



Getty Images / Liyao Xie

Improving SNAP Access for Older Adults: *Lessons from Massachusetts on Breaking Down Barriers and Improving Retention*

By Vicky Negus and Pat Baker | December 2020

CLASP
The Center for Law and Social Policy



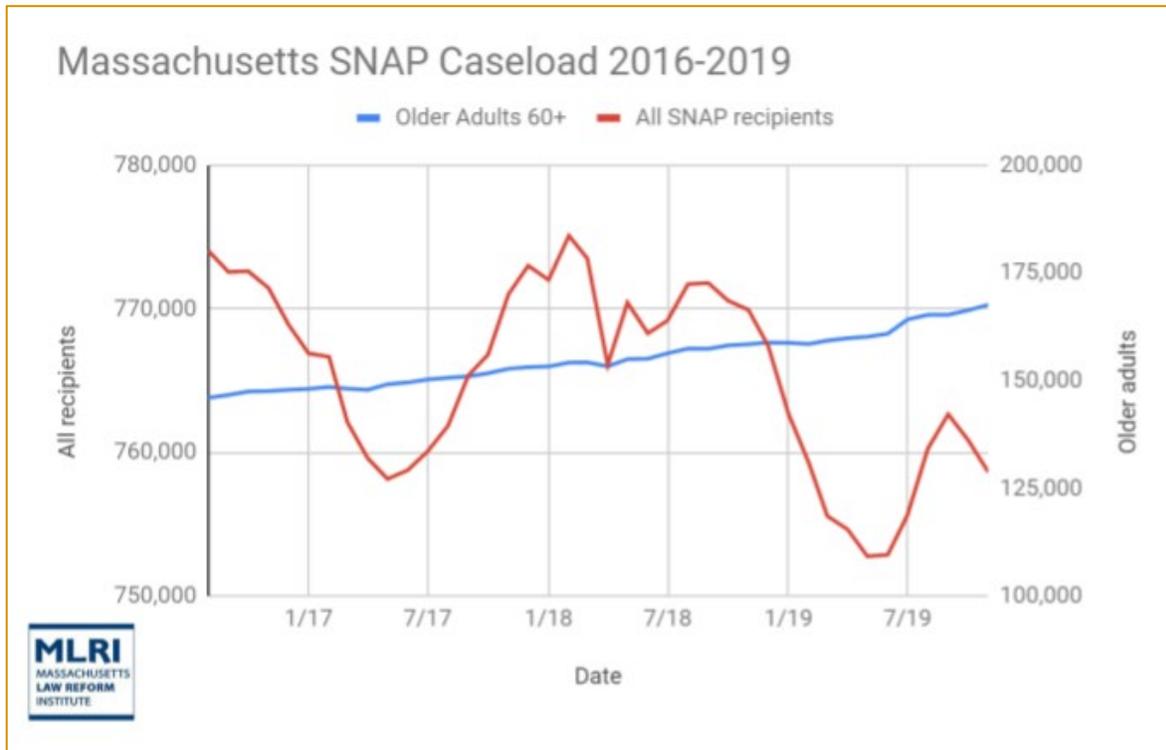
Introduction

In 2014 and 2015, after climbing out of the Great Recession, Massachusetts tumbled into a serious “SNAP crisis.” Participation in the Supplemental Nutrition Assistance Program (SNAP) dropped drastically due to the state SNAP agency’s rapid implementation of untested modernization changes coupled with deeply flawed program integrity measures.

Alarmed by the state’s troubling practices, Massachusetts anti-hunger advocates initiated a multi-year advocacy effort to improve enrollment and reduce access barriers. This policy brief describes advocacy strategies and state options to increase SNAP enrollment and retention. It shares approaches to reduce state administrative costs, and barriers to SNAP participation for older adults.

To ensure SNAP meaningfully served older adults across Massachusetts, advocates focused on building strong relationships with a new state administration and reinforcing mutually beneficial SNAP policies. Their goals included increasing SNAP access and the value of benefits, while simultaneously reducing state agency workload, error rates, and administrative burden. Advocates successfully secured positive *policy*

and systems changes that have helped increase household access and retention during the COVID-19 pandemic.



