ELIGIBILITY WOULD BE DETERMINED ON SAME BASIS AS THAT OF OTHER APPLICANTS AND RECIPIENTS.	ACCEPTED RECOMMENDATION. ISSUE WILL BECOME LOW PRIORITY IF COST IS HIGH.	LAW	\$56	a	
30. ELIGIBILITY: STUDENTS	NO RESTRICTIONS ON STUDENT ELIGIBILITY IN ADDITION TO THOSE FOR OTHER INDIVIDUALS.	STUDENTS MUST MEET SPECIFIC ELIGIBILITY CRITERIA IN ADDITION TO THOSE WHICH APPLY TO OTHER INDIVIDUALS.	WAIVE STUDENT ELIGIBILITY DETERMINATION FOR RECIPIENTS OF A STATE'S GA PROGRAM BENEFITS AND RECIPIENTS OF FINANCIAL EDUCATION ASSISTANCE BASED ON NEED, REGARDLESS OF SOURCE.	ACCEPTED RECOMMENDATION.	LAW	\$67	n/a	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
31. INCOME: COMPLEMENTARY PROGRAMS	PERMITS STATES TO DISREGARD THE VALUE OF ASSISTANCE PAYMENTS THAT ARE COMPLEMENTARY AND NOT DUPLICATIVE.	WITH SPECIFIED EXCEPTIONS, GENERALLY COUNTS STATE-FUNDED ASSISTANCE WHETHER PAID DIRECTLY OR VENDORED.	AMEND FOOD STAMP ACT TO ALLOW A STATE THAT EXEMPTS FUNDS FROM A COMPLEMENTARY PROGRAM IN AFDC TO ALSO EXEMPT INCOME FROM THAT PROGRAM FOR FOOD STAMPS.	ACCEPTED RECOMMENDATION.	LAW	b	n/a	
32. INCOME: EARNINGS OF 18-YEAR-OLD HIGH SCHOOL STUDENTS	DISREGARDS EARNINGS OF DEPENDENT CHILD RECIPIENT WHO IS FULL OR PART-TIME STUDENT FOR NEEDS AND BENEFIT DETERMINATION. STATE OPTION TO DISREGARD EARNINGS OF FULL-TIME STUDENT APPLICANT OR RECIPIENT FOR NEEDS AND ELIGIBILITY FOR UP TO 6 MONTHS.	COUNTS AS EARNED INCOME.	EXCLUDE INCOME OF 18 YEAR-OLD HIGH SCHOOL STUDENTS UNTIL THEY REACH 19 AS LONG AS THEY MEET THE DEFINITION OF A CHILD FOR A PARTICULAR STATE'S AFDC PROGRAM.	ACCEPTED RECOMMENDATION.	LAW	\$8	n/a	IN LELAND BILL.

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
33. INCOME: EARNINGS OF STUDENTS UNDER 18	DISREGARDS EARNINGS OF DEPENDENT CHILD RECIPIENT WHO IS FULL-TIME OR PART-TIME STUDENT FOR NEEDS AND BENEFIT DETERMINATION. STATE OPTION TO DISREGARD EARNINGS OF FULL-TIME STUDENT APPLICANT OR RECIPIENT FOR NEEDS AND ELIGIBILITY FOR UP TO 6 MONTHS.	EXCLUDES IF STUDENT IS IN SCHOOL AT LEAST HALF TIME AND IS UNDER PARENTAL CONTROL.	EXCLUDE EARNINGS OF FULL OR PART-TIME STUDENTS UNDER 18 FOR BOTH ELIGIBILITY AND BENEFIT DETERMINATIONS FOR BOTH PROGRAMS.	ACCEPTED RECOMMENDATION.	LAW	a	a	
34. INCOME: ENERGY ASSISTANCE	EXCLUDES ASSISTANCE PROVIDED UNDER LOW-INCOME HOME ENERGY ASSISTANCE ACT. STATES HAVE OPTION TO EXCLUDE ASSISTANCE FROM OTHER SPECIFIED TYPES OF PROVIDERS.	EXCLUDES CASH OR IN-KIND ENERGY ASSISTANCE UNDER FEDERAL LAW AND WITH FNS APPROVAL FROM SOME STATE AND LOCAL PROGRAMS, INCLUDING ASSISTANCE COMBINED WITH PUBLIC OR GENERAL ASSISTANCE PROGRAMS.	DISREGARD FOR BOTH PROGRAMS ANY ENERGY PAYMENT BASED ON FINANCIAL NEED. ENERGY ASSISTANCE IS DEFINED AS ANY ASSISTANCE PAID TO OR ON BEHALF OF A HOUSEHOLD TO COVER THE PAYMENT FOR FUEL TO HEAT OR COOL RESIDENCE, WHICH IS BASED ON FINANCIAL NEED.	ACCEPTED RECOMMENDATION.	LAW	b	b	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
35. INCOME: HUD UTILITY PAYMENTS	STATES HAVE OPTION TO COUNT OR DISREGARD RENT OR HOUSING SUBSIDIES AS INCOME, BUT MAY COUNT ONLY THE AMOUNT THAT EXCEEDS THE SHELTER AMOUNT ESTABLISHED IN THE PAYMENT STANDARD FOR AN ASSISTANCE UNIT OF THE SAME SIZE AND COMPOSITION.	VENDOR PAYMENTS TO LANDLORD EXCLUDED. DIRECT PAYMENTS TO HOUSEHOLD AND VENDOR PAYMENTS TO UTILITY PROVIDER COUNTED. AMOUNT HOUSEHOLD OWES LANDLORD AFTER HUD PAYMENTS IS ALLOWED AS RENT EXPENSE. IN 3RD CIRCUIT, HUD UTILITY PAYMENTS EXCLUDED.	EXCLUDE FROM INCOME FOR BOTH PROGRAMS. TREAT AS ISSUE SEPARATE FROM ENERGY ASSISTANCE.	ACCEPTED RECOMMENDATION.	LAW	\$160	n/a	
36. INCOME: IN-KIND INCOME/VENDOR PAYMENTS	EARNED IN-KIND INCOME COUNTED AS INCOME. STATE OPTION TO DISREGARD SUPPORT AND MAINTENANCE IN-KIND ASSISTANCE FURNISHED BY PRIVATE NON-PROFIT AGENCY OR SPECIFIED HOME ENERGY PROVIDERS. STATE OPTION TO COUNT OR DISREGARD UNEARNED IN-KIND INCOME.	EXCLUDES IN-KIND INCOME. UNLESS SPECIFICALLY EXCLUDED, THIRD-PARTY PAYMENTS ARE COUNTED AS INCOME IF FUNDS ARE LEGALLY OBLIGATED TO BE PAID TO THE HOUSEHOLD.	EXCLUDE IN-KIND BENEFITS AS INCOME FOR BOTH PROGRAMS. ADOPT FSP VENDOR PAYMENT POLICY FOR AFDC.	ACCEPTED RECOMMENDATIONS.	LAW	\$-3 c	\$9	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
37. INCOME: INCOME EXCLUDED BY OTHER LAWS	EXCLUSIONS FOR EDUCATION ASSISTANCE, INDIAN PER CAPITA PAYMENTS, JTPA, AND OTHERS REQUIRED BY LAW DIFFER FROM FOOD STAMP EXCLUSIONS.	EXCLUSIONS FOR EDUCATION ASSISTANCE, INDIAN PER CAPITA PAYMENTS, JTPA, AND OTHERS REQUIRED BY LAW DIFFER FROM THE AFDC EXCLUSIONS.	AMEND SOCIAL SECURITY ACT AND FOOD STAMP ACT TO MAKE LISTS OF EXCLUDED INCOME IDENTICAL. AMEND BOTH LAWS TO ALLOW THE SECRETARIES OF AGRICULTURE AND DHHS TO ISSUE REGULATIONS AT ANY TIME ANOTHER LAW MAKES INCOME FROM A PROGRAM EXEMPT FOR AFDC OR FSP.	ACCEPTED RECOMMENDATION.	LAW	b	b	
38. INCOME: INCOME OF INELIGIBLE (DISQUALIFIED) MEMBERS	TREATMENT OF THE INCOME OF AN INDIVIDUAL LIVING WITH THE UNIT BUT NOT PARTICIPATING DEPENDS ON THE REASON FOR NONPARTICIPATION. EXCEPT FOR INDIVIDUALS DISQUALIFIED FOR SPECIFIED REASONS, STATES HAVE OPTION TO ALLOCATE INCOME OF NONPARTICIPATING MEMBERS.	TREATMENT OF INCOME OF INELIGIBLE MEMBER DEPENDS ON THE REASON FOR INELIGIBILITY.	GIVE THIS DIFFERENCE LOW PRIORITY OR DROP IT UNTIL COORDINATION IS ACHIEVED IN THE REASONS FOR DISQUALIFICATION FROM PROGRAM PARTICIPATION.	ACCEPTED RECOMMENDATION. DROP AS INCOME ISSUE.		n/a	n/a	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
39. INCOME: IRREGULAR INCOME	STATE OPTION TO DISREGARD SMALL NONRECURRING GIFTS NOT TO EXCEED \$30 PER INDIVIDUAL IN A QUARTER.	FOR PROSPECTIVE BUDGETING, IRREGULAR INCOME NOT TO EXCEED \$30 IN A QUARTER DISREGARDED. IRREGULAR INCOME COUNTED IN RETROSPECTIVE BUDGETING.	REVISE FOOD STAMP ACT TO DISREGARD UP TO \$30 PER PERSON PER QUARTER OF GIFTS AND INCONSEQUENTIAL INCOME IN EITHER PROSPECTIVE OR RETROSPECTIVE BUDGETING.	ACCEPTED RECOMMENDATION.	LAW	a	n/a	
40. INCOME: JTPA EARNINGS FROM STATE TRAINING PROGRAMS	AT STATE OPTION, MAY DISREGARD UNEARNED INCOME INDEFINITELY AND EARNED INCOME FOR 6 MONTHS OF A DEPENDENT CHILD PARTICIPATING IN JTPA.	EXCLUDES ALL JTPA INCOME EXCEPT THAT FROM ON-THE-JOB TRAINING PROGRAMS UNDER SECTION 204(5) OF TITLE II, JTPA. ALL OJT INCOME OF INDIVIDUALS UNDER 19 UNDER PARENTAL CONTROL EXCLUDED.	AMEND AFDC PROGRAM TO BE CONSISTENT WITH FSP AND EXCLUDE JTPA STATE TRAINING PROGRAM INCOME OF HOUSEHOLD MEMBERS UNDER 19.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	
41. INCOME: LUMP SUM PAYMENTS	IF UNIT'S INCOME AFTER DISREGARDS EXCEEDS NEEDS STANDARD BECAUSE OF RECEIPT OF NONRECURRING EARNED OR UNEARNED LUMP SUM INCOME, UNIT IS INELIGIBLE FOR PERIOD DETERMINED BY DIVIDING LUMP SUM AMOUNT PLUS OTHER HOUSEHOLD INCOME BY NEEDS STANDARD.	ACT EXCLUDES FROM INCOME NONRECURRING LUMP-SUM PAYMENTS INCLUDING BUT NOT LIMITED TO INCOME TAX REFUNDS, REBATES OR CREDITS, RETROACTIVE LUMP-SUM SOCIAL SECURITY OR RAILROAD RETIREMENT PENSION PAYMENTS AND INSURANCE SETTLEMENTS.	AMEND SOCIAL SECURITY ACT TO ADOPT FSP POLICY. ADD PROVISIONS TO RULES OF BOTH PROGRAMS TO REQUIRE VERIFICATION OF THE DISPOSITION OF LUMP PAYMENTS IN EXCESS OF THE RESOURCE ELIGIBILITY MAXIMUMS.	ACCEPTED RECOMMENDATION.	LAW	\$-2 c	\$6	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
42. INCOME: SELF-EMPLOYMENT - CALCULATING BOARDER INCOME	ALLOWS USE OF A FLAT PERCENTAGE FOR EXPENSES IN CALCULATING INCOME FROM BOARDERS.	THE COST OF PRODUCING SELF-EMPLOYMENT BOARDER INCOME (OTHER THAN COMMERCIAL BOARDING HOUSES) IS THE GREATER OF THE MAXIMUM ALLOTMENT AMOUNT FOR THE BOARDER'S HOUSEHOLD SIZE OR THE ACTUAL COST OF PROVIDING ROOM AND BOARD.	AMEND AFDC PROGRAM TO CONFORM WITH FSP RULES AND ALLOW EITHER MAXIMUM ALLOTMENT FOR HOUSEHOLD OF THE SAME SIZE AS NUMBER OF BOARDERS OR THE ACTUAL DOCUMENTED COST, IF HIGHER THAN THE ALLOTMENT.	ACCEPTED RECOMMENDATION.	REG	n/a	a	WAIVER POSSIBLE FOR AFDC AND FSP. FSP SIMPLIFICATION RULE INCLUDES OPTION FOR PERCENTAGE FOR CHILD CARE PROVIDERS AND HOUSEHOLDS WITH BOARDERS.
43. INCOME: SELF-EMPLOYMENT EXPENSES	EXPENSES LIMITED TO THOSE WITHOUT WHICH GOODS OR SERVICES COULD NOT BE PRODUCED. DEPRECIATION, PURCHASES OF CAPITAL EQUIPMENT, PAYMENTS ON PRINCIPAL OF LOANS FOR CAPITAL ASSETS OR DURABLE GOODS, PERSONAL BUSINESS, TRANS., ENTERTAINMENT NOT ALLOWED.	EXPENSES NOT ALLOWED ARE: NET LOSSES FROM PRIOR PERIODS, DEPRECIATION, RETIREMENT MONEY, PURCHASE PRICE OR PAYMENTS ON PRINCIPAL OF LOANS FOR EQUIPMENT, PERSONAL INCOME TAXES AND OTHER WORK-RELATED EXPENSES COVERED BY EARNED INCOME DEDUCTION.	BOTH PROGRAMS SHOULD MODIFY REGULATIONS TO ALLOW SAME EXPENSES AND RECONSIDER TREATMENT OF DEPRECIATION. AMEND LAWS TO ALLOW STATES TO DEVELOP PERCENTAGE STANDARDS TO COVER THE COSTS OF DOING BUSINESS.	ACCEPTED RECOMMENDATION. NEED COMMON DEFINITIONS OF EXPENSES. WANT TO USE PERCENT, BUT NEED MORE INFORMATION TO DETERMINE WHAT THE PERCENT SHOULD BE.	REG	a	a	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
44. INCOME: STUDENT ASSISTANCE	EXCLUDES LOANS AND GRANTS OBTAINED AND USED UNDER CONDITIONS THAT PRECLUDE USE FOR CURRENT LIVING COSTS. EXCLUDES AID TO UNDERGRADUATES FROM EDUCATION DEPT. EXCLUDES COSTS OF ATTENDANCE FROM TITLE IV, BIA. STATE OPTION TO DISREGARD ALL STUDENT AID.	EXCLUDES AMOUNTS EARMARKED OR USED FOR COSTS OF ATTENDANCE, BUT COUNTS AS INCOME AMOUNTS MADE AVAILABLE FOR NORMAL LIVING COSTS.	LONG-TERM GOAL IS TO AMEND THE FOOD STAMP ACT TO TOTALLY DISREGARD ALL EDUCATIONAL ASSISTANCE. SHORT-TERM GOAL IS FOR FNS TO ALLOW STATES TO SEND A FORM TO SCHOOLS ASKING WHAT PORTION OF ASSISTANCE IS MADE AVAILABLE FOR ROOM AND BOARD.	ACCEPTED RECOMMENDATION.	LAW	\$5	n/a	LELAND BILL WOULD EXCLUDE EDUCATION ASSISTANCE.
45. INCOME: TITLE IV-D \$50 CHILD SUPPORT PASS-THROUGH PAYMENTS	DISREGARDS THE PASS-THROUGH PAYMENTS.	COUNTS PAYMENTS AS INCOME. STATES HAVE OPTION TO DISREGARD, BUT MUST PAY FNS FOR THE RESULTING ADDITIONAL BENEFITS ISSUED.	AMEND FOOD STAMP ACT TO DISREGARD THE \$50 PAYMENTS.	ACCEPTED RECOMMENDATION.	LAW	\$181	n/a	IN LELAND BILL.
46. RECERTIFICATION (REDETERMINATION): CERTIFICATION PERIODS	REDETERMINES ELIGIBILITY WHEN NECESSARY BUT AT LEAST ONCE EVERY 6 MONTHS UNLESS UNIT REPORTS MONTHLY OR IS COVERED BY APPROVED ERROR-PRONE PROFILING SYSTEM. MUST HAVE FACE-TO-FACE REDETERMINATION ONCE IN 12 MONTHS.	CERTIFICATION PERIODS OF FROM ONE TO TWELVE MONTHS ARE ASSIGNED TO NONMONTHLY REPORTING HOUSEHOLDS, DEPENDING ON HOUSEHOLD CHARACTERISTICS. MONTHLY REPORTING HOUSEHOLDS MUST BE CERTIFIED FOR SIX OR TWELVE MONTHS.	ALLOW OPEN-ENDED AUTHORIZATION OF BENEFITS FOR ALL HOUSEHOLDS. AT A MINIMUM, ALL CASES MUST BE REVIEWED EVERY 24 MONTHS.	ACCEPTED RECOMMENDATION.	LAW	b	b	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
47. RECERTIFICATION (REDETERMINATION): PROCESS	STATES MAY PRESCRIBE FORMS AND PROCEDURES.	LAW AND REGULATIONS CONTAIN SPECIFIC PROCEDURAL REQUIREMENTS FOR NOTICE OF EXPIRATION AND REAPPLICATION.	ALLOW STATE AGENCIES TO SET OWN REVIEW SCHEDULES.	ACCEPTED RECOMMENDATION.	LAW	a	a	FSP PROPOSED SIMPLIFICATION RULE WILL INCLUDE PROVISIONS ON RECERTIFICATION.
48. RESOURCES: ACCESSIBILITY	RESOURCES ARE CONSIDERED AVAILABLE WHEN ACTUALLY AVAILABLE AND WHEN THE CLIENT HAS A LEGAL INTEREST IN A LIQUIDATED SUM AND HAS THE LEGAL ABILITY TO MAKE IT AVAILABLE.	REGS EXCLUDE INACCESSIBLE RESOURCES SUCH AS THOSE IN IRREVOCABLE TRUSTS, PROBATE, SECURITY DEPOSITS, REAL PROPERTY BEING SOLD, JOINTLY HELD RESOURCES THAT CANNOT PRACTICALLY BE SUBDIVIDED AND THE OTHER OWNER REFUSES TO SELL.	COUNT THE VALUE OF PROPERTY SOLELY OWNED BY THE HOUSEHOLD/ASSISTANCE UNIT FOR BOTH PROGRAMS. EXCLUDE HEIR OR JOINTLY OWNED PROPERTY (OTHER THAN IF OWNED BY PERSONS IN THE BUDGET UNIT).	ACCEPTED RECOMMENDATION.	REG	a	a	
49. RESOURCES: BURIAL PLANS	EXCLUDES ONE BONA FIDE FUNERAL AGREEMENT PER INDIVIDUAL UP TO \$1,500 IN EQUITY VALUE OR LOWER AMOUNT AT STATE OPTION AND EXCLUDES ONE BURIAL PLOT PER INDIVIDUAL.	INACCESSIBLE FUNDS IN BURIAL AGREEMENTS AND ONE BURIAL PLOT PER MEMBER ARE EXCLUDED. ACCESSIBLE FUNDS ARE COUNTED.	EXCLUDE FOR BOTH PROGRAMS.	ACCEPTED RECOMMENDATION.	REG	a	a	PROVISION ON BURIAL PLANS IN FSP SIMPLIFICATION RULE.

