

# Facilitating CalFresh Eligibility and Enrollment for SSI Recipients

January 2017

Coalition of California Welfare  
Rights Organizations

County Welfare Directors  
Association of California

Social Interest Solutions

## Acknowledgements

The authors express gratitude to staff from the following organizations who generously shared their time and contributed information and insights to this project: Alabama Department of Human Resources, Benefits Data Trust, California Department of Health Care Services, California Department of Social Services, California Food Policy Advocates, California Office of Systems Integration, California Statewide Automated Welfare System Consortium IV (C-IV), CalWIN Consortium, Center on Budget and Policy Priorities, Community Legal Services of Philadelphia, Hunger Solutions New York, Kone Consulting, Los Angeles County Department of Public Social Services, Massachusetts Law Reform Institute, and National Council on Aging.



## About the Coalition of California Welfare Rights Organizations

The Coalition of California Welfare Rights Organizations (CCWRO) is a state-wide nonprofit organization that has been providing advocacy in the public benefits field since the early 1980s. CCWRO provides public assistance training, consultation and information services, and serves as co-counsel on hearings and administrative procedures related to public benefit programs.

[www.ccwro.org](http://www.ccwro.org)



## About the County Welfare Directors Association

The County Welfare Directors Association of California (CWDA) is a non-profit association representing the human services directors from each of California's 58 counties. The association's mission is to promote a human services system that encourages self-sufficiency of families and communities and protects vulnerable children and adults from abuse and neglect.

[www.cwda.org](http://www.cwda.org)



## About Social Interest Solutions

Social Interest Solutions (SIS) is a national nonprofit organization dedicated to improving access to quality health and social services through technology and policy solutions. SIS has worked to advance federal, state and local policies to streamline and modernize eligibility and enrollment processes, and has developed pioneering technology solutions that have impacted the quality of life for more than 20 million of the nation's underserved population.

[www.socialinterest.org](http://www.socialinterest.org)

# Contents

## **1 Executive Summary**

Streamlined CalFresh Enrollment Options for SSI Recipients  
Additional Considerations

## **2 Introduction**

## **3 Background**

## **4 Current California Landscape**

SSI

CalFresh

## **9 Streamlined Enrollment Models**

SSA Role in SNAP Enrollment

Simplified SNAP Enrollment Pilots

Streamlined Enrollment Based on Eligibility for Other Programs

Options for Streamlining Enrollment

## **13 Facilitating CalFresh Enrollment for SSI Recipients**

CalFresh Eligibility and Enrollment for Current SSI Recipients

CalFresh Eligibility and Enrollment for New SSI Applicants

Ongoing CalFresh Case Management for SSI Recipients

CalFresh Recertification for SSI Recipients

## **21 Additional Considerations**

Planning and Phased Rollout

Working with Trusted Partners

Multiple Communication Channels

Training and Customer Support

## **22 Conclusion**

## **23 Endnotes**

## Executive Summary

Supplemental Security Income (SSI) recipients in California are not currently eligible for CalFresh (California's version of the Supplemental Nutrition Assistance Program – SNAP, formerly known as Food Stamps). Instead, California has historically opted to support food expenses for the SSI population through the state share of the SSI payment, a policy decision known as “cash-out.” California is now reexamining this policy and considering changes to allow SSI recipients who meet income and other requirements to be eligible for CalFresh benefits.

If California decides to end cash-out, it will be important to consider how existing processes and systems can be leveraged and streamlined to facilitate CalFresh eligibility determination and enrollment for as many as 1.3 million existing SSI recipients. California counties have well-established systems and processes used to determine CalFresh eligibility and manage ongoing caseload using their State Automated Welfare System (SAWS). Furthermore, the state has existing access to a rich data file on SSI recipients through the Social Security Administration (SSA) State Data Exchange (SDX), and a subset of that data is already captured by state and county systems.

However, given California's current number of SSI recipients, it will be challenging from a workload perspective to collect CalFresh applications for the entire population and expeditiously process them all at once. Therefore, California may want to assess opportunities to streamline the application and enrollment process. Existing models in other states targeted at facilitating SNAP participation for elderly and disabled populations, such as the Combined Application Project (CAP) and the Elderly Simplified Application Project (ESAP), may provide lessons for California. California may also want to examine the role that SSA currently plays in other states to help facilitate SNAP applications for SSI applicants. These models have utilized a range of options that may be useful to California for streamlining enrollment if it decides to end cash-out.

### Streamlined CalFresh Enrollment Options for SSI Recipients

Facilitating CalFresh enrollment for SSI recipients will include: assessing eligibility for, and conducting enrollment in, CalFresh for *current* SSI recipients; facilitating CalFresh applications for *new* SSI applicants; providing ongoing

CalFresh case management; and managing CalFresh recertification. These options are discussed briefly below.

#### ***Facilitating CalFresh for Current SSI Recipients: Fast Track***

Given the large number of SSI recipients in California, the state could identify a “fast track” population that is highly likely to be eligible for CalFresh and implement a one-time simplified enrollment process for this group. The fast track population could be defined as single individuals or couples whose only income comes from SSI, a group that is considered categorically eligible for SNAP in all other states.

Once the fast track population has been identified, a streamlined approach for initial CalFresh enrollment for this group could be implemented. A potential approach could include the following high-level steps: calculate a standard benefit amount; issue a notice of eligibility, EBT card, PIN number and instructions on how to accept and use the benefits to recipients; allow use of the EBT card to serve as consent or collect consent by electronic/telephonic signature, in person, or by mail, and conduct interviews by phone or waive the interview requirement. This approach would require a number of policy and procedural changes, some of which would require federal waivers, including modified data sharing agreements between federal and state agencies, the application of standard allowances to CalFresh income calculations, changes to current consent policies and/or the ability to collect signatures telephonically, and the potential waiving of the CalFresh interview requirement. The tradeoffs of these changes would need to be weighed against the usability of the process for SSI recipients and the potential efficiencies for program administrators.

#### ***Enrollment of Current SSI Recipients: Non-Fast Track***

SSI recipients who are not identified as fast track, meaning those with additional sources of income and/or additional household members, would likely require a full eligibility determination process to obtain an accurate CalFresh benefit amount. However, potential options for streamlining this approach could include leveraging existing SSI data to initiate enrollment and verify household information, utilizing a simplified CalFresh application, disregarding non-SSI income and resources, and exploring treating all SSI recipients as individual households. In order to mitigate the impact of ending cash-out on existing CalFresh households with SSI members, the state could also delay recertification of these

households until the next regularly scheduled CalFresh re-determination date.

### ***Facilitating CalFresh for New SSI Applicants***

On an ongoing basis, individuals who are newly applying to SSI could also benefit from a streamlined connection to CalFresh. A potential approach would be to leverage SSA's existing obligation to assist SSI applicants with SNAP applications. In some states, the SSI application has been modified to ask applicants about their interest in applying for SNAP (and collect consent), and in some cases to collect additional required information for SNAP eligibility determination purposes. The SSI interview could also be deemed to satisfy the initial CalFresh interview requirement.

### ***Ongoing CalFresh Case Management for SSI Recipients***

Ongoing CalFresh case management for SSI recipients, which will be managed by county human services offices as it is for current CalFresh recipients, can benefit by ensuring specialized training for staff on providing customer support for elderly and disabled individuals. Furthermore, careful advance planning will be required to ensure adequate staffing levels to support the expanded caseload.

### ***CalFresh Recertification for SSI Recipients***

CalFresh currently requires recertification every 12 months for most households, and every 24 months for elderly and disabled recipients. An interview is required at the time of recertification, and interim reporting is required within 10 days of a change. This process could be simplified for fast track SSI recipients, for example, by extending the CalFresh recertification timeline, waiving interim reporting requirements, aligning the CalFresh recertification process with the SSI or Medi-Cal redetermination processes, or allowing SSA's redetermination process for SSI to fulfill the CalFresh recertification requirements. Non-fast track households could use the current CalFresh recertification process, but additional efficiencies could be achieved, such as if CalFresh were able to conduct an ex-parte recertification of SSI recipients using the most current data from SSA. These and other ideas should be more formally considered and fleshed out by the state, counties, advocates and other stakeholders.

### **Additional Considerations**

Lessons from other states provide additional considerations for California to weigh if it ends cash-out, including: the importance of planning and the possibility of a phased

approach; working with trusted community partners to effectively communicate with SSI recipients; providing multiple communication channels for recipients, including in-person, web, phone and mail; and ensuring adequate training and specialized customer support.

Evaluating options for streamlining enrollment in CalFresh for SSI recipients will require discussions about the potential need for state policy changes (including federal waivers), the ability to leverage existing technology, and one-time versus ongoing process and program changes. Furthermore, the state will want to consider the importance of planning, training, and building partnerships with county eligibility staff as well as community-based organizations. These decisions will ultimately determine whether seniors and people with disabilities in California are able to obtain the nutrition assistance they need in a manner that is least burdensome for them as well as most efficient for the state.

## **Introduction**

Supplemental Security Income (SSI) recipients in California are not currently eligible for CalFresh (California's version of the Supplemental Nutrition Assistance Program – SNAP, formerly known as Food Stamps). Today, California is reexamining this policy, referred to as "cash-out." State policymakers are considering changes to allow SSI recipients who meet income and other requirements to be eligible for CalFresh benefits. If this policy change is realized, 1.3 million elderly and disabled Californians receiving SSI today, as well as future SSI recipients in California, could potentially become eligible for CalFresh. The purpose of this policy paper is to assess solutions for maximizing enrollment of eligible SSI recipients into CalFresh, should California decide to end cash-out. The paper discusses:

- ▶ The California cash-out policy
- ▶ Current enrollment processes and systems for SSI and CalFresh
- ▶ Models for streamlining enrollment across programs
- ▶ Options for facilitating CalFresh enrollment for SSI recipients in California
- ▶ Key policy, technology and other considerations

The findings were informed by interviews and workgroup sessions with more than 30 California state and county program officials, national and state advocates, and representatives from efforts in other states to connect the SSI population with nutrition assistance.

