An Advocate's Guide to the Elderly Simplified Application Project

March 2017

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Executive Summary

Leaders from across the political spectrum are committed to ensuring that America's older adults have the freedom and security to age in place with dignity. Unfortunately, millions of low-income seniors cannot meet their basic needs, leading to worsening health and increased healthcare utilization. Directly addressing these social determinants of health by connecting eligible households to key public benefits programs improves the well-being of low-income seniors and generates significant healthcare savings.

For over a decade, the National Council on Aging (NCOA) and Benefits Data Trust (BDT) have worked together to increase senior participation in various public benefits programs, including the Supplemental Nutrition Assistance Program (SNAP, formerly called "food stamps"). Despite major progress in recent years, only 42% of eligible seniors participated in SNAP in 2015 due in large part to a very difficult and intimidating enrollment process. While there are many tools that advocates can use to address low senior participation, one promising strategy to overcome these well-known enrollment barriers is the Elderly Simplified Application Project (ESAP), a federal demonstration program currently operating in eight states. ESAP is a collection of policy and process changes that, taken together, can dramatically streamline SNAP enrollment processes for households with no earned income that contain only senior and/or disabled individuals.

The purpose of this Guide is to educate state-based aging and anti-hunger advocates about ESAP and suggest ways they can engage their state agency leaders to create ESAPs.

The Guide is organized into four parts to allow readers to quickly find the information most relevant to them:

- Part 1: What is ESAP? provides background information on the policy and process changes that make up ESAP, as well as implementation differences between the eight active ESAP states.

- Part 2: Results to Date shares one approach to evaluating ESAPs by considering the extent to which current ESAPs succeed in improving customer service, administrative efficiency, and participation rates. We suggest that *process* change is at least as important as *policy* change.

- Part 3: Lessons Learned describes best practices and common obstacles gleaned from the experiences of current ESAP states to inform program design in new states.

- Part 4: Opportunities for Advocates summarizes a typical ESAP demonstration approval and renewal process, and suggests areas where advocates are best positioned to contribute.

As the number of seniors facing poverty and hunger is likely to rise over the next two decades, government at all levels will need effective and efficient strategies to ensure seniors can meet their basic needs and age in place with dignity. ESAP is one promising strategy to accomplish that goal and advocates are well positioned to bring ESAP and other innovative ideas to their states.

Introduction

America is an aging nation. In 2015, 48 million Americans were age 65 or older.[1] By 2030, that population will grow to 74 million, representing one in five Americans.[2] Not only is the total senior population growing rapidly, so is the number of seniors who are poor and food insecure.[3] In 2015, 4.2 million older adults (age 65 and older) lived in poverty and 14.8 million seniors, or nearly one in three, lived on less than twice the poverty level.[4] Among those age 60 and older, 5.7 million experienced food insecurity, resulting in poorer health and lower quality of life. Specifically, food insecurity increases the likelihood of chronic disease, including high cholesterol, diabetes, and heart disease among older adults.[5,6] Furthermore, food insecure older adults have limitations in activities of daily living akin to food secure seniors fourteen years older.[7]

Connecting older adults with the resources to meet their basic needs will allow them to age in place with dignity while reducing healthcare costs. Exciting new research suggests that access to public benefits reduces the likelihood of nursing home admission, hospital admission, and emergency department use among low-income seniors who receive both Medicare and Medicaid (known as "dual eligibles").[8] The cost implications of these findings are significant, as reducing nursing home admission by just 5% would save approximately $8 billion per year.[9]

SNAP is this nation's most effective tool to combat hunger and food insecurity, including among older Americans.[10] In Fiscal Year 2015, SNAP supported 4.8 million older adults age 60 and over, accounting for 10% of all SNAP recipients.[11]

Still, only 42% of eligible seniors participated in SNAP, resulting in 5.2 million seniors who were eligible for but unable to access the benefit. The reasons for low participation among seniors are well known and include complex and cumbersome application processes, limited mobility and access to technology, as well as lack of awareness about SNAP and who qualifies.[12] Over the past decade, the U.S. Department of Agriculture's Food and Nutrition Service (FNS) has partnered with innovative states to test various enrollment strategies to improve the enrollment experience for eligible seniors.[13] One such successful demonstration, known as the Elderly Simplified Application Project (ESAP), is the subject of this paper.

As demographic changes accelerate and the share of SNAP households with older adults continues to grow, states will increasingly need to identify streamlined enrollment and caseload maintenance strategies to manage costs. Agency administrators and advocates must work together to implement cost-effective enrollment solutions, like ESAP, tailored to meet the unique needs of older adults.

Purpose of this Guide

Communities across the country have committed to boosting SNAP participation among low-income seniors and are looking for new strategies that overcome multiple barriers to enrollment. ESAP is one successful model that has received special attention in recent years, due to its impressive results in several southern states. Benefits Data Trust (BDT) and the National Council on Aging (NCOA) recognized ESAP as a promising approach to improving benefits access for seniors and decided to partner with FNS, state agencies, and community-based advocates around the country to:

1. Better understand the original ESAP demonstrations (AL, GA, FL, MS, SC, WA)

2. Provide technical assistance to states setting up new ESAP demonstrations (PA, MD)

3. Share information with states and advocates interested in seeking ESAP approval

BDT and NCOA designed this guide to help state advocates better understand if and how an ESAP demonstration could help meet their state's goals of (1) reducing senior hunger by increasing senior SNAP participation, (2) achieving administrative efficiency, and (3) providing better customer service to low-income seniors. BDT and NCOA appreciate that advocates and state administrators alike must consider the costs and benefits of new initiatives as they weigh competing priorities and decide what issues and ideas to put their limited resources behind.

