The Research Packet For

THE SNAP TASK FORCE

Meeting of April, 2017

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I. UNITED STATES DEPARTMENT OF AGRICULTURE

1. CASES OF SEVERELY DELAYED CERTIFICATION DUE TO STATE AGENCY FAULT, APRIL 10, 2017


State agencies are accountable for compensating SNAP-eligible households whose benefits are improperly denied, terminated, or under-issued due to the fault of the agency. However, SNAP regulations\(^1\) limit retroactivity of benefits to one year in such cases.

This memorandum clarifies that the one-year retroactivity period also applies to cases "in which the application or recertification process of an eligible household has been delayed for more than one year." FNS equates cases delayed for more than a year to an improper denial or termination.

2. COMMENT REQUEST – UNDERSTANDING THE ANTI-FRAUD MEASURES OF SNAP RETAILERS, APRIL 5, 2017

<https://www.fns.usda.gov/snap/fr-040517>

FNS is seeking comment on a survey designed to better understand the anti-fraud measures of large SNAP retailers. Fraud at retailers includes buying and selling of ineligible items like alcohol and tobacco. According to FNS, research shows that SNAP fraud rates are consistently low at large retailers such as “super store chains, large supermarket chains, convenience store chains, and other chain stores.” The agency seeks to survey managers at 45 large retailers in an effort to identify their steps in reducing fraud, both in SNAP and in general. At minimum, the survey will study anti-fraud methods at the corporate and store levels, such as “point of sale systems, analytics, training, surveillance, investigation, and liaison with law enforcement.”

Comments on the information collection are due to FNS by June 5, 2017.

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\(^1\) 7 C.F.R. 273.17(b)
3. USDA ECONOMIC RESEARCH SERVICE: COMPARING ALTERNATIVE ECONOMIC MECHANISMS TO INCREASE FRUIT AND VEGETABLE PURCHASES, APRIL 2017


Research shows that the majority of Americans, including SNAP recipients, fall short of eating enough fruits and vegetables as recommended by the Dietary Guidelines for Americans. 2007-2010 data from National Health and Nutrition Examination Survey estimated that about three quarters of Americans did not eat recommended levels of fruits, while four-fifths did not meet vegetable consumption guidelines. This report explores the effectiveness of three different incentive models – a bonus, rebate, and cash value voucher (CVV) – developed to increase fruit and vegetable purchases and consumption by SNAP recipients.

<table>
<thead>
<tr>
<th>Table 1</th>
<th>Features of three economic mechanisms</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mechanism (Form of the Benefit)</td>
<td>Calculation of Benefit</td>
</tr>
<tr>
<td>(Farmers market) bonus</td>
<td>A farmers market provides a dollar’s worth of additional benefits for each $1 of SNAP benefits that are committed to purchasing fruits and vegetables at farmers market.</td>
</tr>
<tr>
<td>Rebate</td>
<td>A percentage of expenditures on fruits and vegetables is reimbursed to the participant immediately after purchase.</td>
</tr>
<tr>
<td>Cash Value Voucher (CVV)</td>
<td>Not applicable—each participant receives each month a CVV worth a fixed dollar value.</td>
</tr>
</tbody>
</table>

The authors concluded that each of these models would promote fruit/vegetable purchases among many, but not all SNAP recipients. Bonuses and rebates, implemented at farmers’ markets and pilots around the country, help lower the effective price of fruits/vegetables. However, SNAP participants who are unaccustomed to purchasing fruits/vegetables may not buy more, even at a lower effective price. By contrast, a Cash Value Voucher designated towards fruits/vegetables would incentivize SNAP recipients to redeem vouchers towards those items. This is similar to the model used by the WIC program. However, the impact may not be as great for those who already buy fruits/vegetables, as the vouchers could simply be used to free up funds for other purchases.

