

# **CBPP SNAP Academy**

Webinar 6: SNAP Recertification

February 18, 2015







# **Agenda**

- Introduce CBPP SNAP Team and Mass Law Reform Institute
- SNAP Reporting Obligations
- SNAP Recertification/Renewal Process
- Strategies to Identify and Address "Churn"
- Questions





### **Guest Presenter**

Patricia Baker, Senior Policy Analyst and Chair MA SNAP Coalition
Mass Law Reform Institute www.mlri.org





Home

### + About Us Welcome to the Massachusetts Law Reform Institute

+ Advocacy

+ State Budget

The Massachusetts Law Reform Institute (MLRI) is a statewide nonprofit poverty law and policy center. Its mission is to advance economic, racial and social justice through legal action, policy advocacy, coalition building, and community outreach. MLRI specializes in large-scale legal initiatives and systemic reforms that address the root causes of poverty, remove barriers to opportunity, promote economic stability and create a path to self-sufficiency for low-income individuals and families.

Analysis + 45 Years of Impact

In addition, MLRI serves as the statewide poverty law support center for the Massachusetts civil legal services delivery system, providing expertise and support to local legal aid programs and also to social service, health care and human service providers, and other community organizations that serve low income people.

+ Our Community Partners

MLRI's goals and objectives are to:

+ Video:"End of the Line"

- address public and institutional policies and procedures that either contribute to, or perpetuate, the cycle of poverty;
- + News and Media
- ensure that low-income and underserved populations across the state are provided the same legal protections, rights and liberties enjoyed by all members of society;

+ Publications

provide local legal services providers and community-based advocacy organizations that serve low income people with the substantive expertise, technical
assistance, support, and trainings they need to best serve their clients.

+ Support & Training + Donate to MLRI

For over 45 years, MLRI's advocacy has been responsible for groundbreaking policies that have advanced the legal, economic and social rights of low-income people. It is considered one of the premier law reform and statewide poverty law support centers in the nation.

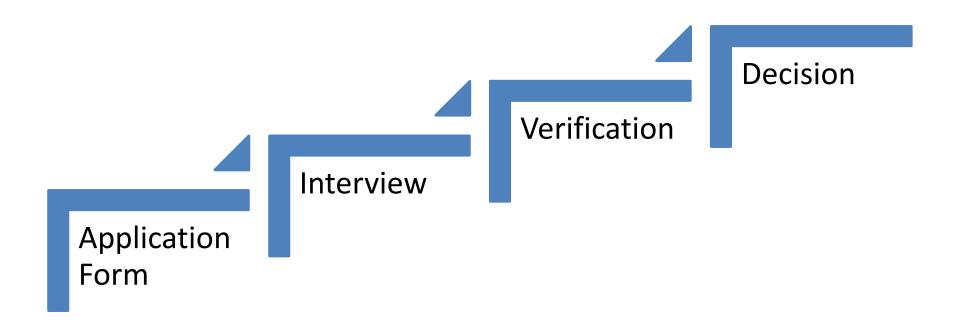
+ Contact Us







# **Re-Cap on Applications**







# **SNAP Recertification Framework**

Why is the recertification process important?

What is different about the SNAP recert vs application process?

How much time do individuals have to complete the process before their SNAP case closes?

Why is it important for us as advocates or assisters to engage in the recertification process?







# **SNAP Eligibility Framework**

Apply
(application,
interview,
and
verifications)

**Participate** 

Report changes and verifications



Recertify interview and verifications

**Participate** 





# What are Certification Periods?

- SNAP benefits are approved for a <u>set number of</u> months – called a "certification period"
- The length of time usually depends on the characteristics of the household

 Before the end of the cert period, the state must give the household the opportunity to renew or recertify without interruption.