To be clear, this guide is not meant as a technical "how to" for state agencies that have already committed to pursuing ESAP. FNS published helpful guidance to states on ESAP in November 2015, which can be found at https://www.fns.usda.gov/sites/default/files/snap/ESAP_Guidance.pdf.[14] In comparison, this "Guide for Advocates" is for external stakeholders who seek to inform state leadership of opportunities to improve the well-being of low-income older adults, such as Area Agencies on Aging, senior centers, local food banks, anti-hunger policy organizations, and faith-based communities. BDT and NCOA understand that such individuals and groups are often instrumental in getting significant policy and process change off the ground, as well as monitoring and advocating for improvement in policies and programs once they are in place.

PART 1: What is the Elderly Simplified Application Project?

Overview

The Elderly Simplified Application Project (ESAP) is a demonstration project designed to dramatically simplify the SNAP application and verification process for eligible households, while also reducing the administrative burden on states. In approved states, SNAP applicants are eligible for ESAP if all household members are age 60 or older and have no earned income. Some states also elect to include disabled households. Effective ESAPs have the potential to do three things:

- Improve the customer experience for vulnerable households

- Achieve administrative efficiencies for state agencies

- Increase SNAP participation among seniors and people with disabilities

Policy Changes

While each state's ESAP is slightly different, ESAPs typically include three separate "waivers" from FNS:

Table 1: ESAP Waiver Options

36 Month Certification Period *(Section 3(f) of the Food and Nutrition Act)*	Recertification Interview Waiver *(7 CFR 273.14(a)(3))*	Simplified Verification *(7 CFR 273.2(f))*
DETAILS	**DETAILS**	**DETAILS**
Most SNAP households are certified for 6 or 12 months before having to recertify for benefits. Under current law, states have the option to extend certification periods to 24 months for elderly or disabled households. With ESAP, states can go farther by granting a 36 month certification period to eligible households. Most ESAP states are still required to have "interim contact" at 12 months for ESAP households to maintain SNAP eligibility.[15]	Most SNAP households must complete a full interview at recertification, but this requirement is waived under ESAP. Some non-ESAP states also have this waiver.[16]	FNS waives the requirement to verify unearned income, household size, residency, identity, and shelter expenses, unless questionable.[17] Electronic verification sources are used to the greatest extent possible. Non-citizen status and medical expenses still must be verified.
BENEFITS	**BENEFITS**	**BENEFITS**
Longer periods of enrollment make sense for a population whose SNAP eligibility is unlikely to change. The waiver reduces "churn" (the cycling of eligible households on and off a benefit) among ESAP households and allows states to concentrate renewal resources on more complex households.	This waiver allows elderly/disabled households to continue receiving SNAP without the administrative hassle of a recertification interview.	Because ESAP households do not, by definition, have earnings, nearly all eligibility information is available from the Social Security Data Exchange and other electronic sources.

All of the initial ESAP demonstrations (AL, GA, FL, SC, MS, WA) included a waiver of the initial application interview, but FNS stopped granting these waivers when new guidance was released in 2015.[18] FNS's decision to reinstate the initial interview was based on their belief that a conversation with a SNAP caseworker ensures that eligible seniors fully understand program rules and are advised on how to claim all available deductions.[19] All existing ESAPs will be required to reestablish interview processes at application at the time of waiver renewal. Alabama and Washington were the first states affected by this new policy, as their ESAP demonstrations were up for renewal in 2016.[20]

Process Changes

In addition to FNS-approved policy changes, some ESAP states have implemented application process changes to further improve the customer experience and gain administrative efficiencies. These changes do not require FNS waiver approval.

Table 2: ESAP Process Changes

Central Processing Unit	Short Application	Rebranding
DETAILS	**DETAILS**	**DETAILS**
Some states consolidate ESAP cases to be managed by a centralized group of caseworkers specially trained to process ESAP cases.	SNAP-only or multi-benefit applications can range from 8 to 30 pages long. Some states choose to create a simple, two page application tailored to older adults.[22]	Some states promote ESAP as a nutrition program just for seniors to avoid the stigma associated with "food stamps".
BENEFITS	**BENEFITS**	**BENEFITS**
A central unit allows for consistent application processing and facilitates specialized training for caseworkers who will be exclusively interfacing with elderly/disabled households. Because of streamlined processes, ESAP units can handle bigger caseloads with fewer staff.[21]	Seniors are often intimidated by multi-page applications. A simpler application has proven to be an effective tool for older adults to get more comfortable proceeding with a SNAP application.	Rebranding can help state agencies and their community partners generate interest from eligible seniors who may have been hesitant to apply for SNAP in the past.

Finally, three ESAP states, Alabama, Georgia, and South Carolina, recently decided to strengthen their programs by adding a Standard Medical Deduction (SMD) for senior and disabled households. The SMD simplifies the collection of medical receipts, which can boost SNAP benefits for eligible households, save caseworker time, and reduce administrative errors. To learn more about the SMD, read the Center on Budget and Policy Priorities' August 2014 *SNAP's Excess Medical Expense Deduction: Targeting Food Assistance to Low-Income Seniors and Individuals with Disabilities* report available here: http://www.cbpp.org/sites/default/files/atoms/files/8-20-14fa.pdf.

State Variation

As described above, ESAPs represent a combination of policy waivers and application processing improvements that, taken together, can improve access to SNAP for older adults and increase administrative efficiency. States can elect to incorporate some or all of these streamlining tactics to meet their unique goals and application processing environments. This chart summarizes the policy and process choices that active ESAP states have made.

Table 3: Policy and Process Choices in ESAP States

State	Renewal Date	36 Month Certification	Recertification Interview Waiver	Simplified Verification	Central Processing Unit	Initial Interview Waived**	Combined w/ SMD
AL	12/2020*	✓	✓	✓	✓		✓
FL	09/2017		✓	✓		✓	
GA	11/2017		✓	✓	✓	✓	✓
MD	11/2021	✓	✓	✓	✓		
MS	09/2017	✓	✓	✓	✓	✓	
PA	09/2020	✓	✓	✓			
SC	09/2017		✓	✓	✓	✓	✓
WA+	09/2020		✓	✓			

*As of December 2016, Alabama's ESAP renewal was pending final approval from FNS.

