

Best Practices for SNAP Elderly Simplified Application Projects

SCOPE ■ State

PROGRAM ■ Supplemental Nutrition Assistance Program (SNAP)

PRACTICE ■

States can request a SNAP waiver from the U.S. Department of Agriculture (USDA) to implement the Elderly Simplified Application Project (ESAP) for households with seniors and/or people with disabilities that have no earned income. ESAP allows states to streamline the application and recertification process, helping more seniors (age 60 and older) and people with disabilities benefit from SNAP.

Advocates can encourage the state agency to apply for a waiver to implement ESAP, help a state improve an existing ESAP waiver, and/or partner on ESAP implementation. Once ESAP is implemented, advocates can target enrollment assistance to ESAP-eligible seniors (and, depending on the scope of the waiver, eligible people with disabilities).

WHY ■

Food insecurity is a significant problem in the United States, including among older Americans and people with disabilities. An estimated 9.5 percent of the more than 45 million households with seniors are food insecure (on average each year from 2014-2016).ⁱ Moreover, food insecurity impacts one-third of households with a working-age adult who is out of the labor force due to

disability, and one quarter of households with a working-age adult with a disability who has remained in the workforce.ⁱⁱ

Older adults and people with disabilities may face unique barriers when applying or recertifying for SNAP. They may have limited mobility to get to a SNAP office or have difficulty accessing or using online applications, mobile apps, and other technological innovations that can make it easier to access SNAP. Among SNAP households “coming due for recertification, households with elderly or disabled members are more likely than others to churn”ⁱⁱⁱ (i.e., experience interruptions in their connections to SNAP due to procedural factors rather than financial ineligibility).

Because of these and other factors, many seniors are missing out on SNAP benefits that could improve their nutrition, health, and economic security. On average, only 45 percent of eligible older adults participate in SNAP.^{iv}

BACKGROUND ■

ESAP is a package of SNAP policy waivers and procedures that serve to increase administrative efficiencies and decrease barriers for seniors and persons with disabilities with no earned income. Early ESAP implementing states were Alabama, Florida, and South Carolina. Since then California, Colorado, Massachusetts, and a

number of other states have implemented ESAP.^v States can decide which of the available ESAP components they wish to adopt and can align ESAP with other waivers and procedures that support eligible seniors and people with disabilities to access SNAP. ESAP projects must be approved by USDA-FNS and are granted for five years.

Policy Waivers To help more seniors and persons with disabilities readily get and keep SNAP, ESAP states typically include the following waiver requests:

- extending the recertification period to three years;¹
- eliminating the need for an interview to recertify for SNAP;² and
- requiring verification—of unearned income, household size, residency, identity, and/or shelter expenses—from the client only if the information is questionable.³ (The state agency uses electronic data sources to the greatest extent possible to verify client information, e.g., income and social security number.)

¹ This waives the requirement that SNAP certification periods shall not exceed 12 months, except for households where all members are people 60+ or people with disabilities, they may be up to 24 months. ([The Food and Nutrition Act of 2008, Section 3\(f\)](#) and [7 CFR 273.10\(f\)\(1\)](#))

² This waives the required interview at recertification. ([7 CFR 273.2\(e\)](#)) Several early ESAP states waived the requirement that the state agency conduct an *initial* interview (the certification interview) for the senior or person with a disability applying for SNAP. As of the writing of this best practice, this option is no longer available. According to the FNS' Elderly

ESAP waiver requests can be aligned with other SNAP waivers, such as the standard medical deduction (SMD).^{vi} The SMD can buttress the positive impact of ESAP. Under regular SNAP rules, individuals age 60 and older and non-elderly persons with disabilities can deduct from countable income verified unreimbursed medical expenses. Under an SMD waiver, a state can allow a flat amount for medical expenses instead of the time-consuming process of documenting each individual medical expense. Applicants still must verify the first \$35 in medical expenses to claim the SMD. Those with monthly expenses *above* the SMD can claim the full amount as long as each expense is documented.

Procedures and Best Practices As part of ESAP, states can also include administrative procedures and best practices that help maximize the impact of ESAP waivers, such as:

- operating a call center dedicated to handling ESAP cases;
- screening for ESAP cases;

Simplified Application Project Guidance report, “[w]aiver data and lessons learned from existing projects have shown the importance of the certification interview in familiarizing SNAP applicants with SNAP eligibility requirements, appropriate deductions, and reporting process.” (https://fns-prod.azureedge.net/sites/default/files/snap/ESAP_Guidance.pdf)

³ This waives the requirement that the client verify gross nonexempt income, utility expenses, medical expenses, social security numbers, residency, identity, and household size (if household size is questionable). ([The Food and Nutrition Act of 2008, Section 11\(e\)\(3\)](#) and [7 CFR 273.2\(f\)](#))

- partnering with community-based organizations that work with older adults and/or persons with disabilities (e.g., local area councils on aging, meals on wheels providers, and senior centers);
- improving data matching for verification purposes;
- allowing self-declaration of shelter costs; and
- improving the font size, formatting, and plain language of the SNAP application.