## Background

SSI, a federal income support program administered by the Social Security Administration (SSA), was created in 1974 to help aged, blind and disabled individuals with little or no income pay for basic needs. States can choose to supplement the federal SSI benefit using state funds. This additional payment is called the State Supplementary Payment (SSP).

SSI recipients in California are not currently eligible for CalFresh, a state-federal program that provides nutrition assistance to low-income individuals and families. Instead, California has opted to support nutrition assistance for the SSI population through its SSP benefit, a policy decision commonly referred to as “cash-out.”

California’s cash-out policy dates back to the creation of the SSI program in 1974. States that provided a SSP payment were allowed to increase the amount of that payment in lieu of allowing SSI recipients to be eligible for food stamps (now called SNAP, known as CalFresh in California). To save on the administrative costs of administering both SSI and food stamps benefits to SSI recipients, California chose to utilize the cash-out policy option.<sup>1</sup> While four other states implemented cash-out initially (Massachusetts, Nevada, New York and Wisconsin), California is the only state that has maintained cash-out to the present day. However, SSI/SSP payments (hereafter referred to simply as “SSI”) have not kept pace with inflation over time. In 1980, a year of SSI payments for an individual equated to about 128% of the federal poverty level (FPL); by 2002, the annual value of SSI payments had decreased to about 102% of FPL.<sup>2</sup> In 2016, SSI recipients are living below the federal poverty level. A year of SSI payments in California for an individual residing in their own home (\$10,672.80) equates to about 90% of FPL (\$11,880 annually).<sup>3</sup> As a result, spending on food must compete with scarce resources for living expenses and other basic necessities.

For this and other reasons, California has contemplated ending cash-out several times since 1974. Most recently,

the California Assembly enacted a measure – Assembly Joint Resolution 35 – calling on the federal government to allow California to end cash-out in a way that would maximize participation among those newly eligible for CalFresh and mitigate the impact on those determined to be ineligible for CalFresh for income or other reasons. One of the stated drivers behind the current reconsideration of cash-out is a concern that “many low-income seniors and people with disabilities in California... have difficulties obtaining sufficient food.”<sup>4</sup>

Data support this concern. One in seven seniors over the age of 60 and half of individuals with disabilities over the age of 40 in the United States have experienced “food insecurity,” or inadequate access to a sufficient quantity of affordable, nutritious food.<sup>5</sup> Food insecurity is also widespread among those with low incomes: 38% of those between zero and 50% of FPL and 45.5% of those between 50% and 100% of FPL struggle with food insecurity.<sup>6</sup> In California, food insecurity has increased among low-income seniors in recent years, increasing from 21% of California seniors with incomes under 200% of FPL in 2009/10, to 27% in 2013/14.<sup>7</sup> Food insecurity can compromise health, particularly among vulnerable populations such as those eligible for the SSI program: One study found that food insecure seniors were more than twice as likely to report fair or poor health status as their food secure counterparts.<sup>8</sup>

As California contemplates ending cash-out, a number of procedural, policy and system issues will need to be thought through in order to maximize enrollment for newly eligible SSI recipients. One of the challenges the state faces is how to optimally enroll seniors and people with disabilities in CalFresh, an issue with which California and many other states have struggled. In 2012, with only 18% of eligible Californians over the age of 60 (excluding SSI recipients) enrolled in SNAP, California ranked last in enrollment compared to other states and was nearly seven percentage points lower than the next lowest state.<sup>9</sup>

To set the context for, and provide insights into, the decisions California faces if it decides to end cash-out, the next two sections describe the current California landscape for SSI and CalFresh, and examine a range of potential models for streamlining eligibility and enrollment of SSI recipients into CalFresh.

# Current California Landscape

California's existing processes and systems for administering SSI and CalFresh will need to be leveraged and may require adjustments if cash-out ends. This section provides a high-level overview of the steps and systems currently involved in determining eligibility for each program in California.

## SSI

Supplemental Security Income (SSI) is income assistance for people who are disabled, blind, or age 65 or older with limited income and resources.<sup>10</sup> Of SSI recipients in California, 43% are age 65 or older, 48% are non-elderly adults and 9% are children.<sup>11</sup> Some 72% of SSI recipients qualify for the program on the basis of a disability, including a portion of the group age 65 and older.<sup>12</sup>

The program is both federally (SSI) and state (SSP) funded. The Social Security Administration (SSA) administers SSI at the federal level. Although some states administer the SSP portion of the program, California has opted to have SSA administer its SSP program as well. However, SSA has delegated a portion of the SSI eligibility determination process to the state via the California Department of Social Services (CDSS). This process is described in more detail below.

SSI recipients in California are categorically eligible for Medi-Cal (the state Medicaid program), referred to as SSI-linked Medi-Cal. Because the process and systems used to administer SSI-linked Medi-Cal might inform facilitating CalFresh enrollment for SSI recipients, the steps involved in this process are included in the description of the SSI eligibility and enrollment process below.

### **SSI and SSI-Linked Medi-Cal Eligibility and Enrollment Process**

In California, the steps to enroll in SSI and SSI-linked Medi-Cal are:

1. An individual goes in person to a local SSA office to complete an application and interview for SSI. The application can be started online, but must be completed in person at the SSA office. In California, and other states with an automatic linkage between SSI and Medicaid, the SSA application also serves as an application for Medi-Cal.

2. The local SSA office determines financial eligibility and conducts an interview.<sup>13,14</sup> The applicant may need to submit additional documentation. If the applicant is not determined to be financially eligible, SSA issues a denial notice.
3. If the applicant is determined to be financially eligible, a disability determination is conducted, unless the applicant is over age 65 or legally blind, in which case a separate disability determination is not required.
  - ▶ SSA contracts with the California Department of Social Services' Disability Determination Service Division (DDSD) to conduct the disability determination and report the result back to SSA.
  - ▶ This process can take several months and often requires multiple medical evaluations.
4. If the applicant is determined to be disabled according to the SSI program rules, SSA sends the applicant an approval notice and the applicant begins to receive a monthly benefit amount from SSA, either via direct deposit into a bank account or into a debit card account.
5. Once approved for SSI, individuals are automatically eligible for Medi-Cal. Information about the newly eligible SSI recipient is sent electronically from SSA in a regular batch file via the State Data Exchange (SDX) and captured by the state Medi-Cal Eligibility Data System (MEDS). (See sidebars below and on page 5.)

#### **State Data Exchange (SDX)**

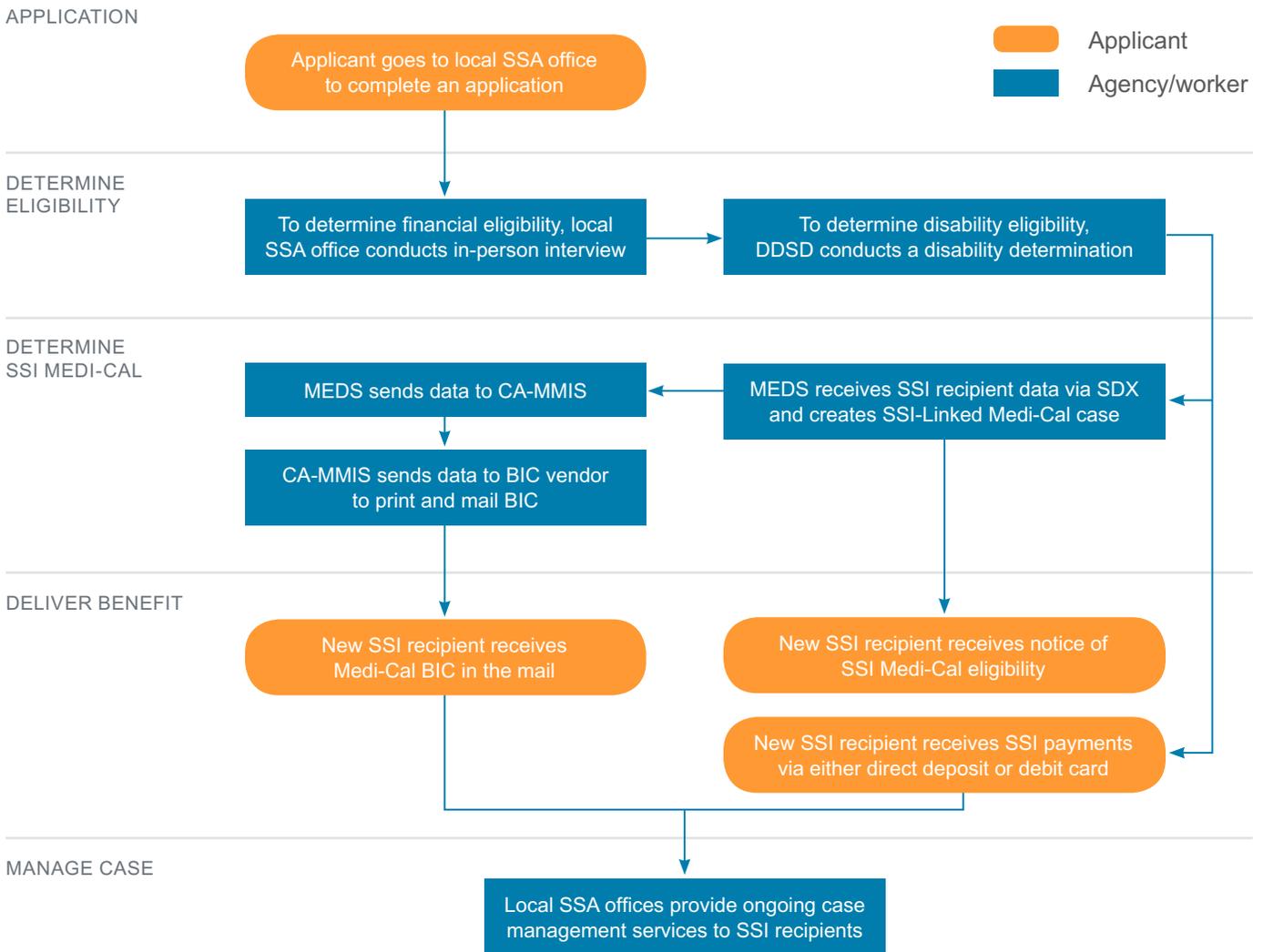
SDX is a batch data exchange that provides data from the Social Security Administration (SSA) on SSI applicants and recipients to states that administer federally funded income and/or health programs such as Medicaid. Each state receives a flat file from SDX and uses its state eligibility system to extract data needed to conduct eligibility for various means-tested programs from the SDX record.<sup>15</sup> States must have a data sharing agreement with SSA that clearly indicates for which programs the state may use the SDX data.<sup>16</sup>

### **Medi-Cal Eligibility Data System (MEDS)**

California's MEDS provides a repository for enrollment data about multiple benefits programs, including Medi-Cal, CalFresh, CalWORKs, and other cash and nutrition assistance programs. MEDS captures data on SSI applicants and recipients, including demographics and program eligibility and enrollment. MEDS also interfaces with all three Statewide Automated Welfare Systems (SAWS), California's county-managed eligibility and enrollment system of record for public programs (see next section for more information on SAWS).