**As of December 2016, these states still have authority under original demonstration terms to waive initial interview.

+As of December 2016, Washington has a pending request to FNS to implement 36 month certification.

To gain a deeper understanding of how the policy and process choices described above play out on the ground, BDT and NCOA explored the process further with three states – Alabama, South Carolina, and Washington.

Alabama: The Alabama Elderly Simplified Application Project (AESAP) is widely considered a success. When designing AESAP in 2008, Alabama sought to achieve administrative efficiency and significantly improve the enrollment experience for Alabama's seniors by centralizing the case management for elderly-only SNAP households. Alabama has reported that the transition from county-based to centralized case management took some adjustment from consumers and caseworkers alike, but has been embraced over time due to the convenience and reliability of the central unit. Since its inception, the AESAP caseload has grown significantly, resulting in approximately 42,000 new households (as of 2016). Alabama attributes its success to strong community partnerships that helped with outreach and re-branding the program for seniors, as well as early lessons learned about how to appropriately staff the central processing unit to accommodate seniors' needs. AESAP has also enjoyed widespread political support in Alabama due to the significant administrative efficiencies the program has achieved.

South Carolina: South Carolina has a long history of designing unique SNAP enrollment solutions to better serve older residents in need. In 1995, South Carolina became the first state to implement the South Carolina Combined Application Project (SCCAP) to increase SNAP participation among Supplemental Security Income recipients, which has since been replicated and/or modified by 16 other states. In 2004, South Carolina designed and received FNS approval to implement the first ESAP to serve additional senior-only households without earnings. In their own words, South Carolina sought to "reinvent the SNAP application process…[for] a segment of our population facing barriers to participation in SNAP due to the complexity of the application process and problems associated with age, such as transportation, mobility, and disability." To operate both demonstrations, South Carolina implemented a dedicated caseworker unit that specialized in serving seniors. The state attained significant efficiencies from this design, as neither SCCAP nor ESAP required eligibility interviews and virtually all eligibility factors could be verified electronically.

Because of South Carolina's application process reengineering, very few eligible seniors in South Carolina are denied SNAP for procedural reasons, such as missing an interview or submitting incomplete paperwork. Since 2015, BDT has assisted low-income seniors in South Carolina to complete SNAP applications through the ESAP demonstration and sees a 93% application approval rate.

Washington: Similar to South Carolina, Washington State had already successfully executed the Washington Combined Application Project (WASHCAP) when it sought to implement ESAP in 2013. The primary goal of Washington's ESAP was to eliminate the certification interview, which the state identified as a primary application barrier for seniors. ESAP applications are processed at the local office level, rather than centrally, and follow all the same verification requirements as other applications since Washington already maximizes use of electronic verification for all ages. Washington considered introducing a shortened SNAP application after learning about other states' success, but felt the trade-off of providing less space to request application details, like medical expenses, outweighed the benefits. Despite FNS' requirement to reinstate the initial application interview, Washington chose to renew its ESAP demonstration in 2016 and is working to make better use of other ESAP options, such as extending certification periods from 12 to 36 months.

PART 2: Results to Date

FNS requires ESAP states to collect and report certain data elements and conduct quality control reviews for the ESAP population, but comprehensive outcomes data is not publicly available. FNS recognized the need for more comprehensive evaluation data on ESAP and other elderly-focused demonstration projects and, in 2016, awarded a research grant to Social Policy Research Associates to conduct such an evaluation. Pending the anticipated release of the study in 2019, BDT and NCOA are providing currently available details on ESAP outcomes to inform states' current advocacy plans. Detailed below are preliminary observations of where and how ESAPs have successfully improved customer experience, increased administrative efficiency, and boosted senior participation.

Effects on Customer Experience

> *"I'll be able to eat [with SNAP]. Because my income is so low, the help that you'll be able to help me with is very much appreciated. You've been really wonderful. When somebody is in need, that is very, very important. It eases the pain. Thank you for your time and your kindness."*
>
> Ms. B could not afford her rent or utilities on her own and was forced to ask her daughter for financial help. She was living on just $684 each month in Social Security and was unable to work. However, after speaking with the South Carolina Benefits Center, Mrs. B was found to be eligible for up to $194 in SNAP to help her afford her groceries, a 28% increase in her income.

As described in the introduction, an increasing number of states are looking to ESAP and other administrative innovations to improve the enrollment experience for vulnerable seniors. Historically, many eligible seniors have been hesitant to apply for SNAP due to misunderstanding, stigma, and trouble navigating a very complex application and verification process. By reimagining the enrollment process with older adults in mind and maximizing the use of existing data sources, ESAP has the potential to dramatically improve the customer experience.

Other than the FNS-commissioned study that launched in 2016, there have not been any systematic efforts to collect seniors' experiences across ESAP states. To help paint a picture of what may be happening, BDT has been collecting data and testimonials from ESAP applicants in South Carolina since April 2015, reflecting an overwhelmingly positive enrollment experience. Because of the streamlined enrollment process and high enrollment rates, seniors rarely contact BDT to report problems reaching a caseworker or tracking down missing paperwork, both of which are common complaints in non-ESAP states.

Without other data, it cannot be assumed that other seniors applying for ESAP without the support of a non-profit organization, like BDT, have similarly positive experiences. Seniors applying on their own may have a stronger need to speak with a caseworker to learn how to use the Electronic Benefits Transfer (EBT) card, report changes, or claim additional deductions. In fact, Alabama has found that, despite interviews currently not being required to receive benefits, many AESAP applicants and participants still reach out to the AESAP Call Center to ask questions about their eligibility and how to use their benefits. Alabama appreciates the importance of being available for such conversations and staffs its AESAP Call Center accordingly.[23]

Information on how ESAP states that do not employ central processing and/or a dedicated call center improve the customer experience is less available. It is likely that such states have lower than average denial rates for procedural reasons (i.e. missed interview or incomplete verification), but until the release of the forthcoming study we must rely on the currently available information.

