Elderly Simplified Application Project Guidance

Program Development Division
FY2015-FY2016

What is the Elderly Simplified Application Project (ESAP) Demonstration?

The Elderly Simplified Application Project (ESAP) is a demonstration project that seeks to increase participation among the elderly low-income population by streamlining the application and certification process. ESAPs are limited to elderly households with no earned income, although some projects also include disabled households with no earned income. The waiver is granted for a period of five years.

Specifically, the demonstration project waives the recertification interview requirement, makes use of data matches to reduce the amount of client-provided verification, and extends the certification period to 36 months. ESAP demonstration projects also often make use of a simplified two-page application.

Early ESAP demonstrations also waived the interview at initial certification for households. Waiver 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. In order to better facilitate this, ESAPs will continue to incorporate a waiver of the recertification interview, but will no longer waive the initial certification interview. If a senior and/or disabled person was receiving SNAP benefits outside of the waiver and then transitioned into the demonstration, they will only need to be interviewed at recertification, if an interview is requested. They do not need to have an interview under the demonstration, as they already had an initial interview at the time of SNAP certification. Twelve-month interim reports are still required for all ESAP participants.

Why should my State have an ESAP waiver?

The elderly are a historically underserved group and face many barriers to participation including limited mobility and minimal access to electronic equipment that can facilitate compliance with verification and reporting requirements. Similarly, disabled households struggle to make ends meet and the verification and paperwork requirements may be a hurdle to participation. However, low-income elderly and disabled households with no earned income often live in stable settings where factors like unearned income (e.g. social security, SSI), social security number, residency, etc. are readily verifiable through other means like data matches. As a result, the burden of the typical SNAP application process may hinder participation of these vulnerable groups, while contributing relatively little information that cannot be found and verified elsewhere. The ESAP demonstration projects work to minimize these barriers, while balancing the need for ESAP participants to get the full benefit they are entitled to receive.

Do ESAPs improve access?

ESAP demonstration projects are generally well-received by State agency staff and the target SNAP clients. They reduce administrative and client burden by reducing the amount of verification information exchanged between applicants and the State agency, provide for a longer certification period, and reduce the need for interviews once the household is certified. Making it easier for households to get on and stay on SNAP by waiving the recertification interview and some verification requirements, ESAPs increase program access among this vulnerable population. Some States have also

found that pairing the ESAP with the Standard Medical Deduction waiver further improves access by reducing the burden on seniors to provide extensive documentation of their medical expenses.

What waivers are required?

The ESAP demonstration project is a collection of several waivers of the Food and Nutrition Act of 2008, as amended, (the Act) and SNAP regulations. Specifically, the ESAP waives:

The Food and Nutrition Act of 2008:

- **Section 3(f)**. States that the certification period shall not exceed 12 months, except that the certification period may be up to 24 months if all adult household members are elderly or disabled. The waiver allows State agencies to establish a 36–month certification period for ESAP households.
- **Section 11(e)(3)**. Requires the State agency to verify all non-excludable income and household size. The waiver allows State agencies use data matches, in lieu of asking the client for income verification. Households are only asked to verify this information when it is questionable.

The Regulations:

- **7 CFR 273.2(e)**. Requires the State agency to conduct an interview at certification and recertification. Each ESAP household must still have an initial certification interview , but the waiver does not require an interview at recertification unless a household specifically requests one. No case can be denied at recertification without an attempt to schedule an interview.
- **7 CFR 273.2(f)**. Requires the State Agency to verify gross nonexempt income, utility expenses, medical expenses, social security numbers, residency, and identity. Under the waiver, elderly and disabled households only need to provide verification if information is questionable. Computer matches are used to the greatest extent possible to verify income and social security numbers.
- **7 CFR 273.10(f)(1).** Allows certification periods to extend up to 24 months for elderly and disabled households. The waiver allows certifications periods to be extended up to 36 months.

What are the agency reporting requirements?

Information gathered from the first set of ESAP States has been instrumental in helping FNS shape current ESAP reporting elements. As demonstration projects are designed to test the potential of new strategies to improve SNAP service delivery and program performance, at times it may be necessary to modify these elements lessons learned and best practices in order to ensure the evaluation and reporting process is as robust as possible.

In order to evaluate the effectiveness of the ESAP waivers at increasing participation among eligible seniors, each State is to report the number of eligible seniors (elderly households - aged 60 years or older - with no earned income) who were enrolled in SNAP at any point in the previous fiscal year (before the start of the waiver).

In addition, to the enrollment data above, the State agency shall provide to FNS a yearly report summarizing key program access and integrity evaluative components. The evaluation shall be based on a random sample of ESAP cases. All the required data shall be provided in a standard reporting

template provided by FNS. A brief executive summary may accompany each report explaining the data and progress of the demonstration project.

<u>Evaluative Components:</u>

Certifications (broken out by project year):
- Number of initial certification applications approved
- Number of initial certification applications denied
- Number of recertification applications approved
- Number of recertification applications denied
- How many of the recertifications required an interview
- The total number of ESAP participants.