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
50. RESOURCES: INCOME-PRODUCING REAL PROPERTY	COUNTS AS A RESOURCE EXCEPT UNDER PROVISIONS GOVERNING REAL PROPERTY FOR SALE.	EXCLUDES AS A RESOURCE IF PRODUCING INCOME CONSISTENT WITH ITS FAIR MARKET VALUE OR ESSENTIAL TO SELF-EMPLOYMENT, BUT COUNTS INCOME PRODUCED.	EXCLUDE FOR BOTH PROGRAMS INCOME-PRODUCING PROPERTY ESSENTIAL TO EMPLOYMENT OR SELF-EMPLOYMENT. EXCLUDE FOR BOTH PROGRAMS THE EQUITY VALUE OF REAL PROPERTY (SOLE AND CLEAR OWNERSHIP) WHICH IS PRODUCING INCOME CONSISTENT WITH ITS FAIR MARKET VALUE.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	
51. RESOURCES: LIFE INSURANCE	COUNTS AS A RESOURCE.	EXCLUDES AS A RESOURCE.	EXCLUDE FOR BOTH PROGRAMS.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	
52. RESOURCES: REAL PROPERTY FOR SALE	RESOURCE AFTER 6 MONTHS (OR 9 AT STATE OPTION) IF NOT SOLD. CLIENT MUST AGREE TO MAKE A GOOD FAITH EFFORT TO DISPOSE OF PROPERTY AND REPAY AFDC RECEIVED DURING SALE PERIOD. IF NOT SOLD DURING PERIOD, AFDC ENDS. OVERPAYMENT CALCULATED WHEN PROPERTY SOLD.	EXCLUDES FOR UNSPECIFIED TIME IF HOUSEHOLD MAKING GOOD FAITH EFFORT TO SELL.	EXCLUDE FOR BOTH PROGRAMS REAL PROPERTY THE UNIT IS MAKING A GOOD FAITH EFFORT TO SELL.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
53. RESOURCES: RESOURCE LIMIT	\$1,000 PER ASSISTANCE UNIT USING EQUITY VALUE OF RESOURCES.	\$2,000 PER HOUSEHOLD OR \$3,000 IF ONE MEMBER IS 60 OR OVER, USING EQUITY VALUE EXCEPT FOR VEHICLES. LIMIT DOES NOT APPLY TO CATEGORICALLY ELIGIBLE HOUSEHOLDS OR TO HOUSEHOLD MEMBERS WHO RECEIVE AFDC.	USE FOOD STAMP RESOURCE LIMITS.	ACCEPTED RECOMMENDATION.	LAW	b	b	
54. RESOURCES: TRANSFER	AFDC REGS CONTAIN NO PROVISION REGARDING INELIGIBILITY BECAUSE OF TRANSFER OF RESOURCES, BUT REGULATIONS ALLOW STATES TO IMPOSE ADDITIONAL CONDITIONS OF ELIGIBILITY. 35 STATES PROHIBIT TRANSFER OR OTHER DISPOSITION OF PROPERTY PRIOR TO APPLICATION.	PROHIBITS PARTICIPATION IN THE PROGRAM FOR UP TO ONE YEAR IF RESOURCE IS TRANSFERRED WITHIN 3 MONTHS PRIOR TO APPLICATION OR DURING CERTIFICATION PERIOD IN ORDER TO MEET FSP RESOURCE LIMITS.	STATES MAY CONFORM AFDC POLICY TO FSP POLICY.	ACCEPTED RECOMMENDATION.		n/a	a	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
55. RESOURCES: VEHICLES	EXCLUDES VEHICLES USED AS HOUSEHOLD HOME OR NEEDED TO PRODUCE INCOME. EXCLUDES FIRST \$1,500 OF EQUITY VALUE OF ONE VEHICLE AND COUNTS REMAINDER AS AVAILABLE RESOURCE.	EXCLUDES VEHICLES USED AS HOME, NEEDED TO PRODUCE INCOME OR TO TRANSPORT DISABLED MEMBER. COUNTS MARKET VALUE OVER \$4,500 OF 1 VEHICLE PER HOUSEHOLD AND EDUCATION AND WORK-RELATED VEHICLES. COUNTS GREATER OF FMV OVER \$4,500 OR EQUITY FOR OTHERS.	EXCLUDE ONE VEHICLE PER HOUSEHOLD REGARDLESS OF VALUE. COUNT FOR BOTH PROGRAMS THE EXCESS EQUITY (FAIR MARKET VALUE LESS ENCUMBRANCES) VALUE OF OTHER LICENSED VEHICLES.	ACCEPTED RECOMMENDATION.	LAW	\$280	\$736	INDEXING OF \$4500 FMV LIMIT IN LELAND BILL.
56. RESTORED BENEFITS (UNDERPAYMENTS): POLICY	UNDERPAYMENTS RESULTING FROM CLIENT OR AGENCY ERRORS ARE CORRECTED TO CURRENT RECIPIENTS AS LONG AS THE REPORTING REQUIREMENT FOR CHANGES IS SATISFIED. STATES MAY CORRECT UNDERPAYMENTS CAUSED BY CLIENT OR AGENCY ERROR TO FORMER RECIPIENTS.	LOST BENEFITS ARE RESTORED ONLY WHEN THE AGENCY MAKES A MISTAKE.	PAY RESTORED BENEFITS WHETHER DUE TO AGENCY OR CLIENT ERROR. CONTINUE TO ALLOW OFFSET OF RESTORED BENEFITS AGAINST OUTSTANDING CLAIMS. OFFSET POTENTIAL RESTORATIONS OLDER THAN ONE YEAR AGAINST OUTSTANDING CLAIMS.	DECIDED THAT BENEFITS SHOULD NOT BE RESTORED FOR CLIENT ERROR.	REG	\$2	\$-6	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
57. RESTORED BENEFITS (UNDERPAYMENTS): TIME LIMIT	NO TIME LIMIT FOR CORRECTION OF UNDERPAYMENTS. BENEFITS ARE RESTORED TO CURRENT RECIPIENTS BEGINNING WITH THE MONTH THAT CHANGES MUST BE REPORTED TO THE STATE AGENCY. CORRECTIVE PAYMENTS TO UNDERPAID FORMER RECIPIENTS ARE PERMITTED BUT NOT REQUIRED.	LOST BENEFITS CANNOT BE RESTORED FOR MORE THAN 12 MONTHS UNLESS THERE IS A SPECIAL EXCEPTION.	MODIFY AFDC LAW TO CONFORM WITH THE FOOD STAMP 12-MONTH LIMIT ON RESTORED BENEFITS, UNLESS REGULATIONS SPECIFY HOUSEHOLD IS ENTITLED TO LOST BENEFITS FOR A LONGER BENEFIT.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	

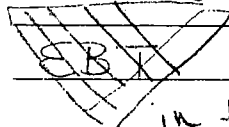
APWA AGENDA AT A GLANCE

SUNDAY JULY 18	MONDAY JULY 19	TUESDAY JULY 20	WEDNESDAY JULY 21	THURSDAY JULY 22	FRIDAY JULY 23
10:00 A.M. - 5:00 P.M. SELF-SUFFICIENCY TASK FORCE <i>Marquette</i> SMHRCY/CASSP Meeting <i>Monet I</i> 10:00 A.M. - 4:00 P.M. TA BOARD MEETING <i>Lasalle</i> 11:00 A.M. - 12:00 NOON OUTCOME MEASURES COMMITTEE <i>Monet II</i> 1:00 P.M. - 4:00 P.M. PROVIDER RELATIONS COMMITTEE <i>Monet III</i> 4:00 P.M. - 5:00 P.M. SOCIAL WORK EDUCATION COMMITTEE <i>Monet II</i> 5:00 P.M. - 6:30 P.M. AFFILIATE PRESIDENTS' MEETING <i>Lasalle</i> 6:00 P.M. - 7:00 P.M. Y AND JUVENILE COURT <i>Monet III</i>	APWA BOARD OF DIRECTORS 8:00 A.M. - 9:00 A.M. Executive Committee Meeting <i>Marquette</i> 9:00 A.M. - 5:00 P.M. Board Meeting <i>Quorum</i> 12:00 P.M. - 1:30 P.M. Lunch <i>Montcalm</i> NAPCWA MEETINGS 8:30 A.M. - 12:00 NOON Executive Committee <i>Monet I</i> 1:00 P.M. - 5:00 P.M. NAPCWA/SMHRCY Meeting <i>Ballroom C & D</i> 8:00 A.M. - 5:00 P.M. QC EXECUTIVE & TAGS <i>Lasalle</i>	8:00 A.M. - 9:30 A.M. NCBSHA OPENING SESSION <i>Solarium</i> 9:00 A.M. - 12:30 P.M. NAPCWA WORKSHOPS <i>Caucus</i> 9:30 A.M. - 12:30 NOON PROGRAM SIMPLIFICATION & COORDINATION <i>Monet IV</i> 9:30 A.M. - 5:00 P.M. JOINT MEETING OF HEALTH CARE & PUBLIC AFFAIRS TASK FORCE <i>Monet III</i> CHILD SUPPORT ENFORCEMENT <i>Monet II</i> 12:00 NOON - 4:30 P.M. NATIONAL COUNCIL OF LOCAL PUBLIC WELFARE ADMINISTRATORS <i>Lafayette</i> 12:30 P.M. - 1:30 P.M. NAPCWA LUNCH <i>Solarium</i> 1:00 P.M. - 5:00 P.M. FOOD STAMP SUBCOMMITTEE <i>Monet IV</i> QUALITY CONTROL DIRECTORS' TAGS <i>Lasalle</i> 1:30 P.M. - 5:00 P.M. NAPCWA PLENARY SESSION <i>Ballroom C&D</i> 5:30 P.M. - 7:30 P.M. RECEPTION <i>Solarium</i> 5:00 P.M. - 7:00 P.M. AA FOOD STAMP DIRECTORS Executive Committee <i>Lafayette</i>	8:00 A.M. - 9:45 A.M. NCBSHA SPECIAL SESSION <i>Ballroom A & B</i> 10:00 A.M. - 12:30 P.M. ECONOMIC SECURITY <i>Monet I</i> INFORMATION SYSTEMS <i>Monet II</i> 10:00 A.M. - 4:00 P.M. CHILDREN, FAMILY & ADULT SERVICES <i>Ballroom C&D</i> PUBLIC AFFAIRS TASK FORCE <i>Monet III</i> 1:30 P.M. - 4:00 P.M. QUALITY CONTROL <i>Monet I</i> EDUCATION, TRAINING & EMPLOYMENT <i>Monet II</i> 4:00 P.M. - 6:00 P.M. NCBSHA Executive Committee <i>Caucus</i>	8:00 A.M. - 10:00 A.M. CEO BREAKFAST MEETING <i>Monet I</i> 10:00 A.M. - 11:00 A.M. NCBSHA CLOSING SESSION <i>Ballroom A</i> JOBS POLICY FORUM 12:00 P.M. - 1:30 P.M. REGISTRATION <i>Monet Foyer</i> 1:30 P.M. - 5:00 P.M. MEETING <i>Monet I</i> 5:00 P.M. - 7:00 P.M. RECEPTION <i>Marquette</i>	JOBS POLICY FORUM 9:00 A.M. - 4:30 P.M. <i>Ballroom A</i> SATURDAY JULY 24 JOBS POLICY FORUM 9:00 A.M. - 12:00 NOON <i>Ballroom A</i>

Family Preservation,
ETC, relief for
domestic
violence

Have A Good Day

part of this
Administrative



opportunity to participate
in the Administration welfare

reform program better known AS E WAWKI

- Ellwood - 4 themes - MAKE WORK PAY
child support
TRANS. BENEFITS
- 9 issues groups

bipartisan

- welfare simplification in one
HUD, HHS, USDA,
NEC, TREASURY, E.D. & LABOR

4/6 ac
6/10 ac
fruits.

Mission to ~~standardize~~ standardize
and simplify - Food stamps,
AFDC, housing for those who
administer as well as
those who apply.

one
National
hearing
work
papers
developed

based on APWA project
Time for a Change

identify
& recommend
changes
in regulation
As well as law

THE CRITICALLY ACCLAIMED
CAFE PIERRE SERVES
AMERICAN CONTEMPORARY CUISINE
JOIN US AFTER YOUR MEETING

Bill Emerson



LOEWS L'ENFANT PLAZA
HOTEL



Have A Good Day

ADMINISTRATIVE

"flat standard for AFDC/Food Stamps"

"Expanding demonstration project
authority"

shelter deduction,

Alabama, Mn

THE CRITICALLY ACCLAIMED
CAFE PIERRE SERVES
AMERICAN CONTEMPORARY CUISINE
JOIN US AFTER YOUR MEETING



LOEWS L'ENFANT PLAZA

H O T E L

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

H O T E L.

[illegible]

H O T E L

[illegible]

H O T E L.

1

H O T E :

[illegible]

H O T E L

[illegible]

H O T E L



AMERICAN PUBLIC WELFARE ASSOCIATION

Kevin W. Concannon, President
A. Sidney Johnson III, Executive Director

PRIORITY ISSUES

RECOMMENDATIONS FOR AFDC/FOOD STAMP SIMPLIFICATION AND COORDINATION

APWA has identified the following priority areas for AFDC and food stamp simplification and coordination. These proposals should be implemented in law or regulation as quickly as possible. The issues are taken from the package of simplification and coordination recommendations adopted by the National Council of State Human Service Administrators December 10, 1992.

The five areas are not in any rank order; all are equally important. Issue number citations refer to the item number of the detailed chart of recommendations dated 7/14/93.

Budget figures have been supplied by the Food and Nutrition Service and the Administration for Children and Families. "Minimal" budget impact indicates a cost so low that it would not be counted for budget purposes.

* * * * *

I. APPLICATION PROCESS

The initial procedures now required to take and process application information present some of the most time consuming and difficult tasks in administering AFDC and food stamps. States believe current requirements can be greatly streamlined without harm to either the accuracy of case data or to applicants' opportunities to provide necessary information.

Recommendation: Simplify the food stamp program and conform it to AFDC by removing current detailed food stamp requirements and replace them with a policy allowing states to deny an application if the household does not provide requested verification within ten days. Simplify both AFDC and food stamps by allowing states to

choose what information to verify. Make optional use of the federal IEVS and SAVE systems. (Issues 4, 5, and 7)

Change required: regulatory and legislative. *Budget impact:* Food stamps, \$3 million savings; AFDC, minimal.

II. CHANGES AND BUDGETING

Many families, particularly in the Food Stamp Program, hold jobs in which wages change frequently. Participants in both programs also experience frequent changes in their family composition and expenses. States are now required to track these fluctuations closely, a policy that results in repeated contact between the family and the eligibility worker and in numerous changes to the case record. Eligibility workers spend inordinate amounts of time tracking and processing these changes; participants must repeatedly contact workers to report changes; and repeated handling of the case budget contributes to payment errors.

Recommendation: Adopt a proposal regarding estimating earned income and change reporting for non monthly reporting requirements in which adjustments in the budget for anticipated income are tied to a change in the income status, not an arbitrary \$25 as in current food stamp policy. This proposal is close to the AFDC policy used in many states. FNS is considering, but has not issued, new regulations which may address some of these concerns. Conform AFDC to food stamp policy regarding the effective date of changes and supplemental benefits to new members. Conform AFDC to food stamps to allow retrospective budgeting of nonmonthly reporters. Conform AFDC to food stamps to eliminate the 10 day reporting requirement for monthly reporters. (Issues 8, 15-17)

Change required: regulatory. *Budget impact* (available to date): minimal.

III. INCOME AND DEDUCTIONS

Perhaps no aspect of eligibility determination is as complex and time-consuming as the calculation of income and deductions from income. Both programs have highly detailed (and frequently different) rules for determining what and how much income is "counted," that is, used in calculating whether a family qualifies for assistance and if so how much. Once income is determined, many families can have their gross income reduced by a variety of expenses and other items deemed necessary for such important purposes as child care or going to work.

Recommendation: Because this issue is so complex, APWA has found it necessary to propose a number of specific recommendations. Briefly, our proposals would completely exclude from consideration several types of income now counted in one or both

programs; conform the two programs in the many detailed areas where they now differ; disregard all educational assistance; and conform the programs with respect to dependent care expenses and the incentive disregards for holding a job.

A particularly difficult issue in this group is that of incentive disregards for wage earners. AFDC and food stamps take substantially different approaches to this issue. Although food stamps is simpler, with its across-the-board deduction of a flat 20 percent, APWA doubts whether this percentage may accurately reflects the true costs of holding a job. Our recommendation is to broaden the work incentive by increasing it to 25 percent. This change would entail some budget costs but is an important support for families trying to achieve self-sufficiency. (Issues 18-20, 31-45.)

Change required: legislative. Budget impact: AFDC, \$15 million; food stamps, \$649 million. Note that almost all costs come from three food stamp issues: the earned income deduction (issue 19), exclusion of HUD utility payments (issue 35), and disregard of the first \$50 of child support payments (issue 45). The latter proposal is contained in the Mickey Leland Act food stamp legislation now in the House reconciliation package.

IV. RECERTIFICATION AND REDETERMINATION

Both AFDC and food stamps provide for renewal or extension of eligibility once a family is receiving assistance. Cases are "redetermined" in AFDC and "recertified" in food stamps through repeating some of the same interview and documentary processes required for initial application. However, the two programs take a fundamentally different approach to this issue: in AFDC, a family is considered eligible continuously until determined otherwise through the redetermination process or other change. In food stamps, a family's eligibility is finite and endures only for the "certification period" assigned based on stability of income and other factors. This fact and other substantial differences have made the recertification/redetermination process extremely cumbersome when any attempt is made to coordinate the handling of both programs for a given family.

Recommendation: Allow an "open-ended" authorization of benefits for all families in both programs, with required reviews of cases at least every 24 months. (Issues 46-47)

Change required: legislative. Budget impact: not yet determined.

V. RESOURCES

Both AFDC and food stamps allow eligible households to have certain resources--an amount of cash on hand and certain items of property, such as their home and personal items. Beyond that simple statement the two programs diverge substantially, and have different rules for both amounts and allowable categories of resources. The issue is a constant source of difficulty for both staff and participants.

