# Online Application Review Guide

This is a tool to assist with a review of your state's online application for benefits for Medicaid, SNAP and TANF.  It is meant to provide a basic framework and is not comprehensive.  CBPP is available to provide additional assistance if needed.

## Pre-Application Registration

Pre-application registration is when online applications require that a consumer set up an account prior to starting an application for benefits.  State agencies allow consumers to set-up accounts for various reasons.  Most notably, when consumers have private accounts with the state agency, they are often able to check the status of their application, appointment times, renewal dates, and benefit amount.  Several state agencies enable account holders to report changes online without having to contact a state employee.  These are all important customer service enhancements.  However, pre-application registration can be an access barrier for applicants.  Access barriers arise when a pre-application registration is required, asks multiple questions that will later be asked on the application, requires identity verification of the individual completing the application, and does not provide the consumer with information about the benefits of setting up an account.

**SNAP Requirement:**  FNS guidance states that the registration process must be simple (no more than user name, password, and hint question) and may not duplicate information on the application. FNS Guidance at http://www.fns.usda.gov/snap/rules/Memo/2011/121710.pdf.

**Tension with Health**:  It is possible that the registration requirement under the Federal Facilitated Marketplace (FFM) is confusing states about what is permissible or advisable for state online applications.  The FFM application registration process includes a three-step process.  First, the consumer is asked for name, username, password, and three security questions.  Second, they are asked another set of questions and last they have to pass an identity verification process managed through a contract with the Experian Corporation.  These requirements are clearly too burdensome with respect to SNAP rules. Multiple steps for the applicant prior to starting the actual application could deter participation.

**Things to look for:**
- Is there a required pre-application registration?  (Does the application require that the consumer set up an account in order to access the application?)
- If so, what is required to set up the account?  (username, password, security questions)
- Does the application explain why the registration is needed? (yes/no)

## Right to Apply (SNAP)

**SNAP Requirement**:  The Food and Nutrition Act requires the state to accept an application with just a name, address, and signature.[1]  In addition, the regulations specify that: "[r]egardless of the type of system the State agency uses (paper or electronic), the State agency must provide a means for

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[1] 7 U.S.C.§2020(e)(2)(B)(iii).

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applicants to immediately begin the application process with name, address, and signature."[2] Because a household's first month of benefits is paid back to the application date, it is vital that applicants file as soon as possible, even if their form is incomplete. Otherwise some applicants will forego benefits to which they are entitled. Someone filling out the online application may find that he or she cannot finish the entire form on their first try. Perhaps some piece of requested information, such as precise monthly income amounts, is not available or the applicant simply runs out of time and must leave the computer

**Things to look for:**
1. Can an applicant submit an application after providing name, address, and signature? Is that opportunity only offered once?
2. Are applicants made aware early in the process that they are able to file an incomplete application?
3. Does the application when combined with another program, for example health, have more required questions?

## Expedited Service (SNAP)

**SNAP Requirement**: SNAP rules require that all applications describe expedited SNAP provisions in plain and prominent language, on or near the front page of the application. 7 C.F.R. §273.2(b)(1)(vi).

**Things to look for:**

1. Does the application, early on in the process, explain expedited SNAP benefits as required in the federal rules?
2. If so, where are the questions asked (what screen) or where is the information provided?
3. Is the applicant able to submit the application after filling in the expedited screen?

## Requests for SSNs

**SNAP and Health Requirement**: Requests for SSNs are governed by both individual program statutes and the Privacy Act. The Privacy Act requires that when individuals are asked to provide SSNs, they be given notice to enable them to make an informed decision regarding whether or not to divulge the SSNs. The notice requirement applies equally to applicants and non-applicants and the application must permit users to choose whether or not to provide the information. The user must be able to skip the optional question and continue with the application.

**Things to look for:**

1. Does the application request a social security number (SSN)? Yes/No
2. Is SSN mandatory or voluntary? Does the application allow the user to proceed without providing any information in the SSN field? Yes/No (Yes is defined as the user may proceed to the next page AND submit the application without an error message.)

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[2] 7 C.F.R.§273.2(b)(1)(v).

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3. Does the application provide the consumer with information about how the SSN will be used?
4. Does the application require that everyone in the household state whether they have a SSN or not?

   *While states may remind users that providing SSNs is helpful, with a message prompt such as, "please note, by entering the SSN we may be able to process your application more quickly." More than one message prompt, intimidating language in the prompt, red font color, or graphics such as stop signs may deter applicants and should be avoided.