Quality Control and Error Rates (broken out by project year):
- The State will randomly sample 200 active ESAP cases. The State will review the applications for payment accuracy.
- The State will randomly sample 100 denied and terminated ESAP applications and review the applications for the negative error rate.
- The State shall perform a full quality control review based on the Quality Control 310 Handbook.
- For active error rates, the State will provide payment accuracy information with a brief description of the source of the error.
- The State will provide information on all active cases where a variance in payment was discovered in a payment variance spreadsheet. Unlike the error threshold (FY 2015 = $37) used in the calculation of the active error rate, payment variance is any amount over or under the true benefit the household should have received.
- For negative cases, the State will provide the CAPER rate, the reason for denial, as either procedural (e.g. failure to provide verification or additional information) or client ineligibility (due to income, fleeing felon, drug convict, alien status, and self-reported resources).
- The State may conduct these reviews via telephone.
- The State should report on all errors by case.

Timeliness (broken out by project year):
- The State should differentiate between expedited and regular 30-day applications and indicate the number of each type of application processed within the statutory requirements for application processing.
- The State should report the percent of all ESAP participants processed within current timeliness standards.

What Best Practices should my State consider?

Best Practice	Description	Potential Advantage
Centralize ESAP processing	Create a centralized unit with workers exclusively assigned to process ESAP applications and changes. Workers may be shared between the Processing Center and Call Center depending on workloads in the two spaces.	Staff can anticipate and meet the special needs of the ESAP populations (e.g. common questions, data matching issues).
Establish an ESAP Call Center	Create a dedicated ESAP Call Center to handle the unique circumstances of older applicants. Workers may be shared between the Processing Center and Call Center depending on workloads in the two spaces.	Staff can anticipate and meet the special needs of the ESAP populations (e.g. many ESAP applicants are older and used to working one-on-one with a case worker).
Use an alternative name	Create a name for the ESAP that explains it is a special food assistance program for seniors and/or the disabled with no earned income.	States that have used an alternative name have found seniors are more receptive to enrollment.
Describe deductions well on application	Give prompts and examples of eligible deductions. This material could be included in a pamphlet sent with the application, or as links on online applications.	Many seniors may not be aware of all eligible deductions and would benefit from simple, easy-to-read information.
Assign a special code to ESAP cases	Assign a code in the eligibility system that can easily identify ESAP cases. For instance, in States with county-based systems, ESAP cases could have a unique county code.	Allows for easier generation program performance reports.
Screen for ESAP cases	Make use of business processes to identify potential ESAP cases as soon as possible. For instance: • Online applications screen for ESAP cases early and route potential ESAP cases to a special	Identifies ESAP cases early and reduces application time for potentially eligible senior and/or disabled households and processing time for eligibility workers.

	application. • Eligibility software "alerts" when a potential ESAP client's data is entered. • Clerical staff review applications immediately for potential ESAP eligibility.	
Expedite ESAP applications	ESAP applications are well-suited for expedited review because of the reduced verification burden.	Eligible senior and/or disabled households receive their benefits quickly.
Apply for the Standard Medical Deduction Waiver	All applicants with out-of-pocket medical expenses over $35 receive a standard medical deduction.	Reduces the paperwork burden for senior and/or disabled households. Reduces Quality Control errors.
Work with outreach partners	Build relationships with community organizations that work with the elderly and/or disabled. Provide training on ESAP applications and eligibility criteria.	Expand enrollment to eligible senior and/or the disabled households.
Develop a community resource guide	Create a guide detailing services available to seniors in your community.	Many senior and/or disabled households have multiple needs and can benefit from increased access to community programs.

What are some Lessons Learned from other States?

- **Ensure adequate staffing**. States implementing a centralized ESAP Processing Center were surprised at the number of ESAP applications they received when the demonstration project started. As a result, they needed to quickly shift staff to work on their ESAP caseload. Before implementing your own ESAP demonstration project, talk with other States to better gauge your staffing needs.

- **Increase call center capacity**. States with a specialized ESAP Call Center received higher call volume than planned. To accommodate this increased volume, States added additional lines and shifted staff to work the call center during high call volume times.

- **Budget time for one-on-one work with ESAP clients.** States found that many senior citizens are more comfortable talking to someone about their case. While the ESAP demonstration project waives the recertification interview, many seniors still called the SNAP office when they had questions, resulting in increased call volume.

- **Add clarity to SNAP application.** Since the recertification interview is waived, adding clarity to the questions on the ESAP application is important to ensure seniors complete the questions correctly.

- **Account for time to process the medical deduction.** States underestimated the amount of staff time required to process the medical deduction for ESAP cases. ESAP cases typically have high medical expenses, and the lack of a recertification interview meant seniors received less help in locating and transmitting the required paperwork for the deduction. Pairing the ESAP with the Standard Medical Deduction waiver may reduce this workload.

- **Use simplified language when sending notices.** This is a good general practice, but perhaps especially important when communicating with seniors and elderly households who may have trouble understanding jargon and complicated notices. Confusing notices may increase call center call volume and result in timeliness delays.

- **Anticipate some household circumstances will change.** While income was stable in most ESAP households, some States found that other circumstances like home address changed more frequently than expected. Be prepared to use data matches and other methods of data collection to update case files.

How do I request an ESAP waiver?

If you are considering an ESAP, your FNS Regional Office can provide further insight and connect you to additional resources, including States with experience operating ESAP demonstrations who can share their experiences. If you are ready to submit your request, ESAP waivers can be requested by using the attached template.