Recommendation: In many areas of resource policy our proposal is straightforward and causes minimal budgetary impact. We recommend common definitions of excluded property, like treatment of the value of insurance and burial plans, and the same cash on hand limit. With regard to allowable vehicles, however, our proposal is somewhat more problematic. We believe the simplest and most equitable policy would be the complete exclusion of one vehicle per household, regardless of value, and the counting of the equity value of any other licensed vehicles. However, this change would cost \$280 million in food stamps and \$736 million in AFDC. Nevertheless we support this policy as one that serves the best interests of administrators and clients alike. We note that the Mickey Leland Act now pending in Congress would substantially raise the allowable vehicle value in the Food Stamp Program. (Issues 48-55)

Change required: regulatory and legislative. Budget impact: food stamps, \$280 million; AFDC, \$736 million.

Revised 7-15-93

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
1. ADMINISTRATIVE WAIVER AUTHORITY	DEMONSTRATION WAIVER AUTHORITY PROVIDED IN STATUTE. THERE IS NO ADMINISTRATIVE WAIVER AUTHORITY SIMILAR TO THAT IN THE FOOD STAMP PROGRAM.	7 CFR 272.3(c) ALLOWS WAIVERS OF REGULATORY PROVISIONS FOR EXTRAORDINARY TEMPORARY SITUATIONS, MORE EFFECTIVE AND EFFICIENT ADMINISTRATION OF THE PROGRAM, OR UNIQUE GEOGRAPHIC OR CLIMATIC CONDITIONS.	(1) SUPPORT THE EFFORT OF THE ADMINISTRATION FOR CHILDREN AND FAMILIES TO AMEND 45 CFR TO PERMIT APPROVAL OF ADMINISTRATIVE WAIVERS. (2) AMEND FOOD STAMP ACT TO CONFORM WITH AFDC DEMONSTRATION WAIVER AUTHORITY.	1) GROUP FAVORS RECOMMENDATION BUT WILL DISCUSS DETAILS WITH ADVOCATES. GROUP VOTED TO MAINTAIN FSP AVERAGE BENEFIT LEVEL.	REG	a	a	PROPOSED ACF ADMINISTRATIVE WAIVER ON HOLD.
2. APPLICATION PROCESS: ALIEN/CITIZENSHIP DECLARATION	EACH ADULT MUST ATTEST TO HIS/HER ALIEN OR CITIZENSHIP STATUS. ONE ADULT MAY SIGN FOR ALL CHILDREN.	THE APPLICATION FORM MUST INCLUDE A STATEMENT TO BE SIGNED BY ONE ADULT HOUSEHOLD MEMBER CERTIFYING THAT THE INFORMATION IN THE APPLICATION IS TRUE, INCLUDING INFORMATION ABOUT THE CITIZENSHIP OR ALIEN STATUS OF HOUSEHOLD MEMBERS.	AMEND SOCIAL SECURITY ACT TO ELIMINATE REQUIREMENT THAT EACH ADULT SIGN DECLARATION.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	ALIEN DECLARATION PROVISION IN RECONCILIATION BILL.

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
3. APPLICATION PROCESS: APPLICATION FORM	THE AGENCY SHALL REQUIRE A WRITTEN APPLICATION, SIGNED UNDER PENALTY OF PERJURY, ON A FORM PRESCRIBED BY THE STATE, FROM THE APPLICANT OR AUTHORIZED REPRESENTATIVE.	ACT CONTAINS SPECIFIC REQUIREMENTS FOR APPLICATION CONTENT, MANDATES USE OF A SIMPLIFIED, UNIFORM NATIONAL FORM OR APPROVED SUBSTITUTE, AND REQUIRES A COMBINED APPLICATION FOR PA HOUSEHOLDS AND GA HOUSEHOLDS IF STATE HAS STATEWIDE GA APPLICATION FORM.	FNS AND ACF JOINTLY DEVELOP A GENERIC RIGHTS AND RESPONSIBILITIES DOCUMENT. AMEND FOOD STAMP ACT TO ELIMINATE REQUIREMENTS FOR SPECIFIC APPLICATION LANGUAGE AND REQUIREMENT THAT STATE AGENCIES USE APPLICATION APPROVED BY FNS.	ACCEPTED RECOMMENDATION, SUBJECT TO ADDITIONAL STATE COMMENTS ON PROPOSED LANGUAGE.	LAW	a	a	FNS AND ACF DEVELOPED EASY-TO-READ STATEMENTS OF RIGHTS AND RESPONSIBILITIES THAT ARE GENERIC TO THE EXTENT POSSIBLE. DRAFT STATEMENTS BEING REVISED IN RESPONSE TO COMMENTS.
4. APPLICATION PROCESS: DELAY PROCEDURES	NO CORRESPONDING REQUIREMENT.	REGULATIONS PROVIDE DETAILED PROCEDURES AGENCY MUST FOLLOW IF HOUSEHOLD'S ELIGIBILITY IS NOT DETERMINED WITHIN 30 DAYS AFTER APPLICATION.	FOOD STAMPS SHOULD CONFORM WITH AFDC.	ACCEPTED RECOMMENDATION.	REG	a	n/a	SEE PROCESSING STANDARDS.

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
5. APPLICATION PROCESS: PROCESSING STANDARDS	A DECISION MUST BE REACHED WITHIN STATE-SET STANDARDS, NOT TO EXCEED 45 DAYS. STATES MUST PROVIDE BENEFITS FROM THE EARLIER OF THE DATE OF AUTHORIZATION OR 30 DAYS FROM APPLICATION. THEY MAY PROVIDE PRORATED BENEFITS FROM THE DATE OF APPLICATION.	CLIENTS MUST RECEIVE BENEFITS RETROACTIVE TO THE DATE OF APPLICATION WITHIN 30 DAYS OF APPLICATION UNDER NORMAL PROCESSING AND WITHIN 5 DAYS FOR EXPEDITED SERVICE.	ALLOW STATES TO DENY APPLICATION IF HOUSEHOLD DOES NOT PROVIDE REQUESTED VERIFICATION WITHIN 10 DAYS.	ACCEPTED RECOMMENDATION TO HAVE FNS MAKE AVAILABLE TO STATES THE OPTION TO DENY CASE AFTER 10 DAYS IF REQUESTED VERIFICATION IS NOT RECEIVED. REINSTATEMENT REQUIRED IF HH COMPLIES.	REG	a	n/a	
6. APPLICATION PROCESS: SCHEDULING SECOND INTERVIEW	CLIENT MUST BE NOTIFIED ORALLY AND IN WRITING OF RIGHTS AND RESPONSIBILITIES. THERE IS NO REQUIREMENT FOR THE AGENCY TO RESCHEDULE A MISSED INTERVIEW.	REGULATIONS REQUIRE AGENCY TO RESCHEDULE INTERVIEW IF CLIENT DOES NOT APPEAR FOR THE ONE ORIGINALLY SCHEDULED.	ELIMINATE REQUIREMENT TO SCHEDULE SECOND APPOINTMENT.	ACCEPTED RECOMMENDATION.	REG	a	n/a	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
7. APPLICATION PROCESS: VERIFICATION	INCOME MUST BE VERIFIED THROUGH IEVS, SOCIAL SECURITY NUMBERS THROUGH SSA, AND ALIEN DOCUMENTS THROUGH SAVE. STATES MAY ESTABLISH OTHER VERIFICATION REQUIREMENTS. DECISIONS RE ELIGIBILITY OR INELIGIBILITY MUST BE SUPPORTED BY FACTS IN THE CASE RECORD.	IN ADDITION TO REQUIRED VERIFICATION THROUGH IEVS AND SAVE, REGULATIONS MANDATE VERIFICATION OF INCOME, ALIEN STATUS, UTILITY AND MEDICAL EXPENSES (WHEN ACTUAL IS CLAIMED), SSN, IDENTITY, RESIDENCY, DISABILITY, AND HOUSEHOLD COMPOSITION (IF QUESTIONABLE)	SIMPLIFY VERIFICATION REQUIREMENTS SO STATES CAN DECIDE WHAT TO VERIFY. MAKE USE OF IEVS AND SAVE OPTIONAL.	ACCEPTED RECOMMENDATION.	LAW	\$-3	a	
8. BUDGETING (PROSPECTIVE): BEST ESTIMATE/ANTICIPATING INCOME	USES BEST ESTIMATE OF INCOME AND CIRCUMSTANCES BASED ON THE AGENCY'S REASONABLE EXPECTATION AND KNOWLEDGE OF CURRENT, PAST AND FUTURE CIRCUMSTANCES. INTERMITTENT INCOME MAY BE PRORATED.	INCOME RECEIVED DURING THE PAST 30 DAYS IS USED AS AN INDICATOR OF FUTURE INCOME, WITH SPECIFIED EXCEPTIONS. IF THE AMOUNT OF INCOME OR DATE THAT IT WILL BE RECEIVED IS UNCERTAIN, IT IS NOT USED. HOUSEHOLDS MAY ELECT TO HAVE INCOME AVERAGED.	ADOPT AFDC POLICY FOR FSP. AFDC POLICY IS LESS ERROR-PRONE AND ALLOWS WORKERS MORE FLEXIBILITY.	ACCEPTED RECOMMENDATION, SUBJECT TO ADDITIONAL STATE COMMENTS ON PROPOSED LANGUAGE.	REG	a	n/a	FNS DRAFTING RULE WITH CHANGES IN PROCEDURES FOR ANTICIPATING INCOME.

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
9. BUDGETING (RETROSPECTIVE): INCOME FROM A TERMINATED SOURCE	INCOME RECEIVED IN THE BEGINNING MONTHS FROM A NONCONTINUOUS SOURCE WHICH WAS COUNTED PROSPECTIVELY IS DISREGARDED IN THE FIRST AND SECOND MONTHS OF RETROSPECTIVE BUDGETING. THE DISREGARD DOES NOT APPLY IF INCOME IS RECEIVED AGAIN FROM A SIMILAR SOURCE.	INCOME RECEIVED IN BEGINNING MONTHS FROM A TERMINATED SOURCE WHICH WAS COUNTED PROSPECTIVELY IS DISREGARDED FOR THE FIRST AND SECOND MONTHS OF RETROSPECTIVE BUDGETING. THE DISREGARD APPLIES UNLESS INCOME WAS RECEIVED AGAIN FROM THE SAME FUNDING SOURCE	DIFFERENCE NO LONGER EXISTS. [FNS COMMENT: MAJOR DIFFERENCE IN LENGTH OF DISREGARD NO LONGER EXISTS. THERE IS A MINOR DIFFERENCE IN THE DEFINITION OF WHAT CONSTITUTES A TERMINATED SOURCE.]	DROPPED.		n/a	n/a	
10. BUDGETING (RETROSPECTIVE): SUSPENSION	IF INELIGIBILITY WILL BE FOR ONE MONTH ONLY, ASSISTANCE MAY BE SUSPENDED IN THE PAYMENT MONTH BASED ON INCOME AND CIRCUMSTANCES IN THE BUDGET MONTH. UNIT MUST GENERALLY BE BUDGETED RETROSPECTIVELY THE MONTH AFTER SUSPENSION.	REGULATIONS GIVE STATES OPTION OF SUSPENDING HOUSEHOLDS PROSPECTIVELY IF INELIGIBILITY WILL EXIST FOR ONE MONTH ONLY. HOUSEHOLDS MUST BE BUDGETED RETROSPECTIVELY THE MONTH AFTER SUSPENSION.	IN BOTH PROGRAMS SUSPEND RETROSPECTIVELY IF THERE IS A ONE-TIME CHANGE IN INCOME WHICH CAUSES INELIGIBILITY. CONTINUE RETROSPECTIVE BUDGETING CYCLE UNLESS THERE IS A CHANGE WHICH BY LAW OR STATE OPTION CAUSES PROSPECTIVE BUDGETING.	ACCEPTED RECOMMENDATION.	REG	a	a	RETROSPECTIVE SUSPENSION INCLUDED IN DRAFT FSP SIMPLIFICATION RULE.

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
11. BUDGETING: CONVERTING INCOME TO A MONTHLY AMOUNT	NO PROVISION, BUT STATES MAY USE CONVERSION IN CALCULATING A BEST ESTIMATE FOR CONSISTENCY WITH FOOD STAMPS.	INCOME RECEIVED WEEKLY MAY BE MULTIPLIED BY 4.3 AND BIWEEKLY INCOME BY 2.15 TO ARRIVE AT A MONTHLY FIGURE, OR THE STATE'S PUBLIC ASSISTANCE CONVERSION FACTOR MAY BE USED.	AMEND AFDC REGULATION TO MAKE CONVERSION FACTORS CONSISTENT WITH FSP REGULATIONS.	DROPPED.		n/a	n/a	DROPPED BECAUSE STATES CAN USE CONSISTENT PROCEDURES WITHOUT REGULATION.
12. BUDGETING: PRORATION OF CONTRACT AND SELF-EMPLOYMENT INCOME	ALLOWS STATES TO AVERAGE OR PRORATE CONTRACT INCOME OVER THE PERIOD OF THE CONTRACT AND SELF-EMPLOYMENT INCOME OVER THE PERIOD THE INCOME COVERS.	REQUIRES ANNUALIZING CONTRACT AND SELF-EMPLOYMENT INCOME RECEIVED IN A PERIOD SHORTER THAN ONE YEAR IF IT IS THE HOUSEHOLD'S ANNUAL INCOME. IF INCOME IS NOT THE HOUSEHOLD'S ANNUAL INCOME, IT IS PRORATED OVER THE PERIOD IT IS INTENDED TO COVER.	NO DIFFERENCE EXISTS BECAUSE AFDC REGULATIONS ALLOW INCOME TO BE PRORATED OVER THE PERIOD THE CONTRACT COVERS OR COUNTED IN THE MONTH IT IS RECEIVED.	NO CHANGE IN CURRENT REGULATIONS IS NEEDED.		n/a	n/a	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
13. CHANGES: EFFECTIVE DATE	CHANGE THAT RESULTS IN OVERPAYMENT OR UNDERPAYMENT IS EFFECTIVE IN THE MONTH OF THE CHANGE.	EFFECTIVE DATE DEPENDS ON TIME FRAMES FOR REPORTING AND ACTING ON CHANGES.	AFDC SHOULD CONFORM TO FSP POLICY ON EFFECTIVE DATE. APPLY TO BOTH PROSPECTIVE AND RETROSPECTIVE BUDGETING. ADOPT AFDC PAYMENT ADJUSTMENT LAG (PAL) QC CONCEPT FOR FSP. ADOPT FSP OVERPAYMENT ESTABLISHMENT AND CLAIMS COLLECTION POLICY FOR AFDC.	ACCEPTED RECOMMENDATION.	REG	\$5c	\$-17	
14. CHANGES: MONTHLY REPORTING AND BUDGETING REQUIREMENTS	MONTHLY REPORTING IS OPTIONAL. HOUSEHOLDS NOT REQUIRED TO REPORT MONTHLY MUST BE BUDGETED PROSPECTIVELY UNLESS WAIVER HAS BEEN GRANTED FOR CONSISTENCY WITH FSP.	MONTHLY REPORTING IS OPTIONAL, BUT PROHIBITED FOR CERTAIN CATEGORIES OF HOUSEHOLDS THAT MUST BE BUDGETED PROSPECTIVELY. OTHER HOUSEHOLDS NOT REQUIRED TO REPORT MONTHLY MAY BE BUDGETED PROSPECTIVELY OR RETROSPECTIVELY.	CHANGE AFDC LEGISLATION TO ALLOW NONMONTHLY REPORTING HOUSEHOLDS TO BE BUDGETED RETROSPECTIVELY.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	WAS IN HR 11.

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
15. CHANGES: NOTICE OF ADVERSE ACTION	ADVANCE NOTICE NOT REQUIRED WHEN, AMONG OTHER REASONS, MAIL IS RETURNED WITHOUT A FORWARDING ADDRESS.	NOTICE OF ADVERSE ACTION REQUIRED BY 7 CFR 273.13 NOT REQUIRED WHEN, AMONG OTHER REASONS, THE HOUSEHOLD VOLUNTARILY REQUESTS IN THE PRESENCE OF A CASEWORKER THAT ITS PARTICIPATION BE TERMINATED.	CONFORM TO FSP POLICY RE TOLL-FREE NUMBER AND LEGAL AID REFERRAL ON NOTICE, MASS CHANGES, AND VOLUNTARY TERMINATION OF PARTICIPATION. CONFORM TO AFDC POLICY RE RETURNED MAIL.	COMMITTEE RECOMMENDED DROPPING ISSUE OF TOLL-FREE NUMBER AND LEGAL AID INFO. ACCEPTED OTHER RECOMMENDATIONS.	REG	a	a	PROVISION REGARDING RETURNED MAIL INCLUDED IN FSP PROPOSED SIMPLIFICATION RULE.
16. CHANGES: REPORTING REQUIREMENTS	RECIPIENTS MUST REPORT PROMPTLY ALL CHANGES IN INCOME, RESOURCES AND OTHER CIRCUMSTANCES AFFECTING ELIGIBILITY OR BENEFITS AS THEY BECOME AWARE OF THEM AND ALSO ON MONTHLY REPORT IF MONTHLY REPORTING IS REQUIRED.	MONTHLY REPORTING HOUSEHOLDS NEED NOT REPORT CHANGES OUTSIDE MONTHLY REPORT FORM. CHANGE REPORTERS MUST REPORT CHANGES IN INCOME AND MEDICAL EXPENSES OF MORE THAN \$25, HOUSEHOLD COMPOSITION, RESIDENCE, LIQUID RESOURCES, AND VEHICLES WITHIN 10 DAYS.	HOUSEHOLD/ASSISTANCE UNIT REQUIRED TO REPORT ONLY CHANGES IN SOURCE OF INCOME, RATE OF PAY, EMPLOYMENT STATUS, CHANGE OF ADDRESS, HOUSEHOLD/UNIT COMPOSITION. CHANGE AFDC REGULATIONS TO REQUIRE MONTHLY REPORTERS TO REPORT CHANGES ONLY ON MONTHLY REPORT.	ACCEPTED RECOMMENDATIONS.	REG	b	b	SIMILAR CHANGE IN REPORTING REQUIREMENTS FOR EARNINGS IN FSP DRAFT RULE.