The authors suggest that a pilot could be used to evaluate and compare all three mechanisms in a randomized control trial. They also emphasize that effects may vary depending on the characteristics of the target population, as well as the available administrative and public support.
4. USDA ECONOMIC RESEARCH SERVICE – THE FOOD ASSISTANCE LANDSCAPE: FY 2016 ANNUAL REPORT, MARCH 2017


This report examines trends in spending and participation in USDA FNS’ food and nutrition programs in FY 2016, and summarizes trends in household food insecurity in the US through 2015. About 1 in 4 Americans participates in USDA’s 15 food and nutrition programs at some point during the year. The majority of federal food and nutrition spending is invested towards the SNAP program, which accounted for 69 percent of all spending in FY 2016. About 14 percent of Americans participated in SNAP in an average month, receiving an average of $126 in benefits per person.

However, FY 2016 marked the third consecutive year in which SNAP participation has declined. This is notable because from 2000-2013, SNAP participation increased in 12 of the previous 13 years. An average of 44.2 million people participated in FY 2016, a seven percent decrease compared to the historical high of 47.6 million people in FY 2013. ERS attributes this trend to continued economic growth, as well as the reinstatement of SNAP time limits for able-bodied adults without dependents.

National food insecurity rates are also on the decline, with an estimated 12.7 percent of households reporting they were food-insecure at some point in 2015, compared to 14 percent in 2014. Households that experienced food insecurity were unable to access food for an active, healthy life at some point during the year. 59 percent of these households participated in SNAP, WIC, or School Lunch programs. The report notes that food insecurity rates are elevated for single-parent households, as well as households headed by Black or Hispanic members.
II. NEW YORK STATE OFFICE OF TEMPORARY AND DISABILITY ASSISTANCE

1. ADMINISTRATIVE DIRECTIVE 17-ADM-01: REQUIREMENTS FOR ABLE-BODIED ADULTS WITHOUT DEPENDENTS (ABAWDs), APRIL 13, 2017


This directive provides current policies and procedures on the treatment of Able-Bodied Adults Without Dependents (ABAWDs) in New York State. OTDA has also been informed of a federally directed change to notify households containing an ABAWD(s) who has received three months of SNAP without meeting the ABAWD requirement.

Tracking ABAWD status

Local districts must monitor each ABAWD’s compliance with the ABAWD requirement on a monthly basis. Due to the federal change, districts must now take steps to review an ABAWD’s case and issue a Notice of Adverse Action prior to the end of the ABAWD’s 3rd month of eligibility. This change is designed to prevent districts from issuing an unauthorized fourth month of SNAP benefits to an ineligible ABAWD.

The three year period began on January 1, 2016 and will continue until December 31, 2018.
Local districts are also required to evaluate SNAP households to verify the employability and ABAWD status of each member. An ABAWD who is not exempt and who does not live in a waived area must comply with ABAWD requirements (e.g. paid/unpaid work activities of 80 hours/month, work placement, etc.) in order to qualify for SNAP for more than three months in a fixed three-year period. OTDA recommends districts “limit SNAP certification periods for households that include an ABAWD to no more than six months.”

**Countable months toward ABAWD time limit**

The directive notes that a countable month does not include a calendar month during which:

- The household did not receive SNAP for the full month
- An ABAWD provides proof that he/she is exempt from the requirement
- An ABAWD provides proof that he/she resided in an area with an approved ABAWD waiver
- An ABAWD had good cause for missing some work hours, provided that the absence is temporary and the ABAWD resumes participation in a qualifying activity
- An ABAWD turned 18 years of age, unless the birthday is on the 1st of the month

**Additional clarifications**

- Districts are encouraged to discuss available qualifying work activities during the eligibility interview or other discussions with an ABAWD
- An ABAWD receiving worker’s compensation at less than a 100% benefit rate is not exempt from the ABAWD requirement, but may instead provide medical proof showing that he/she is unable to work at least 80 hours per month
- ABAWD who meet the requirement through unpaid work activities must document the actual number of hours each month, due by the 10th of the following month. The district should provide time sheets to be completed by the work site or supervisor