6. MEDS identifies the newly eligible SSI recipient based on SDX records, assigns an aid code designating each individual as an SSI-linked Medi-Cal recipient, and this information is sent to the California Medicaid Management Information System (CA-MMIS) to complete Medi-Cal enrollment for the SSI recipient. Note, that unlike for all other Medi-Cal recipients, SSI-linked Medi-Cal cases are not managed at the county level and therefore do not have a record in the county eligibility and enrollment system unless it is from a case that existed prior to the individual's enrollment in SSI.
7. CA-MMIS electronically notifies the state vendor (Xerox) to issue and mail a Medi-Cal Beneficiary Identification Card (BIC) to the recipient. The BIC serves as proof of enrollment for the SSI-linked Medi-Cal recipient to use when receiving Medi-Cal covered health care services from a provider.
8. The SSA office provides ongoing case management for SSI and SSI-linked Medi-Cal. SSA is responsible for informing SSI recipients about their SSI and Medi-Cal benefits, handling benefits questions or problems (including any issues related to Medi-Cal BIC cards), receiving and processing recipient reports of changes in eligibility, and managing the SSI redetermination process. If the SSI recipient calls or goes to the county human services office for assistance with Medi-Cal, the county can record a change of address or reissue a BIC card, but SSA handles all other case management. The SSI recipient must report any changes in eligibility (e.g., change of address, household, or income) directly to SSA within 10 days and must undergo redetermination annually if changes are likely.<sup>17</sup> As long as the recipient retains SSI eligibility, they remain enrolled in Medi-Cal.

**Figure 1. SSI and SSI-Linked Medi-Cal Eligibility and Enrollment Process**



**CalFresh**

CalFresh, California’s SNAP program, assists low-income individuals and households in purchasing food. The program issues monthly electronic benefits via an Electronic Benefits Transfer (EBT) card that can be used to buy most foods at many markets and grocery stores. (See sidebar on page 7.)

CalFresh benefits are federally funded, while program administrative costs are shared between the federal (50%), state (35%) and county (15%) governments. The program is administered at the federal level by the U.S. Department of Agriculture, under the Food and Nutrition Service (FNS), and at the state level by CDSS. Under California’s county-administered public benefit system, 58 county human services departments are responsible for CalFresh eligibility determinations and case management.

**CalFresh Eligibility and Enrollment Process**

The steps to enroll in CalFresh are:

1. An individual or family applies online, by phone, by mail, or in person at the local county human services office. The applicant must sign the application to certify the information provided is accurate and to provide consent to use the information for an eligibility determination for CalFresh.
2. A county eligibility worker checks to see if the applicant has a prior or existing case in MEDS (known as file clearance; see sidebar on page 7). MEDS is also checked to determine whether the applicant has SSI, which would, under today’s cash-out policy, make them ineligible for CalFresh.

### Electronic Benefits Transfer (EBT)

EBT cards are used by states to provide an easy way for public program recipients to access benefits. EBT cards are similar to bank debit cards and can be used at any point of sale (POS) system that accepts the card, for example, a card reader at a grocery check-out. States were required to start using EBT cards for SNAP in 2002. In California, an EBT card is issued by default to the adult designated as the head of household in the CalFresh benefits case. The head of household may authorize other adults in the household, as well as one additional adult outside the household, to be issued an EBT card as well, all linked to the same CalFresh benefits case. Those who are issued an EBT card are also assigned or are prompted to choose a personal identification number (PIN) that allows them to use the EBT card and access the CalFresh benefits. California's EBT vendor, Xerox, is responsible for issuing CalFresh EBT cards and tracking spending against recipients' benefit amounts.

3. If a case does not already exist, the county eligibility worker opens a new case in the Statewide Automated Welfare System (see sidebar). If a SAWS case does exist, the county eligibility worker adds information from the new CalFresh application to the existing case.
4. The county eligibility worker interviews the applicant, either in-person or by phone.<sup>18</sup> In the interview, the eligibility worker reviews the application and explains the program. If any additional documents are needed from the applicant, the eligibility worker asks the applicant to send that information to the county.
5. Once the applicant has completed the interview and provided all necessary information and documentation, the eligibility worker uses SAWS to determine eligibility and calculate the CalFresh benefit amount for the household. (See details below.)
6. SAWS then sends the new CalFresh recipient data to MEDS and to the EBT system, whose vendor (Xerox) generates and mails an EBT card with the correct benefit amount. The recipient separately receives a Personal Identification Number (PIN) to use when making purchases with the EBT card. The CalFresh recipient can immediately use the EBT card, like a debit card, to purchase food at most grocery stores and many other locations. Alternatively, if the CalFresh recipient applied in person at a county office, the county staff can print an EBT card on the spot and help the recipient set a PIN before they leave the office.

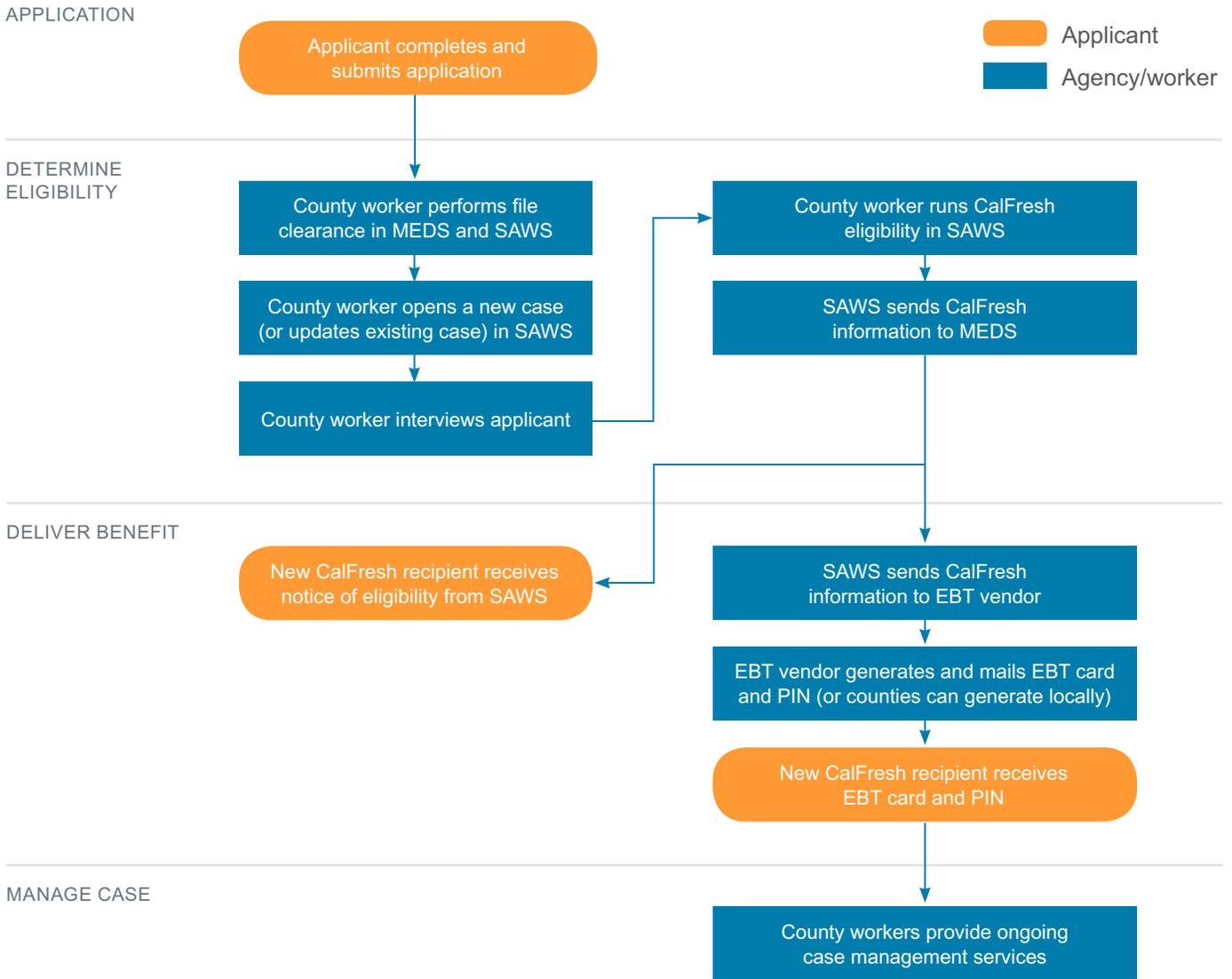
### File Clearance

Currently, before a CalFresh case can be created in SAWS, county workers must first go through a file clearance process to avoid creating a duplicate record for the same individual. The county worker searches for an existing record in MEDS using the individual's information (name, date of birth, address, and Social Security number). If the individual is "known to MEDS," the county worker selects the existing Client Index Number (CIN) and links the new application to an existing SAWS case in that county, or creates a new SAWS case, as appropriate. If the individual is not already known to MEDS, a new CIN is created in MEDS, and a new case is created in SAWS.