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
17. CHANGES: SUPPLEMENTAL BENEFITS FOR NEW MEMBERS	NEW PERSON IS TREATED AS AN APPLICANT AND ADDED THE DATE HE/SHE ENTERED THE HOUSEHOLD OR DATE DETERMINED ELIGIBLE. SUPPLEMENTAL BENEFITS ARE ISSUED.	SUPPLEMENTAL BENEFITS MAY BE ISSUED FOR A NEW MEMBER IN MONTH OF REPORTED CHANGE UNDER PROSPECTIVE BUDGETING. SUPPLEMENTAL BENEFITS MAY NOT BE ISSUED UNDER RETROSPECTIVE BUDGETING FOR MONTH OF CHANGE, BUT ALLOTMENT MAY BE INCREASED IF NOT ALREADY ISSUED.	CONFORM AFDC TO FOOD STAMP POLICY.	ACCEPTED RECOMMENDATION.	REG	a	d	PROPOSAL TO ALLOW CONSISTENCY WITH AFDC INCLUDED IN DRAFT FSP PROPOSED REGULATION.
18. DEDUCTIONS: DEPENDENT CARE	FOR FULLTIME WORKERS AND JOBS PARTICIPANTS: ACTUAL COSTS UP TO \$175 PER MO. PER DEPENDENT CHILD 2 AND OVER OR INCAPACITATED ADULT LIVING IN SAME HOME AND RECEIVING AFDC AND UP TO \$200 PER MO. PER CHILD UNDER 2. STATE MAY SET LESSER AMOUNT FOR PARTTIME.	ACTUAL NOT TO EXCEED \$160 PER CHILD OR OTHER DEPENDENT WHEN CARE IS NEEDED TO ACCEPT OR CONTINUE EMPLOYMENT, OR TRAINING OR EDUCATION THAT IS PREPARATORY TO EMPLOYMENT.	SET LIMITS AT \$175 PER INDIVIDUAL (\$200 FOR CHILDREN UNDER TWO). ALLOW DEDUCTION FOR SEEKING EMPLOYMENT, EMPLOYMENT, OR ATTENDING TRAINING OR SCHOOL. SUBTRACT DEDUCTION FROM HOUSEHOLD OR UNIT'S INCOME AFTER OTHER DEDUCTIONS HAVE BEEN SUBTRACTED.	DECIDED TO DELETE LAST SENTENCE. RECOMMENDED THAT AFDC CAPS FOR DEPENDENT CARE BE USED AND DEDUCTION BE ALLOWED FROM UNEARNED INCOME FOR TRAINING/EDUCATION IN BOTH PROGRAMS.	LAW	\$1	b	IN LELAND BILL.

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
19. DEDUCTIONS: EARNED INCOME DEDUCTION	DISREGARDS \$90 OF INDIVIDUAL'S EARNINGS. \$30 AND ONE-THIRD OF REMAINDER DISREGARDED IN 4 CONSECUTIVE MONTHS. THEN \$30 DISREGARDED IN 8 CONSECUTIVE MONTHS. NOT ALLOWED AGAIN UNTIL PERSON OFF AFDC FOR 12 CONSECUTIVE MONTHS.	DEDUCTS 20 PERCENT OF ALL EARNINGS.	DEDUCT 25 PERCENT OF GROSS EARNED INCOME IN ANY MONTH THE HOUSEHOLD OR ASSISTANCE UNIT HAD EARNINGS AS EARNED INCOME DEDUCTION FOR BOTH PROGRAMS.	WORK INCENTIVES NEED FURTHER CONSIDERATION.	LAW	\$298	b	
20. DEDUCTIONS: EARNED INCOME DEDUCTION PENALTY	\$90, \$30 AND ONE-THIRD, DEPENDENT CARE DISREGARDS NOT ALLOWED IF INDIVIDUAL VOLUNTARILY QUIT OR FAILED TO ACCEPT JOB, RETURN MONTHLY REPORT TIMELY, OR REQUESTED CASE TERMINATION TO AVOID RECEIVING \$30 AND ONE-THIRD DISREGARD FOR 4 CONSECUTIVE MONTHS.	WHEN CALCULATING OVERISSUANCE, EARNED INCOME DEDUCTION IS NOT ALLOWED ON PORTION OF EARNED INCOME HOUSEHOLD MEMBER WILLFULLY FAILED TO REPORT.	DO NOT ALLOW EARNED INCOME DEDUCTION IN ANY MONTH THE INCOME WAS NOT REPORTED BY THE HOUSEHOLD OR ASSISTANCE UNIT, WHETHER THROUGH INTENTIONAL PROGRAM VIOLATION OR INADVERTENT CLIENT ERROR. DISALLOWANCE AFFECTS CALCULATION OF OVERPAYMENTS, NOT BENEFITS.	ACCEPTED RECOMMENDATION.	LAW	\$-1	a	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
21. DEDUCTIONS: EXCESS MEDICAL DEDUCTION	N/A	A DEDUCTION IS ALLOWED FOR THAT PORTION OF MEDICAL EXPENSES IN EXCESS OF \$35 PER MONTH INCURRED BY ANY HOUSEHOLD MEMBER WHO IS ELDERLY OR DISABLED.	AUTHORIZE A TWO-TIERED STANDARD FOR EACH STATE TO BE CALCULATED BY EACH STATE AND APPROVED BY FNS.	AGREED TO RECOMMEND THAT MEDICAL DEDUCTION BE ELIMINATED AND THAT HOUSEHOLDS ADVERSELY AFFECTED BE COMPENSATED BY OTHER CHANGE, POSSIBLY IN MINIMUM BENEFIT LEVEL.	LAW	\$-87	n/a	
22. DEDUCTIONS: STANDARD SHELTER DEDUCTION	N/A	A DEDUCTION IS ALLOWED FOR ACTUAL SHELTER EXPENSES IN EXCESS OF 50 PERCENT OF THE HOUSEHOLD'S NET INCOME UP TO AN ANNUALLY UPDATED CAP, CURRENTLY SET AT \$194. HOUSEHOLDS CONTAINING AN ELDERLY OR DISABLED MEMBER ARE NOT SUBJECT TO THE CAP.	ELIMINATE THE REQUIREMENT TO REPORT CHANGES IN SHELTER DURING THE CERTIFICATION PERIOD. LET EACH STATE DEVELOP A STANDARD SHELTER EXPENSE USING FNS-DEVELOPED GUIDELINES. HOUSEHOLD WOULD VERIFY TO GET ACTUAL IF HIGHER.	ACCEPTED RECOMMENDATION RE NO REQUIRED REPORTING OF CHANGES IN SHELTER DURING CERT PERIOD. RECOMMENDED FNS ALLOW STATES TO CONDUCT DEMO PROJECTS USING STANDARD SHELTER EXPENSE.	LAW	b	n/a	MODIFICATION OF CURRENT DEMONSTRATION PROJECT AUTHORITY NEEDED TO ALLOW DEMONSTRATION PROJECTS WHICH USE STANDARD AND DO NOT ALLOW HOUSEHOLD OPTION TO USE HIGHER ACTUAL COSTS.

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
23. ELIGIBILITY: ALIEN STATUS	ALLOWS PARTICIPATION BY ALIENS ADMITTED FOR PERMANENT RESIDENCE OR PERMANENTLY RESIDING UNDER COLOR OF LAW (PRUCOL).	FOOD STAMP ACT LIMITS ALIEN PARTICIPATION TO THOSE ADMITTED UNDER SPECIFIED SECTIONS OF THE IMMIGRATION AND NATIONALITY ACT.	ADOPT AFDC PRUCOL PROVISION FOR FSP.	ACCEPTED RECOMMENDATION.	LAW	a	n/a	ACF AND FNS TO EXPLORE COMMITTEE REQUEST TO CLASSIFY ALIENS BY TYPE OF DOCUMENTATION.
24. ELIGIBILITY: CERTIFIED UNIT	ASSISTANCE UNIT CONSISTS OF DEPENDENT CHILDREN UNDER 18 (OR 18 IF IN SCHOOL AND WILL FINISH BEFORE 19) DEPRIVED OF PARENTAL SUPPORT AND LIVING IN THE HOME OF THE PARENT OR SPECIFIED RELATIVES. THE NEEDS, INCOME AND RESOURCES OF ALL IN UNIT ARE INCLUDED.	HOUSEHOLD USUALLY CONSISTS OF PERSONS WHO PURCHASE AND PREPARE MEALS TOGETHER. PARENTS AND CHILDREN AND SIBLINGS MAY NOT BE SEPARATE HOUSEHOLDS UNLESS THE PARENT OR SIBLING IS OVER 60 OR DISABLED OR THE CHILD OR SIBLING HAS A MINOR CHILD.	RECOMMENDS NO CHANGE IN DEFINITIONS OF CERTIFIED UNIT BECAUSE OF FUNDAMENTAL DIFFERENCES IN THE PROGRAMS. POSSIBLE ANSWER WOULD BE USE OF STANDARDIZED ALLOTMENTS FOR JOINT FSP/AFDC HOUSEHOLDS.	ACCEPTED RECOMMENDATION. STANDARDIZED ALLOTMENTS OPTION DROPPED.		n/a	n/a	LELAND BILL CONTAINS CHANGES IN FOOD STAMP HOUSEHOLD DEFINITION.
25. ELIGIBILITY: CHILD SUPPORT ASSIGNMENT AND COOPERATION	ASSIGNING TO THE STATE AGENCY ANY RIGHTS TO CHILD OR SPOUSAL SUPPORT AND COOPERATING WITH THE CHILD SUPPORT COLLECTION AGENCY IN ESTABLISHING PATERNITY AND OBTAINING SUPPORT PAYMENTS ARE CONDITIONS OF ELIGIBILITY.	NO COMPARABLE PROVISION.	CHILD SUPPORT COOPERATION SHOULD BE STATE OPTION. SAME GOOD CAUSE CRITERIA AS AFDC. DISREGARD FIRST \$50 OF CHILD SUPPORT. PROVIDE FEDERAL FINANCIAL INCENTIVES AND FFP AT CHILD SUPPORT FFP LEVEL. WAIVE INITIAL FEE.	ACCEPTED RECOMMENDATION THAT IN FSP: 1) FAMILIES BE ENCOURAGED TO COOPERATE WITH CHILD SUPPORT. 2) OPPOSE LEGISLATION TO REQUIRE COOPERATION WITH CHILD SUPPORT. 3) DISREGARD \$50.	LAW	n/a	n/a	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
26. ELIGIBILITY: POTENTIAL SOURCES OF INCOME	AGENCY MUST ESTABLISH AND CARRY OUT POLICIES WITH REFERENCE TO APPLICANTS' AND RECIPIENTS' POTENTIAL SOURCES OF INCOME THAT CAN BE DEVELOPED TO A STATE OF AVAILABILITY.	THERE IS NO REQUIREMENT THAT APPLICANTS OR RECIPIENTS APPLY FOR OTHER ASSISTANCE AS A CONDITON OF ELIGIBILITY.	REVISED POSITION PAPER RECOMMENDED LEGISLATIVE CHANGE TO FOOD STAMP ACT TO ENCOURAGE, BUT NOT REQUIRE, APPLICANTS TO APPLY FOR OTHER POTENTIAL SOURCES OF INCOME. NO CONSENSUS WAS REACHED ON THIS ISSUE.	CONSENSUS NOT REACHED.		n/a	n/a	DROPPED.
27. ELIGIBILITY: RESIDENCY REQUIREMENT	ASSISTANCE UNIT MUST RESIDE IN THE STATE, BUT THERE IS NO DURATIONAL REQUIREMENT.	HOUSEHOLD MUST RESIDE IN THE PROJECT AREA IN WHICH IT APPLIES, BUT THERE IS NO DURATIONAL REQUIREMENT.	FS ACT IS FLEXIBLE ENOUGH TO ALLOW STATES TO CONFORM FOOD STAMP POLICY TO AFDC POLICY WITHOUT A REGULATORY CHANGE. CURRENT REGULATIONS SHOULD REMAIN IN PLACE SO AS NOT TO PENALIZE STATES THAT DO NOT HAVE SYSTEMS NEEDED TO IMPLEMENT POLICY.	ACCEPTED RECOMMENDATION.	REG	a	n/a	OPTION FOR STATE RESIDENCY IN PROPOSED FSP SIMPLIFICATION RULE.

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
28. ELIGIBILITY: SOCIAL SECURITY NUMBERS	APPLICANT MUST PROVIDE SSN OR APPLY FOR ONE.	APPLICANT MUST PROVIDE NUMBER OR APPLY FOR ONE, BUT GOOD CAUSE ALLOWED FOR FAILURE TO APPLY.	CHANGE AFDC REGULATIONS TO INCLUDE FSP GOOD CAUSE CRITERIA.	LEAVE EACH PROGRAM AS IS.		n/a	n/a	DROPPED.
29. ELIGIBILITY: STRIKER DEFINITION	FAMILY INELIGIBLE IF ANY CARETAKER RELATIVE IS PARTICIPATING IN A STRIKE ON THE LAST DAY OF THE MONTH. INDIVIDUAL'S NEEDS NOT INCLUDED IF INDIVIDUAL IS ON STRIKER LAST DAY OF THE MONTH.	HOUSEHOLD IS INELIGIBLE IF ANY MEMBER IS ON STRIKE UNLESS THE HOUSEHOLD WAS ELIGIBLE PRIOR TO THE STRIKE OR THE STRIKING MEMBER WAS EXEMPT FROM WORK REGISTRATION THE DAY PRIOR TO THE STRIKE.	ELIMINATE STRIKER PROVISIONS. STRIKER ELIGIBILITY WOULD BE DETERMINED ON SAME BASIS AS THAT OF OTHER APPLICANTS AND RECIPIENTS.	ACCEPTED RECOMMENDATION. ISSUE WILL BECOME LOW PRIORITY IF COST IS HIGH.	LAW	\$56	a	
30. ELIGIBILITY: STUDENTS	NO RESTRICTIONS ON STUDENT ELIGIBILITY IN ADDITION TO THOSE FOR OTHER INDIVIDUALS.	STUDENTS MUST MEET SPECIFIC ELIGIBILITY CRITERIA IN ADDITION TO THOSE WHICH APPLY TO OTHER INDIVIDUALS.	WAIVE STUDENT ELIGIBILITY DETERMINATION FOR RECIPIENTS OF A STATE'S GA PROGRAM BENEFITS AND RECIPIENTS OF FINANCIAL EDUCATION ASSISTANCE BASED ON NEED, REGARDLESS OF SOURCE.	ACCEPTED RECOMMENDATION.	LAW	\$67	n/a	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
31. INCOME: COMPLEMENTARY PROGRAMS	PERMITS STATES TO DISREGARD THE VALUE OF ASSISTANCE PAYMENTS THAT ARE COMPLEMENTARY AND NOT DUPLICATIVE.	WITH SPECIFIED EXCEPTIONS, GENERALLY COUNTS STATE-FUNDED ASSISTANCE WHETHER PAID DIRECTLY OR VENDORED.	AMEND FOOD STAMP ACT TO ALLOW A STATE THAT EXEMPTS FUNDS FROM A COMPLEMENTARY PROGRAM IN AFDC TO ALSO EXEMPT INCOME FROM THAT PROGRAM FOR FOOD STAMPS.	ACCEPTED RECOMMENDATION.	LAW	b	n/a	
32. INCOME: EARNINGS OF 18-YEAR-OLD HIGH SCHOOL STUDENTS	DISREGARDS EARNINGS OF DEPENDENT CHILD RECIPIENT WHO IS FULL OR PART-TIME STUDENT FOR NEEDS AND BENEFIT DETERMINATION. STATE OPTION TO DISREGARD EARNINGS OF FULL-TIME STUDENT APPLICANT OR RECIPIENT FOR NEEDS AND ELIGIBILITY FOR UP TO 6 MONTHS.	COUNTS AS EARNED INCOME.	EXCLUDE INCOME OF 18 YEAR-OLD HIGH SCHOOL STUDENTS UNTIL THEY REACH 19 AS LONG AS THEY MEET THE DEFINITION OF A CHILD FOR A PARTICULAR STATE'S AFDC PROGRAM.	ACCEPTED RECOMMENDATION.	LAW	\$8	n/a	IN LELAND BILL.