2. **NEW YORK STATE SNAP PARTICIPATION AND BENEFIT VALUE IN JANUARY 2017**


According to the latest data from OTDA, SNAP participation in New York State showed a very slight decrease of 0.16 percent from December 2016 to January 2017. Across the state, benefits and average benefit per household have decreased by half a percentage point or more. The average SNAP benefit in NYC is $258.99. Overall, 1,696,761 individuals participated in SNAP citywide, receiving $247,470,663 in benefits. Participation tables are available on the next page.
III. NEW YORK CITY HUMAN RESOURCES ADMINISTRATION

1. POLICY BULLETINS AND DIRECTIVES


HRA has created new notices for individuals who submit an invalid document through the NYC HRA Document Upload app for their SNAP or Cash Assistance case. HRA Document Upload can be used to return documents requested by HRA to verify or maintain eligibility for benefits. However, the app includes a disclaimer informing users that certain forms cannot be submitted using the app (e.g., applications, recertifications, periodic reports).

When HRA has identified that a SNAP client has submitted an invalid document, staff will generate an “Invalid Submission Using NYC HRA Document Upload” (FIA-1139b) notice. See Appendix A for a sample copy. The notice indicates the date of submission and the name of the invalid document. In addition, the FIA-1139b also provides options for the recipient to resubmit the form, including visiting ACCESS NYC or mailing the document in an enclosed pre-paid envelope.
Approximately 500 SNAP cases were affected by a system error with the NYC HRA Mobile Document Upload app. Due to intermittent issues, documents submitted between 7:00pm on March 10, 2017 and 5:00pm on March 13, 2017 were not indexed. As a result, clients must resubmit their documents via the app, in-person, or by mail/fax.

HRA notified affected clients via the “Information about your HRA Case” (FIA-1191) notice. A copy of the FIA-1191 is available in Appendix B. The notice instructed recipients to re-upload documents by April 10, 2017. HRA staff were instructed not to take negative case actions for missing documents until April 14, 2017.

HRA has updated its list (FIA-1138) of community-based organizations (CBOs) approved to submit documents on behalf of SNAP applicants and participants. Rather than visit their SNAP Center, clients can opt to visit a CBO in their area to return documents requested by HRA. See Appendix C for the updated list.
The FIA-1138 is included whenever the “Action is Required! You Must Submit Documents For Your SNAP Case” (FIA-1146) is issued to a SNAP client. Among the updates, several community-based organizations were removed, including:

- Department of Probation
- Phipps Soundview Community Center
- Bronxworks – Townsend
- Reaching Out Community Services
- CAMBA

**POLICY BULLETIN #17-34-ELI: REVISIONS TO THE NOTICE OF ABLE-BODIED ADULT WITHOUT DEPENDENTS (ABAWD) STATUS (FIA-1021), MARCH 30, 2017**

HRA has updated a notice issued to Able-Bodied Adults Without Dependents (ABAWDs) in New York City. The Notice of ABAWD Status (FIA-1021) informs SNAP recipients that they are classified as an ABAWD, and are subject to a three-month time limit on SNAP participation if they live in a non-waived area.

The revised notice includes new maps indicating the boundaries of areas in Queens and Manhattan exempt from ABAWD requirements in calendar year 2017. See Appendix D for sample copies of these maps.

## IV. Reports and Notable Items from Other Sources

### 1. REPORTS FROM FOOD RESEARCH AND ACTION CENTER (FRAC):

- **SNAP OVER-THE-YEAR PARTICIPATION DOWN MORE THAN 2 MILLION PEOPLE IN JANUARY 2017, THE LOWEST LEVEL IN SIX YEARS**
  
  According to the Food Research and Action Center (FRAC), SNAP participation decreased by 248,930 persons nationally from December 2016 to January 2017, the last month in which data is available. This drop reflects a continuing downward trend in SNAP participation, which in January 2017 was at its lowest level since September 2010. As in previous months, FRAC attributes the over-the-month decrease to improved economic conditions, coupled with SNAP time limits pushing some jobless adults off of SNAP.

