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
Re-Cap on Applications

Application Form → Interview → Verification → Decision
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
- STOP
- Recertify interview and verifications
- Participate
What are Certification Periods?

• SNAP benefits are approved for a set number of 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)
NOTICE OF APPROVAL
FOR CALFRESH BENEFITS

☐ YOUR APPLICATION FOR CALFRESH BENEFITS HAS BEEN APPROVED.

Your initial amount of benefits is: $___________ for _____________. Your benefit amount for the rest of your certification period will be $___________ from ____________ through _____________.

IF YOU ALSO APPLIED FOR CASH AID, and it has not yet been approved, your CalFresh benefits may be lowered or stopped without another notice if your cash aid is approved.

☐ Your CalFresh eligibility starts the same day as your cash aid.
☐ Your first month’s benefits include more than one month’s benefits because of the date your application was approved.
☐ Your first month’s benefits were prorated from the date you filed your application.

☐ BECAUSE YOU RECEIVED CALFRESH BENEFITS RIGHT AWAY, we did not require you to give us the following verification:

__________________________________________
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
CALFRESH NOTICE OF EXPIRATION OF CERTIFICATION

STATE OF CALIFORNIA – HEALTH AND HUMAN SERVICES AGENCY

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

COUNTY OF

Notice Date: 
Case Name: 
Case Number: 
Worker Name: 
Worker Number: 
Telephone Number: 
Address: 

Questions? Ask your worker.

State Hearing: If you think this action is wrong, you can 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.

1. Your CalFresh Certification period will end on MMMDDCCYY.

2. 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 any proof of income, expenses, or other information turned in no later than the end of the certification period.

3. 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

*Applications can also be taken over the telephone.
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

Your Texas Benefits: Renewal Form

Form H-1010R
December 2012

Case Number: 1234567890

How to Renew

You can renew online at www.YourTexasBenefits.com.

1. If you don’t want to renew online, fill out this form:
   a. Cross it out, and (b) update it.
2. Sign and date page(s) 9,10
3. 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:

- 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.

<table>
<thead>
<tr>
<th>First Name:</th>
<th>Middle Initial:</th>
<th>Last Name:</th>
</tr>
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<tbody>
<tr>
<td>John</td>
<td></td>
<td>Doe</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Home Address (street and apartment number)</th>
<th>City</th>
<th>State</th>
<th>ZIP</th>
<th>County</th>
</tr>
</thead>
<tbody>
<tr>
<td>2250 Ridgepoint Dr, APT 123</td>
<td>Austin</td>
<td>TX</td>
<td>78754</td>
<td>Travis</td>
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</table>

<table>
<thead>
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<th>Home Phone</th>
<th>Cell or Daytime Phone</th>
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</thead>
<tbody>
<tr>
<td>234-234-3456</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Mailing Address (if different from home address)</th>
<th>City</th>
<th>State</th>
<th>ZIP</th>
</tr>
</thead>
</table>
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

Supplemental Nutrition Assistance Program (SNAP) Recertification Interview Information

We must review your Supplemental Nutrition Assistance Program (SNAP) case to see if you still qualify for food benefits. You need to have an interview as a part of this review.

☐ Check here if you want to go to an office for an interview.

☐ Please mail a phone interview date and time to the address on my application.

For the phone interview, you prefer a call on these days of the week:
☐ Monday  ☐ Tuesday  ☐ Wednesday  ☐ Thursday  ☐ Friday

The best time to call is in the ☐ morning or ☐ afternoon.

Please give us the phone number you want us to call you at: ____________________________

☐ Yes, I need an interpreter. Language?

You will be contacted within 15 days from the date you turn in the paperwork 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 re-verified via federal data bases
- Income deductions (shelter costs, child care, medical) that have NOT changed usually does not need to be re-verified
- 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

DHS
Oregon Department of Human Services

Simplified Change Report For Supplemental Nutrition Assistance Program (SNAP) and Employment Related Day Care (ERDC)

Keep this form until you have a change to report. You must report changes by the tenth of the month after the change happens. If you can’t mail this form or bring it to the office, you can report the change by calling us at:

You may call collect, if needed.

This report form is for Supplemental Nutrition Assistance Program (SNAP) and Employment Related Day Care (ERDC). If you are getting cash or medical benefits, you must report more changes.

I want to report:

☐ My total household gross income last month was more than the amount shown above.
   The income totaled: $____________________ (attach proof of income)
   The income went up because:
   The income is expected to be the same this month. ☐ Yes ☐ No

☐ For ERDC, loss of employment:
   Name of person who is no longer working: ______________________ Date last worked: __________

☐ For ERDC, a current or expecting parent or the spouse of the caretaker moved in. Date:

☐ For ERDC, I have a new child care provider. This is my primary provider. ☐ Yes ☐ No
   Provider name and phone number:

☐ Something else happened (you do not have to fill this in). You can report changes that could give you more benefits. Some examples are: your shelter costs went up, someone moved into your home, you have out of pocket dependent care costs or medical expenses for elderly or disabled individuals:
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 1\textsuperscript{st} thru December 30\textsuperscript{th}

• Green’s must file an “interim report” before June 30\textsuperscript{th} (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?

12/31/2014
Recertification Period Ends

1/5/2015
Participant submits recertification form.

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

1/30/2015
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

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

Additional Resources

• The Food and Nutrition Service (FNS)
• Food Research and Action Center (FRAC)
Partner Resources

• **Alameda County Community Food Bank:**
  – [www.accfb.org](http://www.accfb.org)

• **Center for Civil Justice:**

• **Hunger Free Vermont**

• **Massachusetts Law Reform Institute**

• **Ohio Association of Food Banks**