Background

In 2015, the Massachusetts Law Reform Institute (MLRI) and its SNAP Coalition of community partners¹ identified older adults with low incomes as a key group of people facing significant barriers accessing SNAP. National research confirms that, despite their elevated risk of food insecurity, older adults with low incomes forgo SNAP for a wide range of reasons, including:

- Bureaucratic barriers in navigating the SNAP application;
- Reluctance to apply for government benefits perceived as “shameful” or “for other people;”

¹ The MA Food Stamp/SNAP Coalition formed in 2002 in response to the state reaching the lowest Food Stamp participation rate in the country. The state administration at the time enthusiastically implemented harmful TANF provisions of the 1996 Welfare Reform Law while also refusing to elect key SNAP options provided to states in the 2002 Farm Bill, including “categorical eligibility,” simplified reporting, transitional SNAP post cash termination, the drug felon opt out and more. MLRI and Rosie’s Place, a woman’s shelter in Boston, co-organized the Coalition with shelters, legal services, food banks, health care professionals, social workers, community action programs and individuals with lived experience to seek state legislative remedies to this problem. Advocacy efforts were successful. Nearly 20 years later, the SNAP Coalition led by MLRI meets regularly with community partner organizations to advocate for SNAP improvements, state and federal policy options, and to ensure state and federal agencies are transparent and responsive. The Coalition regularly invites the state SNAP agency to give policy updates and receive feedback from community partners while actively advocating for SNAP improvements.

- Confusion about eligibility rules; and
- Frustration with low benefit amounts.

National and state research also confirms that lack of adequate SNAP benefits increases food insecurity, harms health, and exacerbates the need to choose between paying for food or other necessities.

Massachusetts advocates formed a working group to tackle older adults' access to nutrition benefits. The group used available state data and individual SNAP case examples to identify and highlight the systemic barriers older adults faced getting and keeping SNAP benefits. Through tracking participation and benefits data, advocates successfully urged state policymakers to implement policies to help more older adults keep their benefits. Policy advancements included improved online and paper applications and practices to reduce the number of eligible people who are denied or terminated benefits. These efforts led to tangible improvements: the number of older adults receiving SNAP in Massachusetts **increased by 26 percent** between June 2016 and April 2020.²

Strategies for Successful Advocacy

The Massachusetts advocacy working group used several approaches to improve SNAP access for older adults. Advocates reviewed in-depth data, conducted background research, and used case examples to inform priorities. In addition, advocates urged the SNAP agency to adopt policies that helped eligible older adults understand how to use their benefits and how to stay enrolled in the program. These strategies are detailed below.

1. Explore the SNAP Data

An important starting point for advocates to address barriers to SNAP for any demographic or community is to start with the SNAP data. State agencies must track applications and reevaluation paperwork, comply with timeliness rules, and ensure program accuracy. MA advocates sought to identify policies that could improve these metrics without undermining older adults' ability to access and maintain benefits.

Advocates also focused on available data showing gaps in SNAP participation. This information highlighted significant federal dollars left on the table – and because older adults who are food insecure have higher health care costs, SNAP gap data reinforces messaging that the state and local communities face higher costs as a result. The working group focused on the following data points:

- **Eligible people not getting SNAP (“SNAP gaps”):** Many individuals were enrolled in other public benefit programs and, based on their income, were likely eligible for but not receiving SNAP. For example, nearly 100,000 adults, age 60 and older, were receiving Medicaid but not SNAP.
- **Metrics that show how long it took applicants to get SNAP and how they applied:** Reviewing how long it takes for the state to act on and approve applications (eg. expedited and

² DTA Performance Scorecards: www.mass.gov/lists/department-of-transitional-assistance-performance-scorecards

regular application timeliness) and how applications are filed (eg. online, paper, in person, by phone) can flag areas for improvement. For example, in Massachusetts in 2015 and 2016 about 60 percent of applications were done in person. High foot traffic in local SNAP offices was costly for the agency and burdensome for applicants. Improving application options significantly improved this data– in 2019, about 40 percent of applicants applied in person.