# **SNAP Certification Periods**

Most households:

Certified for 6-12 months

"Interim" or Simplified Reporting Seniors & persons with disabilities:
Certified 24+ months

Interim "contact" & Change Reporting





# Special SNAP Certification Periods

# Expedited:

Certified 1-2 months pending completion of full application process

### **ABAWDs:**

Typically certified for 3 months, if subject to time limit





# Notice of Approval/Recertification

- After completing the SNAP recertification process, the household typically receives one or two written notices that give:
  - ☐ The amount of monthly SNAP benefits
  - ☐ The length of the certification period and/or the month when the cert period ends
  - ☐ The household "reporting requirements"

    during the cert period (this may also be in a separate SNAP notice to the household)





OTICE OF APPROVAL	COUNTY OF	STATE OF CALIFORNIA HEALTH AND HUMAN SERVICES AGENCY CALIFORNIA DEPARTMENT OF SOCIAL SERVICES
FOR CALFRESH BENEFITS	Notice Date : Case Name : Number : Worker Name : Number : Telephone: Address :	
(ADDRESSEE)		
	S is T Y	tate Hearing: If you think this action wrong, you can ask for a hearing. he back of this page tells you how. Our benefits may not be changed if ou ask for a hearing before this ction takes place.
_	_	•
YOUR APPLICATION FOR CALFRESH BENEFIT	TS HAS BEEN APPROV	ED.
Your initial amount of benefits is: \$ for period will be \$ from		benefit amount for the rest of your certification
IF YOU ALSO APPLIED FOR CASH AID, and it h stopped without another notice if your cash aid is appr		ed, your CalFresh benefits may be lowered or
Your CalFresh eligibility starts the same day a Your first month's benefits include more than capproved.	one month's benefits beca	
Your first month's benefits were prorated from	the date you filed your ap	oplication.
BECAUSE YOU RECEIVED CALFRESH BENEF verification:	ITS RIGHT AWAY, we did	d not require you to give us the following





# Time line for Recertification

### **12 Month Certification**

SNAP approval notice sent
12 month certification
Household advised of reporting requirements

Notice of expiration and recertification form sent Verifications requested

**Interview scheduled** 

45-60 days before end

Last Day of Cert Period

SNAP continues with new cert period

State should process timely, avoid interruption in benefits





# "Notice of Expiration" of Cert Period

- A notice must be sent before the first day of the last month of the certification period:
- The notice must include
  - >The date the certification period ends
  - The date by which household must reapply to avoid an interruption in SNAP benefits
  - ➤ What happens to benefits if the household does not reapply or fails to attend an interview
  - >How to file the recertification or reapplication form





STATE OF CALIFORNIA - HEALTH AND HUMAN SERVICES AGENCY

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

### CALFRESH NOTICE OF EXPIRATION OF CERTIFICATION

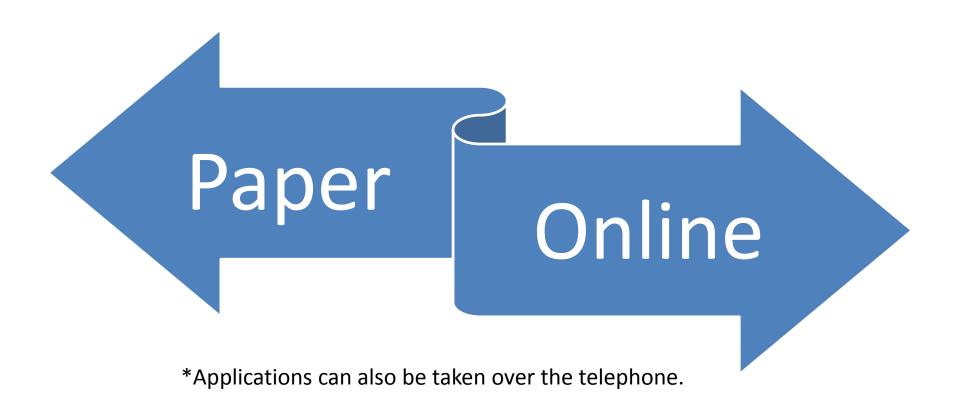
		ask for a hearing. The back of this page tells you how. Your benefits may not be changed if you ask for a hearing before this action takes place.
		Questions? Ask your worker.  State Hearing: If you think this action is wrong, you can
•		Notice Date : Case Name : Case Number : Worker Name : Worker Number : Telephone Number : Address :
		COUNTY OF