### Statewide Automated Welfare System (SAWS)

SAWS is California's county-managed eligibility and enrollment system and is the state's system of record for public programs including CalFresh, Medi-Cal, and CalWORKs (cash assistance). SAWS supports eligibility determination, benefit calculation, benefit issuance, case management and reporting. All of California's 58 counties are organized into one of three "SAWS consortia": CalWIN, C-IV, and LRS (C-IV and LRS will consolidate into a single consortia over the next several years).

**Figure 2. CalFresh Eligibility and Enrollment Process**



7. County human services offices provide initial and ongoing case management for CalFresh cases. In addition to processing all mandatory periodic reports submitted by recipient households and annual recertifications, eligibility workers respond to all changes in household circumstances, address changes, lost EBT card, and other reports and changes communicated by households. In addition, county staff explains program rules, answer questions, and assist households with securing necessary documents and verifications required by federal and state regulations.

**CalFresh Calculation of Income and Benefit Amount**

An individualized assessment is required to determine eligibility and the monthly amount of CalFresh benefits for the applicant’s household. Anyone in the household, whether related or not, who purchases and prepares meals together, is counted as part of the CalFresh household, as is their income. To qualify for the program:

- ▶ Total gross household income must be below 200% of FPL; and
- ▶ Net income (gross income minus deductions and standard allowances) must be at or below 100% of FPL.<sup>19</sup>

Net income is determined by applying deductions and standard allowances to gross income. Most deductions are based on actual costs incurred by a household for certain expenses, such as housing and dependent care, up to a maximum amount. For example, in California, medical expenses greater than \$35 per month can be deducted from gross income.<sup>20</sup> Another type of deduction, the earned income deduction, is for households that have earned income such as wages or salaries. These households are given a deduction equaling 20% of their qualifying earned income.

Standard allowances are a pre-set amount, determined by the state, and deducted from gross income for certain living costs, regardless of the amount spent by the household on that item. For example, CalFresh households that incur a utility cost separately from their rent or mortgage also receive a Standard Utility Allowance (SUA) for utility expenses that is deducted from gross income.

After all deductions and standard allowances have been applied to the gross household income, an individualized assessment is made to determine the amount of the CalFresh benefit for all eligible members of the household. Under SNAP program rules, households are generally expected to contribute 30% of their net income to food expenses. That amount is subtracted from the CalFresh program maximum benefit amount for that household size, which is tied to the cost of the Department of Agriculture's Thrifty Food Plan.<sup>21</sup> For example, if a household has no income, it would receive the maximum CalFresh benefit amount. If a household has a net income of \$400 per month, it would be expected to contribute 30% (\$120) to food; that amount would be deducted from the maximum CalFresh benefit amount for that household size, and the resulting difference would be the amount received each month by that household from CalFresh.

Based on these program rules, CalFresh households must submit documentation of income and relevant expenses and undergo an individualized assessment in order to calculate eligibility and benefit amount.

## Streamlined Enrollment Models

Existing models targeted at increasing SNAP participation for elderly and disabled populations or for facilitating streamlined enrollment across other public benefit programs can provide lessons to California as it contemplates ending cash-out. This section highlights some of those models and identifies a range of potential options for streamlining eligibility and enrollment.

### SSA Role in SNAP Enrollment

In all states other than California, SSI recipients are eligible to apply for SNAP. Under federal law, the Social Security Administration (SSA) is required to assist SSI applicants in applying for SNAP benefits.<sup>22</sup> Specifically, for all households consisting of only SSI applicants and/or recipients, SSA must:

- ▶ Help to fill out the state SNAP application at the time applicants register for SSI, if they are not already receiving SNAP benefits;
- ▶ Deliver the completed SNAP application to the state or county agency responsible for facilitating SNAP benefits. That agency must process the SNAP application within 30 days.<sup>23-25</sup>

For individuals applying for SSI who have other household members or other income, SSA must inform applicants of potential eligibility for SNAP and refer them to the appropriate state or county agency to apply.<sup>26</sup>

### Simplified SNAP Enrollment Pilots

SNAP enrollment challenges related to the senior population are well documented. Nationally, in fiscal year 2014 just 42% of eligible elderly individuals were enrolled in SNAP, compared to 83% of all eligible individuals.<sup>27</sup> FNS has attempted to approve various pilot projects over the years to test various enrollment strategies to help increase SNAP participation among seniors through a variety of demonstration pilots, including the Combined Application Project (CAP) and the Elderly Simplified Application Project (ESAP).

#### *Combined Application Project (CAP)*

CAP is an FNS demonstration project established 21 years ago that has allowed 18 states to streamline enrollment of SSI recipients into SNAP.<sup>28,29</sup> The primary goal of CAP is to

increase SNAP participation among SSI recipients by simplifying the process for receiving SNAP benefits in conjunction with SSI benefits.

The “standard” CAP model builds on the existing SSA obligation to screen and help enroll new SSI applicants into SNAP. Under this model, people applying for SSI benefits are asked if they would also like to apply for state CAP SNAP benefits; if yes, they only need answer a few additional questions on their SSI application, rather than completing a separate SNAP application, in order for the state or county SNAP agency to determine eligibility for the CAP SNAP benefits. In contrast, under the “modified” CAP model, the state or county SNAP agency affirmatively reviews the SDX data to identify SSI recipients who live alone or only with a spouse and are thus more likely to be eligible for CAP SNAP benefits. The SNAP agency then notifies these individuals of eligibility for CAP SNAP benefits and provides instructions on how to opt in. With both CAP models, the SSI interview satisfies the SNAP interview requirement.

### ***Elderly Simplified Application Project (ESAP)***

ESAP is an FNS demonstration project that as of November 2016 has allowed eight states (Alabama, Florida, Georgia, Maryland, Mississippi, Pennsylvania, South Carolina, and Washington) to streamline application and recertification for eligible elderly (and in some states, disabled) individuals.<sup>30</sup> The primary goal of ESAP is to increase SNAP participation among the elderly low-income population, and in some states, the disabled low-income population as well, by simplifying the existing SNAP application and certification requirements for those most likely to be eligible for SNAP. Typically, individuals are eligible for ESAP if all household members are disabled or over 60 years of age and have no earned income. While ESAPs are not limited to SSI recipients, those who are eligible greatly overlap with the SSI population.

The ESAP pilots streamline the SNAP application and certification process by using a shorter application, eliminating the interview requirement at recertification (early ESAP pilots were also able to offer SNAP eligibility without conducting an initial interview), making use of data matches to eliminate the need for applicants and recipients to provide paper documents, and extending the SNAP certification period from 12 to 36 months.<sup>31</sup>

## **Streamlined Enrollment Based on Eligibility for Other Programs**

Another model for streamlined enrollment is direct certification of eligibility from one program to another. For example, under the Affordable Care Act (ACA), states are permitted to find certain SNAP recipients automatically eligible for Medicaid based on the SNAP eligibility determination.<sup>32</sup> In 2014, California initiated an Express Lane Eligibility (ELE) program to provide a streamlined process to enroll new and existing CalFresh recipients into Medi-Cal.<sup>33</sup>

Specifically, the California Medi-Cal agency identified existing CalFresh recipients in MEDS who were not already enrolled in Medi-Cal and notified them by mail that they could affirmatively “opt in” to Medi-Cal without completing a new application. Those opting in could respond by mail, phone, web portal, or in person using a provided PIN. The response rate to the initial mailing was estimated to be about 30%, with responses primarily from mail and phone. On an ongoing basis, the CalFresh application is altered so new applicants for CalFresh can be evaluated for Medi-Cal if they meet the ELE requirements.

## **Options for Streamlining Enrollment**

The models described utilize a range of options for streamlining enrollment either for target populations or across programs that may be useful to California if it decides to end cash-out. Some of these options could be utilized to streamline the eligibility and enrollment process for SSI recipients in CalFresh, and are described briefly below.

### ***Population Identification***

Targeted outreach using existing data sources can be an efficient way to identify recipients of one public program who may be eligible for another, despite some differences in program eligibility rules. For example, in CAP states the SNAP agency identifies newly eligible SSI recipients from the SDX data periodically sent by SSA and initiates the CAP SNAP enrollment process so that only a few additional questions have to be answered to complete the CAP SNAP determination. Similarly, for its CalFresh/Medi-Cal ELE program, California queried MEDS to identify existing CalFresh recipients who were not already enrolled in Medi-Cal and sent notices to those individuals informing them of their eligibility for Medi-Cal without requiring they complete a separate application. If California ends cash-out, it can identify and reach out to existing SSI recipients who are most likely to be eligible for CalFresh using only data available through SDX and MEDS.

## **Simplified Application**

Implementing a simplified application can be a core component of streamlining program enrollment. ESAP states have provided individuals who they have identified as being likely eligible for SNAP with a simplified two-page SNAP application. CAP states with a standard CAP model have built on the SSA existing obligation to facilitate enrollment of SSI recipients into SNAP by adding a small number of SNAP-specific eligibility questions to the existing SSI application, in lieu of a separate SNAP application. If California opts to adopt this approach, state oversight of the SSA obligation may initially be needed to ensure that staff at the local SSA offices ask the additional SNAP questions, capture and record the answers, and ensure that the SDX records are sent on a timely basis.