- **Churn rates showing that eligible older adults were too often terminated from SNAP benefits:** When people enrolled in SNAP are cut off then re-apply within a short period of time it's called "churn." High churn rates indicate that many households were terminated for procedural reasons – not because they were no longer eligible under the program rules. For example, in 2016, the state's churn data drove policy changes because older adults without earnings faced churn rates of 40 percent, compared with 27 percent for the entire caseload. A 40 percent churn rate is extremely high (Section 3 offers a more detailed discussion of churn).
- **Data showing utilization of the SNAP Medical Expense Deduction for older adults and people with disabilities:** Under-utilization of the medical expense deduction – a key deduction in the SNAP math that, when claimed, can significantly boost SNAP benefits – can flag a cumbersome or confusing application process. USDA Quality Control data showed only 15 percent of MA elder and disabled SNAP households claimed medical expenses.

Approaches to obtain needed state data

Some state agencies are committed to transparency and may readily track and share SNAP participation data. Other state agencies may refuse to disclose it. But there are strategies advocates can use to get relevant SNAP data. They include:

- **Review publicly accessible information.** This can include SNAP data published by the USDA, the Center on Budget and Policy Priorities (CBPP), and the Food Research and Action Center (FRAC).
- **File public record requests.** This is especially useful for key metrics the SNAP agency is required to report to USDA's Food and Nutrition Service.
- **Engage key partners** invested in reducing food insecurity among older adults. They can help make data requests. Consider partners such as state-wide health care organizations, the state AARP chapter, the Councils on Aging affiliate.
- **Connect with sympathetic policymakers.** Members of Congress and/or state elected officials may be interested in knowing if their state is maximizing federal nutrition dollars for their low-income constituents and their district or state.
- **When appropriate, find media sources** interested in covering food security issues, government transparency, or accountability. Before using this strategy, advocates should evaluate whether media attention will help improve the situation, or whether it could backfire. In some cases, media attention can make the state agency less willing to share data and engage with advocates.

Over the years, Massachusetts advocates employed each of these strategies to get data instrumental in reinforcing the need for SNAP policy changes.

2. Promote multiple avenues for SNAP enrollment

Older adults, as well as other people with low incomes, often face significant challenges applying for public benefits, including completing the interview and verification process. These hardships are exacerbated for people with unique needs, such as individuals with mobility limitations; cognitive or mental health impairments; people who lack transportation; those who have limited literacy or limited English proficiency; and people who do not have broadband internet and/or a familiarity with technology.

Advocates and state agencies can collaborate to ensure anyone can apply for SNAP benefits in a way that meets their needs. State SNAP agencies should embrace a “no wrong door” philosophy. That is, they should have a variety of ways for people to submit a SNAP application. To improve access at each entry point, advocates should urge states to adopt simple language. Advocates can also urge agencies to ensure each question on the SNAP application is necessary and useful in determining a person’s eligibility. It is also critical for the state to comply with core application rules, including accepting SNAP applications filed with minimal information.³ **The following are some best practices for each type of SNAP application, whether it is online, on paper, by phone, or completed with support from community organizations.**

a. Online SNAP applications

While some older adults may not have a smartphone, do not have internet access, or struggle with online portals, older adults are increasingly comfortable with technology. Further, they may have family members and friends who can assist with the online SNAP application. SNAP Outreach Partners can also help older adults apply online.

Until 2018, the Massachusetts online SNAP application was difficult to use. Advocates worked with the state to design one that was more customer-friendly. The online SNAP application through [DTAConnect.com](https://www.dtacconnect.com) is now formatted for a smartphone, tablet, or regular internet browser. It is written in simple language and is available in five languages. It also does not ask for information that is unnecessary or beyond what is required by SNAP regulations. The new online application was also designed to simplify the application process by asking questions aimed at reducing the need for follow-up verification. For example, it allows the applicant to self-declare rent and homeownership costs.