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
33. INCOME: EARNINGS OF STUDENTS UNDER 18	DISREGARDS EARNINGS OF DEPENDENT CHILD RECIPIENT WHO IS FULL-TIME OR PART-TIME STUDENT FOR NEEDS AND BENEFIT DETERMINATION. STATE OPTION TO DISREGARD EARNINGS OF FULL-TIME STUDENT APPLICANT OR RECIPIENT FOR NEEDS AND ELIGIBILITY FOR UP TO 6 MONTHS.	EXCLUDES IF STUDENT IS IN SCHOOL AT LEAST HALF TIME AND IS UNDER PARENTAL CONTROL.	EXCLUDE EARNINGS OF FULL OR PART-TIME STUDENTS UNDER 18 FOR BOTH ELIGIBILITY AND BENEFIT DETERMINATIONS FOR BOTH PROGRAMS.	ACCEPTED RECOMMENDATION.	LAW	a	a	
34. INCOME: ENERGY ASSISTANCE	EXCLUDES ASSISTANCE PROVIDED UNDER LOW-INCOME HOME ENERGY ASSISTANCE ACT. STATES HAVE OPTION TO EXCLUDE ASSISTANCE FROM OTHER SPECIFIED TYPES OF PROVIDERS.	EXCLUDES CASH OR IN-KIND ENERGY ASSISTANCE UNDER FEDERAL LAW AND WITH FNS APPROVAL FROM SOME STATE AND LOCAL PROGRAMS, INCLUDING ASSISTANCE COMBINED WITH PUBLIC OR GENERAL ASSISTANCE PROGRAMS.	DISREGARD FOR BOTH PROGRAMS ANY ENERGY PAYMENT BASED ON FINANCIAL NEED. ENERGY ASSISTANCE IS DEFINED AS ANY ASSISTANCE PAID TO OR ON BEHALF OF A HOUSEHOLD TO COVER THE PAYMENT FOR FUEL TO HEAT OR COOL RESIDENCE, WHICH IS BASED ON FINANCIAL NEED.	ACCEPTED RECOMMENDATION.	LAW	b	b	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
35. INCOME: HUD UTILITY PAYMENTS	STATES HAVE OPTION TO COUNT OR DISREGARD RENT OR HOUSING SUBSIDIES AS INCOME, BUT MAY COUNT ONLY THE AMOUNT THAT EXCEEDS THE SHELTER AMOUNT ESTABLISHED IN THE PAYMENT STANDARD FOR AN ASSISTANCE UNIT OF THE SAME SIZE AND COMPOSITION.	VENDOR PAYMENTS TO LANDLORD EXCLUDED. DIRECT PAYMENTS TO HOUSEHOLD AND VENDOR PAYMENTS TO UTILITY PROVIDER COUNTED. AMOUNT HOUSEHOLD OWES LANDLORD AFTER HUD PAYMENTS IS ALLOWED AS RENT EXPENSE. IN 3RD CIRCUIT, HUD UTILITY PAYMENTS EXCLUDED.	EXCLUDE FROM INCOME FOR BOTH PROGRAMS. TREAT AS ISSUE SEPARATE FROM ENERGY ASSISTANCE.	ACCEPTED RECOMMENDATION.	LAW	\$160	n/a	
36. INCOME: IN-KIND INCOME/VENDOR PAYMENTS	EARNED IN-KIND INCOME COUNTED AS INCOME. STATE OPTION TO DISREGARD SUPPORT AND MAINTENANCE IN-KIND ASSISTANCE FURNISHED BY PRIVATE NON-PROFIT AGENCY OR SPECIFIED HOME ENERGY PROVIDERS. STATE OPTION TO COUNT OR DISREGARD UNEARNED IN-KIND INCOME.	EXCLUDES IN-KIND INCOME. UNLESS SPECIFICALLY EXCLUDED, THIRD-PARTY PAYMENTS ARE COUNTED AS INCOME IF FUNDS ARE LEGALLY OBLIGATED TO BE PAID TO THE HOUSEHOLD.	EXCLUDE IN-KIND BENEFITS AS INCOME FOR BOTH PROGRAMS. ADOPT FSP VENDOR PAYMENT POLICY FOR AFDC.	ACCEPTED RECOMMENDATIONS.	LAW	\$-3 c	\$9	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
37. INCOME: INCOME EXCLUDED BY OTHER LAWS	EXCLUSIONS FOR EDUCATION ASSISTANCE, INDIAN PER CAPITA PAYMENTS, JTPA, AND OTHERS REQUIRED BY LAW DIFFER FROM FOOD STAMP EXCLUSIONS.	EXCLUSIONS FOR EDUCATION ASSISTANCE, INDIAN PER CAPITA PAYMENTS, JTPA, AND OTHERS REQUIRED BY LAW DIFFER FROM THE AFDC EXCLUSIONS.	AMEND SOCIAL SECURITY ACT AND FOOD STAMP ACT TO MAKE LISTS OF EXCLUDED INCOME IDENTICAL. AMEND BOTH LAWS TO ALLOW THE SECRETARIES OF AGRICULTURE AND DHHS TO ISSUE REGULATIONS AT ANY TIME ANOTHER LAW MAKES INCOME FROM A PROGRAM EXEMPT FOR AFDC OR FSP.	ACCEPTED RECOMMENDATION.	LAW	b	b	
38. INCOME: INCOME OF INELIGIBLE (DISQUALIFIED) MEMBERS	TREATMENT OF THE INCOME OF AN INDIVIDUAL LIVING WITH THE UNIT BUT NOT PARTICIPATING DEPENDS ON THE REASON FOR NONPARTICIPATION. EXCEPT FOR INDIVIDUALS DISQUALIFIED FOR SPECIFIED REASONS, STATES HAVE OPTION TO ALLOCATE INCOME OF NONPARTICIPATING MEMBERS.	TREATMENT OF INCOME OF INELIGIBLE MEMBER DEPENDS ON THE REASON FOR INELIGIBILITY.	GIVE THIS DIFFERENCE LOW PRIORITY OR DROP IT UNTIL COORDINATION IS ACHIEVED IN THE REASONS FOR DISQUALIFICATION FROM PROGRAM PARTICIPATION.	ACCEPTED RECOMMENDATION. DROP AS INCOME ISSUE.		n/a	n/a	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
39. INCOME: IRREGULAR INCOME	STATE OPTION TO DISREGARD SMALL NONRECURRING GIFTS NOT TO EXCEED \$30 PER INDIVIDUAL IN A QUARTER.	FOR PROSPECTIVE BUDGETING, IRREGULAR INCOME NOT TO EXCEED \$30 IN A QUARTER DISREGARDED. IRREGULAR INCOME COUNTED IN RETROSPECTIVE BUDGETING.	REVISE FOOD STAMP ACT TO DISREGARD UP TO \$30 PER PERSON PER QUARTER OF GIFTS AND INCONSEQUENTIAL INCOME IN EITHER PROSPECTIVE OR RETROSPECTIVE BUDGETING.	ACCEPTED RECOMMENDATION.	LAW	a	n/a	
40. INCOME: JTPA EARNINGS FROM STATE TRAINING PROGRAMS	AT STATE OPTION, MAY DISREGARD UNEARNED INCOME INDEFINITELY AND EARNED INCOME FOR 6 MONTHS OF A DEPENDENT CHILD PARTICIPATING IN JTPA.	EXCLUDES ALL JTPA INCOME EXCEPT THAT FROM ON-THE-JOB TRAINING PROGRAMS UNDER SECTION 204(5) OF TITLE II, JTPA. ALL OJT INCOME OF INDIVIDUALS UNDER 19 UNDER PARENTAL CONTROL EXCLUDED.	AMEND AFDC PROGRAM TO BE CONSISTENT WITH FSP AND EXCLUDE JTPA STATE TRAINING PROGRAM INCOME OF HOUSEHOLD MEMBERS UNDER 19.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	
41. INCOME: LUMP SUM PAYMENTS	IF UNIT'S INCOME AFTER DISREGARDS EXCEEDS NEEDS STANDARD BECAUSE OF RECEIPT OF NONRECURRING EARNED OR UNEARNED LUMP SUM INCOME, UNIT IS INELIGIBLE FOR PERIOD DETERMINED BY DIVIDING LUMP SUM AMOUNT PLUS OTHER HOUSEHOLD INCOME BY NEEDS STANDARD.	ACT EXCLUDES FROM INCOME NONRECURRING LUMP-SUM PAYMENTS INCLUDING BUT NOT LIMITED TO INCOME TAX REFUNDS, REBATES OR CREDITS, RETROACTIVE LUMP-SUM SOCIAL SECURITY OR RAILROAD RETIREMENT PENSION PAYMENTS AND INSURANCE SETTLEMENTS.	AMEND SOCIAL SECURITY ACT TO ADOPT FSP POLICY. ADD PROVISIONS TO RULES OF BOTH PROGRAMS TO REQUIRE VERIFICATION OF THE DISPOSITION OF LUMP PAYMENTS IN EXCESS OF THE RESOURCE ELIGIBILITY MAXIMUMS.	ACCEPTED RECOMMENDATION.	LAW	\$-2 c	\$6	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
42. INCOME: SELF-EMPLOYMENT - CALCULATING BOARDER INCOME	ALLOWS USE OF A FLAT PERCENTAGE FOR EXPENSES IN CALCULATING INCOME FROM BOARDERS.	THE COST OF PRODUCING SELF-EMPLOYMENT BOARDER INCOME (OTHER THAN COMMERCIAL BOARDING HOUSES) IS THE GREATER OF THE MAXIMUM ALLOTMENT AMOUNT FOR THE BOARDER'S HOUSEHOLD SIZE OR THE ACTUAL COST OF PROVIDING ROOM AND BOARD.	AMEND AFDC PROGRAM TO CONFORM WITH FSP RULES AND ALLOW EITHER MAXIMUM ALLOTMENT FOR HOUSEHOLD OF THE SAME SIZE AS NUMBER OF BOARDERS OR THE ACTUAL DOCUMENTED COST, IF HIGHER THAN THE ALLOTMENT.	ACCEPTED RECOMMENDATION.	REG	n/a	a	WAIVER POSSIBLE FOR AFDC AND FSP. FSP SIMPLIFICATION RULE INCLUDES OPTION FOR PERCENTAGE FOR CHILD CARE PROVIDERS AND HOUSEHOLDS WITH BOARDERS.
43. INCOME: SELF-EMPLOYMENT EXPENSES	EXPENSES LIMITED TO THOSE WITHOUT WHICH GOODS OR SERVICES COULD NOT BE PRODUCED. DEPRECIATION, PURCHASES OF CAPITAL EQUIPMENT, PAYMENTS ON PRINCIPAL OF LOANS FOR CAPITAL ASSETS OR DURABLE GOODS, PERSONAL BUSINESS, TRANS., ENTERTAINMENT NOT ALLOWED.	EXPENSES NOT ALLOWED ARE: NET LOSSES FROM PRIOR PERIODS, DEPRECIATION, RETIREMENT MONEY, PURCHASE PRICE OR PAYMENTS ON PRINCIPAL OF LOANS FOR EQUIPMENT, PERSONAL INCOME TAXES AND OTHER WORK-RELATED EXPENSES COVERED BY EARNED INCOME DEDUCTION.	BOTH PROGRAMS SHOULD MODIFY REGULATIONS TO ALLOW SAME EXPENSES AND RECONSIDER TREATMENT OF DEPRECIATION. AMEND LAWS TO ALLOW STATES TO DEVELOP PERCENTAGE STANDARDS TO COVER THE COSTS OF DOING BUSINESS.	ACCEPTED RECOMMENDATION. NEED COMMON DEFINITIONS OF EXPENSES. WANT TO USE PERCENT, BUT NEED MORE INFORMATION TO DETERMINE WHAT THE PERCENT SHOULD BE.	REG	a	a	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
44. INCOME: STUDENT ASSISTANCE	EXCLUDES LOANS AND GRANTS OBTAINED AND USED UNDER CONDITIONS THAT PRECLUDE USE FOR CURRENT LIVING COSTS. EXCLUDES AID TO UNDERGRADUATES FROM EDUCATION DEPT. EXCLUDES COSTS OF ATTENDANCE FROM TITLE IV, BIA. STATE OPTION TO DISREGARD ALL STUDENT AID.	EXCLUDES AMOUNTS EARMARKED OR USED FOR COSTS OF ATTENDANCE, BUT COUNTS AS INCOME AMOUNTS MADE AVAILABLE FOR NORMAL LIVING COSTS.	LONG-TERM GOAL IS TO AMEND THE FOOD STAMP ACT TO TOTALLY DISREGARD ALL EDUCATIONAL ASSISTANCE. SHORT-TERM GOAL IS FOR FNS TO ALLOW STATES TO SEND A FORM TO SCHOOLS ASKING WHAT PORTION OF ASSISTANCE IS MADE AVAILABLE FOR ROOM AND BOARD.	ACCEPTED RECOMMENDATION.	LAW	\$5	n/a	LELAND BILL WOULD EXCLUDE EDUCATION ASSISTANCE.
45. INCOME: TITLE IV-D \$50 CHILD SUPPORT PASS-THROUGH PAYMENTS	DISREGARDS THE PASS-THROUGH PAYMENTS.	COUNTS PAYMENTS AS INCOME. STATES HAVE OPTION TO DISREGARD, BUT MUST PAY FNS FOR THE RESULTING ADDITIONAL BENEFITS ISSUED.	AMEND FOOD STAMP ACT TO DISREGARD THE \$50 PAYMENTS.	ACCEPTED RECOMMENDATION.	LAW	\$181	n/a	IN LELAND BILL.
46. RECERTIFICATION (REDETERMINATION): CERTIFICATION PERIODS	REDETERMINES ELIGIBILITY WHEN NECESSARY BUT AT LEAST ONCE EVERY 6 MONTHS UNLESS UNIT REPORTS MONTHLY OR IS COVERED BY APPROVED ERROR-PRONE PROFILING SYSTEM. MUST HAVE FACE-TO-FACE REDETERMINATION ONCE IN 12 MONTHS.	CERTIFICATION PERIODS OF FROM ONE TO TWELVE MONTHS ARE ASSIGNED TO NONMONTHLY REPORTING HOUSEHOLDS, DEPENDING ON HOUSEHOLD CHARACTERISTICS. MONTHLY REPORTING HOUSEHOLDS MUST BE CERTIFIED FOR SIX OR TWELVE MONTHS.	ALLOW OPEN-ENDED AUTHORIZATION OF BENEFITS FOR ALL HOUSEHOLDS. AT A MINIMUM, ALL CASES MUST BE REVIEWED EVERY 24 MONTHS.	ACCEPTED RECOMMENDATION.	LAW	b	b	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
47. RECERTIFICATION (REDETERMINATION): PROCESS	STATES MAY PRESCRIBE FORMS AND PROCEDURES.	LAW AND REGULATIONS CONTAIN SPECIFIC PROCEDURAL REQUIREMENTS FOR NOTICE OF EXPIRATION AND REAPPLICATION.	ALLOW STATE AGENCIES TO SET OWN REVIEW SCHEDULES.	ACCEPTED RECOMMENDATION.	LAW	a	a	FSP PROPOSED SIMPLIFICATION RULE WILL INCLUDE PROVISIONS ON RECERTIFICATION.
48. RESOURCES: ACCESSIBILITY	RESOURCES ARE CONSIDERED AVAILABLE WHEN ACTUALLY AVAILABLE AND WHEN THE CLIENT HAS A LEGAL INTEREST IN A LIQUIDATED SUM AND HAS THE LEGAL ABILITY TO MAKE IT AVAILABLE.	REGS EXCLUDE INACCESSIBLE RESOURCES SUCH AS THOSE IN IRREVOCABLE TRUSTS, PROBATE, SECURITY DEPOSITS, REAL PROPERTY BEING SOLD, JOINTLY HELD RESOURCES THAT CANNOT PRACTICALLY BE SUBDIVIDED AND THE OTHER OWNER REFUSES TO SELL.	COUNT THE VALUE OF PROPERTY SOLELY OWNED BY THE HOUSEHOLD/ASSISTANCE UNIT FOR BOTH PROGRAMS. EXCLUDE HEIR OR JOINTLY OWNED PROPERTY (OTHER THAN IF OWNED BY PERSONS IN THE BUDGET UNIT).	ACCEPTED RECOMMENDATION.	REG	a	a	
49. RESOURCES: BURIAL PLANS	EXCLUDES ONE BONA FIDE FUNERAL AGREEMENT PER INDIVIDUAL UP TO \$1,500 IN EQUITY VALUE OR LOWER AMOUNT AT STATE OPTION AND EXCLUDES ONE BURIAL PLOT PER INDIVIDUAL.	INACCESSIBLE FUNDS IN BURIAL AGREEMENTS AND ONE BURIAL PLOT PER MEMBER ARE EXCLUDED. ACCESSIBLE FUNDS ARE COUNTED.	EXCLUDE FOR BOTH PROGRAMS.	ACCEPTED RECOMMENDATION.	REG	a	a	PROVISION ON BURIAL PLANS IN FSP SIMPLIFICATION RULE.

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
50. RESOURCES: INCOME-PRODUCING REAL PROPERTY	COUNTS AS A RESOURCE EXCEPT UNDER PROVISIONS GOVERNING REAL PROPERTY FOR SALE.	EXCLUDES AS A RESOURCE IF PRODUCING INCOME CONSISTENT WITH ITS FAIR MARKET VALUE OR ESSENTIAL TO SELF-EMPLOYMENT, BUT COUNTS INCOME PRODUCED.	EXCLUDE FOR BOTH PROGRAMS INCOME-PRODUCING PROPERTY ESSENTIAL TO EMPLOYMENT OR SELF-EMPLOYMENT. EXCLUDE FOR BOTH PROGRAMS THE EQUITY VALUE OF REAL PROPERTY (SOLE AND CLEAR OWNERSHIP) WHICH IS PRODUCING INCOME CONSISTENT WITH ITS FAIR MARKET VALUE.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	
51. RESOURCES: LIFE INSURANCE	COUNTS AS A RESOURCE.	EXCLUDES AS A RESOURCE.	EXCLUDE FOR BOTH PROGRAMS.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	
52. RESOURCES: REAL PROPERTY FOR SALE	RESOURCE AFTER 6 MONTHS (OR 9 AT STATE OPTION) IF NOT SOLD. CLIENT MUST AGREE TO MAKE A GOOD FAITH EFFORT TO DISPOSE OF PROPERTY AND REPAY AFDC RECEIVED DURING SALE PERIOD. IF NOT SOLD DURING PERIOD, AFDC ENDS. OVERPAYMENT CALCULATED WHEN PROPERTY SOLD.	EXCLUDES FOR UNSPECIFIED TIME IF HOUSEHOLD MAKING GOOD FAITH EFFORT TO SELL.	EXCLUDE FOR BOTH PROGRAMS REAL PROPERTY THE UNIT IS MAKING A GOOD FAITH EFFORT TO SELL.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
53. RESOURCES: RESOURCE LIMIT	\$1,000 PER ASSISTANCE UNIT USING EQUITY VALUE OF RESOURCES.	\$2,000 PER HOUSEHOLD OR \$3,000 IF ONE MEMBER IS 60 OR OVER, USING EQUITY VALUE EXCEPT FOR VEHICLES. LIMIT DOES NOT APPLY TO CATEGORICALLY ELIGIBLE HOUSEHOLDS OR TO HOUSEHOLD MEMBERS WHO RECEIVE AFDC.	USE FOOD STAMP RESOURCE LIMITS.	ACCEPTED RECOMMENDATION.	LAW	b	b	
54. RESOURCES: TRANSFER	AFDC REGS CONTAIN NO PROVISION REGARDING INELIGIBILITY BECAUSE OF TRANSFER OF RESOURCES, BUT REGULATIONS ALLOW STATES TO IMPOSE ADDITIONAL CONDITIONS OF ELIGIBILITY. 35 STATES PROHIBIT TRANSFER OR OTHER DISPOSITION OF PROPERTY PRIOR TO APPLICATION.	PROHIBITS PARTICIPATION IN THE PROGRAM FOR UP TO ONE YEAR IF RESOURCE IS TRANSFERRED WITHIN 3 MONTHS PRIOR TO APPLICATION OR DURING CERTIFICATION PERIOD IN ORDER TO MEET FSP RESOURCE LIMITS.	STATES MAY CONFORM AFDC POLICY TO FSP POLICY.	ACCEPTED RECOMMENDATION.		n/a	a	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
55. RESOURCES: VEHICLES	EXCLUDES VEHICLES USED AS HOUSEHOLD HOME OR NEEDED TO PRODUCE INCOME. EXCLUDES FIRST \$1,500 OF EQUITY VALUE OF ONE VEHICLE AND COUNTS REMAINDER AS AVAILABLE RESOURCE.	EXCLUDES VEHICLES USED AS HOME, NEEDED TO PRODUCE INCOME OR TO TRANSPORT DISABLED MEMBER. COUNTS MARKET VALUE OVER \$4,500 OF 1 VEHICLE PER HOUSEHOLD AND EDUCATION AND WORK-RELATED VEHICLES. COUNTS GREATER OF FMV OVER \$4,500 OR EQUITY FOR OTHERS.	EXCLUDE ONE VEHICLE PER HOUSEHOLD REGARDLESS OF VALUE. COUNT FOR BOTH PROGRAMS THE EXCESS EQUITY (FAIR MARKET VALUE LESS ENCUMBRANCES) VALUE OF OTHER LICENSED VEHICLES.	ACCEPTED RECOMMENDATION.	LAW	\$280	\$736	INDEXING OF \$4500 FMV LIMIT IN LELAND BILL.
56. RESTORED BENEFITS (UNDERPAYMENTS): POLICY	UNDERPAYMENTS RESULTING FROM CLIENT OR AGENCY ERRORS ARE CORRECTED TO CURRENT RECIPIENTS AS LONG AS THE REPORTING REQUIREMENT FOR CHANGES IS SATISFIED. STATES MAY CORRECT UNDERPAYMENTS CAUSED BY CLIENT OR AGENCY ERROR TO FORMER RECIPIENTS.	LOST BENEFITS ARE RESTORED ONLY WHEN THE AGENCY MAKES A MISTAKE.	PAY RESTORED BENEFITS WHETHER DUE TO AGENCY OR CLIENT ERROR. CONTINUE TO ALLOW OFFSET OF RESTORED BENEFITS AGAINST OUTSTANDING CLAIMS. OFFSET POTENTIAL RESTORATIONS OLDER THAN ONE YEAR AGAINST OUTSTANDING CLAIMS.	DECIDED THAT BENEFITS SHOULD NOT BE RESTORED FOR CLIENT ERROR.	REG	\$2	\$-6	

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
57. RESTORED BENEFITS (UNDERPAYMENTS): TIME LIMIT	NO TIME LIMIT FOR CORRECTION OF UNDERPAYMENTS. BENEFITS ARE RESTORED TO CURRENT RECIPIENTS BEGINNING WITH THE MONTH THAT CHANGES MUST BE REPORTED TO THE STATE AGENCY. CORRECTIVE PAYMENTS TO UNDERPAID FORMER RECIPIENTS ARE PERMITTED BUT NOT REQUIRED.	LOST BENEFITS CANNOT BE RESTORED FOR MORE THAN 12 MONTHS UNLESS THERE IS A SPECIAL EXCEPTION.	MODIFY AFDC LAW TO CONFORM WITH THE FOOD STAMP 12-MONTH LIMIT ON RESTORED BENEFITS, UNLESS REGULATIONS SPECIFY HOUSEHOLD IS ENTITLED TO LOST BENEFITS FOR A LONGER BENEFIT.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	



NATIONAL COUNCIL OF STATE HUMAN SERVICE
ADMINISTRATORS

OPENING SESSION

Solarium Room -- L'Enfant Plaza Hotel
Washington, DC
July 20, 1993

A G E N D A

8:00 A.M.