- If you want to keep getting your benefits without a break; you must file an application no later than the 15th day of the
  last month of the certification period. An interview must be completed, and <u>any</u> proof of income, expenses, or other
  information turned in no later than the end of the certification period.
- If you have a one-month or two-month certification period, contact your worker for when your application needs to be turned in.
- 4. You will get a separate letter with an interview appointment date and time. Call your worker right away if you do not get the appointment letter within 10 days of this notice. Your appointment letter will tell you if you have a phone interview or if you have to come into the office for your interview.





# **SNAP Recertification Options**







# States variations on SNAP recertification

- Traditional blank paper recertification form or application
- "Pre-populated" recertification form
- On-line recertification option





# Sample Traditional Recertification or "Renewal" form

Form H-1010R December 2012



Your Texas Benefits: Renewal Form

How to Renew

You can renew online at www.YourTexasBenefits.com.

If you don't want to renew online, fill out this form:

- If you need to correct anything on this form:

   (a) cross it out, and (b) update it.
- Sign and date page(s) 9,10
- Attach the items we need. Items are listed next to the questions.
- 4. Send in this form by fax, mail, or in person:

Fax: 1877-447-2839. If the form is 2-sided fax both sides

Mail: HHSC, P.O. Box 14700, Midland, TX 79711-9907

In person: At a benefit office. Call 2-1-1 to find one near you.

All phone and fax numbers on this form are free to call.

#### Questions

Call 2-1-1 or 1-877-541-7905. After you pick a language, press 2 to:

Case Number: 1234567890

- · Ask question about this form.
- Find where to get help filling out this form.
- Check the status of this form.
- Ask questions about benefit programs.

To learn more about benefits, you also can go to www.hhsc.state.tx.us and www.CHIPMedicaid.org.

#### Report waste, fraud, and abuse

If you think anyone is misusing HHSC benefits, call 1-800-436-6184.

Medicaid for people age 65 or older and for adults who have a disability:

If you want to apply for Medicaid for the Elderly and People with Disabilities, call 2-1-1. Ask for a different form.

First Name: John	Middle initi	tal:	Last name: Doe		
Home address (street and apartment number) 2250 Ridgepoint Dr, APT 123	City	State TX	ZIP 78754	County	
Home phone 234-234-3456		Cell or d	laytime pho	ne	
Mailing address (if different from home address	city City		State	ZIP	





# Important information to know about "on-line" SNAP case-specific services

- On-line recertification works best for SNAP households with internet access, computer and ability to do on-line transactions
- Many on-line transactions do **not** work on mobile (cell phone) devices







# **Next, the Interview**

 This interview is usually shorter than the first application interview. The SNAP interviewer will go over the recertification information and any data they have which indicate possible changes.

It is still important to make sure the information

is accurate and complete.







### **Sample notice of Recertification Interview - OR**

10-	Print Form	Clear Form					
Oregon Department of Human Services			Program:	Bran	ch:	Case number:	
Supplemental Nutrition Assistance Program			Case name		Worker ID:		
s		ntal Nutritio				(SNAP)	
	Red	certification	n Intervie	w Inforr	nation		
	, , , , , , , , , , , , , , , , , , , ,	mental Nutrition need to have ar		•	,	se to see if you still v.	
Check here	if you want to	go to an office	for an intervi	ew.			
Please mail a phone interview date and time to the address on my application.							
For the pho	For the phone interview, you prefer a call on these days of the week:						
Monda	Monday Tuesday Wednesday Thursday Friday						
The best til	me to call is in	the 🔲 mornin	ng or 🔲 a	fternoon.			
Please give	e us the phone	e number you w	ant us to cal	you at:			
Yes, I need	d an interprete	er. Language?					
You will be con	tacted within 1	5 days from the	date you tu	rn in the pa	perwork a	about an interview.	