Effects on Administrative Efficiency

Another major motivator for states considering ESAP is the opportunity to gain administrative efficiencies by simplifying the enrollment process for senior/disabled households without earned income. Due to widespread receipt of Social Security benefits in this population, almost all required eligibility details, such as Social Security Number, income, and residency, can be verified through the Social Security Data Exchange. In most situations, ESAP households only need to provide proof of expenses, such as medical expenses, to determine the appropriate benefit amount, rather than to establish eligibility.

Alabama enjoys significant efficiencies as a result of implementing ESAP. In 2015, the AESAP Call Center was staffed by 35 dedicated workers that manage the same number of cases that would require 100 caseworkers in a local office under normal processing standards.[24] Elimination of the certification and recertification interviews, which both require at least 30 minutes of caseworker time to schedule and complete, is likely the main driver for Alabama's time savings, in addition to reduced requests to ESAP households for documentation.[25] It will be important to evaluate if and how these efficiencies change when Alabama reintroduces the initial application interview as required by their 2016 demonstrational approval.

Effects on Participation

Because the pool of eligible seniors fluctuates with a state's economic conditions, the most important measure to evaluate how well a state's SNAP program reaches those in need is the *participation rate*. Fifteen years ago, only 25% of eligible seniors received SNAP benefits.[26] By 2010, the elderly participation rate had risen to 33%.[27] In 2015, the national participation rate for seniors climbed to 42% with increases in every state, thanks to a variety of policy changes, enrollment innovations, and outreach efforts.[28] Still, elderly SNAP participation lags far behind other demographic groups where the national participation rate is 83%.[29]

While national rates of senior SNAP participation are on the rise, state-level participation rates reveal significant state and regional variation. Figure 1 shows state-level participation rates in FY2012, the most recent year for which there is state-level participation data.

Figure 1: Estimated Senior SNAP Participation Rates, FY 2012

Legend:
- Under 35% (16)
- 35% to 44% (20)
- 45% to 54% (9)
- 55% to 63% (6)
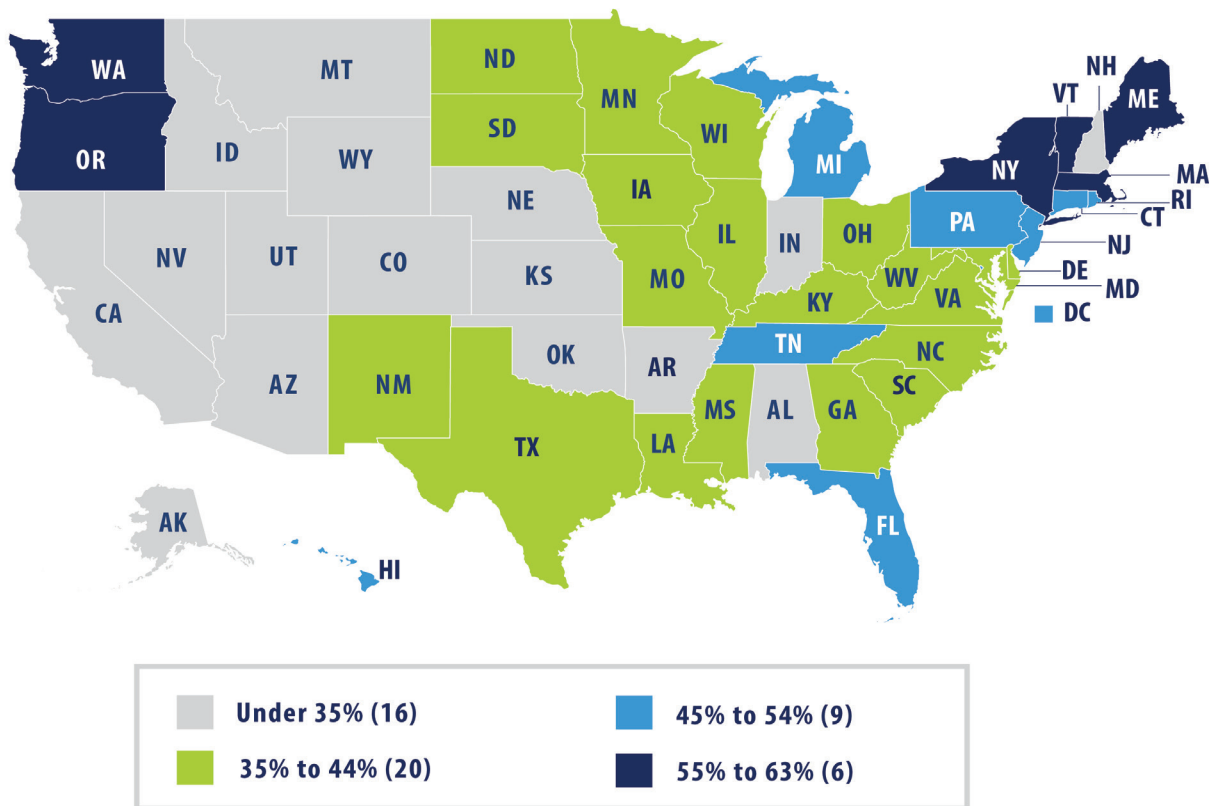
Given the many factors that influence a state's participation rate, one cannot draw conclusions about ESAP's effect on participation from this data. Still, it is important to note that only two ESAP states (Florida and Washington) rank among the top 15 states for senior participation and this data pre-dates Washington's adoption of ESAP in 2013.[30] Other early ESAP states (GA, MS, SC) ranked in the middle of the pack with participation rates between 35% and 44%.[31] And despite the success of ESAP in Alabama beginning with the initiation of AESAP in 2008, its 2012 participation rate was just 32%.[32]

When thinking about increasing senior participation, it is important for advocates to think of a multi-pronged approach to increasing senior participation and ESAP as one of many tools that can be used.