CONVENE AND OPENING REMARKS

Larry D. Jackson, Chair and Commissioner,
Virginia Department of Social Services

PRESENTATION OF AWARDS

Hon. Jill Long

United States House of Representatives

Sammie Lynn Puett

Vice President for Public Service and Continuing
Education

University of Tennessee

**WELFARE REFORM AND HEALTH CARE
REFORM**

David Ellwood

Assistant Secretary for Planning and Evaluation, HHS

Carol Rasco

Assistant to the President for Domestic Policy

9:30 A.M.

ADJOURN



NATIONAL COUNCIL OF STATE HUMAN SERVICE
ADMINISTRATORS

SPECIAL GENERAL SESSION

for state and local administrators and agency staff only

Ballroom A&B -- L'Enfant Plaza Hotel
Washington, DC
July 21, 1993

A G E N D A

8:00 A.M. CONVENE AND OPENING REMARKS
Larry D. Jackson, Chair and Commissioner,
Virginia Department of Social Services

STATUS OF WELFARE REFORM AND
BRIEFING ON APWA TASK FORCE ON
SELF-SUFFICIENCY
Larry Jackson

9:45 A.M. ADJOURN



NATIONAL COUNCIL OF STATE HUMAN SERVICE
ADMINISTRATORS

Second Meeting of 1993

**National Council of State Human Service Administrators
National Council of Local Public Welfare Administrators
National Association of Public Child Welfare Administrators
APWA Board of Directors**

**Loews L'Enfant Plaza Hotel
Washington, D.C.
July 18-22, 1993**

A G E N D A

Sunday, July 18, 1993

National Association of Public Child Welfare Administrators (NAPCWA)

10:00 a.m. - 5:00 p.m.	SMHRCY/CASSP Meeting	Monet I
11:00 a.m. - 12:00 noon	Outcome Measures Committee	Monet II
1:00 p.m. - 4:00 p.m.	Provider Relations Committee	Monet III
4:00 p.m. - 5:00 p.m.	Social Work Education Committee	Monet II
6:00 p.m. - 7:00 p.m.	Family and Juvenile Courts Committee	Monet III

Sunday, July 18, 1993 (continued)

National Council of State Human Service Administrators

10:00 a.m. - 5:00 p.m.	Task Force on Self-Sufficiency (closed)	Marquette
4:00 p.m. - 6:00 p.m.	Registration	

Monday, July 19, 1993

7:00 a.m.	Registration	
-----------	---------------------	--

National Council of Public Child Welfare Administrators (NAPCWA)

7:30 a.m. - 8:30 a.m.	Orientation Breakfast: New NAPCWA Executive Committee members	
8:30 a.m. - 12:00 noon	NAPCWA Executive Committee	Monet I
1:00 p.m. - 5:00 p.m.	NAPCWA - SMHRCY Meeting	Ballroom C&D

National Council of State Human Service Administrators

8:30 a.m. - 5:00 p.m.	Quality Control TAG Meetings	LaSalle
8:30 a.m. - 10:00 a.m.	● Food Stamp TAG	
10:15 a.m. - 12:00 noon	● AFDC TAG	
1:00 p.m. - 2:30 p.m.	● QC Simplification	
2:30 p.m. - 5:00 p.m.	● QC Directors Board Meeting	

APWA Board of Directors

Quorum

9:00 a.m. - 5:00 p.m.	
-----------------------	--

Tuesday, July 20, 1993

7:00 a.m. Registration

National Association of Public Child Welfare Administrators (NAPCWA)

9:00 a.m. - 5:00 p.m. NAPCWA - SMHRCY Meeting

National Council of State Human Service Administrators

8:00 a.m. - 9:30 a.m. Opening Session Solarium

Leadership in Human Services Award:

Rep. Jill Long, D-Ind.

Special Appreciation Award:

Sammie Lynn Puett

Welfare Reform and Health Care Reform:

David Ellwood

Assistant Secretary for Planning and Evaluation, HHS

Carol Rasco

Assistant to the President for Domestic Policy

9:30 a.m. - 4:30 p.m. Health Care Committee Monet III

● **Implications of National Health Care Reforms for the States**

● **State Health Care Reform Initiatives: Spotlight on Three States**

**9:30 a.m. - 4:30 p.m. Public Affairs Task Force Monet III
(joint meeting with Health Care Committee)**

9:30 a.m. - 5:00 p.m. Child Support Enforcement Subcommittee Monet II

● **Child Support Reform and President Clinton's Welfare Reform Proposal**

Tuesday, July 20, 1993 (continued)

- **Update on APWA's Task Force on Self-Sufficiency and the APWA/NGA/NCSL Joint Welfare Reform Work Group**
- **Update: HHS Office of Child Support Enforcement**
- **Discussion of Audit Reform Bill**
- **Status of State Automation Systems**
- **Monitoring of Non-IV-D Withholding Cases and the Proposed Lack of FFP**

9:30 a.m. - 12:00 p.m. Task Force on Simplification and Coordination Monet IV

- **Report on Welfare Simplification and Coordination Advisory Committee's Recommendations**
- **White House Perspective**
- **Congressional and Agency Updates**

1:00 p.m. - 5:00 p.m. Food Stamp Subcommittee Monet IV

- **Status of Mickey Leland Act**
- **QC Reform Legislation and FY 92 Penalties**
- **Indian Reservation Mandates**
- **Simplification/Coordination Update**
- **HUD Utility Payments/SUA Issues**
- **SAVE Program and Waivers**

Tuesday, July 20, 1993 (continued)

1:00 p.m. - 5:00 p.m. **Quality Control TAG Meetings** **LaSalle**

1:00 p.m. - 3:00 p.m. ● **Corrective Action TAG**

3:00 p.m. - 5:00 p.m. ● **NIQCS and Medicaid**

National Council of Local Public Welfare Administrators **LaFayette**

12:15 p.m. - 1:30 p.m. ● **Council Luncheon**
Barbara Sabol, Commissioner, New York City
Human Resources Administration

1:30 p.m. - 2:00 p.m. ● **Association for the Quality of Life in America**
(AQUOLA)

2:00 p.m. - 2:30 p.m. ● **Local Initiatives: AQUOLA; Families Count**

2:30 p.m. - 2:45 p.m. ● **Break**

2:45 p.m. - 3:15 p.m. ● **Reports: Executive Director; Government Affairs**

3:15 p.m. - 3:30 p.m. ● **NAPCWA**

3:30 p.m. - 4:30 p.m. ● **Business Meeting**

* * * * *

5:30 p.m. - 7:30 p.m. **RECEPTION** **Solarium**
STATE AND LOCAL COUNCIL

Wednesday, July 21, 1993

7:00 a.m. - 4:00 p.m. Registration

National Council of State Human Service Administrators

8:00 a.m. - 9:45 a.m. Special Opening Session Ballroom A&B
(for state and local administrators
and agency staff only)
Status of Welfare Reform and Briefing on
APWA Task Force on Self-Sufficiency

10:00 a.m. - 4:00 p.m. Children Family and Adult Services Committee
Ballroom C&D

- **Regulatory Update: P. L. 96-272 and CAPTA;**
Future Regulatory Changes
- **Implementation Issues Related to Family**
Preservation Legislation
- **Update on Intercountry Adoptions**
- **Discussion of Self-neglect as it Relates to Adult**
Services
- **Legislative Update:**
H.R. 2127, Weldon/Andrews bill
Sen. Cohen's bill on grandparenting and
kinship care

10:00 a.m. - 12:30 p.m. Economic Security Committee Monet I

- **Legislative Update**
- **Subcommittee & Task Force Reports:**
Food Stamp Subcommittee
Program Simplification & Coordination
Child Support Enforcement

Wednesday, July 21, 1993 (continued)

- **Presentation/Discussion: House Republican Proposals for Welfare Reform**
- **Presentation: GAO Study--AFDC Caseload Growth**
- **Update: Implementation of "Motor Voter" Bill**

10:00 a.m. - 12:30 p.m.

Information Systems Committee

Monet II

- **Update on EBT Systems and Regulation E**
- **Enhanced Match Proposal in President's budget**
- **Next Steps in Reforming the ISM Process**
- **Discussion: Welfare Automation Regulation Guidebook**
- **Update by HHS on Automation Including CSENet and Other Issues**
- **AAPWISM Update**

10:00 a.m. - 4:00 p.m.

Public Affairs Task Force

Monet III

- **Marketing Welfare Reform:**
 1. **Vermont's Family Independence Project**
 2. **APWA's Task Force on Self-Sufficiency**
 3. **Language to Use; Language to Avoid**
- **Informal Lunch with Washington Reporters**
- **Workshop: Use of Radio Communications**
- **Welfare Simplification and Coordination: Significance for Agency Communications**
- **Problem-Solving Roundtable: Negative Press on Family Preservation**

Wednesday, July 21, 1993 (continued)

1:30 p.m. - 4:00 p.m. **Education, Training & Employment Committee Monet II**

- **Legislative Update**
- **Presentation: MDRC Evaluation of California's GAIN Program**
- **Iowa's State-Based Welfare Reform Initiative**
- **Update: National Service Legislation**

1:30 p.m. - 4:00 p.m. **Quality Control Committee Monet I**

- **Status of Food Stamp QC Reform Legislation**
- **Status of Food Stamp QC Settlement**
- **Federal Agency Update**
- **QC Directors' Affiliate Update**

4:00 p.m. - 6:00 p.m. **NCSHSA Executive Committee Caucus**

Thursday, July 22, 1993

8:00 a.m. - 10:00 a.m. **Registration**

National Council of State Human Service Administrators

8:00 a.m. - 10:00 a.m. **CEO Breakfast (CEO's only) Monet I**

10:00 a.m. - 11:00 a.m. **Closing Session Ballroom A**



NATIONAL COUNCIL OF STATE HUMAN SERVICE
ADMINISTRATORS

LEGISLATIVE AND POLICY UPDATE

JULY 16, 1993

FY 94 BUDGET RECONCILIATION

House and Senate conferees were expected to begin work the week of July 12 on resolving the differences between the House and Senate version of the FY 94 Budget Reconciliation Act (H.R. 2264 and S. 1134). Democratic leaders in Congress and the White House hope to have a bill passed before Congress adjourns for the August recess. Following is an overview of the human service provisions contained in either the House or Senate version, or both.

Food Stamp Benefit Improvements/Mickey Leland Act

On May 13 the House Agriculture Committee approved H.R. 529, the Mickey Leland Childhood Hunger Relief Act, which provides \$7.137 billion over five years to expand the Food Stamp Program. Former Rep. Leon E. Panetta (D), now Director of the Office of Management and Budget (OMB), had introduced the bill in January. The Leland Act had been passed in substantially similar form by the House last year and in 1990, but despite its broad support in Congress and by many organizations including APWA has never become law because of funding limitations. Supporters were optimistic the bill would become law this year because the Clinton administration funded the bill in its budget plan submitted to Congress earlier this year. The bill's major provisions would remove the cap on shelter deductions, simplify and liberalize the household definition, exclude from income the first \$50 received in monthly child support, increase the limit on the value of vehicles households may own, and increase the basic benefit level to 104 percent of the Thrifty Food Plan. A provision added to the original bill by the Clinton administration would also greatly simplify the handling of student income. The full House approved the Leland Act as reported by the Agriculture Committee, and the language is now in the House budget reconciliation bill.

The Senate Agriculture Committee did not take up the Leland Act, and the Senate version of the reconciliation consequently does not address food stamp expansion. Supporters must now rely on House-Senate budget conferees to include Leland funding as they determine this and other funding priorities.

Food Stamp Quality Control Reform

The House bill also includes several major food stamp quality control (QC) reforms that would substantially reduce future potential state liabilities. The reforms, first proposed several years ago and actively supported by APWA and the states, change the present food stamp target error rate to a floating national average; change the method of assessing penalties to a sliding scale that concentrates penalties on states well beyond the target; apply these changes to penalties for FY 92; extend the grace period during which states are held harmless for implementing policy changes; and mandate a study of the reasons for recent food stamp error increases and of the present system's statistical validity. The QC provisions were taken from H.R. 1195, a bill introduced last March by Rep. Jill Long (D-Ind.), which contained the states' comprehensive QC reform package. Provisions of the Long bill omitted from the House action would have eliminated the current two-tier case sampling system and replaced it with a one-tier system in which states review cases under FNS direction, and replaced the current good-cause waiver process with a system that empowers administrative law judges to vacate penalties for cause. States are continuing to work with Congress and the administration around these latter provisions in the hope they can still be included in the final version of the reconciliation package that will be worked out by the conference committee.

As with the Mickey Leland benefit provisions, there is no Senate language addressing food stamp QC.

Elimination of Enhanced Administrative Funding

Both the House and Senate reconciliation bills implement the Clinton Administration's request to eliminate enhanced federal matching funds in the Food Stamp and AFDC programs. In Food Stamps, the bills would reduce to 50 percent the current 63 percent match for automation improvements, the 75 percent match for anti-fraud activities, and the 100 percent match for the SAVE alien status verification system. The house bill phases in the cuts over three years, making them fully effective July 1, 1996, while the Senate implements the cuts April 1, 1994. Projected savings for the Senate version are \$15 million for FY 94 and \$165 million over five years, FYs 94-98.

In AFDC, the federal match rate for automation would be reduced from 90 percent to 50 percent, dramatically affecting more than 20 states that are developing automation systems. Funding for anti-fraud activities would be reduced from 75 percent to 50 percent, and funding for the Systematic Alien Verification for Entitlement (SAVE) program from 100 percent to 50 percent. The provision would be effective in April 1994.

User Fees for State Supplemental SSI Benefits

Both the House and Senate versions contain a provision that establishes a new federal user fee for administering state supplemental SSI benefits, affecting 27 states and the District of Columbia. In the majority of states this supplement is administered by the Social Security Administration (SSA) on a contractual basis at no cost. This no-cost service has been provided by SSA since 1974 to expedite the payment process, produce administrative efficiencies, and encourage states to offer "one-stop shopping" for the aged, blind, and disabled. The new fee would result in a cost shift of \$777 million to the states over five years.

Family Preservation and Support

The House version of the budget reconciliation package includes the administration's child welfare reform proposal, entitled the Family Preservation and Support Act of 1993. The child welfare provisions broaden the focus of new Title IV-B preventive services funds to include family support services. In his statement before the Ways and Means Subcommittee on Human Resources, Wendell Primus, HHS deputy assistant secretary for human services policy, noted that the administration's bill is similar to H.R. 11 but that "our legislation will help finance the continuum of services that supports 'well' and at-risk families, provides intensive services to families in crisis, and improves the foster care and adoption system for children who must be separated from their families."

The administration's proposal is significantly different from S. 596, the Family Preservation and Child Protection Reform Act of 1993 (the CPR Act), introduced by Senator John D. Rockefeller (D-W. Va.) in March. The CPR Act strongly reflects the child welfare provisions in H.R. 11, the vetoed tax and urban aid bill of the 102nd Congress. The Rockefeller proposal provides \$2.2 billion over five years for major child welfare reforms including three new entitlements to states for (1) innovative family preservation and family support services, (2) substance abuse prevention and treatment, and (3) respite care services. This measure also includes a number of Title IV-E improvements, and is currently pending before the Senate Finance Committee.

New IV-B Capped Entitlement

The House budget package's child welfare provisions include a new capped entitlement under a new Subpart 2 of Title IV-B allowing states to use "significant resources for family preservation and community-based family support services." Funds would be authorized at \$60 million in FY 94, \$135 million in FY 95, \$240 million in FY 96, \$360 million in FY 97, and \$600 million in FY 98, totaling \$1.395 billion over five years; the Congressional Budget Office (CBO) estimates total outlays of these new funds at \$1.275 billion. The federal match rate for the new entitlement is set at 75 percent, with funds allocated to states based upon the average number of children receiving food stamps in a state. The new Title IV-B entitlement will be subject to a sunset provision following FY 98, designed to allow for congressional review and evaluation of the program. The actual entitlement authorization is not subject to the sunset provision.

Family preservation and community-based family support services are defined in the administration's proposal as follows:

Family Preservation Services--Services for children and families (including foster, adoptive, and extended families) at risk or in crisis, including: services to help children, where appropriate, return to their original families or be placed for adoption, with a legal guardian, or in some other planned, permanent arrangement; preplacement preventive services, such as intensive family preservation programs, to help children at risk of foster care placement remain with their families; services designed to provide follow-up care to families to whom a child has been returned following a foster care placement; respite care of children to provide temporary relief for parents and other caregivers (such as foster parents); and services designed to improve parenting skills.

Family Support Services--Community-based services to promote the well being of children and families. The services are designed to increase the strength and stability of families (including foster, adoptive and extended families), to increase parents' confidence and competence in their parenting abilities, to afford children a stable and supportive family environment, and otherwise to enhance child development. Family support services include: respite care of children to provide temporary relief for parents and other caregivers, structured activities involving parents and children to strengthen the parent-child relationship; drop-in centers to afford families opportunities for informal interaction with other families and program staff; information and referral services to afford families access to other community services, including child care, health care, nutrition programs, adult education and literacy programs, and counseling and mentoring services; and early

developmental screening to assess the needs of children and provide assistance to families in securing services.

Set-Asides and Court Enhancement

The new Title IV-B entitlement also includes a one percent set-aside for evaluation, research, training, and technical assistance and a one percent set-aside for allotment to Indian tribal organizations. The new entitlement also funds a new four-year program of grants to the highest state courts to assess and improve handling and proceedings related to foster care and adoption. The program is funded at \$5 million for FY 95 and \$10 million for FYs 96-98. Each grant recipient will receive allotments of \$75,000 for FY 95, and \$85,000 for each of the three succeeding fiscal years, plus a share of the remainder of funds based on the state's population of individuals under 21 years of age. Courts must provide 25 percent in matching funds for the last three years.

State Plan Requirements

States will be required to involve public and private agencies and community-based agencies in the development of the state plan. New Title IV-B state plan requirements also include compliance with the Indian Child Welfare Act, a report on five year goals, and an inventory of service entitlement programs. Ninety percent of expenditures must be used for children and families, and "significant portions" of the 90 percent must go to family preservation and community-based family support services. State plans must also include an assurance that the new funds will not supplant funds for existing services and programs. For FY 94, a state that has not completed its plan may receive up to \$1 million for plan development, plus any remaining portion of its allotment to provide services to children and families. HHS must evaluate family preservation and family support programs for effectiveness with evaluation criteria developed in consultation with state, private, and nonprofit agencies.

New Title IV-B Protections

The administration's proposal repeals Section 427 effective at the start of FY 95. States would be required to provide preplacement preventive services and review laws for abandoned infants, and the implementation of such laws and procedures, to expedite permanency.