Return this form along with your application by mail or at a DHS office drop box.





# **Verifications**

- There are usually fewer verifications at recertification than application
  - > Earned income usually needs to be re-verified
  - ➤ Unearned income such as Social Security is often reverified via federal data bases
  - Income deductions (shelter costs, child care, medical) that have NOT changed usually does not need to be reverified
  - ➤ Recipients can still claim/verify income deductions at any point, even if not claimed at application





# Change Reporting

Typically SNAP households with just seniors and/or persons with disabilities and no earnings

Must report changes of > \$100 earned income OR > \$50 unearned income

# Simplified Reporting

Most SNAP households
- childless, families
with kids

Must report if gross income > household's gross income test





# Simplified Reporting - What is it?

- Under "simplified reporting," a SNAP household is not required to report most changes until the reporting due date.
- Most states have semi-annual or 6 month simplified or "interim" reporting periods
  - The **EXCEPTION** to this rule is when household gross income exceeds the gross income test (or if a work-required ABAWDs loses a job).





### Sample Simplified Reporting - Interim Change Form - OR

<b>%</b>	Print Form	Reset Form	Program:	Branch:	Case number:	Worker
ハローS Oregon Depa	rtment of Human S	Services	Case name	e:		
Supplemen Program (S	Change Repo Ital Nutrition A INAP) and En Iy Care (ERDC	Assistance iployment	When the an colum before     For El expeco moves change     Household the annual transfer of the annual trans	nounts be n. (Gross deduction RDC, Whe tant parer s in; or if y le provide	is monthly income low, use the figure income is the amons, such as taxes an a child's paren th, or the caretake ou lose employmens.	e in the nount s.) It or er's spouse
You must report after the change If you can't mail	this form or bring i he change by callir	nth of the month t to the office,	3 4 5 7		144 SNA 584 Putting Healthy Food Within React 464 904	person, add
Employment I		mental Nutrition e (ERDC). If you				îts, you
I want to report:						
My total house. The income	sehold gross incom	ne last month was m				
	e is expected to be oss of employment	the same this mon	th. Yes	5	lo	
	son who is no long				e last worked:	
For ERDC, I		ng parent or the spo care provider. This i ber:			_	No
more benefit	s. Some examples	do not have to fill to are: your shelter coare costs or medic	osts went up	, someon	e moved into you	ır home, you





# **The Green Family**



Molly and Jeff live with their daughter Katie. Both parents work, earning between \$1,800 and \$2,100 a month. They are certified for \$315/month for 12 months -Jan 2015 to Jan 2016.





# The Green family certification and reporting obligations

- Family certified for 12 months January
   1st thru December 30th
- Green's must file an "interim report" before June 30<sup>th</sup> (halfway through the cert period)
- Greens do not need to report changes in between -unless their gross income exceeds \$2,144 (gross income 130% FPL)





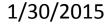
# **Delayed Recertifications?**

1/5/2015

Participant submits recertification form.

12/31/2014

Recertification Period Ends If recertification form received more than 30 days after end of cert. period, it is a new SNAP application.



If recertification form submitted by this date, state will reopen and benefits pro-rated.





# **Questions?**







# **Avoiding "Churn":**Keeping Eligible People Connected to SNAP

- At initial application we have outreach and timeliness
- For ongoing eligibility the equivalent is avoiding "churn"

 Upcoming CBPP paper on Measuring and Addressing Churn





# What is Churn?

- Eligible clients do not complete the recertification but quickly re-enroll.
- Break in enrollment is short 0 to 90 days.
- Typically a procedural problem.