These administrative procedures and best practices do not require FNS waiver approval. Some of these procedures and best practices are available to non-ESAP states and can be helpful to not just seniors and people with disabilities but all households. For instance, states can improve or simplify verification procedures e.g., by using computer matches to the greatest extent possible to verify gross nonexempt income, utility expenses, social security, numbers, residency, and identity. Such verification procedure improvements can be used for *all* households (not just ESAP households.)

The USDA-FNS [*Elderly Simplified Application Project Guidance*](#) and Benefits Data Trust and the National Council on Aging’s [*Advocates Guide to the Elderly Simplified Application Project*](#) provide states and advocates with information necessary to move forward with and implement ESAP. USDA-FNS also provides an [*ESAP demonstration request template*](#).

KEY PRIORITIES ■

⁴ Elected officials or senior stakeholder groups can be helpful allies in getting SNAP data.

Prior to ESAP Adoption

- Gather community support for ESAP, including among groups serving seniors and persons with disabilities. For example, Councils on Aging, disability advocacy organizations, and health care groups can all be powerful partners in advocating for a simpler SNAP system.
- Talk with your SNAP state agency about how ESAP can streamline SNAP operations and access for state and local SNAP agencies as well as for clients.
- Ask the state agency for relevant SNAP data, including:
 - ▶ numbers of seniors and persons with disabilities with recent applications who had previously participated in SNAP during the prior three months (indicating a likelihood that cases had closed for procedural reasons, also known as “churn”);
 - ▶ data on the reasons for denial and termination of seniors and persons with disabilities (such data can help to distinguish procedural denials/terminations from those that are due to financial ineligibility); and
 - ▶ data on timeliness of application and recertification processing (which provide an indicator of SNAP system performance). ⁴
- Provide your SNAP state agency and other stakeholders with:
 - ▶ data on senior SNAP participation rates in other states, including ESAP states; ^{vii} and
 - ▶ examples of older adults or persons with disabilities who would benefit from a simplified SNAP process.
- Work with your state on structures and policies that will facilitate ESAP’s effectiveness – such as a special unit to

work with seniors, a centralized call center, timely processing, clear materials and notices, and self-declaration policies for shelter costs.

For States with ESAP

- Track impact and case examples to flag implementation issues or areas needing clarification. For example, seniors may be confused about what they need to report, or community partners may not be clear on where to direct ESAP household applications.
- Partner with community groups that service seniors and persons with disabilities to increase SNAP participation among ESAP-eligible populations.
- Work with ESAP states on other matters that could improve SNAP for older adults and persons with disabilities, such as streamlining procedures for claiming medical expenses or simplifying access through telephonic signatures.^{viii}

CHALLENGES ■

Common questions that state agencies might raise before requesting waivers for ESAP include:

- questions about how ESAP fits with other SNAP agency goals and priorities;
- questions about what systems changes ESAP might require and how they could be accommodated; and
- questions about any workload, time, costs, and resource impacts ESAP would entail, such as any associated with yearly reporting to USDA-FNS on ESAP access indicators and integrity evaluation components.

OPPORTUNITIES ■

The UDA-FNS [*Elderly Simplified Application Project Guidance*](#) provides detailed information on ESAP demonstration projects that can address many of the questions that states considering ESAP might raise. The report offers:

- a standard reporting template for states implementing ESAP demonstration projects;
- lessons learned from ESAP states, such as adequate staffing; call center capacity; one-on-one time with ESAP clients; clear and understandable language for the SNAP application and client notices; and anticipated changes in some households' circumstances; and
- best practices for states implementing ESAP demonstration projects, such as ESAP processing; ESAP call centers, branding, and ways to alert seniors about eligible deductions; special coding for ESAP cases, screening for ESAP cases; expedited ESAP applications; partnering with outreach partners, and a community resource guide.

SPOTLIGHT

For many years the SNAP state agency and advocates in Massachusetts have focused on improving SNAP access for older adults. Massachusetts first implemented its standard medical deduction (SMD) in 2008; it increased the value of the deduction in 2014. In 2017 the state SNAP agency, in partnership with the Massachusetts Law Reform Institute, significantly simplified the SNAP application for seniors,^{ix} thereby reducing confusion about the application process. In 2018 the state SNAP agency opened a Senior Assistance Office (SAO) to focus on SNAP access and retention for seniors.^x The SAO is staffed with case managers who are specially trained to work on

senior SNAP cases. The SMD, simple SNAP application, and the SAO set the groundwork for successful implementation of ESAP.

