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Impact of the SNAP Application Process on Access for Eligible Individuals

Introduction

Established as a permanent program in 1964, the Supplemental Nutrition Assistance Program (SNAP/food stamps) serves 47 million Americans and is considered the United States' first line of defense against hunger.ⁱ Although states were initially responsible for devising eligibility requirements and plans of operation, a 1971 amendment established national standards for eligibility following findings that certain states—particularly in the South—were administering the program in ways that excluded some of the nation's poorest citizens.ⁱⁱ States remain in charge of the program's administration, however, and have several options for how to do so. These options, in addition to periodic updates of the national Farm Bill, affect the accessibility of SNAP to food insecure Americans.

As a countercyclical program designed to respond to economic conditions, SNAP is also impacted by the economy. Since the last major cutback in SNAP access during welfare reform in the 1990s, SNAP caseload has increased significantly in response to both the 2008 recession and certain policy changes promoting access.

Recently in Pennsylvania, two changes to the SNAP application process have been implemented. In an effort to streamline the application process for SNAP applicants and caseworkers, applicants may now self-declare dependent care and shelter/utility expenses. To improve the efficiency of the interview portion of the application, phone interviews are now completed through an "on-demand" system where applicants call into the County Assistance Office during a designated window of time.

This paper provides context for those two changes and introduces a pilot study conducted at the Greater Philadelphia Coalition Against Hunger to determine whether or not the changes are in place and effective. I begin with an overview of the SNAP program, including an introduction to its history and administration. I then discuss the context for these changes and why they were needed in Pennsylvania. Finally, I introduce the Coalition Against Hunger's pilot study, and discuss some of the preliminary findings.

Overview of the Supplemental Nutrition Assistance Program (SNAP)

Introduction to SNAP

The Supplemental Nutrition Assistance Program (SNAP), formerly known as the Food Stamp Program, is considered the United States' first line of defense against hunger and an integral component of the nation's safety net.ⁱⁱⁱ During an average month of fiscal year 2013, 47 million people participated in SNAP at a total annual cost of over \$76 billion.^{iv} In 2010, the most recent year for which the Congressional Budget Office published SNAP demographic data, about 75% of SNAP recipient households had a child, a person 60 years or older, or a disabled person. About 85% had incomes below the federal poverty guidelines.^v In spite of the scale of the program, many individuals eligible for SNAP do not receive benefits. In 2011, 79% of eligible people received SNAP benefits, while a solid fifth of the eligible population remained without them.^{vi}

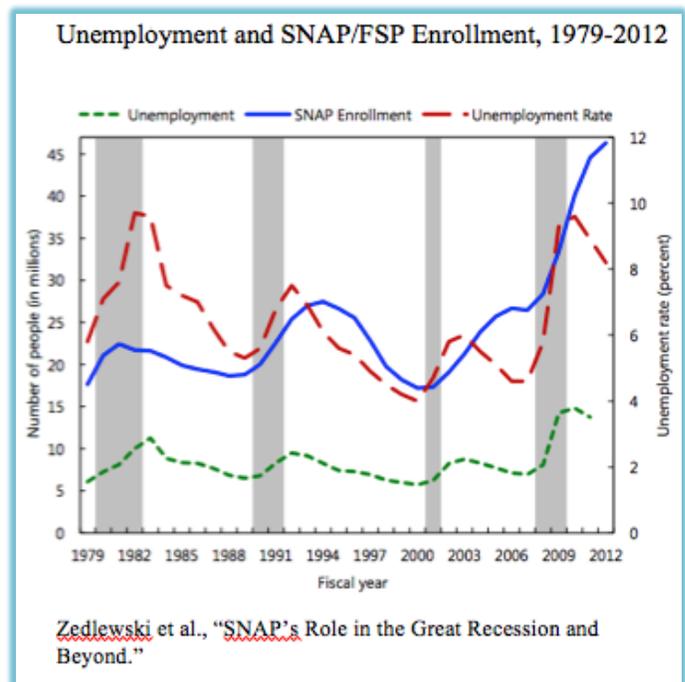
SNAP eligibility and benefit amounts are determined through a calculation that considers an individual's income and assets. The calculation is based on the United States Department of Agriculture's (USDA) Thrifty Food Plan, which approximates the cost of a market basket of food. Critics point out that the Thrifty Food Plan is outdated and not adequate to support a

nutritious diet.^{vii} Households with no income receive the maximum benefit amount under the Thrifty Food Plan. Households with earnings have thirty percent of their income deducted from the maximum amount, with “earned” income deducted at a lower rate than “unearned” income. The calculation takes into account certain expenses, including childcare, housing, and utility costs, and medical costs for the elderly or disabled.^{viii} The expenses used in the calculation have varied over time, state lines, and political climate, and affect the benefit allotment a household receives.