Before these changes - in June 2015 - only one in four (25 percent) SNAP applications were filed online. In June 2019, more than half (55 percent) were filed this way. Having an accessible online application can be a game changer for the state and for SNAP applicants.

³ The minimal elements required by SNAP rules to file a SNAP application include the applicant’s name, address, and signature. 7 CFR 273.2(b)(v); States must respond with same day mailing of a SNAP application when it receives a written request for food assistance. 7 CFR 273.2(c)(2)(i).

Key considerations for advocates working with states to develop online SNAP applications include:

- **Simplify language:** Strive to use plain language when wording questions and application instructions.
- **Limit questions:** Only ask for information that cannot be readily verified by information in existing databases or provided verbally during the required interview. That will reduce the need for the agency to ask for verifications.
- **Offer context:** Provide “help” links or text to explain why a question is being asked. Ensure that applicants are told which questions are optional (all questions other than name, address, and signature). For example, the Massachusetts SNAP application informs households they can submit an application at any time *without* having to complete all questions.
- **Streamline verification:** Allow applicants to submit verifications (proof documents) as part of the online application process.
- **Make it easy to apply:** Do not require people applying to create an account before submitting an online application. Instead, ensure that people can simply click “apply” and enter their information, without having to take extra steps or have an e-mail address.
- **Provide follow-up information:** Include clear “next steps” after a person clicks “Submit.” For example, the Massachusetts SNAP application reminds applicants about verifications and to expect a phone interview.

b. Simplified SNAP paper applications

Some states, including Massachusetts, have developed simplified paper SNAP applications designed for older adults. Paper applications best serve older adults if they are printed with a larger font and have more white space than the regular SNAP application. The content on the form also matters. Advocates worked closely with the state to rewrite its SNAP application for older adults. Recommendations drilled down on the purpose of each question and ensured they were appropriate and specific to people 60 and older.⁴

In particular, paper SNAP applications should ask about expenses specific to older adults. The application should seek details about medical expenses to capture large one-time bills and common, ongoing expenses. For example, older adults may frequently pay for over-the-counter health items; co-pays; vision or dental care; and travel-related costs to go to the pharmacy or their health provider. SNAP applications also need to fully capture the costs of older adults’ housing. Many applications ask for mortgage costs but fail to ask about other homeownership costs, such as property taxes, property insurance, and condo fees.

c. Applications by phone

Allowing people with low incomes to apply for SNAP by phone is essential. This option is especially key for older adults who may not have internet access; may not be comfortable with using an online

⁴ MA DTA SNAP application for seniors: www.mass.gov/doc/snap-application-for-seniors-1/download

application; or cannot get to a local SNAP office.

Massachusetts is currently working to set up an option for people to provide a verbal “voice signature” when they apply for SNAP by phone. This would allow the agency to capture the applicant’s verbal signature and add it to their case file. Advocates should seek a phone signature option that is easy for older adults to access and does not take a lot of time to complete. The process should also ensure people seeking SNAP benefits receive a record of the information they filed in their phone application.

d. Expand role of SNAP Outreach providers

States can maximize SNAP outreach by engaging with community organizations that have experience working with older adults. This partnership can also benefit the organizations. Approved SNAP outreach partners receive nearly 50 percent of USDA federal reimbursement for their services helping people with SNAP applications, provided that this time is otherwise funded through state or private funding.⁵

Councils on Aging (COAs) and Senior Centers may be familiar partners to people over 60 years old. Such institutions can offer “peer to peer” support for older adults in need of nutrition aid. This personal connection can help break down application barriers, build trust, and bust negative perceptions of SNAP. These organizations can also simplify the application process, helping older adults submit a complete application with appropriate verifications (such as proof of medical expenses).⁶ SNAP outreach partners can also claim federal reimbursement when assisting recipients with SNAP recertifications (since it is essentially a reapplication). SNAP outreach partners should track recertification deadlines for the people they help, following up with reminders and assisting older adults with filing timely renewal paperwork.