## Requiring Citizenship and/or Immigration Information from Non-Applicant Household Members

The policy and rationale is explained in the Tri-agency Guidance, which states that "states *may not* require applicants to provide information about the citizenship or immigration status of any non-applicant family or household member or deny benefits to an applicant because a non-applicant family or household member has not disclosed his or her citizenship or immigration status."[3]

Requiring non-applicant household members to provide sensitive information may deter certain citizens (particularly those with non-citizen parents) from applying for benefits. To ensure that these households are not deterred, states must provide household members the ability to opt-out of applying for benefits and the opt-out must occur before household members are asked sensitive questions.

**Things to look for:**
1. Does the application allow for household members to designate themselves as non-applicants, i.e. "opt out"? If yes, when is the option offered?
2. Are non-applicants required to disclose their citizenship or immigration status?
3. Can a non-applicant household member get through the entire application without providing sensitive information?

## Language Access

In addition to the concerns about providing sensitive information, language barriers also affect participation of vulnerable population in federal programs. For limited English proficient individuals the inability to communicate can directly impact their access to and the quality of federal services they received. Advocates want to see if their state's application is providing in more than one language.

**Things to look for:**

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[3] Policy Guidance Regarding Inquiries into Citizenship, Immigration Status and Social Security Numbers in State Applications for Medicaid, State Children's Health Insurance Program (SCHIP), Temporary Assistance for Needy Families (TANF), and Food Stamp Benefits, http://origin.www.fns.usda.gov/snap/rules/Memo/pdfs/triagencyletter.pdf.

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1. Is the application in any foreign languages?  If so, which ones?
2. If so, when you click on the application is the entire application translated?
3. If the application is not offered in additional languages, what is offered to non-English speakers as the alternative?


# Health Coverage Income Questions

**Requirements:**  Because Medicaid has changed its methods for counting income and in order to ensure that people can be assessed for eligibility for multiple health programs, there are new data asked of consumers to complete the eligibility process.  For example, Medicaid now asks about future plans for tax filing.  Some of these questions can be confusing to consumers and they can also be very consequential.  For example, people are asked if they plan to file taxes, they may think they have to file taxes even though many people eligible for SNAP and Medicaid are not in the income range that requires tax filing, but on the other hand, if it turns out the person is eligible for premium tax credits to help pay for coverage in the marketplace consumers must agree to file taxes for the coverage year.  This can all be very confusing.  Other questions to pay attention to are how income is asked for and questions related to access to employer sponsored insurance that is also relevant for marketplace health insurance coverage.  It is important to look at how these question are asked to make sure they are clearly understood by consumers.

**Things to look for:**
1. How does the application ask about income?
2. How does the application gather tax filing plans?
3. Is everyone required to answer questions about access to minimal essential coverage?  Are the questions understandable?  What happens if they are unanswered but the person is eligible for Medicaid?


# Identity Proofing

Centers for Medicare and Medicaid Services (CMS) has required that states have an identification authentication process built into online applications and telephonic interactions.  Up to now this has mostly been implemented in online applications.  For example the federally facilitated marketplace requires that at least one adult in the unit be authenticated before an application can be submitted online.  This can be a significant barrier for many families with low incomes because the authentication process that is in place heavily relies on consumers having credit histories in order to be able to quickly complete this requirement.

**Tension with SNAP:** This is not a requirement for SNAP and creates a tension for states that create multi-benefit applications and they want to meet the rules of both programs.

**Things to look for:**

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1. Does the application require an adult in the unit to complete identity proofing in order to submit an application online?
2. Does the application's proofing process primarily rely on information from credit history records?
3. Is there an alternative identity proofing process for people who don't have credit histories and does the alternative work for mixed status families?

## Questions to Ask About the Application Process

In order to review applications you need some understanding of the process. Here are some questions to ask in order to get an understanding of the process.

▸ How quickly do you review and begin processing web applications? What is the first step in the review process?
▸ How does your system flag SNAP applications that are potentially expedited? What's the process for expedited applications versus regular application?
▸ Can customers upload verification along with their applications?
▸ Do you have dedicated staff or staff time to address web applications?
▸ How many web applications do you receive daily? Do you track the disposition of those applications separately?
▸ How does timeliness for online applications compare to timeliness for in-person, mail or phone applications? What is the state doing to address discrepancies?