## **Consent**

Under federal law, individuals seeking SNAP must affirmatively agree – or consent – to apply. Typically, the SNAP agency collects an applicant’s consent through a signature on the initial application prior to conducting an eligibility determination. Streamlined options for collecting consent from SSI recipients to apply for CalFresh that California might consider include:

- ▶ **Allowing electronic signatures.** FNS recently provided states instruction on using electronic signatures for SNAP, which requires the consent to be recorded and be available for review in the individual’s case file.<sup>34</sup>
- ▶ **Providing multiple channels.** Individuals enrolled in one program who may be eligible for a second program may need to provide consent prior to being “automatically” enrolled. Once these individuals are notified of potential eligibility, providing multiple channels of communicating their consent could help increase the response rate for auto enrollment. For example, the California CalFresh/Medi-Cal ELE program allowed SNAP recipients to provide consent for Medi-Cal by mail, phone, web portal, or in person.
- ▶ **Usage of EBT card as proxy for consent.** In lieu of providing consent through a signature, some states have allowed an individual’s use of the EBT card to purchase food to indicate consent to be enrolled in SNAP. In New York and Pennsylvania, an individual’s use of an EBT card and PIN mailed

to them was considered as consent to receive SNAP benefits. If the EBT card is not used within a set period, the individual’s case is closed. CAP recipients in New York have 90 days to begin using the EBT card to purchase food. Recipients are mailed a reminder if they have not used the card within 60 days, and the state SNAP agency closes the case if not used it within 90 days.

## **Interview**

Another potential area for streamlining is around the SNAP program requirement for an interview at initial application and annual recertification. The purpose of the interview is to gather or confirm additional information to determine eligibility, and to provide information to applicants about the program, including their rights and responsibilities. States can conduct interviews by phone for some populations. However, requiring an interview as an eligibility criterion can create a barrier to enrollment for some, preventing or delaying otherwise eligible individuals from completing enrollment for failing to complete the interview. The CAP and ESAP pilots have explored alternative approaches to the SNAP interview requirement:

- ▶ In CAP states, FNS allowed the SSA in-person interview for SSI to fulfill the state SNAP agency’s interview requirement, both at initial application and at SSI recertification.
- ▶ In ESAP states, the SNAP interview requirement at recertification is waived. In some of the initial ESAP pilots, the interview requirement for SNAP was also waived.

Waiving the interview requirement, however, would require finding another channel for providing SNAP education to new recipients and giving them opportunities to ask questions about their new benefits. The value of this can be seen in Washington’s specialized call center for its CAP. Since CAP allows the initial interview by SSA to satisfy the SNAP interview requirement, Washington’s CAP call center could be dedicated to providing education and support to recipients once they received their SNAP benefits. The specialized call center staff are trained to handle a variety of questions, ranging from questions about data matching errors to how to use an EBT card, which also helps reduce call volume in Washington’s other human services call centers and county offices. However, waiving the initial interviews for SNAP eligibility may be difficult; FNS will permit states to postpone but

not waive the initial interview for expedited SNAP applicants and Alabama's request to continue waiver of the initial interview in its ESAP renewal was recently denied by FNS.<sup>35</sup>

### **Verification**

Some SNAP eligibility data, including income and medical deductions, must be verified, often through documentation supplied by the applicant. This can delay the application process if an applicant does not have all of the required information on hand at the time of initial application. Data matching using reliable, external data sources can assist with verification of most eligibility criteria – e.g., income, citizenship status, births and deaths – so that the applicant need only supply information and documentation for a few eligibility criteria rather than all. For example, the U.S. Government Accountability Office (GAO) recently found that SSA data on unearned income is particularly reliable for data matching purposes because the data is current, accessible in real time, and relies on a primary data source.<sup>36</sup>

One of the key features of ESAP pilots is to leverage this data matching capability to verify certain eligibility criteria, including income and household size, without relying on the applicant to provide information or documentation.<sup>37</sup> SSI recipients are already required to report changes to SSA, providing the CalFresh program an opportunity to use SDX data to fulfill at least some CalFresh data verification requirements as states participating in ESAP do.

### **Eligibility Determination**

One way to streamline enrollment across public programs is to allow one program's eligibility determination to serve as the determination for a second program. This is referred to as categorical or deemed eligibility or direct certification. For example, once an applicant has been enrolled in SSI, states have the option to automatically determine them eligible for, and enroll them in, Medicaid.<sup>38</sup> More recently, CMS encouraged states to streamline Medicaid enrollment by directly certifying an individual for Medicaid using existing SNAP eligibility determination, without requiring a separate Medicaid application or resubmission of documents that were already provided to the SNAP agency.<sup>39</sup>

Another option is to apply some of the eligibility calculations for one program to satisfy a second program's requirement, and to then only collect whatever required information is still needed. Currently, in non-cash-out states, SSI recipients are considered income eligible for SNAP if their households

consist of only those who receive SSI benefits.<sup>40</sup> The SNAP agency can deem these individuals eligible for SNAP based on their receipt of SSI and only request any additional information that the SNAP agency needs that SSA does not collect, such as housing costs.<sup>41</sup>

### **Benefit Calculation**

Developing a standard SNAP benefit amount is another way to streamline the SNAP enrollment process. As discussed earlier, an individualized assessment of income and expenses for each CalFresh applicant is currently performed to determine eligibility and CalFresh benefit amount. One key difference in the CAP and ESAP models that allows SNAP determination to be simplified is that instead of going through the regular SNAP calculation process to determine a SNAP benefit amount, CAP SNAP recipients receive a standardized SNAP benefit amount. It may be lower than if the recipient went through the regular SNAP eligibility process, but the advantage of ensuring that more SSI recipients successfully enroll in SNAP benefits is perceived to outweigh this disadvantage. One specific method used by some CAP and ESAP states is to apply standard allowances for living expenses (such as housing, utilities and medical expenses), rather than requesting documentation of actual expenses.

For example, most CAP states applied one or more standard allowances to each CAP participant's reported gross income. The levels of the standard allowances vary in an effort to account for the different levels of housing and other costs actually paid by participants. Individuals who self-report high housing or utility costs have their gross income reduced by a higher standard allowance amount than those with smaller costs. The tradeoff of this approach is that some households may receive more or less SNAP benefits than they would if they had provided documentation and were individually assessed based on their actual income and expenses. For example, those who spend less in actual housing expenses than the standard housing allowance receive a higher level of SNAP benefits than if they had gone through an individualized assessment, while those with higher housing costs receive a smaller SNAP benefit amount than they would have under an individualized eligibility determination. In the latter cases, however, states report that recipients who received less SNAP benefits than they might have otherwise often remained in CAP (rather than opt to apply through the regular SNAP process and potentially receive more in SNAP benefits) and accepted the lower benefit amount as a tradeoff for the benefit of a more streamlined

enrollment process, including a longer recertification period and no interim reporting requirements.

The CalFresh benefit calculation could be further simplified by assuming the same gross income for all SSI recipients as well as applying the same deductions and standard allowances for some groups of SSI recipients. Applying a standard allowance to a standard gross income results in the same amount of SNAP benefits, thereby effectively creating a standard benefit amount. Because SSI recipients with no income other than their SSI benefit have generally the same level of gross income (as defined by the federal poverty level), CAP states are able to predetermine the SNAP benefit amount by applying a few standard allowances to the same gross SSI income. By creating a standard benefit amount, applicants do not have to provide documentation of their income and expenses, the administrative costs for the SNAP agency to follow up with applicants who failed to submit documents are reduced, and more eligible applicants are likely to receive benefits rather than being denied for lack of documents.

### **Recertification**

Once an individual successfully completes the application process and is enrolled in the program, a streamlined recertification process can improve continuity of benefits. One option for streamlining CalFresh recertification of SSI recipients is to extend the time between recertification. In ESAP states, the SNAP recertification period is extended from 12 months to 36 months. Many CAP states have also opted to extend the recertification period beyond 12 months, either to 24 months or 36 months.

Another potential option for streamlining recertification would be to waive or reduce the frequency of SNAP interim reporting requirements for SSI recipients, which could also help reduce administrative costs for the SNAP agency. In some ESAP states, interim reporting during the 36-month recertification period was not required, based on the relative stability of residence, income, and disability status among the elderly and disabled participants. Alternatively, rather than waiving interim reporting altogether, data matching could be used to satisfy the interim reporting requirements. For example, ESAP states are required to leverage data matching capabilities at recertification to verify certain eligibility criteria, including income and household size, only asking program participants to provide information or documentation, if needed.<sup>42</sup>

## **Facilitating CalFresh Enrollment for SSI Recipients**

In the event that California decides to end cash-out, plans will need to be in place to address the following processes:

- ▶ Conduct CalFresh eligibility and enrollment for current SSI recipients
- ▶ Facilitate CalFresh eligibility and enrollment for new SSI applicants
- ▶ Provide ongoing CalFresh case management for SSI recipients
- ▶ Manage CalFresh recertification for SSI recipients

This section discusses streamlining options for each of these processes to help maximize enrollment of eligible seniors and disabled individuals into CalFresh based on their linkage to the SSI program, should California end cash-out.

### **CalFresh Eligibility and Enrollment for Current SSI Recipients**

If California changes its cash-out policy, 1.3 million elderly and disabled SSI recipients will become potentially eligible for CalFresh. Given the size of this population, CDSS and county human services agencies could face capacity and efficiency challenges in expeditiously processing applications if a large volume of CalFresh applications from existing SSI recipients are submitted all at once. One option is to do a phased rollout, by county or by SSI sub-population (for example, process individuals first, followed by more complex households), using the current CalFresh eligibility and enrollment process.

A second option is to use available SSI data to identify a subset of the SSI population that is highly likely to be eligible for CalFresh, and implement a one-time simplified enrollment process – a “fast track” – for this group. Households with more complex situations, the “non-fast track” population, could be assessed using a process more similar to the current CalFresh eligibility determination process. This section outlines options and considerations for CalFresh eligibility and enrollment for both the fast track and non-fast track groups.

## Fast Track

### Identifying the Fast Track Population

The fast track population could be defined as single individuals or couples whose only income comes from SSI. This group has also been referred to as “pure SSI” households, and is considered categorically eligible for SNAP in all other states.<sup>43</sup> The fast track population can be identified using available SSI data, either directly from the SDX data set, or possibly via the subset of SDX data fields that are delivered to MEDS.