As noted above, ESAP is just one of many factors influencing states' senior SNAP participation rates. In fact, the five states with the highest senior participation rates (all 60% or above) do not have ESAP demonstration projects.[33] Other important factors that likely influence a state's senior participation rate include:

- **State Outreach Plans:** Many states partner with local community-based organizations to conduct outreach and provide application assistance for low-income seniors and families who are eligible for SNAP benefits. States can draw down federal matching funds to support this critical activity.[34] States with extensive community partner networks and robust state outreach plans often enjoy higher SNAP participation rates.[35]

- **Combined Application Projects:** As mentioned in Part 1, Washington, South Carolina, and 15 other states operate Combined Application Projects (CAPs), which are special demonstration projects designed to streamline SNAP enrollment for single SSI recipients. In seven "standard" CAP states, the Social Security Administration facilitates SNAP applications as eligible individuals apply for or recertify for SSI. Notably, three of the top 10 states for elderly SNAP participation operate standard CAP demonstrations.[36] Another 10 states operate "modified" CAP demonstrations, which target mailings to eligible SSI households inviting them to apply using a simplified SNAP enrollment process.[37]

- **Modernization:** States have undergone significant modernization in recent years ranging from wholesale replacement of eligibility systems to the introduction of case-banking (a model where caseworkers share cases and are assigned to different parts of the enrollment process) and statewide call centers.[38, 39] While research on the effects of modernization on low-income seniors is limited, several studies suggest that phone-based enrollment assistance is preferred by seniors, when compared to in-person or online enrollment options.[40] Among ESAP states, Florida has done the most to leverage technology to reengineer SNAP enrollment and renewal processes for all populations, and has outpaced senior SNAP participation growth nationally.

PART 3: Lessons Learned

After several years of observing ESAPs, federal and state agency officials, along with national and state advocates, have learned a great deal about what policies and practices contribute to successful programs. FNS provided a detailed description of a wide range of best practices in their 2015 guidance to states.[42] Listed below are select best practices and common pitfalls for advocates to consider when partnering with their state agency colleagues to design or renew ESAP demonstrations.[43]

Table 4: ESAP Best Practices

BEST PRACTICE	PURPOSE
Centralize ESAP processing	Allows for consistent processing and specialized workforce training
Establish an ESAP Call Center	Staff is trained and available to handle unique needs of the ESAP population. A Call Center can be combined with other elderly specific units, as South Carolina did with SCCAP.
Screen for ESAP Cases through all Application Mediums	Not all ESAP eligible applicants will know to apply for SNAP through a special application, so states need to be able to identify eligible applicants who apply through traditional mediums (in-person, online) as soon as possible. This can reduce overall processing time for clients and caseworkers.
Pair with Standard Medical Deduction	Medical expense verification is one of the only factors where ESAP applicants still must provide documentation. SMD simplifies processing, and in turn, increases the percentage of seniors claiming medical deductions and reduces Quality Control errors.
Prepare comprehensive training and communication plan for field staff, even if centralizing ESAP processing	Caseworkers must understand the benefits and standard operating procedures for ESAP, including local caseworkers giving up their senior caseload to a central team. Good communication to staff leads to more accurate information for consumers.
Prepare forecasts to anticipate demand for phone assistance from ESAP population	Seniors still want to be able to get through to a worker with questions and changes, even if it is not in the form of a formal interview. Forecasting phone volume is critical to ensuring the SNAP agency can be responsive to senior needs without long hold times.
Secure leadership commitment	Leadership buy-in ensures ESAP receives sufficient time and resources for effective program design, implementation, and evaluation.
Ongoing communication with community partners	An effective feedback loop is critical to ensure new processes are smooth for seniors. Furthermore, ESAP will only reach all eligible participants if community-based groups are aware of and able to promote the program.

Potential Obstacles

The following are some of the challenges that accompany ESAP implementation:

- States with decentralized ESAP application processing require more systems management and training to be successful. Consistent application processing is especially hard when ESAP applicants represent a relatively small portion of the caseload (i.e. caseworkers only occasionally see ESAP cases and are unfamiliar with application processing nuances).

- States that do not maximize waiver options (e.g. still require verification of certain types of income, limit certification periods to 12 months) are missing out on significant simplification opportunities that benefit applicants and SNAP agencies alike.

- Clear policy and procedures are critical to ensure seniors who lose ESAP eligibility but remain SNAP eligible (such as those that take a part-time job or have an individual under age 60 join their household) are seamlessly transferred to standard SNAP case management. Seniors who remain eligible for SNAP should not have to reapply to continue receiving benefits.

One major takeaway for BDT and NCOA is that *process change* is at least as important as *policy change,* especially to achieve the dual goals of improving the consumer experience and increasing administrative efficiency. For those two outcomes, the most successful states appear to be those that re-imagined the entire enrollment experience for older adults in order to overcome the multiple enrollment barriers they often face.

PART 4: Opportunities for Advocates

ESAPs hold great potential for states looking to improve SNAP access for older adults. BDT and NCOA believe that ESAP aligns with bipartisan goals of ensuring that SNAP reaches those in need in the most efficient and cost-effective manner possible. The information below is designed to empower advocates to engage with their state partners as they design and launch effective ESAP demonstrations.

Bringing ESAP to Your State

If the information presented in this guide leads you to believe that an ESAP demonstration may work for your state, you may be wondering how you can help. Below are recommendations for advocates to consider undertaking to encourage state agency officials to launch ESAP.