SNAP has both anti-poverty and anti-hunger effects.^{ix} The USDA estimates that SNAP reduces the prevalence of poverty by 4.4%, and has an even stronger influence on the extent of poverty.^x A study by the Urban Institute found SNAP to reduce food insecurity by 30 percent, and very low food security by 20 percent.^{xi} In addition to promoting nutrition, SNAP also has positive outcomes on the economy. According to Moody’s economist Mark Zandi, every \$1 in SNAP benefits results in \$1.73 in economic activity.^{xii}

As a counter-cyclical program, SNAP responds to national economic conditions, such as economic downturns and unemployment rates.

In addition to economic conditions, policies on national and state levels affect SNAP participation rates. For example, as Steve Carlson of the USDA explains in Feeding America’s article, “SNAP’s Role in the Great Recession and Beyond,” constrictive SNAP policies during the early 1980s that added a gross income test, prohibited SNAP outreach,



altered the definition of a SNAP household, and included retirement accounts among assets, resulted in limited growth in SNAP enrollment even as unemployment rates soared. Likewise, SNAP policies in the 2002 Farm Bill that promoted food stamp access through simplified reporting, increased eligibility, and an expansion of the time period between certifications resulted in growing numbers of SNAP participants from 2004 to 2007, even as unemployment remained fairly constant.^{xiii} Thus, policies in addition to economic conditions affect the SNAP caseload.

While the federal government pays for SNAP benefits, it splits administrative costs with states, which manage administration in their areas.^{xiv} States are responsible for certain quality control and accuracy outcomes. For instance, as of the 1977 Food Stamp Act, states must process applications within thirty days of submission.^{xv} The Application Processing Timeliness (APT) measures the percentage of applications approved or denied within this thirty-day window. When the APT dips below ninety percent, states must take corrective action.^{xvi}

Error rates are another quality control measure used for state administrations. Error rates take into account both overpayments and underpayments of SNAP benefits. In 2008, the Food and Nutrition Act set the standard payment error rate at six percent.^{xvii} States are both incentivized and sanctioned for error rates.^{xviii}

A History of SNAP

The first food stamp program began in 1939 in the context of the Great Depression. Designed to address both rising rates of hunger and agricultural surpluses, the program required the purchase of stamps that could be used to acquire greater amounts of surplus food. While Congress ended this initial program in 1943, old New Dealers continued to point out that hunger

and food insecurity remained in the United States.^{xxix} In 1961, President Kennedy initiated a pilot Food Stamp Program, which then became permanent as part of President Johnson's War on Poverty in 1964.^{xxx} Subsequent Congressional coalitions, formed around conflicting positions on whether to stigmatize or support food stamp recipients and participation in the program, have made multiple changes to the program over time. While states were initially responsible for devising eligibility requirements and plans of operation, a 1971 amendment established national standards for eligibility following findings that certain states were administering the program in ways that excluded some of the nation's poorest citizens.^{xxxi} Later, the 1977 Food Stamp Act eliminated the requirement to purchase food stamps. More recently, the 2008 Food, Conservation, and Energy Act changed the name from the Food Stamp Program to the Supplemental Nutrition Assistance Program (SNAP) to emphasize the program's impact on health and nutrition. It also mandated the use of Electronic Benefit Transfer (EBT) cards—which resemble credit cards—rather than paper stamps, in an effort to reduce the stigma associated with using food stamps and curb fraud and trafficking.^{xxxii} In response to the 2008 recession, the 2009 American Recovery and Reinvestment Act (ARRA) increased monthly benefits by about 15 percent, and temporarily relaxed limits on the amount of time Able Bodied Adults Without Dependents (ABAWDs) can receive SNAP benefits.^{xxxiii} Most recently, the Agricultural Act of 2014 scaled back SNAP expenditures by about \$8 billion over the next ten years through adjustments such as a limit on the extent to which states can link the Low-Income Home Energy Assistance Program (LIHEAP) with SNAP.^{xxxiv} This cutback was in addition to November 2013 reductions in SNAP benefit allotments.^{xxxv}