One caveat is that this group might include SSI recipients who purchase and prepare meals with non-spousal roommates or other family members who are included in the CalFresh definition of household, but are not part of the SSI program’s household definition. However, for purposes of identifying a fast track population in order to streamline initial enrollment of current SSI recipients, the state might explore allowing the SSI definition of household to meet the CalFresh household definition in this specific circumstance (potentially requiring a federal waiver).

### Potential Streamlined Enrollment Process

A potential streamlined approach for initial CalFresh enrollment for the fast track population could include the following steps:

1. Generate a data file of the fast track population from SDX, using a pre-determined set of data elements and criteria.
2. Calculate the initial CalFresh benefit amount for the entire fast track population using standard allowances (including housing and medical) for everyone in this population and assuming the same gross income.
3. Issue notice of eligibility to recipients.
4. Send the data file electronically to the EBT vendor (Xerox) with recipient information and benefit amount so that Xerox can generate the EBT cards.
5. Issue and mail to recipients an EBT card, PIN number, and instructions on how to accept and use the benefits.
  - a. Notify recipients that they need to contact the program via phone, web portal, in person, or by mail to accept their CalFresh benefits and get additional information. Collect their consent to enroll by electronic/telephonic signature, in person, or by mail; or
  - b. Notify recipients that use of their EBT card will indicate their consent to accept the CalFresh benefits.
6. Conduct interviews by phone, or waive the interview requirement.
7. Conduct outreach to recipients who fail to respond to the initial notice (5a) or fail to use their EBT card (5b). Send individuals who fail to respond or use their EBT card a notice of discontinuance and provide information on how to apply for CalFresh benefits if they choose to do so in the future.
8. Provide ongoing case management by leveraging data reported to SSA by SSI recipients wherever possible.

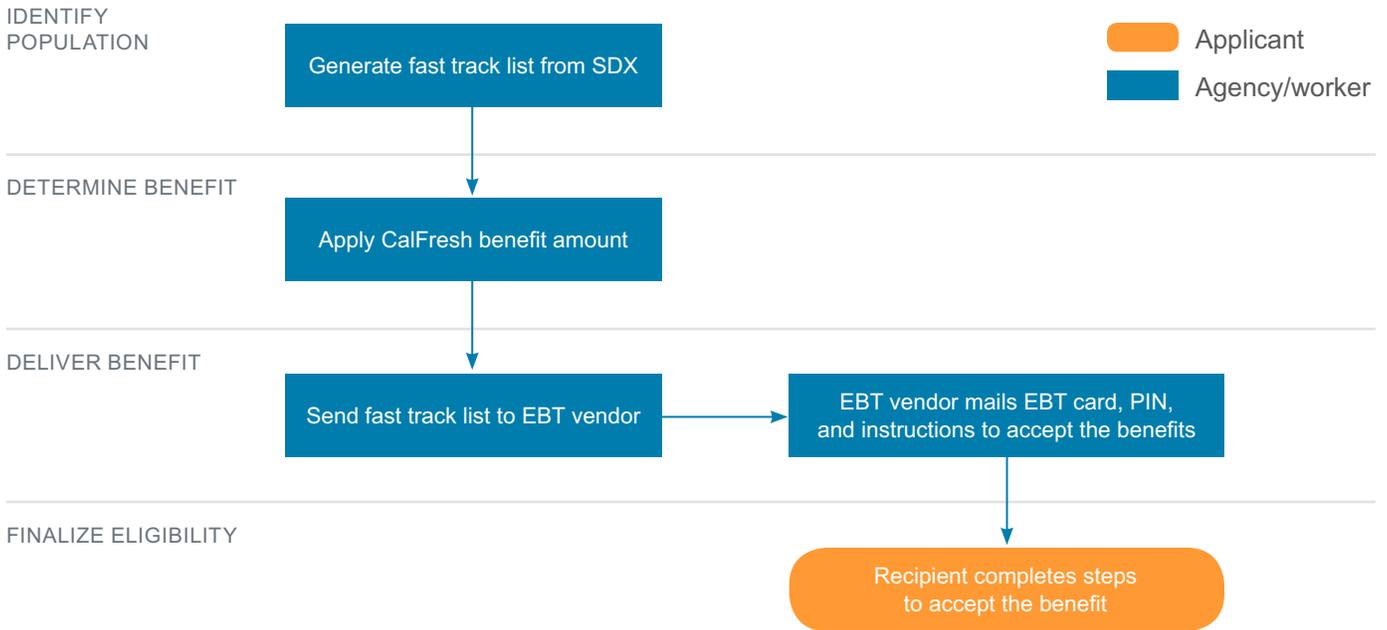
Implementing this streamlined approach for the fast track population would require the following:

- ▶ Modify the existing SSA-CDSS data sharing agreement to allow CDSS to use SDX data to determine CalFresh eligibility, currently not identified in the agreement because of cash-out.
- ▶ Develop and apply pre-set standard allowances, including housing and medical. If the same gross income is assumed for all fast track individuals, a policy option discussed below, determine and apply a standard benefit amount.
- ▶ Allow electronic or telephonic signature to serve as consent for CalFresh and establish a mechanism to collect and store electronic/telephonic signatures per FNS guidance; or allow initial use of the EBT card to establish consent.
- ▶ Potentially waive the interview requirement.
- ▶ Provide a point of contact for SSI recipients to ask questions, conduct interviews, and provide consent as needed during the initial enrollment period.

The implementation details for many of the steps above will depend on key policy decisions, some of which may require a federal waiver, including:

- ▶ Create standard deductions for housing allowance and medical expenses for only the fast track population to allow simplified enrollment. (This would require a federal waiver.)

**Figure 3. Potential Streamlined Enrollment Process for Fast Track Population**



- ▶ Determine which method to use to calculate the monthly benefit amount using only SDX data. Potential options include:

**Option 1.** Calculate the benefit amount for every individual assuming the same income and deductions for all recipients, regardless of income data in SDX, resulting in the same benefit amount for everyone. Using California’s current average benefit amount as an example, all individuals in the fast track population would receive \$200 per month regardless of how much they spend on housing.<sup>44</sup>

**Option 2.** Apply standard deductions to each individual’s actual income reported in SDX. May result in minimal variances to the benefit amount.

**Option 3.** Like option 1, but instead of assuming the same income and deductions for all, assume no income outside of SSI or deductions and provide the minimum CalFresh benefit amount, which is currently \$17 per month.

- ▶ Permit use of a simplified interview requirement for the fast track population or use the SSA interview of the SSI recipient to satisfy the CalFresh interview requirement. (This would require a federal waiver.)

### Considerations and Tradeoffs

**Benefit calculation.** Establishing a standard CalFresh benefit amount using predetermined housing and utility allowances, regardless of actual housing costs, would help to avoid the need for collecting additional information and documentation from the fast track population before making a CalFresh determination. As housing costs vary greatly in California, those in the fast track population with high housing costs might receive a smaller level of CalFresh benefits than they would have if they went through the existing CalFresh determination process, while those with less costly housing (including the homeless) would receive more than they would otherwise qualify. The tradeoff for these recipients opting for the fast track streamlined enrollment process over the existing individualized CalFresh process, however, would be to obtain CalFresh benefits more quickly and easily. A standard utility allowance (SUA) already exists in CalFresh. The state could explore creating a new standard housing allowance to establish a standard benefit amount for enrollment of the fast track population.

The state could allow fast track recipients to “opt out” of the standard benefit at any point after the initial enrollment and request a full CalFresh eligibility determination, likely requiring the collection of additional information. The county could conduct an individualized CalFresh determination and recalculate the benefit amount if the SSI recipient provides

documentation of actual housing or medical costs and complies with other requirements. The ability to opt out is available in some CAP pilots, thus allowing the eligible SNAP recipient to choose between enrolling in SNAP through the standard application and recertification process with an individualized benefit amount, or enrolling through the CAP with a more streamlined process with fewer reporting and recertification requirements and a standard benefit amount. California could consider a similar approach.

**Case creation.** As discussed earlier, county human services offices conduct the CalFresh case creation process. Under the current CalFresh enrollment process, county workers conduct file clearance and enter applicant information into SAWS before a new case can be created (or an existing case can be modified) in SAWS and the enrollment process can proceed. Streamlining this step could help to expedite the initial enrollment of fast track recipients. For example, the state could implement technology solutions to better support the clearance process, and use those to identify and clean up existing duplicate records. Alternatively, the timeline for this effort must provide sufficient lead time and funding for staff to complete this step prior to the target date for the first benefits to be issued.

**Communication with recipients.** If SSI recipients in California become newly eligible for CalFresh they will need education to help them understand and use their new benefits. In addition, SSI recipients who are notified of their new eligibility for CalFresh will need an easy way to give their consent and complete the required CalFresh interview, if not waived. Providing multiple pathways for recipients to communicate with the program, including phone, web portal, in-person, and mail can help increase participation.

Based on successful models in the CAP and ESAP pilots, California could designate one or more call centers with staff trained to support the SSI population to handle incoming requests, conduct phone interviews and obtain telephonic consent (if needed), provide education about CalFresh and use of the EBT card, and make outbound calls to fast track individuals who do not respond within a certain time frame. Given the magnitude of the potential policy change, providing specialized training to call center staff will be vital. Providing one example, Washington's CAP set up a designated call center staffed by a small number of specially trained workers, allowing it to more efficiently process about 60,000 new SNAP cases created through CAP.

## **Non-Fast Track**

### **Identifying the Non-Fast Track Population**

By definition, SSI recipients who are not identified as fast track would be considered non-fast track. In general, non-fast track recipients would have additional sources of income and/or additional members in their households than those in the fast track population. This greater level of complexity would make it difficult to assess CalFresh eligibility without additional information about who else is in their household or the sources and amounts of their other income. Because the eligibility rules for what income is counted and who is part of the household are different in SSI and CalFresh, the county human services agencies would likely need to conduct a full eligibility determination to get an accurate CalFresh benefit amount for the non-fast track population.