Massachusetts received USDA-FNS approval for ESAP in July 2018 and implemented it in December 2018. ESAP in Massachusetts includes seniors and persons with disabilities, where no one in the household has earnings from a job. About 30 percent of the SNAP caseload in Massachusetts is part of ESAP.

ESAP households in Massachusetts only need to report two changes to the SNAP state agency: 1) if someone moves in or out of the household or 2) if someone in the household starts a job. If a household becomes ineligible for ESAP – for example, because a member starts working – the state SNAP agency simply moves the household into regular SNAP.

ESAP frees up administrative time for workers and allows the SNAP agency to focus resources on screenings for deductible expenses (including medical expenses) and other services to the SNAP-eligible population overall. ESAP helps reduce red tape, streamline the pathway for eligible older adults and persons with disabilities to get SNAP, and avoid procedural disruptions in benefits.

RESOURCES

■ USDA-FNS, *Elderly Simplified Application Project Guidance*: https://fns-prod.azureedge.net/sites/default/files/snap/ESAP_Guidance.pdf;

■ USDA-FNS, *ESAP Demo Request Template*: <https://www.fns.usda.gov/snap/elderly-simplified-application-project>;

■ National Council on Aging, *Advocates Guide*: <https://www.ncoa.org/wp-content/uploads/ESAP-TA-Guide.pdf>;

■ USDA-FNS, *State Options Report*: <https://www.fns.usda.gov/snap/state-options-report>; and

■ Massachusetts ESAP information, including a sample notice to ESAP households:

<https://www.masslegalservices.org/content/edsap-major-exciting-dta-change-older-adults-and-persons-disabilities>.

For technical assistance, contact:
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<http://frac.org/>

For more on ending hunger, read FRAC's [*A Plan of Action to End Hunger in America*](#).

ENDNOTES

ⁱ Food Research & Action Center. (2019). *A Primer: SNAP's Importance in Supporting Seniors Struggling Against Hunger in the U.S.* Available at: <http://frac.org/wp-content/uploads/senior-snap-map-primer.pdf>. Accessed on May 15, 2019.

ⁱⁱ Food Research & Action Center. (2015). *SNAP Matters for People with Disabilities*. Available at: http://frac.org/wp-content/uploads/snap_matters_people_with_disabilities.pdf. (analyzing Coleman-Jensen, A., & Nord, M., *Food Insecurity Among Households With Working-Age Adults With Disabilities*. Economic Research Report, 144. U.S. Department of Agriculture, Economic Research Service. https://ageconsearch.umn.edu/record/142955/files/err_144.pdf) Accessed on May 15, 2019.

ⁱⁱⁱ Mills, G. B., Ph.D. (2015). *Statement to the House, Committee on Agriculture, Understanding the Rates, Causes, and Costs of Churning in the Supplemental Nutrition Assistance Program (SNAP)*. Available at: https://republicans-agriculture.house.gov/uploadedfiles/gmills_written_testimony_for_2-26-15.pdf. Accessed on May 15, 2019.

^{iv} U.S. Department of Agriculture, Food and Nutrition Service. (2018). *Trends in Supplemental Nutrition Assistance Program Participation Rates: Fiscal Year 2010 to Fiscal Year 2016 (Summary)*. Available at: <https://fns-prod.azureedge.net/sites/default/files/snap/Trends2010-2016-Summary.pdf>. Accessed on May 15, 2019.

^v U.S. Department of Agriculture, Food and Nutrition Service. (2018). *State Options Report*. Available at: <https://fns-prod.azureedge.net/sites/default/files/snap/14-State-Options.pdf>. Accessed on May 15, 2019.

^{vi} Food Research & Action Center. (2019). *Best Practices for Creating a Standard Medical Deduction for SNAP*. Available at: frac.org/research/resource-library/best-practices-for-creating-a-standard-medical-deduction-for-snap. Accessed on May 15, 2019.

^{vii} Food Research & Action Center. (2019). *SNAP Map: SNAP Matters for Seniors* interactive tool. Available at: <http://frac.org/research/resource-library/snap-map-snap-matters-to-seniors>. Accessed on May 15, 2019.

^{viii} Food Research & Action Center. (2019). *Best Practices for SNAP Telephonic Signatures*. Available at: frac.org/research/resource-library/best-practices-for-snap-telephonic-signatures. Accessed on May 15, 2019.

^{ix} Massachusetts Department of Transitional Assistance. (2018). *Supplemental Nutrition Assistance Program (SNAP) Application for Seniors*. Available at: https://www.mass.gov/files/documents/2018/08/27/snap_app_seniors_english_fillable_0.pdf. Accessed on May 15, 2019.

^x Massachusetts Department of Transitional Assistance. *SNAP Senior Assistance Office*. Available at: <https://www.mass.gov/service-details/department-of-transitional-assistance-snap-senior-assistance-office>. Accessed on May 15, 2019.