  Over the same time period, New York State’s SNAP participation was largely unchanged, decreasing by less than half a percentage point. Meanwhile, over-the-year SNAP participation decreased by 2,137,226 people nationally, and by 25,868 people in New York State. Participation tables are available on the next page.
2. **WAIVERS ADD KEY STATE FLEXIBILITY TO SNAP’S THREE MONTH TIME LIMIT, CENTER FOR BUDGET AND POLICY PRIORITIES, MARCH 24, 2017**


Able-bodied adults without dependents (ABAWDs) are limited to three months of SNAP in a 36-month period unless they work or participate in a work or training program for 80 hours a month. This time limit was signed into law as part of welfare reform in 1996. According to a USDA study, many states have found the law to be unduly harsh and an administrative burden. As a result, many states have sought waivers to suspend the time limit for ABAWDs living in areas with insufficient jobs. This report examines ABAWD waivers and their impact on the able-bodied population.

Federal law enables states to request time limit waivers when their state unemployment rate exceeds 10 percent, or waive areas with a depressed labor market. Beyond unemployment, states have sought waivers for counties, cities and reservations for a variety of reasons. For example, some states have noted that the waiver helps local service providers like food banks, homeless shelters and health clinics – which all experience higher demand when individuals lose their SNAP benefits. Other states note that they would prefer to devote resources towards implementing work requirements tailored to their economy and available training programs.

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2. "FNS Controls Over SNAP Benefits for Able-Bodied Adults Without Dependents," USDA Office of Inspector General
3. **AMERICANS WIDELY SUPPORT PAID FAMILY AND MEDICAL LEAVE, BUT DIFFER OVER SPECIFIC POLICIES, PEW RESEARCH CENTER, MARCH 23, 2017**


Though the vast majority of Americans support paid family and medical leave, access to time off varies greatly among employers and income levels. Pew Research Center interviewed 6,000 individuals who either recently took leave, or wanted to take leave but could not, to assess their experiences and policy views. They discovered that the income divide between low- and middle/high-income wage earners significantly changed workers’ access to time off. Only 37 percent of those with annual household incomes below $30,000 had access to paid time off, whether through an employer benefit or accrued time off. Meanwhile, six out of every ten middle-income earners were paid when they took time off for family/medical reasons. As a result, individuals with low-income were much less likely to take leave when they needed it. Those who did reported financial hardships, with 48 percent saying they went on public assistance to cover their lost salary.

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**Leave takers with lower incomes are the least likely to say they received at least some pay**

<table>
<thead>
<tr>
<th>% of leave takers who say they received</th>
<th>when they took time off from work for parental, family or medical reasons</th>
</tr>
</thead>
<tbody>
<tr>
<td>[ ] Some amount as regular pay</td>
<td>[ ] Only part of regular pay</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>All leave takers</th>
<th>47</th>
<th>16</th>
<th>36</th>
</tr>
</thead>
<tbody>
<tr>
<td>Household income</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>&lt;$30,000</td>
<td>22</td>
<td>14</td>
<td>62</td>
</tr>
<tr>
<td>$30K-$74,999</td>
<td>42</td>
<td>18</td>
<td>40</td>
</tr>
<tr>
<td>$75,000+</td>
<td>58</td>
<td>15</td>
<td>26</td>
</tr>
</tbody>
</table>

Note: Share of respondents who didn’t offer an answer not shown. “Leave takers” refers to those who have taken time off for parental, family or medical reasons in the past two years. Source: Survey of U.S. adults who took or needed/wanted to take leave conducted Nov. 17-Dec. 14, 2016. “Americans Widely Support Paid Family and Medical Leave, but Differ Over Specific Policies” PEW RESEARCH CENTER
V. Hunger and Poverty in the Media

1. LOCAL NEWS

➢ “NEW YORK’S FREE-TUITION PROGRAM WILL HELP TRADITIONAL, BUT NOT TYPICAL, STUDENTS,” NEW YORK TIMES, APRIL 11, 2017

New York State will be the first state to offer free tuition for full-time students at four-year public universities. The Excelsior Scholarship, passed by the state legislature in April, will cut the cost of a four-year degree at a SUNY college from $83,000 to $57,000 for eligible families making up to $100,000 a year. To qualify, students must attend full-time and, upon graduating, work in New York State for as many years as they received the tuition award. The state’s university system estimates that 80,000 of its students will qualify for the program, while CUNY reports that only 3,000-5,000 students will benefit.