Massachusetts’ policymakers have made a concerted effort to bring local COAs into the state’s SNAP Outreach Plan.⁷ COAs serve as an invaluable voice in advocating for change with state agencies. They further provide individual case examples that can help advocates track systemic barriers. MLRI advocates have also prioritized engaging COAs in SNAP application assistance and offer them regular SNAP 101 advocacy trainings, whether or not they are SNAP outreach partners.

3. Promote policies that reduce churn and maximize retention

“Churn” is typically defined as the number of households who are cut off from SNAP but who then re-

⁵ The 50% federal reimbursement can be a significant selling point in submitting grants to private foundations looking to address food insecurity of specific populations. 7 C.F.R. §277.4

⁶ See AARP/FRAC Senior SNAP Toolkit, “**Combating Food Insecurity: Tools for Helping Older Adults Access SNAP.**”

⁷ Massachusetts currently has 22 local Councils on Aging (COAs) in the SNAP Outreach Plan and is expanding to enroll more COAs in federal fiscal year 2021. See **MA SNAP Outreach partners FFY20.**

apply after a relatively short period of time – showing they were likely eligible the entire time and the interruption in SNAP was due to a procedural rather than eligibility reason.⁸ In Massachusetts, the state measures the percentage of applicants who were enrolled in benefits in the prior 90 days. The state's overall churn rate has ranged from about 20 to 30 percent in the past five years. Yet, as noted above, the SNAP churn rate for older adults without earnings was much higher than it was for others enrolled in SNAP. 40 percent of households with older adults who applied for SNAP had been enrolled in the prior 90 days in 2016, versus a churn rate of 27 percent for applicants overall.

People receiving SNAP can be cut off from the program for a number of reasons. It most often happens because people misplace or lose renewal paperwork; miss a recertification interview; or need additional support with renewal. For example, someone may need help securing verifications. Or, they may struggle with navigating automated telephone prompts to ask a SNAP worker for help.

Reducing churn helps people with low incomes by ensuring they continue getting vital benefits without interruptions. It also saves the state significant administrative costs. SNAP renewal tasks take agency caseworkers much less time to complete than processing a new application.

States can adopt a number of policies to address churn and keep older adults with low incomes connected to SNAP benefits:

a. Pursue an Elderly Simplified Application Project

The Elderly Simplified Application Project (ESAP) is a federal option allowing states to adopt policies that ensure older adults and, in some cases, persons with disabilities can maintain their SNAP benefits without interruption. Two key ESAP options include:

1. Allowing states to extend the SNAP certification period to 36 months for households made up of older adults and people with disabilities who do not earn an income, *and*
2. Waiving the SNAP recertification interview.⁹ USDA allows states to waive the recertification interview, largely because the amount of Social Security, pensions, and disability-related benefits tend to not fluctuate and the state can often access data to track annual increases.

In addition to helping eligible older adults keep their SNAP benefits, ESAP reduces administrative tasks for the state agency. It cuts the number of times SNAP cases need to be “touched” by state workers. If robustly implemented, the administrative savings to the state agency can be substantial. Some states couple ESAP with other federal options, such as a standard medical expense deduction. But states are not required to include these options to implement ESAP.

In December 2018, Massachusetts implemented a USDA-approved Elder/Disabled Simplified Application Project (EDSAP). EDSAP currently benefits more than one in three households (about 35

⁸ See CBPP Policy Memo, “**Lessons Churned: Measuring the Impact of Churn in Health and Human Services Programs on Participants and State and Local Agencies**,” Dottie Rosenbaum, March 20, 2015

⁹ Elderly Simplified Application Project (ESAP), USDA guidance and template <https://www.fns.usda.gov/snap/elderly-simplified-application-project>

percent) enrolled in SNAP in Massachusetts.¹⁰ The project includes households enrolled in SNAP where all adults members are 60 or older or persons with disabilities, and who don't earn any income. EDSAP households can include children under 18 if all the adults are 60 or older or have a disability. The project has significantly reduced churn. It has also provided administrative relief for Massachusetts, notably by reducing the number of times recipients and SNAP workers need to take action to renew benefits.