Moreover, additional household members who reside with the SSI recipient may already receive CalFresh, or may have received CalFresh benefits in the past. If so, there would be an existing case in SAWS containing information that may allow for a preliminary recertification of everyone in the current CalFresh household, including the SSI recipient. Given these differences within the non-fast track population and to help streamline enrollment, California may want to identify different types of SSI households within the non-fast track population solely using SDX data and process each group into CalFresh separately as a batch at different times. The enrollment of the non-fast track population could be phased in as follows:

- ▶ **Group 1.** SSI recipients who live alone or with their spouse only, but are not fast track due to having sources of income other than SSI;
- ▶ **Group 2.** SSI recipients who live with additional household members who do not currently receive CalFresh benefits;
- ▶ **Group 3.** SSI recipients who live with additional household members who currently receive CalFresh.

Group 1 could be identified using only SDX data. The remaining population would need to be assessed, using SAWS, to determine whether or not their household has an existing CalFresh case in order to classify them into either Group 2 or Group 3.

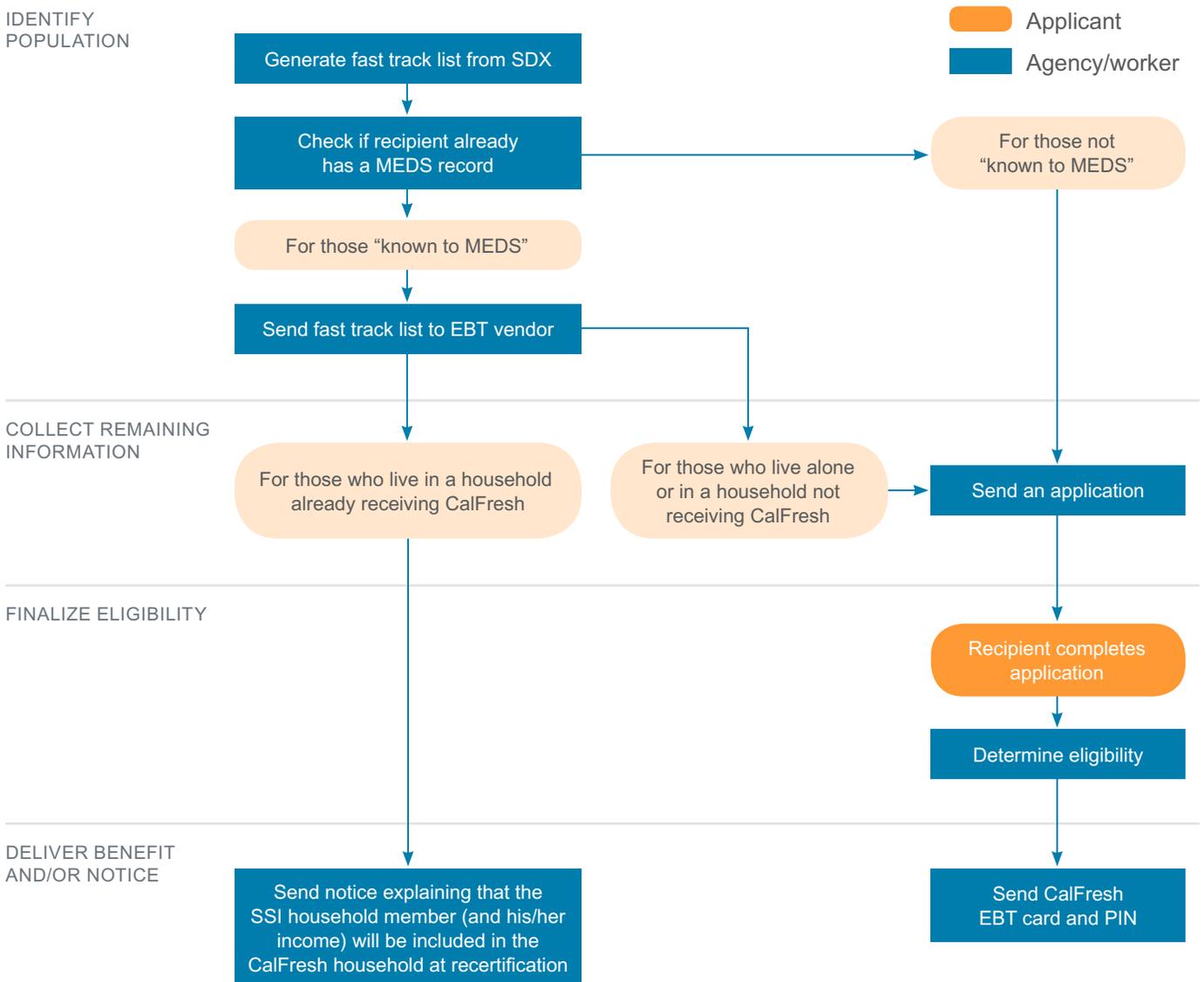
### Potential Streamlined Enrollment Process

A potential streamlined approach for the initial CalFresh enrollment for the non-fast track population could include the following steps:

1. Identify the non-fast track individuals in each of the three groups (identified above) using SDX and SAWS.
2. For Groups 1 and 2:
  - a. Determine what information is still missing to determine CalFresh eligibility.
  - b. For Group 1, send a notice to the SSI recipient asking for any additional information needed to clarify income and complete the eligibility determination. For Group 2,
3. For Group 3:
  - a. Determine the next recertification date for the CalFresh household.

send a notice and a simplified CalFresh application to collect needed information for all household members.

**Figure 4. Potential Streamlined Enrollment Process for Non-Fast Track Population**



- b. Send a notice to explain the policy change and that the SSI household member will need to be included as part of the next CalFresh recertification.
- c. Recertify CalFresh eligibility for the entire household at that next recertification date.

### Considerations and Tradeoffs

Non-fast track SSI recipients would likely require an individualized assessment before they could be found eligible for CalFresh. However, changes to the existing CalFresh enrollment process could help streamline this process. Potential options include:

- ▶ Leverage existing SDX and MEDS data to the greatest extent possible to initiate CalFresh enrollment, and if needed for consent and/or additional information, ask non-fast track households to complete a pre-populated form or simplified application rather than requiring submission of a full CalFresh application (the potential costs of this approach would need to be assessed).
- ▶ Send an individualized notice, preferably from SSA, to all non-fast track SSI recipients in California to explain the change in CalFresh policy and to alert them that they will be contacted with information about any required next steps needed to assess their eligibility for, or complete their enrollment in, CalFresh.
- ▶ Provide a list of non-fast track SSI recipients to county human services agencies for purposes of outreach and follow-up.

The following policy changes could support a streamlined process:

- ▶ Require use of electronic data sources (such as SAWS, SDX and MEDS) to conduct ex-parte review of eligibility for all non-fast track individuals, including those living with other household members; do not request documentation for information that can be verified electronically.
- ▶ Postpone any change in eligibility or benefit amount for existing CalFresh households until the next scheduled CalFresh recertification date.
- ▶ Consider potential disregard of non-SSI income and resources for initial enrollment of the non-fast track population.

- ▶ Consider treating all SSI recipients as individual households (see sidebar).

### Treating All SSI Recipients as Their Own Households

A policy option that California previously explored and may want to consider again is to seek a federal waiver to treat all SSI recipients as their own households. This would alleviate the need for the state to analyze the household composition of current SSI recipients during the initial enrollment into CalFresh and to more easily recertify existing CalFresh households that have SSI household members. Under this approach, all SSI recipients could be treated as fast track, so long as they do not have non-SSI income. A separate CalFresh case could be created for every SSI recipient, and any existing CalFresh cases for households with SSI recipients would continue to exclude the SSI individual and SSI income as part of the household. However, if California opts to consider this option, it should be explored in more detail with counties and SAWS to determine optimal administration structure to minimize workload impacts and automation costs.

In simplifying CalFresh enrollment for non-fast track SSI recipients, California could also facilitate enrollment for non-SSI individuals in those households who are potentially eligible for, but not enrolled in, CalFresh, thereby further reducing food insecurity in California and increasing the CalFresh participation rate. However, some existing CalFresh households that have an SSI household member could see a reduction in their CalFresh benefit amount or become ineligible for CalFresh altogether. Under existing CalFresh eligibility rules, a SSI recipient is not counted as part of the CalFresh household and the SSI income is not included in the CalFresh benefit calculation. If cash-out ends, the SSI recipient and corresponding income would be counted in the CalFresh eligibility and benefit calculation, and would change the income of the overall household.

One way to help temporarily mitigate this issue would be to delay any recertification of SSI recipients in households with existing CalFresh cases until the next scheduled CalFresh recertification date. California could also consider using potential cost savings from streamlined enrollment for the fast track and other non-fast track groups to offset potential reductions in or loss of benefits for affected households.

## CalFresh Eligibility and Enrollment for New SSI Applicants

Following the initial enrollment of existing SSI recipients into CalFresh, individuals who are newly applying for SSI could also benefit from a streamlined CalFresh enrollment process. Leveraging the existing SSA obligation to assist SSI applicants with CalFresh applications, a potential streamlined approach could involve the following steps:

1. Individual applies for SSI. The current SSI application could be modified to ask applicants if they currently receive CalFresh or would like to apply for CalFresh. This is a similar approach to the one used in the standard CAP model. That information is recorded in the SDX record, as it currently is in CAP pilot states.
2. At the initial SSI interview, SSA notifies every SSI applicant regarding eligibility status for CalFresh. SSA conducts a preliminary screen to determine if applicants currently receive CalFresh and whether they could be classified as fast track for CalFresh purposes. For those not already receiving CalFresh benefits:
  - ▶ If not fast track, SSA provides applicants with a CalFresh application and refers them to the appropriate state or county agency to apply for CalFresh.
  - ▶ If fast track, SSA assists with expediting enrollment into CalFresh as described in steps 3 to 4.
3. SSA assists fast track applicants with enrollment into CalFresh by:
  - ▶ Providing a streamlined CalFresh application, similar to the simplified applications used in the CAP and ESAP pilots, and delivers the application to the appropriate state or county agency for expedited processing. Under existing federal rules, CDSS must ensure an eligibility determination is completed within 30 days.
  - ▶ Or, facilitating submission of an online CalFresh application through the county SAWS portal.