State Options for SNAP Administration

The history of SNAP reflects changing degrees of state involvement in the structure and administration of the program. When President Johnson signed the 1964 Food Stamp Act, states were responsible for devising eligibility requirements and plans of operation. A 1971 amendment established national eligibility standards that included a household's income and assets.^{xxvi} Within these national standards, states retained certain policy options that expanded during welfare reform in the 1990s.^{xxvii} In 2012, the USDA offered states approximately twenty-six options for administering SNAP.^{xxviii} Depending on political views about whether to support SNAP's functioning as a "safety net" program that protects households from hunger or to seek to limit what many conservatives see as the tendency of any "welfare" program to encourage "dependency," some state legislatures enact options that streamline the application process and reduce barriers for applicants, while others use options that restrict SNAP access. Examples of options that restrict access to SNAP include the disqualification of drug felons from SNAP, monthly reporting requirements, not allowing able bodied adults without dependents (ABAWDs) to receive food stamps for more than three months in a three year period, requiring photo IDs on EBT cards, and requiring extra verification documents for claimed expenses. Examples of options that promote access include the establishment of customer service call centers for SNAP applicants, reducing the amount of required paperwork, and allowing recipients of other types of state aid such as Low-Income Energy Assistance or information on aid such as Temporary Assistance for Needy Families (TANF) to be "categorically eligible" for SNAP benefits.^{xxix}

Recently, Pennsylvania implemented two changes to the SNAP application process. To reduce the substantial amount of paperwork individuals must provide and caseworkers must review, Pennsylvania adopted a policy option whereby applicants may self-declare dependent

care expenses and shelter and utility expenses.^{xxx} To improve the efficiency of the interview portion of the application, Pennsylvania introduced an “on-demand” system. Rather than the standard telephone interview procedure when a SNAP applicant receives a call from a County Assistance Office caseworker at an appointed time, the on-demand interview process assigns applicants a several hour window when they can call a toll-free number to complete their interview. On-demand interviews offer SNAP applicants greater flexibility for completing their interview, and eliminate the possibility of a client missing the phone call and not being able to reach his or her caseworker afterwards. The changes were implemented in response to growing concern about inefficiencies in SNAP administration in Pennsylvania, resulting in food insecure Pennsylvanians not having access to the benefits for which they qualified.

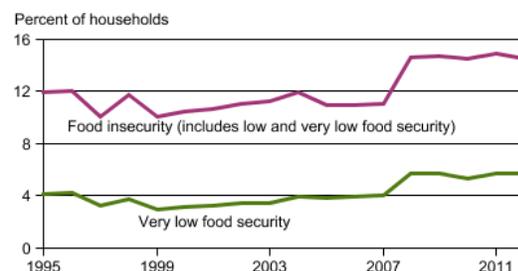
The Supplemental Nutrition Assistance Program in Pennsylvania

Streamlining the application process helps two groups of people: the caseworkers at the County Assistance Offices who must process applications within thirty days, and the applicants who must meet the application requirements. In Pennsylvania, both these groups would benefit from this assistance.

Pressures of Caseload on PA County Assistance Office Staff

In recent years, the number of SNAP applicants in Pennsylvania has grown while the Department of Public Welfare staff size has shrunk. The Recession resulted in a large expansion of SNAP participants nationally, from about 26 million people in 2007 to nearly 45 million people in

Trends in prevalence rates of food insecurity and very low food security in U.S. households, 1995-2012



Prevalence rates for 1996 and 1997 were adjusted for the estimated effects of differences in data collection screening protocols used in those years.

Source: Calculated by ERS based on Current Population Survey Food Security Supplement data.

Source: “Food Security in the United States: Key Statistics & Graphics,” United States Department of Agriculture, last modified September 4, 2013, <http://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/key-statistics-graphics.aspx#.UqflWmRDujI>.