b. Create a specialized unit to assist older adults

The impetus for Massachusetts to create a specialized “Senior Assistance Office” was largely driven by the disproportionately higher churn rate among older adults. The state’s centralized, statewide phone line had numerous automated prompts. Its complexity created substantial challenges for older adults who needed help applying for or keeping SNAP. After hearing from advocates about the many problems with the centralized phone line, the state created a dedicated call center for older adults in 2018.¹¹

The Massachusetts Senior Assistance Office is staffed by specially trained SNAP workers who focus exclusively on supporting older adults. This office handles their SNAP applications and recertifications, and proactively screens for medical expenses and other deductions. Staff also receive training from sister-state agencies on how to refer older adults to additional services and identify potential elder abuse of homebound seniors.

c. Track “idle EBT” usage data to help older adults use their benefits

In 2013, in response to public records requests by elected officials, Massachusetts released public information on high EBT card balances for people enrolled in SNAP. Some believed this data demonstrated that people with unused benefits did not need them.¹² Rather than investigating whether recipients were struggling to use their SNAP benefits, the state rapidly put in place punitive policies to remove SNAP that had accrued from EBT accounts. Instead of reaching out to learn why people weren't using their benefits and offer help, the agency took them away. Older adults and people with disabilities disproportionately lost access to SNAP benefits that had accrued in their account.

However, unused EBT benefits are often a cry for help, not indicative of fraud. High balances often mean a household is in crisis and needs human intervention and community supports.¹³

Massachusetts advocates successfully stopped these practices. They urged the USDA to investigate the state’s policies on removing SNAP benefits from EBT accounts. The state agreed to take a deeper dive

¹⁰ For more information on EDSAP in Massachusetts see MLRI’s guide at [Masslegalservices.org/EDSAP](https://www.masslegalservices.org/EDSAP)

¹¹ Massachusetts SNAP Senior Assistance Office, www.mass.gov/service-details/department-of-transitional-assistance-snap-senior-assistance-office

¹² See Bay State Banner, July 2013 <https://www.baystatebanner.com/2013/07/17/massachusetts-eliminates-use-of-ebt-cards-with-high-accumulated-balances/>

¹³ MLRI materials developed for community organizations, “**Helping Seniors Use (not Lose) their SNAP benefits**”. August, 2014

into the data to identify the kinds of households who had high EBT balances. Not surprisingly, the majority of households with idle EBT accounts and large balances were older adults, many in their 80s and 90s, as well as persons with severe disabilities. The state learned that most of them had lost their cards, forgotten their PINs, and/or needed a shopper or authorized representative to assist with buying food.

With a change in the state administration after the 2014 election, advocates and other key partners met with the new state SNAP agency leaders and other administration staff that served older adults. Together, they developed new protocols to affirmatively reach out to individuals struggling to use their EBT card. The state also agreed to engage sister-state agencies, including the Office of Elder Affairs and local Councils on Aging, to connect older adults and people with disabilities with key services. These groups helped people access the transportation, food shoppers, and/or authorized representatives they needed to manage their benefits and assist with SNAP renewals (See Appendix B).¹⁴