Table 5: ESAP Implementation Process

STEP ONE	STEP TWO	STEP THREE	STEP FOUR	STEP FIVE
Generate Interest and Political Will	Demonstration Proposal Development	Negotiation of Terms and Conditions	Implementation Plan	Program Launch
DESCRIPTION				
State leaders need to know ESAP exists and how it can help meet state goals.	After getting to yes, states must develop a detailed waiver request and implementation plan for FNS approval.	FNS approves ESAP proposals under demonstration authority and may set parameters and reporting requirements that are different from earlier ESAP demos.	Beyond implementation specifics provided to FNS, states should develop detailed plans for systems changes, training, and external communication.	When implementation plans are finalized and system changes are scheduled, states will set launch date, inform FNS and issue guidance to field staff.
ROLE OF ADVOCATES				
Share basic information. Build support in aging and anti-hunger communities; Connect state leaders with peer states for feedback.	Share FNS guidance and waiver template. Offer states technical assistance, as needed.	Consult with states as they consider whether FNS-proposed reporting requirements are feasible, and whether alternative approaches would meet FNS standards.	Share best practices from this guide and inform state decisions by representing the consumer perspective. Detailed planning will lead to smoother implementation.	Issue press release and congratulate leadership; Help spread the word to seniors; Monitor early processes to ensure they meet needs of ESAP applicants. Provide feedback loop to states.
ESTIMATED TIMEFRAME				
~3-12 months	~3 months for proposal development ~3-4 months for FNS response	~1-2 months from FNS response	~6-9 months from state leadership's decision to pursue ESAP (can overlap with proposal development and FNS negotiations)	~6 months of engagement from advocates before and after program launch is ideal

Evaluating ESAP in Your State

Once a state launches a new demonstration project, advocates play an important role to ensure that (1) new processes are working smoothly for individual applicants and (2) the agency is actively tracking enrollment and access measures to understand positive outcomes as well as unintended consequences.

Table 6: ESAP Evaluation Process

STEP ONE	STEP TWO	STEP THREE
Data Collection	Interim Reporting	External Communication

DESCRIPTION		
States must set up system indicator for ESAP cases for ongoing tracking and reporting to FNS. This should happen prior to program launch.	States are required to submit reports to FNS on various factors. States also must conduct Quality Control reviews for ~200 randomly selected ESAP cases each year.	States can instill confidence in ESAP and share progress by establishing formal communication and feedback channels with stakeholders.

ROLE OF ADVOCATES		
Encourage state to capture a wide range of performance metrics, including call center wait times, approval/denial rates, average benefit amount, and churn.	Connect state leadership to peers in other ESAP states who have been through reporting requirements. Request copies of interim reports to understand effects of ESAP to date.	Ask agency leaders to establish ongoing communication channels with advocates. Invite ESAP participants to provide direct feedback to state leaders.

ESTIMATED TIMEFRAME		
Prior to launch, then ongoing	18 months after launch. Annually thereafter	Ongoing

As previously mentioned, evaluating a state's ESAP *processes* is at least as important as evaluating ESAP *policy changes*. With the reintroduction of the initial interview requirement, it will be especially important to compare states with and without central processing of ESAP cases (e.g. Maryland vs. Pennsylvania) to determine what models should be replicated and expanded in the future.

Keeping ESAP in Your State

Four of the eight ESAP states (FL, GA, MS, SC) have ESAP demonstration approvals that expire on September 30, 2017. Each state must decide whether and how to modify their ESAP demonstrations to align with FNS' new guidance related to the initial interview. Advocates in these states are well positioned to consult with their state agency partners to secure an ongoing commitment to streamline the SNAP enrollment process for eligible seniors.

Table 7: ESAP Renewal Process

Demonstration Renewal
DESCRIPTION
At least every 5 years, states must re-establish demonstration aims and re-negotiate terms and conditions with FNS.
ROLE OF ADVOCATES
Suggest evaluation of long-term effects, such as application churn and participation rates; Highlight opportunities for further improvement under program renewal.
ESTIMATED TIMEFRAME
5 years after launch

One key consideration for states as they decide whether to renew a demonstration waiver is whether the value added by special permissions from FNS outweighs the amount of reporting and quality control review that is required. For states operating a SMD, state officials should be encouraged to talk with FNS about how to design a quality control sample that is not duplicative, to preserve agency resources. States are often relieved to learn that they need not treat ESAP and SMD demonstrations, which serve an almost identical caseload, as completely separate reporting and evaluation responsibilities.

Conclusion

America's older adults will only be able to age in place with dignity if they can meet their basic needs. SNAP is a critical resource to buffer seniors against poverty and food insecurity, but much more must be done to ensure eligible seniors can access the program. The Elderly Simplified Application Project is a promising strategy that streamlines the enrollment experience for seniors while also realizing administrative savings for states. Advocates play a critical role in bringing ESAP to the attention of state leaders and ensuring that design and implementation choices reflect best practices nationwide. While discussing ESAP, along with other streamlining strategies referenced in this report, BDT and NCOA recommend that advocates and their state partners stay focused on the critical outcomes that make ESAP worthwhile: better customer experience, increased administrative efficiency, and higher SNAP participation rates among seniors.

For additional information or to request technical assistance related to Elderly Simplified Application Projects, please contact Benefits Data Trust at policy@bdtrust.org or the National Council on Aging at centerforbenefits@ncoa.org.

Key Resources

- *Elderly Simplified Application Project Guidance, FY2015-FY2016,* U.S. Department of Agriculture, Food and Nutrition Service, Program Development Division, November 2015. http://www.fns.usda.gov/sites/default/files/snap/ESAP_Guidance.pdf

- *Strategies to Simplify SNAP for Seniors: ESAP and SMD*, Benefits Data Trust and the National Council on Aging, November 2016. https://www.ncoa.org/resources/simplify-snap-through-esap-smd

- *State Trends in Supplemental Nutrition Assistance Program Eligibility and Participation Among Elderly Individuals, Fiscal Year 2008 to Fiscal Year 2013,* Mathematica Policy Research, July 2015. https://www.mathematica-mpr.com/our-publications-and-findings/publications/state-trends-in-supplemental-nutrition-assistance-program-eligibility-and-participation-among

- *SNAP's Excess Medical Expense Deduction: Targeting Food Assistance to Low-Income Seniors and Individuals with Disabilities*, Written by Ty Jones, Center on Budget and Policy Priorities, August 2014. http://www.cbpp.org/research/snaps-excess-medical-expense-deduction