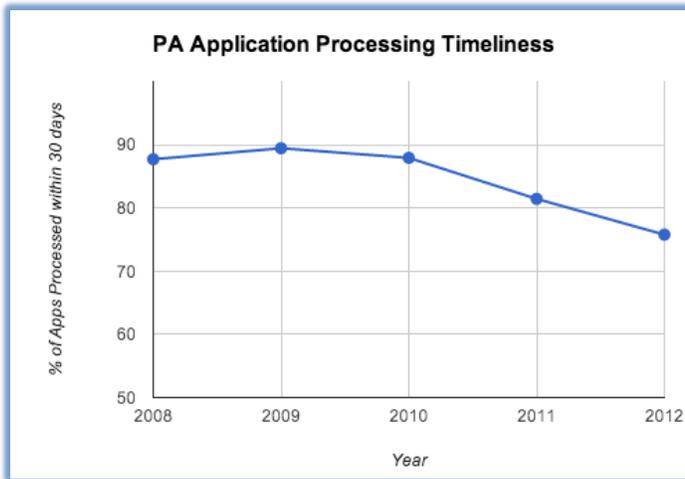
2011.^{xxxvi} Food insecurity nationally surged from a fairly constant 11% up to about 14%, the level where it remains today.^{xxxvii} Certain pockets of Pennsylvania have an even greater prevalence of food insecurity. The Greater Philadelphia Coalition Against Hunger estimates that 22% of Philadelphians are food insecure.^{xxxviii}

Not only did the caseload grow in recent years, but the amount of documentation that caseworkers must process for each applicant has also increased in Pennsylvania with the reimplementation of the asset test in 2012. Under the Pennsylvania asset test, individuals are ineligible for SNAP benefits if they have resources greater than \$5,500, or \$9,000 for the elderly or disabled. Caseworkers must now collect and verify sensitive information including applicant's bank statement, stocks, and the value of a second vehicle.

Concurrent with this growth in demand for SNAP are reductions in the County Assistance Office staff that process SNAP applications. In 2003, the Department of Public Welfare (DPW) in Pennsylvania had approximately 8,000 caseworkers for 855,887 SNAP recipients and 1,586,607 Medicaid recipients. By 2013, DPW had just 4,400 caseworkers for 1,825,015 SNAP recipients and 2,198,810 Medicaid recipients.^{xxxix}

Collectively, the increase in SNAP applicants and the documentation required for SNAP applicants alongside reductions in County Assistance Office staff have impacted the ability of Pennsylvania's DPW to process applications within the prescribed thirty day window. As shown in the chart below, the Application Processing Timeliness (APT) in Pennsylvania dropped from roughly 90% of all applications successfully processed within thirty days in 2009, to only 75% of applications achieving this same result in 2012. In 2012, Pennsylvania was ranked the forty-seventh slowest at processing applications within thirty-days out of the fifty-three states and territories that administer SNAP.^{xxxv}

The pressures on caseworkers at the County Assistance Office due to the Recession and the corresponding growth in SNAP participation, the increase in documents required through the asset test, and staff reductions suggest that policy changes in Pennsylvania that facilitate stages of the SNAP application process are warranted.

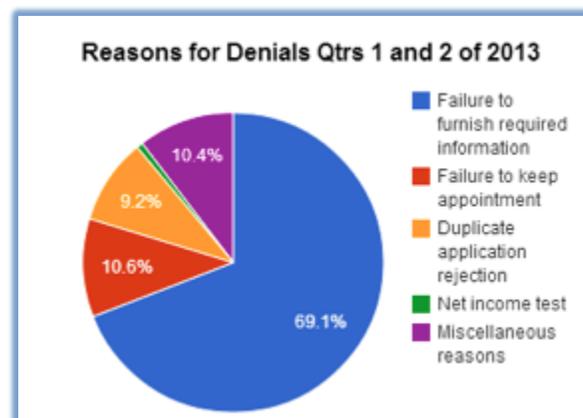


Source: "SNAP Program Improvement," *United States Department of Agriculture*, last modified March 20, 2014, <http://www.fns.usda.gov/snap/snap-program-improvement>.