Critics note that the program will largely benefit “traditional students” who go to college straight from high school. They note that more students, particularly from low-income families, are going to school part-time so they can work. Furthermore, the Excelsior Scholarship would only kick in after other scholarships and grants, limiting its impact for poor students. Finally, the program does not cover living expenses, books, and fees. Governor Cuomo, who made the Scholarship a legislative priority, has said that the program was targeted to middle-class families.

➢ “FREE SCHOOL LUNCH FOR ALL, NYC BOROUGH PRESIDENTS INSIST,” METRO, APRIL 17, 2017

NYC’s five Borough Presidents have asked Mayor de Blasio to offer free school lunches to all public school students, regardless of their income. They insist that many students feel embarrassed among their peers to accept free lunch. Universal free lunch would ensure that all students maintain proper nutrition, which is necessary for learning and concentration. The city has already piloted a universal free lunch program offering meals to 350,000 middle school students. An expansion to additional schools would cost the city $9 million. In a statement, a representative for the De Blasio administration said that the city is reviewing the current pilot to see if it is feasible to scale it citywide.
2. NATIONAL

➢ “KIDS WHO SUFFER HUNGER IN FIRST YEARS LAG BEHIND THEIR PEERS IN SCHOOL,” NPR, MARCH 23, 2017

A new study published in the journal Child Development finds that children growing up in a food insecure household are more likely to fall behind in academic, emotional, and cognitive development upon entering kindergarten. The study builds on a body of research which shows that children who lag behind their peers struggle to catch up. Researchers surveyed parents about levels of food insecurity at different points during their children’s lives: At nine months, 2 years old, and pre-school. They also assessed children on math and reading skills, their ability to pay attention, and emotional development.

The study found that food insecurity strongly correlated with poor performance in school. The author notes that the effects may not just be the result of child hunger, but could also be the result of parents going hungry. Parents who are food insecure are more likely to be distracted and engage less with their children, which can affect their brain development. Organizations like Children’s Health Watch emphasize the importance of food and nutrition programs like SNAP and WIC to promote the health of children and families alike.

➢ “WHAT AMERICANS GET WRONG ABOUT FOOD STAMPS, ACCORDING TO AN EXPERT WHO’S SPENT 20 YEARS RESEARCHING THEM,” WASHINGTON POST, APRIL 4, 2017

Craig Gundersen, professor of agricultural and consumer economics at the University of Illinois, has spent the last 20 years studying SNAP and the public safety net. In addition to producing papers about the SNAP program funded by USDA, Gundersen has also worked to explain SNAP to state legislatures, Congressional representatives, and stakeholders in the fight against hunger.

In this interview, Gundersen dispels several myths about the SNAP program, including perceptions that SNAP discourages work, is primarily used for junk food and non-eligible items, and that the program goes to ineligible immigrants. He explains that SNAP on its own does not discourage work, SNAP recipients tend to buy less junk food compared to the general population, and that many immigrants receive benefits on behalf of their children who are citizens or US residents.
3. INTERNATIONAL

➢ “THIS FUNDAMENTAL GLOBAL PROBLEM TOUCHES EVERYTHING FROM FARMING TO TECHNOLOGY,” CNBC, APRIL 18, 2017

Global food production is sufficient to meet the needs of 7 billion people worldwide, yet many struggle to access the food they need to survive. To face the challenge of global food access, governments, corporations and start-ups are looking to invest in innovative solutions in a variety of sectors, from agriculture to technology.