- *The State of Senior Hunger in America 2014: An Annual Report*, Written by James Ziliak and Craig Gundersen for the National Foundation to End Senior Hunger, June 2016. http://www.nfesh.org/wp-content/uploads/2016/05/State-of-Senior-Hunger-in-America-2014.pdf

End Notes

1 U.S. Census Bureau. *Annual Estimates of the Resident Population for Selected Age Groups by Sex for the United States: April 1, 2010 to July 1, 2015.*June 2016. Available at: https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk

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3 Ziliak, J.P. & Gundersen, C. *The State of Senior Hunger in America 2014: An Annual Report, Supplement*. National Foundation to End Senior Hunger (NFESH). June 2016. Available at: http://www.nfesh.org/wp-content/uploads/2016/05/State-of-Senior-Hunger-in-America-2014.pdf. *See also* Employee Benefit Research Institute. *Notes: Time Trends in Poverty for Older Americans Between 2001-2009*. April 2012. Available at: https://www.ebri.org/pdf/notespdf/ebri_notes_04_apr-12.eldpovty.pdf

4 U.S. Census Bureau. *POV-01. Age and Sex of All People, Family Members and Unrelated Individuals Iterated by Income-to-Poverty Ratio and Race.* 2016. Available at: http://www.census.gov/data/tables/time-series/demo/income-poverty/cps-pov/pov-01.html#par_textimage_30. The Elder Economic Security Standard™ Index provides a more comprehensive overview of how older adults struggle to pay for necessities of daily living; see www.basiceconomicsecurity.org/EI.

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8 Forthcoming publications from Szanton, S. and Samuel, L., et al.

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11 Gray, K.F., et al. *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2015*. Mathematica Policy

Research for the U.S. Department of Agriculture, Food and Nutrition Service, November 2016. Available at: http://www.fns.usda.gov/sites/default/files/ops/Characteristics2015.pdf

12 Bartlett, S., et al. *Food Stamp Program Access Study: Final Report.* Abt Associates, November 2004. Available at https://www.ers.usda.gov/webdocs/publications/efan030133/30268_efan03013-3a_002.pdf; United States Department of Agriculture, Food and Nutrition Service. *Outreach Grants.* June 2014. Available at: http://www.fns.usda.gov/outreach/outreach-grants; Chu, A., et al. *Partnering with Seniors for Better Health: Computer Use and Internet Health Retrieval among Older Adults.* Journal of the Medical Library Association, vol.97, no.1, January 2009, pp. 12-20. Available at http://www.jmir.org/2013/5/e97/; Rower, G., et al. *Assessment of the Contributions of an Interview to SNAP Eligibility and Benefit Determinations: Final Report.* Mathematica Policy Research for U.S. Department of Agriculture, Food and Nutrition Service, May 2015. Available at: http://www.fns.usda.gov/sites/default/files/ops/SNAPInterview.pdf; McConnell, S. & Ponza, M. *The Reaching the Working Poor and Poor Elderly Study: What We Learned and Recommendations for Future Research.* Mathematica Policy Research, December 1999. Available at http://www.mathematica-mpr.com/~/media/publications/PDFs/reach.pdf.

13 Kauff, J., et al. *Reaching the Underserved Elderly and Working Poor in SNAP: Evaluation Findings from the Fiscal Year 2009 Pilots.* Mathematica Policy Research for U.S. Department of Agriculture, Food and Nutrition Service, April 2014. Available at: http://www.fns.usda.gov/sites/default/files/SNAPUnderseved-Elderly2009.pdf; Sama-Miller, E., et al. *Evaluation of the Effectiveness of Pilot Projects in Increasing Supplemental Nutrition Assistance Program (SNAP) Participation among Medicare's Extra Help Population*, Mathematica Policy Research for U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, December 2014. Available at https://www.fns.usda.gov/sites/default/files/ops/SNAPMedicare.pdf; Dorn, S. Examples of Promising Practices for Integrating and Coordinating Eligibility, Enrollment, and Retention: Human Services and Health Programs Under the Affordable Care Act, The Urban Institute for U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation, July 2014. Available at http://www.urban.org/sites/default/files/alfresco/publication-pdfs/413231-Examples-of-Promising-Practices-for-Integrating-and-Coordinating-Eligibility-Enrollment-and-Retention-Human-Services-and-Health-Programs-Under-the-Affordable-Care-Act.PDF.

14 U.S. Department of Agriculture, Food and Nutrition Service, Program Development Division, *Elderly Simplified Application Project Guidance, FY2015-FY2016*, November 2015. Available at http://www.fns.usda.gov/sites/default/files/snap/ESAP_Guidance.pdf

15 Alabama received a novel waiver in April 2015 to test the elimination of the interim reporting requirement for ESAP households, since Alabama can confirm continued eligibility through electronic sources (e.g. Social Security data exchange, death match, etc.). By comparison, Pennsylvania still has an interim reporting requirement, but non-response does not necessarily result in case closure.

16 As of May 2016, Kansas, Louisiana, Massachusetts, Missouri, Nebraska, New Mexico, and Oklahoma also have this waiver. See FNS Waiver Database here: http://www.fns.usda.gov/snap/waivers-rules

17 Not all ESAP states are fully leveraging this waiver. For instance, several states still require proof of unearned income, like pensions, that cannot be electronically verified through the Social Security data exchange.

18 U.S. Department of Agriculture, Food and Nutrition Service, Program Development Division, *Elderly Simplified Application Project Guidance, FY2015-FY2016*, November 2015. Available at http://www.fns.usda.gov/sites/default/files/snap/ESAP_Guidance.pdf

19 According to FNS staff, the decision was also informed by a 2015 evaluation of a two-state demonstration projects that permitted waiving the interview for a portion of all cases. See Rowe, G., et al. *Assessment of the Contributions of an Interview to SNAP Eligibility and Benefit Determinations: Final Report,* Mathematica Policy Research for the U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, May 2015. Available at http://www.fns.usda.gov/sites/default/files/ops/SNAPInterview.pdf.