Child Welfare Traineeships

Public or nonprofit institutions of higher learning may be eligible to receive grants to provide traineeships with stipends only if the institution ensures that each trainee who receives a stipend works at a public or nonprofit child welfare agency, is employed with a public or nonprofit child welfare agency for the same length of time as the internships. The institution must track the student's employment for three years upon completion of the course of study.

Foster Care and Adoption Assistance

The administration's child welfare proposal also makes a number of changes to foster care and adoption assistance services, including modification of the child welfare review system and provision of federal matching funds for statewide automated foster care and adoption data collection systems. Specific changes include:

Adoption--Accelerate dispositional hearings for children in care by requiring that the initial hearing occur no later than 18 months from the day the child enters foster care and a subsequent hearing at least every 12 months. Children who experience a dissolved adoption retain AFDC eligibility.

Foster Care--Children in foster care must have a record that the foster care provider was advised of the child's eligibility for EPSDT under Medicaid. Effective on or after January 1, 1994. The bill permanently extends the Independent Living Program (retroactive to October 1, 1992) and authorizes it at \$70 million. The \$1,000 asset limitation for children in the Independent Living Program is eliminated. Foster and adoptive parent training would also be permanently extended retroactive to October 1, 1992. States would be required to perform certain activities for children placed in a foster home or institutional facilities "a substantial distance" from home or in a different state.

Automated Systems--Like S. 596 and last year's H.R. 11, the administration's proposal provides a 90 percent federal match for planning, design, development or installation (including hardware) of foster care and adoption data collection systems, effective FY 94 through FY 96. A 50 percent match is provided for the ongoing operation of the system effective FY 94. Systems must interface with child abuse and neglect data and Title IV-A where practicable.

Periodic Review of Foster Care Maintenance Payments--States will be required to review and report to the secretary at least every three years on the status of foster care maintenance payments. States' ability to transfer unused foster care funds to

child welfare services is eliminated, as are mandatory and voluntary ceilings on foster care funds.

Child Welfare Review System--HHS would be required to publish regulations for all Title IV-E programs with specific criteria and methodology for reviews and audits. Final regulations must specify the review timetable, the plan requirements subject to review and criteria, and the method used to determine the amount of penalty to be imposed. States not in compliance must be given an opportunity to adopt and implement a corrective action plan, with technical assistance provided by HHS. Penalties may be suspended while the corrective action plan is in effect and financial penalties on states for failure to comply are barred except under final regulations. These regulations may be published only after consultation with state agencies administering the programs. Upon enactment, the bill delays until October 1, 1994 any collection of penalties resulting from Section 427 reviews and financial reviews or audits under Title IV-E.

Demonstration Projects

Two demonstration projects are included in the child welfare provisions. The first would allow ten states over five years to use flexible funding to promote the objectives of Titles IV-B and IV-E. The second project, known as the Border Region Child Welfare Services Training Demonstration, would provide grants for up to five institutions of higher learning along the U.S.-Mexico border, including one in a urban area, to train individuals to deliver culturally sensitive and bilingual child welfare services.

Reasonable Efforts Study/Suter Amendment

The administration's bill requires HHS to study the ways states implement the reasonable efforts requirement. The HHS secretary must issue a report to Congress describing effective state practices and put forth model standards within 18 months of enactment. The Suter compromise language included in the conference report to H.R. 11 last year, and reintroduced as part of S. 596 this year, is also included in the administration's proposal.

Earned Income Tax Credit (EITC)

On March 30, 1993, President Clinton unveiled a dramatic \$28 billion expansion of the Earned Income Tax Credit (EITC), saying the plan would "make work pay." The expansion would reduce or end poverty for millions of working poor people and bring \$7 billion annually to state economies. The House-passed version contains major expansions of the program. First, benefits would be expanded so

that families of four or fewer people with a full-time minimum wage worker would be lifted to the poverty line if they also receive food stamps. Second, EITC benefits would also be adjusted for family size. The maximum credit for working families with two or more children would increase from \$2,000 to about \$3,400. Third, the EITC would be simplified so that families can apply for it more easily and both families and the IRS can handle the credit more readily without mistakes. Finally, the proposal also establishes a modest new EITC component of a few hundred dollars a year for very poor workers without children. This new credit, limited to workers with incomes below \$9,000, is designed to shield them from the effects of the president's proposed energy tax.

The Senate passed a scaled-back version that made dramatic cuts in the President's plan--more than \$10 billion lower than the President's proposal. The credit is cut so that, unlike the House-passed version, families of four with a full-time worker receiving food stamps would no longer be raised to the poverty line. The credit for childless workers is also eliminated so that there is no offset to the transportation tax for poor workers. The credit for families with two or more children is also phased in over three instead of two years.

Medicaid Provisions

Both the Senate and House of the budget reconciliation bill include numerous Medicaid amendments, most of them designed to help the states contain their burgeoning Medicaid costs. Coverage of personal care services would be optional, not mandatory as under current law. States would be allowed to limit their prescription drug formularies again. The rules regarding transfer of assets for persons seeking Medicaid payment for nursing home care would be tightened, as would the rules requiring recovery for Medicaid expenditures from a beneficiary's estate. A new national health information clearinghouse would be established to enhance a state's ability to identify, and collect from, other insurers of Medicaid recipients.

The House version also contains authority for new programs to help states fund the cost of emergency care for undocumented individuals, and for persons ill with drug resistant TB. These new programs are not included in the Senate-passed version; it is unclear whether they will be incorporated in the conference report.

Childhood Immunization Legislation

The Budget Reconciliation Act also contains a number of provisions addressing the problem of childhood immunizations. The House and Senate versions are quite different. The House bill authorizes a federal bulk vaccination purchase

program, under which the Secretary of Health and Human Services would purchase sufficient vaccine for states to supply, free of charge, Medicaid beneficiaries and uninsured and underinsured children. The Senate bill would establish state bulk purchasing programs only for the Medicaid beneficiaries; states would still buy the vaccines, but would be guaranteed the CDC price, plus shipping and handling. The Senate bill would also cap the vaccine prices, through FY 98, at the FY 93 price indexed by the Consumer Price Index. Both versions authorize federal grants for state vaccination tracking systems and enhanced outreach and education programs.

Entitlement Cap

The House bill requires the president and Congress to consider steps to control entitlements should spending exceed the levels projected in the congressional budget resolution by more than 0.5 percent. Under the provision, the president and Congress could decide jointly to reduce other benefit spending or raise taxes to make up the difference, or they could decide to allow the spending to rise; but they must vote to ratify their decision. The cap also contains no adjustment if inflation is higher than projected, leaving the programs vulnerable to large cuts. From APWA's perspective, if this provision were to be approved, the cap on entitlements would produce the worst pain for those least able to afford the cuts: poor families, the elderly, and the disabled. Entitlement growth has not caused the deficit as many have argued; entitlement spending as a percentage of the total economy has not increased since 1975 according to the Congressional Budget Office.

OTHER FOOD STAMP LEGISLATIVE AND POLICY ISSUES

FY 92 Food Stamp QC Sanctions

At the end of June the Food and Nutrition Service (FNS) notified 14 states and the District of Columbia of FY 92 quality control sanction liabilities totaling over \$258 million. The 14 states include Arizona, California, Florida, Georgia, Indiana, Iowa, Minnesota, New Hampshire, New York, Ohio, Tennessee, Texas, Washington state, and West Virginia. The average error rate for FY 92 was 10.69 percent; states were sanctioned if they exceeded the tolerance rate of 10.31 percent. Under current law the tolerance is calculated by adding one point to the lowest national average ever achieved, which is the 9.31 percent average from FY 91. Florida had the highest FY 92 error rate, 19.68 percent, and the highest sanction, \$122.4 million. Most states attributed their errors to record high caseloads, insufficient state resources, and temporary problems associated with implementation of improved automation systems. Florida also cited the aftermath

of Hurricane Andrew, which added 50,000 cases per month between September and November of 1992. Four states--Hawaii, Kentucky, North Dakota, and South Dakota--and the Virgin Islands received enhanced funding totaling nearly \$6.8 million for low error rates; Hawaii had the lowest rate, 3.85 percent, and Kentucky received the highest enhanced payment, \$4.49 million.

Florida officials have already been in contact with FNS about settling their sanction through the food stamp reinvestment option, under which states may seek federal approval to invest all or part of their potential sanction in state administrative improvements, rather than pay the sanction in cash. In January 1993 states successfully negotiated with FNS to settle their sanctions from FYs 86-91 through reinvestment of 15 percent of the amount (10 percent for Alabama) over five years. Permissible investments include second-party supervisory reviews, training in error reduction techniques, computer system upgrades that specifically improve accuracy, and other activities approved by FNS. Potential sanctions avoided by the settlement had accumulated to over \$301 million.

Hearing on Indian Reservation Mandates

The 1990 farm bill contained two provisions that require changes in food stamp issuance methods on Indian reservations. One would prohibit monthly reporting on reservations and the other would require 30-day staggered issuance for all reservation households; the provisions were passed in response to a General Accounting Office (GAO) report on complaints from Native Americans about difficulties understanding monthly reporting requirements and about stores that raise their prices when food stamps arrive each month. States contend the provisions will in fact impose additional burdens on reservation residents and will also be complex and costly to administer. States support present law which allows each state the option to use monthly reporting and the option to stagger issuance up to ten days.

In response to state concerns Congress has twice delayed implementation, most recently on April 1 by passage of legislation that postpones the provisions' effective date until January 31, 1994. The legislation was a substitute for S. 284, introduced last February by Sen. Larry Pressler (R-S.D.), which in its original version would have repealed both the farm bill provisions. Supporters of the Pressler bill included states, FNS, and some Indian groups, but the Senate would agree only to another postponement. Pressler did succeed in securing approval for a joint hearing by the Senate Agriculture and Indian Affairs committees on this and other food stamp issues affecting reservations, which was held May 25. Julie Osnes, food stamp director for South Dakota and president of the American Association of Food Stamp Directors, testified at the hearing on behalf of APWA.

Representatives from FNS and one Indian tribe and others argued at the hearing in favor of retaining present law. Only one witness presented oral testimony directly opposing repeal of the mandates, although written testimony was submitted supporting the staggered issuance mandate. Some observers believed the testimony against the farm bill mandates was strong enough to ensure they will remain suspended at least until they can be thoroughly reviewed during reauthorization of the farm bill in 1995. On the other hand a number of Senators and advocates still strongly support the mandates, and another postponement next January is far from assured. There does seem to be agreement that even if the mandates go forward they will probably require staggered issuance over only 10 days rather than 30.

SIMPLIFICATION AND COORDINATION

APWA Recommendations for AFDC and Food Stamps

In December 1992 a task force of APWA's Economic Security Committee completed a major package of recommendations to simplify and coordinate the AFDC and food stamp programs. The group identified 57 major differences between the programs and made specific legislative or regulatory recommendations in most of the areas. The proposals have been shared with Congress and the administration and have generated considerable interest. Several provisions of the Mickey Leland Act are identical or similar to the APWA recommendations, and FNS is developing a regulatory package that will address some of the issues raised in the APWA report. The House Agriculture Committee has expressed interest in a possible hearing later this year on program coordination, at which APWA's recommendations would be examined and debated.

Welfare Simplification and Coordination Advisory Committee's Report

On July 1 the Welfare Simplification and Coordination Advisory Committee released its report recommending long- and short-term changes in AFDC, food stamps, Medicaid, and low-income housing assistance programs. The committee, created by the 1990 farm bill to recommend ways to overcome barriers to access and efficient administration caused by program differences and conflicts, proposes a single "comprehensive program" consolidating present low-income programs and administered by one federal agency, with a single application form and means test. The length of assistance would vary by family need: those already employable and needing only temporary help would receive short-term assistance; those needing education and training could receive extended assistance; and those

unlikely to ever become self-sufficient, because of mental or physical disabilities, could receive long-term help.

While the single program concept is developed and debated, the group proposed a number of interim recommendations, many of which are consistent with proposals made by APWA. They include national health care reform; coordination among the many congressional committees now overseeing assistance programs; common definitions and rules and uniform change implementation schedules for all needs-based programs; expanded and liberalized demonstration project authority; audit and evaluation procedures based on outcomes; streamlined verification processes; a single case manager for all programs; more flexible rules for sharing client information; and expanded public access to understandable information on program requirements and the potential effects of changes on benefits. The committee urged immediate action on the interim recommendations, saying the public assistance system "has reached a crisis stage" and "stands in danger of collapse" unless changes are made.

Sammie Lynn Puett, a former commissioner of the Tennessee Department of Human Services, chaired the committee and three current state and local human service administrators were among its 10 members--Thomas Eichler, secretary of the Delaware Department of Services for Children, Youth and their Families (formerly secretary of Health and Social Services); Mary Deyampert, director of the North Carolina Division of Social Services; and Ray Garcia, Director of the Bureau of Program Planning and Development for the Los Angeles Department of Public Social Services. APWA worked closely with the committee and provided testimony at each of their four public meetings.

OTHER CHILDREN AND FAMILY LEGISLATIVE AND POLICY ISSUES

Family Unification Program

The Family Unification program (FUP) provides housing assistance through the Section 8 program for families whose children are at risk of initial or prolonged foster care placements primarily due to inadequate housing or homelessness. The program requires local housing authorities and child welfare agencies to work together to identify eligible families. FUP is authorized at \$104.2 million; Congress appropriated \$75 million in FY 92 for eleven states (California, Florida, Maryland, Massachusetts, Michigan, Missouri, New York, New Jersey, Ohio, Pennsylvania, and Texas). The President's FY 94 budget request included \$77.4 million to allow FUP expansion to five additional states. On June 29, the House

passed the FY 94 Veterans Administration, Housing and Urban Development and Independent Agencies Appropriations bill (H.R. 2491) that included \$77.4 million to expand FUP. The Senate Appropriations Subcommittee on VA, HUD and Independent Agencies must now take up the bill. The July 6, 1993, *Federal Register* includes a Notice of Fund Availability (NOFA) for FY 93 and a notice of FUP program guidelines. The Department of Housing and Urban Development (HUD) has selected Georgia, Illinois, Minnesota, North Carolina and Virginia to join with the eleven other states in participating in the FY 93 program.

Children of Substance Abusers Act

The Children of Substance Abusers Act (COSA), authorized at \$50 million, was signed into law in the 102nd Congress as part of the Alcohol, Drug Abuse and Mental Health Administration (ADAMHA) Reorganization Act. COSA is designed to support local networks of public and private agencies (including primary health care providers, drug rehabilitation clinics, developmental disability service providers, and child welfare agencies) to furnish an array of comprehensive services to low income women, children and families affected by substance abuse. The services are intended to deal with at-risk families holistically and encompass: prenatal health care; ongoing pediatric services; periodic evaluation for developmental, psychological and medical problems; therapeutic intervention services; mental health care and substance abuse counseling and related support services. The House Appropriations Subcommittee on Labor, HHS and Education failed to include COSA funding in its FY 94 spending bill, H.R. 2518. The Senate Appropriations Subcommittee on Labor, HHS and Education must now consider whether to include COSA funding; Senate action on the measure is not expected until September.

EBT AND REGULATION E

The Federal Reserve Board proposed on February 17, 1993, that consumer protection laws covering electronic banking transactions, known as Regulation E, be extended to cover the electronic delivery of benefits, or Electronic Benefits Transfer (EBT). Many states fear the proposed rule could hamper the growth of EBT by reducing cost savings and recipient access. There are more than 20 states that are currently pursuing EBT programs.

Approximately 40 states commented on the proposed regulation and argued against the Federal Reserve Board's proposed rule. APWA stated its case in separate meetings with several members of the Federal Reserve Board, the Undersecretary for Domestic Finance at the Treasury Department, and the

Intergovernmental Affairs director at HHS. A decision by the Federal Reserve Board is not expected until at least September.

"MOTOR VOTER" ACT OF 1993

On May 20, 1993, President Clinton signed into law the National Voter Registration Act of 1993 commonly known as the "motor voter" bill (P.L. 103-31). The new law would link registering to vote with applying for a driver's license, would require states to institute uniform procedures for mail-in registration, and would require welfare agencies to permit individuals to register to vote when they apply for benefits. All offices in a state that provide "public assistance" and "state-funded programs primarily engaged in providing services to persons with disabilities" must offer to register people to vote. The effective date of the bill is Jan. 1, 1995, except for those states with constitutional provisions that would produce a conflict with the federal law; these states are given an additional year. APWA was able to have inserted in the bills' committee reports a clarification that the administrative costs of complying with the Act would be matchable under each program's current federal match rate.

Each state's chief election official has responsibility for developing the forms for voter registration. The Federal Election Commission (FEC) will publish a report this month to help state human service agencies develop their voter registration services. APWA will distribute this report to the states and work with the FEC to make the registration process as simple and flexible as possible.

NATIONAL SERVICE

The National Service Trust Act of 1993 passed both the Senate Labor and Human Resources Committee (S. 919) and the House Education and Labor Committee (H.R. 2010) on June 16. The program would provide education awards of \$5,000 per year for a maximum of two years of service in education, the environment, human services, or public safety. Persons age 17 or older may perform community service before, during or after their post secondary education. Local programs would offer stipends to participants and the federal government would provide an 85 percent match and up to 85 percent of the cost of health- and child-care benefits for participants. The administration proposes funding to begin at \$394 million to cover about 25,000 participants in the first year, growing to 150,000 in four years. AFDC recipients with a high school degree or equivalent apparently will be able to participate in the program. The bill has bipartisan support and appears headed for passage before the end of the summer.

CHILD SUPPORT AUDIT

The Child Support Audit Advisory Committee bill (H.R. 2241) was introduced on May 24 at APWA's request by Rep. Jim McDermott (D-Wash.). The bill would reform the child support audit system so that states would not be unfairly fined and would be judged on outcomes, not process. Currently most states fail the initial audit of their IV-D system. The bill would establish a Commission to write audit procedures that would be more outcome-oriented and less process-oriented. These procedures would be used by the HHS Secretary to write new and better regulations. APWA is working with the National Governors' Association and the National Conference of State Legislatures to urge state congressional delegations to sponsor the bill.

HEALTH CARE

Congressional interest in health care issues, including both universal access to quality care and the rising cost of health care, continues to be high. As discussed above the budget reconciliation bill includes a number of Medicaid and Medicare amendments, and also authorizes additional federal funds to strengthen early childhood immunization programs in the states. Once the reconciliation bill is passed, Congressional attention will move to consider national health care reform bills.

Health Care Reform

President Clinton's comprehensive health care reform proposal is now expected to be released early in the fall. Meanwhile a number of members of Congress have moved ahead and introduced their own reform packages. Rep. Jim McDermott (D-Wash.) has introduced H.R. 1200, which is a single-payer system proposal; the bill has 85 cosponsors. Congressman Fortney H. "Pete" Stark (D-Calif.), chairman of the House Ways and Means health subcommittee, introduced H.R. 2610 on July 1. This bill, which is modeled on the Medicare program, would provide health insurance coverage for all Americans. Benefits would be comparable to those provided under Medicare; state Medicaid programs and other insurance programs could supplement the coverage. The system would be funded by a combination of employer and employee-paid premiums and a new gross receipts tax on health care providers.