Impact of the Application Process on SNAP Applicants

The demands of the SNAP application process also impact an applicant's ability to successfully complete an application. For example, since the reimplementation of the asset test, large numbers of otherwise eligible Pennsylvanian applicants have been denied for not submitting required documentation. In fact, four times more applicants have been denied SNAP benefits due to incomplete documentation than to exceeding the assets limit: while 3,950 households have been denied SNAP benefits due to their assets, 111,215 households were denied for inadequate documentation over the nine months following the implementation of the asset test. This is up from the 94,204 households that were denied for incomplete paperwork over the nine months prior to the asset test, for a total of 17,011 more households struggling to find and turn in documents, and the County Assistance Office struggling to review and approve applications within thirty days.^{xxxvi}

The Coalition Against Hunger, a non-profit in Philadelphia, witnesses the effects of the lengthy application process on needy individuals first-hand. The Coalition operates a SNAP-hotline where callers are prescreened for SNAP eligibility. If callers are determined to be eligible for food stamps, staff members at the Coalition help them submit an online application and provide case management throughout the application



Source: data obtained from the Coalition Against Hunger, March 2014.

process. In theory, everyone who applies for food stamps through the Coalition Against Hunger should be approved for benefits, since they have been prescreened for eligibility. However, roughly forty percent of their applicants are nevertheless denied. The Coalition has access to information from the Department of Public Welfare on the clients they apply for, including reasons for denial, where they applied, and demographic information such as household composition. Their information demonstrates that the documentation requirements (labeled “failure to furnish required information”) and interview component of the application process (labeled “failure to keep appointment”) were responsible for nearly 78% of the denials during fiscal quarters one and two of 2013. These results suggest that efforts to facilitate the verification document and interview portions of the application process could result in more SNAP-eligible individuals successfully receiving benefits.

Overview of the Two Policy Changes

The two recent changes were designed to address this context of increases in the number of people applying for SNAP, increases in the amount of documentation required for applications

under the asset test, decreases in County Assistance Office staff, and large numbers of eligible individuals who are denied for failure to furnish required information or failure to complete an interview. States that have already implemented on-demand phone interviews and self-declaration of childcare and shelter expenses have had positive results. Idaho, the state with the highest APT in 2012, has identified on-demand interviews as its most helpful policy waiver and option for achieving its quick processing rate.^{xxxvii} Patricia Baker of Massachusetts Law Reform Institute has cited on-demand call centers “where state food stamp workers are on a batter-up system at a toll free number and clients can call at any time during business hours to speak with a worker for their interviews” as “the only system that works best in a state with limited local offices.”^{xxxviii}

Similarly, reduced verification documents simplify applications without significantly impacting quality control. The USDA’s Food and Nutrition Service highlights states with relaxed verification requirements such as Kentucky and New Mexico for their high performance and timely distribution of benefits.^{xxxix} When Massachusetts began permitting self-declaration of shelter and utility expenses in 2010, it cited research that found few errors related to the shelter deduction.^{xl} Since deductions are often capped at particular levels, variations in reported expenses have a limited impact on benefit allotments.^{xli} Additionally, client reporting makes up just a minority (about 30.52%) of the errors that result in the miscalculation of benefits, while state agencies commit the majority (about 69.09%) of total errors.^{xlii}