20 Some advocates (including BDT) were disappointed by this policy change, fearing that reinstating the interview will result in more eligible applicants being denied for procedural reasons. Data from ESAP states that conduct the initial interview is not yet available to evaluate this hypothesis.

21 For example, Alabama claims that 35 ESAP caseworkers handle the same caseload as 100 caseworkers in a local office, due to the streamlined enrollment permissions and relative simplicity of cases. This efficiency may change when Alabama is required to reintroduce the initial application interview under their new waiver terms.

22 Several non-ESAP states, including Massachusetts, have also introduced short, senior-only SNAP applications.

23 Phone call with Alabama Department of Human Resources, Food Assistance Division, July 2015.

24 Phone call with Alabama Department of Human Resources, Food Assistance Division, July 2015. AESAP has a total of 35 employees including 25 certification staff, five clerical staff, one clerical supervisor, three supervisors, and one manager. Of the 25 certification staff, eight are in the call center.

25 Kauff, J., et al. *Reaching the Underserved Elderly and Working Poor in SNAP: Evaluation Findings from the Fiscal Year 2009 Pilots*. Mathematica Policy Research for U.S. Department of Agriculture, Food and Nutrition Service, April 2014. Available at: http://www.fns.usda.gov/sites/default/files/SNAPUnderseved-Elderly2009.pdf

26 Cunnyngham, K., *State Trends in Supplemental Nutrition Assistance Program Eligibility and Participation Among Elderly*

Individuals: Final Report. Mathematica Policy Research, 2010. Available at: https://naldc.nal.usda.gov/download/45316/PDF

27 Eslami, E., *State Trends in Supplemental Nutrition Assistance Program Eligibility and Participation Among Elderly Individuals, Fiscal Year 2008 to Fiscal Year 2013.* Mathematica Policy Research, July 2015. Available at: https://www.mathematica-mpr.com/our-publications-and-findings/publications/state-trends-in-supplemental-nutrition-assistance-program-eligibility-and-participation-among

28 Gray, K. F. & Cunnyngham, K., *Trends in Supplemental Nutrition Assistance Program Participation Rates: Fiscal Year 2010 to Fiscal Year 2014*, Mathematica Policy Research for U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, June 2016. Available at: http://www.fns.usda.gov/sites/default/files/ops/Trends2010-2014.pdf

29 Ibid.

30 In FY2012, the elderly participation rate in Florida and Washington was 53% and 55%, respectively.

31 In FY2012, the elderly participation rate in Georgia, Mississippi, and South Carolina was 38%, 35%, and 35%, respectively.

32 Ibid.

33 Maine (60%), Massachusetts (61%), New York (60%), Oregon (61%), and Vermont (63%) had the highest SNAP participation rates among seniors in FY 2012. Massachusetts currently utilizes elements of ESAP, including the Recertification Interview Waiver for Elderly and Disabled Households and a 2 page, senior-only application.

34 7 CFR 272.5(c)

35 Food Research and Action Center, *Best Practices for Creating a Federally Reimbursable SNAP Outreach Plan*, November 2016. Available at http://www.frac.org/wp-content/uploads/best-practice-creating-federally-reimbursable-snap-outreach-plan.pdf

36 These are Massachusetts, New York, and Washington. Other standard CAP states are also ESAP states: Florida, Mississippi, South Carolina, and Pennsylvania.

37 States operating modified CAP demonstrations include Arizona, Kentucky, Louisiana, Maryland, Michigan, New Jersey, North Carolina, South Dakota, Texas, and Virginia. See U.S. Department of Agriculture, Food and Nutrition Service, Program Development Division. *State Options Report: Twelfth Edition*, October 2015. Available at: http://www.fns.usda.gov/sites/default/files/snap/12-State_Options.pdf

38 Rowe, G., et al. *Enhancing Supplemental Nutrition Assistance Program (SNAP) Certification: SNAP Modernization Efforts,* The Urban Institute for U.S. Department of Agriculture, Food and Nutrition Service, Office of Research and Analysis, June 2010. Available at https://www.fns.usda.gov/sites/default/files/EnhancedCertification_Vol2Final.pdf

39 Shaw, T, et al. *State Innovations in Horizontal Integration: Leveraging Technology for Health and Human Services*, Social Interest Solutions and the Center on Budget and Policy Priorities, March 2015. Available at http://www.cbpp.org/research/state-innovations-in-horizontal-integration-leveraging-technology-for-health-and-human

40 Kauff, J., et al. *Reaching the Underserved Elderly and Working Poor in SNAP: Evaluation Findings from the Fiscal Year 2009 Pilots.* Mathematica Policy Research for U.S. Department of Agriculture, Food and Nutrition Service, April 2014. Available at: http://www.fns.usda.gov/sites/default/files/SNAPUnderseved-Elderly2009.pdf; Florida Department of Elder Affairs, Bureau of Planning and Evaluation, *2011 SNAP Telephone-Application Survey Report,* October 2011. Available at http://elderaffairs.state.fl.us/doea/Evaluation/SNAP_2011.pdf

41 Florida's SNAP participation rate among seniors grew from 41% to 53% (12 percentage points) between FY 2010 and FY2012, compared to 33% to 42% (9 percentage points) in growth nationally. See Table III.23 of Eslami, E., "State Trends in Supplemental Nutrition Assistance Program Eligibility and Participation Among Elderly Individuals, Fiscal Year 2008 to Fiscal Year 2013." Mathematica Policy Research, July 2015. Available at: https://www.mathematica-mpr.com/our-publications-and-findings/publications/state-trends-in-supplemental-nutrition-assistance-program-eligibility-and-participation-among

42 U.S. Department of Agriculture, Food and Nutrition Service, Program Development Division, *Elderly Simplified Application Project Guidance, FY2015-FY2016*, November 2015. Available at http://www.fns.usda.gov/sites/default/files/snap/ESAP_Guidance.pdf

43 Ibid.