Primary Care Incentives Legislation

Several pieces of legislation have been introduced that are designed to encourage the development of more primary care resources in the country, particularly in rural and inner-city areas. The bills include: H.R. 1770, for rural areas, introduced by Rep. J. Roy Rowland (D-Ga.); H.R. 1814, obstetric services in underserved areas, introduced by Rep. Michael Bilirakis (R-Fla.); and H.R. 2386 and 2387, increased Medicare reimbursement for certain medical practitioners in health professional shortage areas, introduced by Rep. Edolphus Towns (D-N.Y.). These and similar legislation are expected to be taken up as part of the deliberations on comprehensive health care reform legislation later this year.

LABOR, HHS, AND EDUCATION APPROPRIATIONS

The House on June 30 gave final approval to the FY 94 Labor, Health and Human Services (HHS) and Education, and related agencies appropriations bill. The \$215.6 billion measure (H.R. 2518) includes language that would severely restrict the use of Medicaid funds for abortion. The bill provides: \$1.1 billion for the *Job Opportunities and Basic Skills Training (JOBS) Program*; \$400 million for *refugee assistance*; \$448 million for the *Community Services Block Grant and the Stewart B. McKinney Homeless Assistance Act*; \$893 million for the *Child Care and Development Block Grant*; \$2.8 billion for the *Social Services Block Grant*; \$2.99 billion for *foster care and adoption assistance* under title IV-E of the Social Security Act; and \$842 million for *aging services programs*. During floor action on the bill, an amendment offered by House Appropriations Chairman William Natcher (D-Ky.) was approved, which provides for an indefinite appropriation during the last quarter of the fiscal year for AFDC and Medicaid. Without the language, which traditionally is included in the appropriation bill to cover unanticipated program costs such as for caseload growth, states would not have been able to draw down federal funds for the fourth quarter of the fiscal year if the appropriation under the bill was inadequate. The Senate has not completed action on its version of the bill.

APWA PRIORITIES

FY '94 OMNIBUS BUDGET RECONCILIATION ACT

Support the "Children's Initiative" Contained in the House Bill

- ♦ ***Child Welfare Reform: Family Preservation and Support.*** This provision represents the most significant federal reforms for helping abused and neglected children in over a decade. Among the critical features is a \$1.395 billion capped entitlement under Title IV-B, which allows states to invest new service dollars in proven primary prevention and to provide for the needed expansion of services to families in crisis to keep children safe and families together. Other critical provisions are directed to improving the quality of foster care and adoption assistance for children who cannot be protected at home and enhancing accountability for the provision of effective services for vulnerable children and their families. Within the Title IV-E changes, we have deep reservations regarding a provision to require certain review procedures for children placed in foster home or institutional facilities "a significant distance" from home or in a different state.
- ♦ ***Mickey Leland Childhood Hunger Relief Act.*** This provision would increase food stamp benefits and deductions by nearly \$7.3 billion over five years through such changes as raising the basic benefit level, eliminating the cap on shelter deductions, and raising the allowable value of vehicles owned. The bill also contains several important administrative reforms, including: APWA supported provisions to reform the food stamp quality control (QC) system by changing the tolerance rate to the floating national average and by computing penalties on a sliding fee scale; a simpler definition of household; simplified handling of student income; and an exemption from income of the first \$50 in child support received.
- ♦ ***The Childhood Immunization Initiative.*** Provides \$1.2 billion to increase the rate of childhood immunizations. APWA supports giving permission to state Medicaid agencies to negotiate favorable prices with vaccine manufacturers and pay them directly and providing federal funding for parental and provider education programs, outreach, and state registries for tracking a child's immunization record. We strongly oppose proposals to capture state funds that would be used to establish a federal vaccine fund or establish Medicaid eligibility for children solely for the purpose of receiving vaccinations. If

means testing is considered, we urge that the formula not be based on state income levels. Such systems perpetuate inequities in the treatment of families whose incomes are identical but live in different states.

- ♦ ***Expansion of the Earned Income Tax Credit:*** We urge opposition to the Senate's effort to scale back the expansion of the EITC. The Senate cut more than \$10 billion from the \$28 billion expansion passed by the House. The full expansion would, with food stamps, bring a family of four with a full-time, year-round worker to the poverty line. Expansion at this level would serve as an even greater incentive to work and contribute significantly to our efforts to reform the welfare system.

Oppose the Cap on Entitlement Spending Contained in the House Bill

- ♦ ***Entitlement Cap:*** The House bill requires the president and Congress to consider steps to control entitlements should spending exceed the levels projected in the congressional budget resolution by more the 0.5 percent. Under the provision, the president and Congress could decide jointly to reduce other benefit spending or raise taxes to make up the difference, or they could decide to allow the spending to rise; but they must vote to ratify their decision. If this provision were to be approved, the cap on entitlements would produce the worst pain for those least able to afford the cuts: poor families, the elderly, and the disabled. Entitlement growth has not caused the deficit as many have argued. Entitlement spending as a percentage of the total economy has not increased since 1975 according to the Congressional Budget Office.

Oppose Provisions in Both the House and the Senate that Shift Costs to the States

- ♦ ***Elimination of Enhanced Match in AFDC:*** Both the House and Senate bills would eliminate enhanced match for administrative costs for AFDC and food stamps. This would impact automation systems development and anti-fraud activities in both programs. In AFDC, the federal match rate for automation would be reduced from 90 percent to 50 percent, dramatically affecting the ability of more than 20 states that are developing automation systems. Funding from anti-fraud activities would be reduced from 75 percent to 50 percent and from 100 percent to 50 percent funding for the Systematic Alien Verification for Entitlement (SAVE) program. These reductions would come at a time when resources and personnel are already stretched under the weight of unparalleled growth in AFDC. The provision would be effective in April 1994.

- ♦ ***Elimination of Enhanced Match in Food Stamps:*** In food stamps, both the House and Senate Bills would reduce to 50 percent the current 63 percent the federal match for automation improvements, 75 percent for anti-fraud activities and 100 percent for SAVE. The House version would not be fully effective until July 1996 while the Senate version would go into effect in April 1994. As in AFDC, states are facing unparalleled growth in the food stamp program. This is the worst possible time to cripple states ability to effectively administer these programs.
- ♦ ***User Fees for State Supplemental SSI Benefits:*** Both the House and Senate versions contain a provision which establishes a new federal user fee for administering state supplemental SSI benefits affecting 27 states and the District of Columbia. In the majority of states this supplement is administered by the Social Security Administration (SSA) on a contractual basis at no cost. This no-cost service has been provided by SSA since 1974 to expedite the payment process, produce administrative efficiencies, and encourage states to offer "one-stop shopping" for the aged, blind, and disabled. This new fee would result in a cost shift of \$777 million to the states over five years.

Support the One Year Delay of the AFDC-UP Participation Rate Requirement Under JOBS Contained in the House Bill

- ♦ ***Delay in AFDC-UP Rates:*** The House bill would delay by one year from October 1, 1993 to October 21, 1994 the requirement that states meet the 40 percent participation rate requirement for AFDC-UP under the JOBS program. The Senate bill does not contain a similar version. States and localities do not have the resources to expand the JOBS program and meet this participation rate. Failure to obtain the delay or a reasonable compromise will force many states to drain badly needed resources from the current JOBS program serving AFDC mothers and teens to the JOBS program serving two-parent families. States will either fail to meet the participation rate requirement for both programs or the requirement to spend 55 percent of their funds on those with multiple barriers to employment. Failure to meet either of these requirements will result in a loss of federal funds.

NATIONAL COUNCIL
OF
STATE HUMAN SERVICE
ADMINISTRATORS

cordially invites you
to attend a

RECEPTION

in the

Solarium of the
Loews TEnfant Plaza Hotel
480 TEnfant Plaza, SW
Washington, DC

Tuesday , July 20, 1993
5:30 p.m. - 7:30 p.m.



Larry D. Jackson

Cash Bar



No Reply Necessary

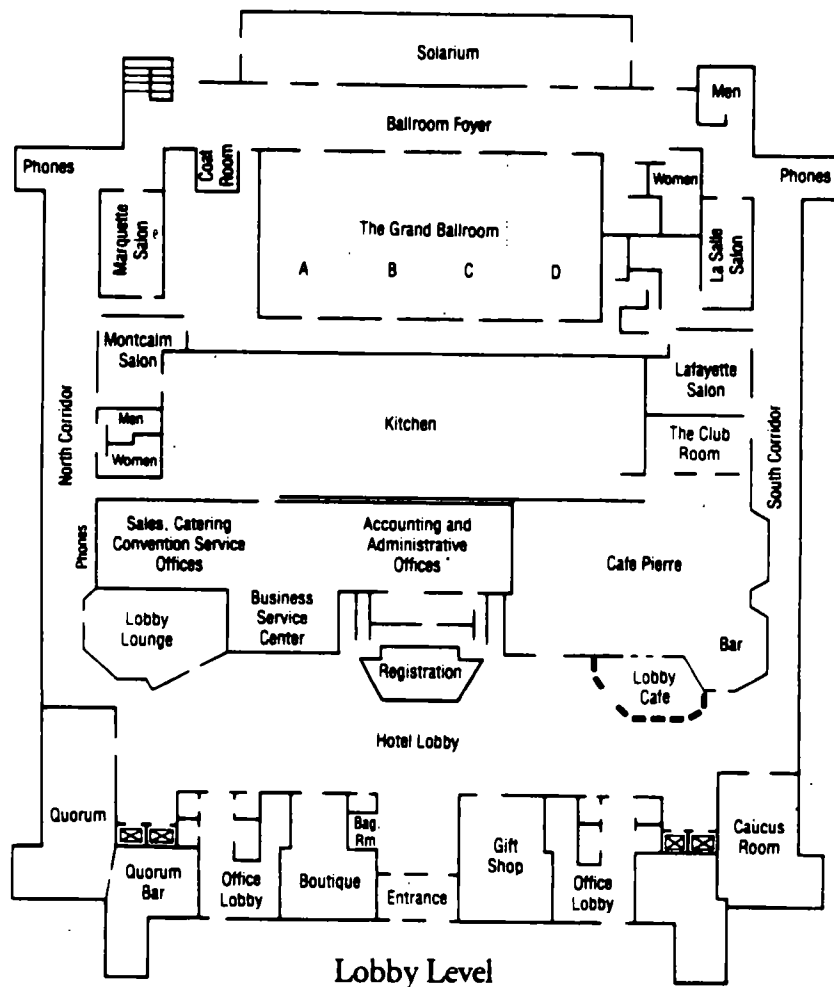
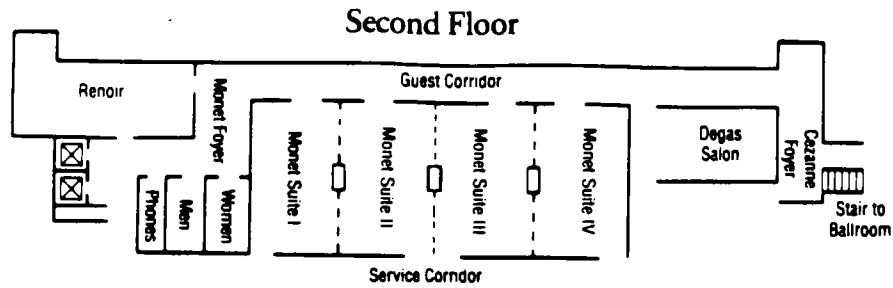
LOEWS L'ENFANT PLAZA HOTEL

480 L'Enfant Plaza Hotel

Washington, D.C.

(202) 484-1000

FLOOR PLAN

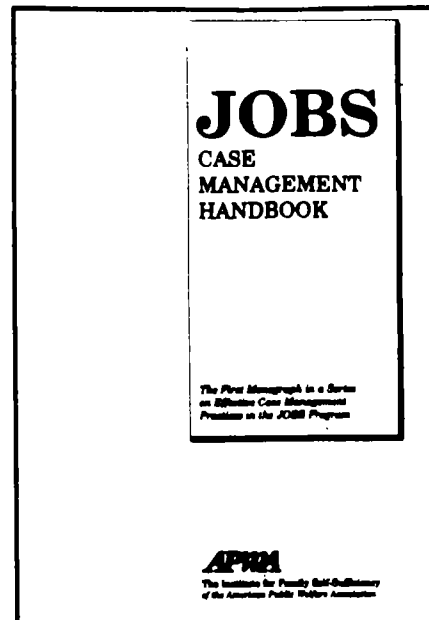


Announcing Publication of APWA's ***JOBS Case Management Handbook***

APWA's Institute for Family Self-Sufficiency has developed a ***JOBS Case Management Handbook*** for administrators and front-line staff in the Job Opportunities and Basic Skills (JOBS) Training Program. This handbook is designed to promote an understanding of how case management can contribute to the goals of family self-sufficiency and integrated service delivery.

The handbook lays out a range of options and administrative practices available to administrators, case managers, supervisors, and other practitioners who work with JOBS participants and their families. It builds upon practices in related disciplines—employment and training, child welfare, mental health, homelessness, long-term health care—to address circumstances commonly faced by JOBS case managers.

The handbook addresses issues relating to the core case management functions in JOBS including (1) orienting participants to JOBS; (2) assessing their strengths and their educational and supportive service needs; (3) developing employability plans; (4) identifying and arranging services for JOBS participants and their families; and (5) monitoring participant progress in component activities.



The handbook also presents approaches that JOBS programs can use to provide case managers with the capacity to (1) advocate on behalf of their clients; (2) help program managers identify ways to facilitate service delivery; (3) identify and help remedy service gaps within existing human service networks; and (4) develop innovative solutions for helping families resolve immediate and long-term economic and social problems.

Order Form

- ☐ Please send me _____ copies of the ***JOBS Case Management Handbook*** (prepayment is required) @ \$15 each; \$12 for APWA members. My payment is enclosed.

Ship to: (Please print)

Name _____

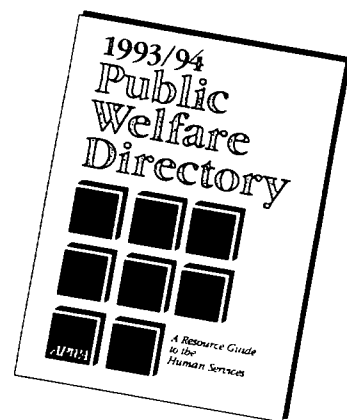
Agency/Organization _____

Street Address _____

City/State/Zip _____

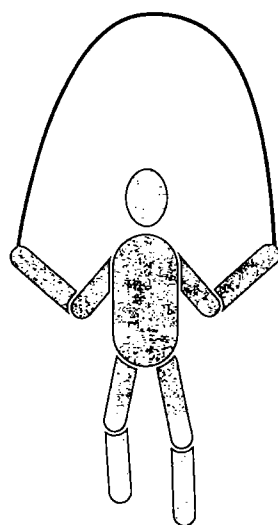
Mail Order Form to: American Public Welfare Association
Attn: Ursula Krieger
810 First Street, N.E., Suite 500
Washington, D.C. 20002-4267

APWA

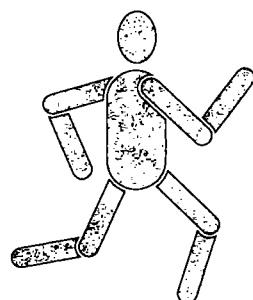
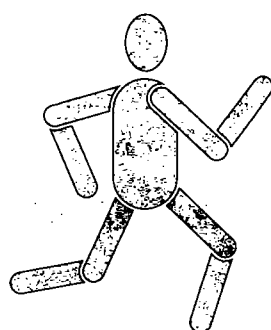


The Public Welfare Directory. ***“It gets you up to speed and keeps you there.”***

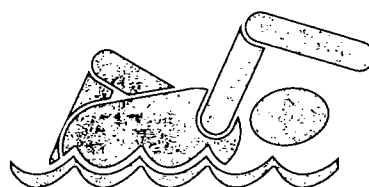
—Larry D. Jackson, Commissioner,
Virginia Department of Social Services



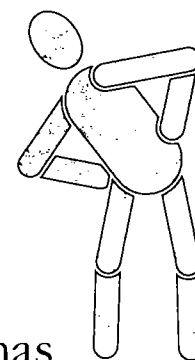
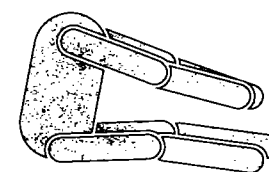
Fitness—yes!



Frustration—take a hike!

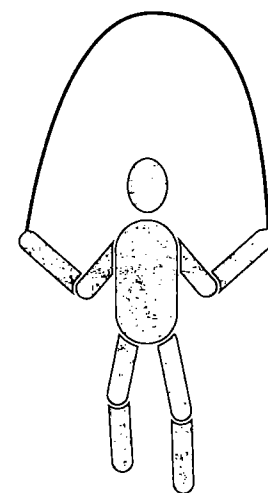


American Public Welfare Association
810 First Street, N.E., Suite 500
Washington, DC 20002-4267

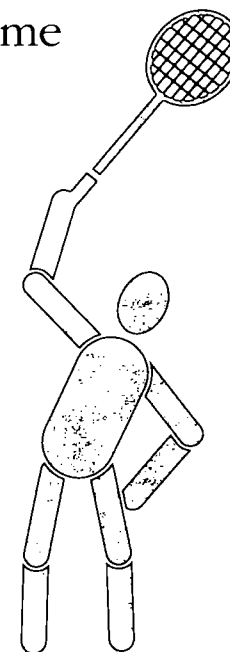


From lite cuisine
to step aerobics,
personal fitness has
become today's intelligent
choice. So when it comes to
better job performance, why

settle for a
sluggish
approach?
Misdirected
mail,
incomplete
message slips,
obsolete rotary
files waste
your time



and energy. The
**1993/94 Public
Welfare Directory**
is the one fitness
tool that efficient
human service
professionals—like
you—must have at
your fingertips.



Fitness—yes!

**Frustration—
take a hike!**

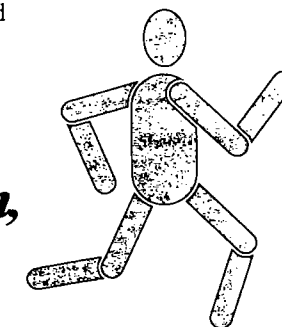
Why make three phone calls when one
will do? Or wonder if your proposal
made it to the right person's desk? The
1993/94 Public Welfare Directory
puts you in touch with vital human
service contacts for need-to-know
information that just can't wait. It's the
most comprehensive, most reliable
reference guide to every state agency,
every local agency, every government
agency in the U.S, its territories, and
Canada. Names, numbers, office hours,
program affiliations, and much, much
more.

“The *Public Welfare Directory*
is power . . . it gets you to the
right person.”

—Carmen Nazario, Secretary,
Delaware Department of Health and
Social Services

***None of the pain,
all of the gain.***

Just take a look inside . . .



CLINTON LIBRARY PHOTOCOPY

APWA

American Public Works Association

1000 17th Street, N.W., Suite 500

Washington, D.C. 20036-6203

(202) 682-5100