Explanation of the Study

Justification

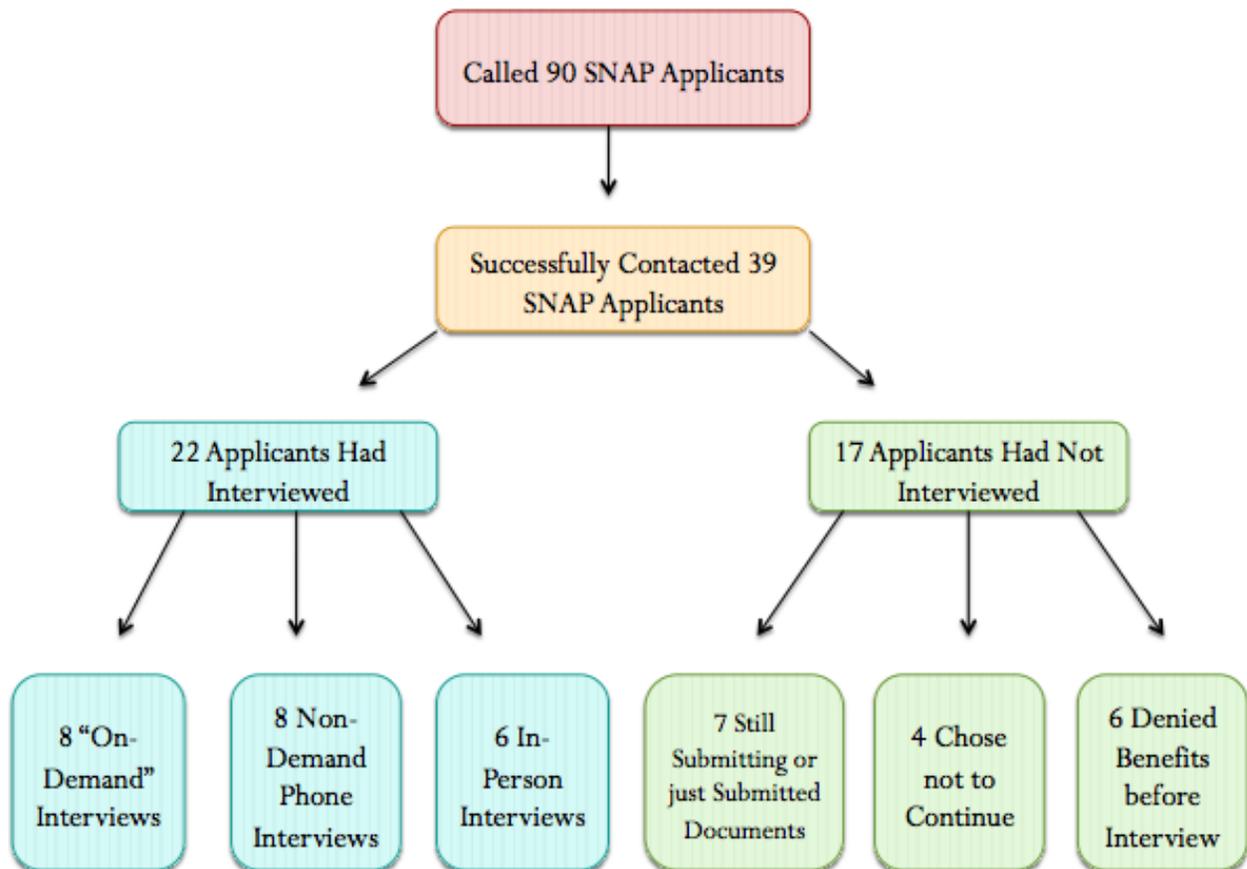
The adoption of on-demand phone interviews and reduced verification documents by Pennsylvania should ease the application process for both applicants and caseworkers. However, some Philadelphia applicants have called the Coalition Against Hunger after being unable to reach a caseworker for an interview through the on-demand system. The Coalition is also concerned that County Assistance Office caseworkers might be asking applicants for verification documents they are no longer required to submit. To evaluate the extent to which these changes have been put in place and what their outcomes on SNAP applications have been, I conducted follow-up phone calls with SNAP applicants who applied through the Coalition Against Hunger.

Methodology

Between April 2, 2014 and May 7, 2014, I called ninety individuals who had applied for SNAP through the Coalition Against Hunger within the previous two months. Staff at the Coalition designed a telephone survey to assess what verification documents were requested and how the individual's interview was conducted. Individuals were also asked to submit copies of the verification documents they had submitted with their application to the Coalition Against Hunger in order to cross check what they remembered submitting with what they did submit. In my phone interviews, I focused on obtaining information about the interview process, since the verification document copies were still being mailed in. Volunteers who take over the study this summer will continue to conduct interviews about the interview process, and will expand the survey to include questions about the verification documents. All phone calls took place from the office of the Coalition Against Hunger between the hours of nine and five.

Results

Of the ninety individuals I called, thirty-nine agreed to be interviewed. The chart below depicts the different outcomes of the applicants.