The article cites the successes of Singapore, which was the third highest-ranking country behind the US and Ireland for food security. The country pursued a roadmap to diversify and reduce tariffs on its imports, helping keep food affordable. The island nation also supports local farmers with infrastructure and funding to improve their productivity. In addition, a Singapore start-up created a new form of nutritionally fortified rice to counter the impacts of climate change on staple foods.


The World Bank cites conflict as the main driver of suffering and poverty, with nearly 14 million people requiring food aid. The article points to countries like Somalia where conflict has put more than half the population in need of assistance. In Nigeria, the Boko Haram conflict has left farmers unable to grow food for the 4.8 million Nigerians who need food assistance. The author argues that hunger and famine is not caused by a lack of food, but is “the result of a deadly mix of conflict, marginalization, and weak governance.” Although crisis response saves lives, it does not solve the underlying problems of hunger. He suggests that efforts should be focused on long-term approaches to preventing conflict and promoting peace.
APPENDIX A

HRA/Family Independence Administration
Centralized Indexing Unit
P.O. Box 29008
Brooklyn, NY, 11202 - 9816

Date: ______________________
Case Number: ______________________
Case Name: ______________________
SNAP Center: ______________________

Invalid Submission Using NYC HRA Document Upload
(Supplemental Nutrition Assistance Program [SNAP])

On ________________, you used NYC HRA Document Upload to submit the following form:

☐ Supplemental Nutrition Assistance Program (SNAP) Application/Recertification (LDSS-4926)
  ☐ Application  ☐ Recertification

☐ Periodic Report (LDSS-4310)
☐ Follow-up to the Periodic Report (LDSS-4310A)
☐ Supplemental Nutrition Assistance Program (SNAP) Change Report Form (LDSS-3151)
☐ NYSNIP Supplemental Nutrition Assistance Program (SNAP) Benefits Interim Report (NYC) (LDSS-4836 NYC)

NYC HRA Document Upload cannot be used to submit applications, recertifications, or periodic reports. You must submit the form again.

You can submit the form using one of the checked options below:

☐ Go to www.nyc.gov/accessnyc.
☐ Mail in to us using the enclosed pre-paid envelope.
☐ Bring it to one of the neighborhood organizations on the list included with this letter.
☐ Fax it to ______________________.
☐ Bring it to a SNAP Center.

If you have any questions, please call (718) 557-1399.
APPENDIX B

Important Information About Your Human Resources Administration (HRA) Case

You recently used NYC HRA’s Document Upload application to submit documents for your case.

We apologize for the inconvenience, but due to a system error between March 10th and March 13th, we did not receive the documents.

The error has been fixed, but we still need your documents!

Please give us the documents by:

- April 10, 2017

You can give us the documents by:

- Uploading them using the NYC HRA Document Upload application
- Faxing them to 917-639-1111
- Bringing them to any SNAP or Job Center
- Mailing them to TIPS 24 PO BOX 380886 Brooklyn, NY 11238

If you have any questions about this letter, you can call InfoLine at 718-557-1399.
For an updated list of locations, please call one of your local Community-Based Organizations (CBOs) listed below.

**HRA's Office**

- **New York City**
  - 111 West 34th Street, New York, NY 10012
- **Brooklyn**
  - 500 Eastern Parkway, New York, NY 11213
- **Bronx**
  - 275 Northern Avenue, New York, NY 10467
- **Queens**
  - 6583 Broadway, New York, NY 11373
- **Staten Island**
  - 1150 Victory Avenue, Brooklyn, NY 11217

For more information, please visit the SNAP website at [SNAP.Gov](http://SNAP.Gov).
APPENDIX D

Upper Manhattan Map

People who live north of the bolded lines in Manhattan do not have to meet the ABAWD work requirements. If it is not clear if you reside in an area where individuals must meet ABAWD work requirements, you should call the HRA Infoline at 718-557-1399.
Queens Community District 12 Map

People who live within the bolded lines in Queens do not have to meet the ABAWD work requirements. If it is not clear if you reside in an area where individuals must meet ABAWD work requirements, you should call the HRA Infoline at 718-557-1399.