Conclusion

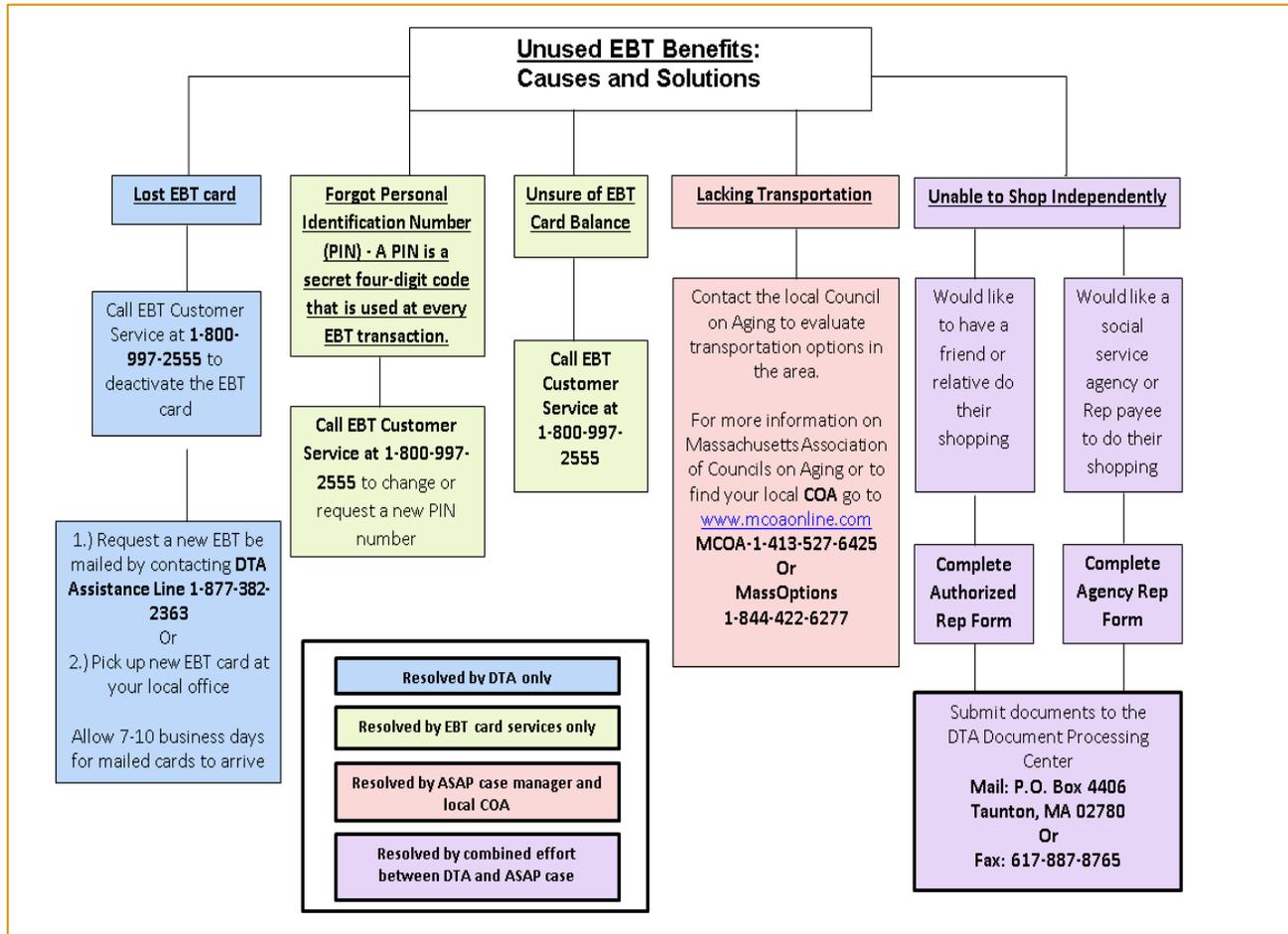
Data about people enrolled in SNAP and benefit participation can highlight gaps and drive opportunities for advocacy to address the needs of communities at risk of food insecurity. Top challenges involve engaging and empowering key stakeholders, and a willingness to dive into the “nitty-gritty” of SNAP data and learn how the state systems operate. It can also be difficult to identify the core concerns of the state agency tasked with serving that population.

There is no straight line or simple path to success. We recommend patience, consistent messaging, and working in partnership to develop multi-forum advocacy strategies. Sister-states and national partners who have been through these wind tunnels are there to support you in this work.

This brief was written as part of the **Advancing Strategies to Align Programs (ASAP) project**, which worked with state advocates to improve the policy and operational components of public benefit programs. For more information about this brief contact the authors, Vicky Negus (vnegus@mlri.org) and Pat Baker (pbaker@mlri.org). For more information about the ASAP project, contact Suzanne Wikle (swikle@clasp.org).

¹⁴ DTA Online Guide, **Un-accessed EBT Benefit Protocol**.

Appendix B: Massachusetts SNAP Agency Flow Chart to Troubleshoot Unused EBT Benefits



Flow chart produced by the Massachusetts Department of Transitional Assistance.