Seventeen of the thirty-nine applicants I contacted still had not been interviewed by the County Assistance Office. Seven of those applicants were either still submitting their verification documents, or had just submitted the documents and were waiting to hear back from a caseworker. This number was a little concerning, since I was reaching out to applicants near the end of the thirty-day window of time applicants have between submitting the online application and completing the other components of the application process. If applicants fail to submit their documents and complete their interviews within this timeframe, their applications are denied. Some of the six applicants whose applications were denied prior to an interview were rejected

because they had not submitted their documents within thirty days. The other denials prior to the interview were attributed to ineligibility for the program. This was also concerning, because any applicant who applies through the Coalition Against Hunger has already been screened for eligibility.

Four of the individuals who had not yet interviewed made the decision not to continue with the application process voluntarily. Some were uncomfortable with the amount and nature of the documentation required, particularly the bank statement requirement of the asset test. Others were only eligible for \$15 a month, and did not feel that amount justified the time and effort it took to complete the application.

Twenty-two of the thirty-nine applicants I spoke with had interviewed at the time of my phone call. Of those, six of the applicants had face-to-face interviews with a caseworker at the County Assistance Office. These were not scheduled interviews, and happened at the same time as clients brought in copies of their verification documents. Another eight applicants reported having phone interviews that originated in the caseworker calling them. Finally, eight individuals reported on their experiences with the “on-demand” telephone interviews. Of these eight, six were able to successfully conduct their interview. Two of them reached a caseworker immediately upon calling during their designated windows. Two others remained on hold for about five to ten minutes before reaching a caseworker and completing their interviews. Two called several times during their designated timeslot, and eventually left voicemails that were returned within two days to complete their interviews. Finally, two applicants had still not successfully reached a caseworker at the time of my phone call. One of them had even obtained a second scheduling notice from the County Assistance Office after calling unsuccessfully

multiple times during his time slot, but he was also unable to reach a caseworker during either time slot.

Discussion

A majority of the applicants I spoke with (N=14/22) did not interview through the on-demand phone system. Of those who did, a majority (N=6/8) did successfully interview with a caseworker using the system. While only two of the applicants were able to reach a caseworker without being put on hold, the remaining four who interviewed either reached a caseworker after being on hold for no more than ten minutes, or had their voicemails returned over the next few days. More data is needed to see whether these results hold in a larger sample size, but they so far suggest moderately positive outcomes associated with the on-demand phone system.

In addition, the information collected on applicants who had not interviewed is also telling. A substantial number of applicants (N=7/17) most likely would not receive SNAP benefits this cycle, since they were still submitting or had just submitted documents towards the end of their thirty-day window. This suggests that documentation remains a burden that prevents eligible individuals from receiving SNAP. The four applicants who actively chose not to continue with the application because they were uncomfortable submitting certain personal documents also indicate the burden of documentation. Finally, it may be worth following up with the six applicants who were denied benefits prior to an interview to determine the reason for their rejections. While some were rejected for not submitting documents within the thirty-day window, others were denied for ineligibility. Since the Coalition Against Hunger prescreens all applicants for eligibility, this number is perplexing. One possibility is that applicants were found ineligible for expedited SNAP benefits, but may still be eligible for regular benefits. There may

also have been miscommunications between the applicant and the Coalition Against Hunger Staff, and the applicant and the County Assistance Office staff. As the study progresses, it may be useful to follow up with these clients.

Conclusion

SNAP is designed to help low-income individuals access inexpensive, nutritious food, yet many Americans are unable to partake in this needed food assistance. SNAP policies at both a national and state level affect SNAP accessibility. In Pennsylvania, two recent changes to the SNAP application process were implemented to facilitate access for food-insecure Pennsylvanians. To assess the impact of these changes, the Greater Philadelphia Coalition Against Hunger began a pilot study this spring to follow-up with clients who recently applied for SNAP. The survey at this point assesses how the interview portion of the SNAP application process was conducted, and what the associated outcomes for applicants were. While the study is on-going, preliminary results suggest that the on-demand phone process is in place for some applicants. The majority of the applicants who interviewed through the on-demand system were able to successfully reach a caseworker to conduct the interview. More research is needed to see whether these results hold with a larger sample size, and to assess the impact of the verification document change. State legislatures should continue to evaluate and change SNAP policies to ensure SNAP access for their neediest citizens.

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