## Possible Causes of Churn

People move and don't receive notices.

Paperwork gets lost or doesn't arrive timely.

Confusion about what is required and when.

Disconnects on requirements across programs.

Recertification timeliness not a management focus historically.

Systems set to auto-close cases.

States are backlogged and overwhelmed.

Interview missed or not at a convenient time.

Will be Different in Different States





# **Churn Affects People**

- Families in poverty often lose benefits.
- Can trigger a cascade of problems, stress, and hardship.
- Often find out at supermarket check-out.

Raises need for emergency food and other services.





# **Churn Affects State Workloads**

- State/county workers have to spend more time keeping eligible households connected.
- Lobbies and phone lines get clogged with unhappy customers.
- Consider the applications that could be avoided!





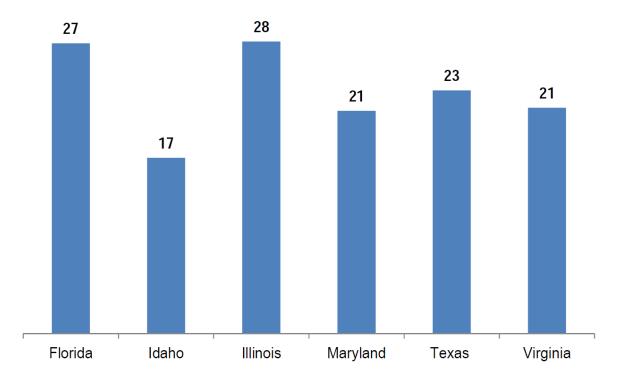


# **How Big Is Churn?**

## Annual Churn Rates from recent USDA study

Figure 2. Rate of Churn by State, FY 2011

In six study states, between 17 and 28 percent of SNAP households "churned" during 2011.







# Other Interesting Data from USDA:

- 62%-79% of "churners" off SNAP less than one month.
- Certification costs associated with churn averaged \$80 for each reapplication
- Annual amount of SNAP benefits forgone due to churn estimated to be between \$2.2 million in Idaho to \$108.2 million in Florida.





# Strategies to Reduce Churn

- Reduce the Risks of Closure
  - Longer certification periods
  - Leverage information across programs
- Address Specific Problems
  - Dedicated staff, better processes, more options for families (online, telephone)
  - Focus on the pieces
    - Returned mail, unclear forms
    - Over-verification
    - Interviews





# **Challenges Engaging with State**

- Churn often invisible "Auto-Closure"
- Who's to blame?
  - Process seems simple to state workers
- Hard to measure
- Root causes hard to disentangle





# First Steps: What Can be Done?

- Start a conversation
- Find a way to:

Begin Measuring and Tracking

Make a Priority, Set a Goal

View as win-win for states and families

Listen to customer experiences

Learn from other states' experiences

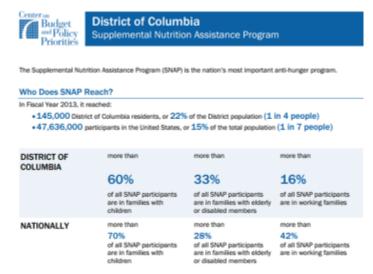




# **National Resources**

## **CBPP Food Assistance Webpage**





### <u>Additional Resources</u>

- The Food and Nutrition Service (FNS)
- Food Research and Action Center (FRAC)





## **Partner Resources**

- Alameda County Community Food Bank:
  - www.accfb.org
- Center for Civil Justice:
  - <a href="http://www.ccj-mi.org/">http://www.ccj-mi.org/</a>
- Hunger Free Vermont
  - <a href="http://www.hungerfreevt.org/">http://www.hungerfreevt.org/</a>
- Massachusetts Law Reform Institute
  - http://mlri.org/
- Ohio Association of Food Banks
  - http://www.benefits.ohiofoodbanks.org/