4. The state could further simplify CalFresh enrollment for new SSI fast track applicants by:
  - ▶ Deeming the SSI interview to satisfy the initial CalFresh phone interview, via a waiver;
  - ▶ Allowing SSA to collect an individual's consent to apply for CalFresh via the SSI application process, if use of the EBT card is not sufficient for consent.
5. CDSS could also regularly review the SDX record to identify new fast track individuals by:
  - ▶ Using the same eligibility criteria as those used in the initial enrollment of fast track individuals; or
  - ▶ Looking for new applicants who indicated on their SSI applications that they currently do not have, but would like to apply for, CalFresh.<sup>45,46</sup>

Best practices from other states related to streamlining SNAP enrollment for new SSI applicants can also inform California's approach, including:

1. Training for staff in California SSA offices about the change in policy and new procedures for CalFresh enrollment for SSI applicants and recipients, such as:
  - ▶ How to help SSI applicants complete and submit CalFresh applications
  - ▶ Potentially adding questions to the SSI application to ensure there is sufficient information in the SDX record to screen for CalFresh eligibility
2. Creating liaisons between SSA, CDSS and the California county agencies
3. Providing one or more designated call centers where SSA staff can refer SSI applicants and recipients for individual assistance with CalFresh

## Ongoing CalFresh Case Management for SSI Recipients

County human services offices will manage ongoing CalFresh case management for the SSI population, as they do for current CalFresh recipients. County staff will support SSI recipients with a wide range of tasks including benefits questions, EBT card replacements and PIN changes, and changes in address, household composition, and income. These processes could be supported by ensuring specialized training for staff on providing customer support for elderly and disabled individuals. Counties may opt to

provide this training broadly, or to designate specific staff or units to provide support to the SSI population. In fact, some counties already designate specific units to support elderly public program recipients. Regardless of the approach, careful planning will be required to ensure adequate staffing levels to support the expanded caseload.

## CalFresh Recertification for SSI Recipients

The current recertification process for CalFresh is:

1. A 12-month recertification period for most households and 24-month recertification period for the elderly and disabled.<sup>47</sup>
2. Interview required at recertification – phone interview is permitted unless the CalFresh recipient requests an in-person interview.<sup>48</sup>
3. Interim reporting for the elderly and disabled is required at 6, 12 and 18 months for households with earned income, and at 12 months for households with no earned income.

This process could be simplified for fast track SSI recipients by leveraging the SSA redetermination process for SSI. For individuals whose SSI is based on disability, SSA conducts a disability review annually or every three years, depending on the severity of the disability.<sup>49</sup> For all other SSI eligibility criteria, SSI recipients must report changes to SSA no later than 10 days after the end of the month in which the change occurred.<sup>50</sup> In order to minimize the recipient having to report the same changes multiple times, California could explore policy and technology changes that would permit data matching from SDX to meet CalFresh interim reporting requirements.

Because CalFresh and SSI have similar financial eligibility criteria and deadlines for reporting changes, California could choose to rely on SDX data for CalFresh recertification and interim reporting to lessen the burden on recipients, avoid duplication of SSA processes for verification and redetermination of new information, and help reduce the churn that occurs when individuals fail to provide requested documentation at renewal, but are otherwise eligible for continued enrollment.

Based on lessons from other states, California could simplify and streamline CalFresh recertification for the SSI fast track population by making the following policy changes:

1. Depending on state policy decisions and federal requirements of budget neutrality, individualized assessments of CalFresh eligibility for fast track individuals who received a standard benefit amount at initial enrollment, could be done at the first recertification date. This could allow verification of the CalFresh household and permit a change in the monthly benefit for those with high housing costs. However, this could result in a large number of individualized assessments coming due at the same time, potentially resulting in significant caseload management issues. To alleviate a potential backlog, a phased recertification approach could be considered.
2. Allow fast track SSI recipients to extend CalFresh recertification to three years with a waiver from FNS. Alternatively, the state could apply the existing CalFresh two-year recertification period, currently available only to aged and disabled individuals, to all SSI recipients.
3. Waive interim reporting requirements between recertification periods (which could be accomplished through an ESAP pilot). Alternatively, allow changes reported to SSA between CalFresh recertification periods that are reflected in the SDX data to meet interim reporting requirements. This would still require some county action to update SAWS with the new information, but would require recipients to report a change only once.
4. Explore data-matching policies and procedures that could initiate a CalFresh redetermination in SAWS if data from SDX indicates an SSI recipient loses SSI eligibility before the next CalFresh recertification period, and request additional information from the recipient only if needed.
5. Allow use of the SSA periodic redetermination of SSI eligibility to automatically serve as a CalFresh recertification for fast track individuals. California could recertify using the same or a new standard CalFresh benefit amount.

Non-fast track households would use the current CalFresh recertification process. However, efficiencies could be achieved if CalFresh is able to conduct an ex-parte recertification of SSI recipients using the most current data from the SDX record, only requesting that SSI recipients provide additional information if not otherwise available (similar to the streamlined process for fast track households outlined above).

## Additional Considerations

Along with the suggestions discussed above, there are additional lessons learned from other states that California can take into consideration. Based on positive results from ESAP states, for example, FNS has recommended that new ESAP pilots adopt best practices such as collaboration with community partners on outreach, specialized call centers for handling ESAP cases and questions, and the development of targeted communications materials such as resource guides to support recipients. Some of these considerations are described briefly below.

### Planning and Phased Rollout

Given the size and diversity of the SSI population in California and the complexity of the process involved in eligibility determination for, and enrollment in, CalFresh, which includes outreach and education, it will be critical for California to plan carefully for the roll-out. CDSS, counties, and other stakeholders can work in partnership to plan and determine the best business process flow for enrollment and recertification of SSI recipients in CalFresh based on the adopted streamlining options. County human services agencies may have their own relationships with local SSA offices that can be leveraged as part of the transition, or may have specialized units that have experience working with aged and disabled populations. California may also want to consider a phased approach to implementation, rolling out the existing SSI population in different subgroups to reduce the simultaneous volume of new CalFresh cases. This approach would give county human services agencies the opportunity to test and refine the enrollment process with a smaller population, ensuring those individuals receive and understand how to use their CalFresh benefits before opening up enrollment more broadly. It would also allow for careful planning and adjustments as needed for training relevant staff, anticipating workload changes, and otherwise ensuring efficient operations.

### Working with Trusted Partners

Early communication with SSI recipients will be particularly important. Many existing SSI recipients in California may not have interacted with the state or county agencies that administer CalFresh. Initial communications coming directly from these agencies, therefore, may be met with confusion or mistrust. As California plans its education and outreach strategy, it may want to consider partnering with organizations that are known to and trusted by the SSI population – SSA,

senior centers, independent living centers, and other community-based organizations and human services agencies. Alabama's ESAP, for example, has succeeded in enrolling more than 60,000 elderly individuals into SNAP due, in part, to coordinated outreach efforts between the Department of Human Resources and community-based organizations.

In California, community partners could provide individualized support, answer questions and provide education about the CalFresh program and how to use the benefits. State and county agencies could help increase recipient satisfaction and increase CalFresh participation rates by involving all community resources and trusted partners. The state could also send a joint notice with SSA or a general notice about the CalFresh program, followed by a personalized notice explaining next steps, based on whether the individual is identified as fast track or non-fast track.

### Multiple Communication Channels

The SSI population in California is diverse and is likely to have a range of customer support needs that will require a flexible and multi-channel enrollment and communications approach. For example, technology solutions, such as use of a web-portal to provide information or enabling communications solely by email or text, could greatly help streamline enrollment and communications with SSI recipients and may be the preferred method of communication for some.

However, other SSI recipients who do not feel comfortable with technology or prefer face-to-face interactions will need alternative ways to ask questions and communicate with the state about their new CalFresh options. For example, low-income seniors tend to have lower adoption of technology than the broader population; only 39% of surveyed seniors with incomes below \$30,000 reported that they go online compared to 59% of all seniors and 86% of all adults. Even fewer low-income seniors have access to broadband services at home – 25% compared to 47% of all seniors and 70% of all adults.<sup>51</sup> Similarly, adults with disabilities are as a group less likely than non-disabled adults to use the Internet (54% compared to 81%) or have broadband at home (41% compared to 69%), though that gap has been narrowing over time.<sup>52</sup>

An optimal solution for supporting the transition of SSI recipients into CalFresh would therefore encompass a range of enrollment and customer support channels, including phone support, in-person assistance, web-based solutions, and mail.

## Training and Customer Support

Based on lessons learned from states with CAP and ESAP states, putting in place a dedicated call center with staff who have been trained specifically to support the SSI population can help increase SNAP program enrollment. Training staff to understand the preferences and perceived barriers of seniors and people with disabilities can lead to better interactions and a greater likelihood that they will want to provide additional information that may be needed to help them apply for or use their SNAP benefits. In California, the state could work with county human services agencies to leverage or create designated call centers that are trained to assist not only with initial CalFresh enrollment for this population but with ongoing determinations, recertification, and/or case management.

For example, after the initial rollout of the pilot did not go as smoothly as planned, Alabama established a dedicated call center for its ESAP pilot and today that call center remains a central part of the ESAP pilot for new enrollments and recertification. Washington's WASHCAP set up a dedicated call center at the start of the pilot, which was staffed by a small number of specially trained call center workers (six eligibility workers and one supervisor) that and took calls exclusively from SSI recipients enrolled in WASHCAP. Washington found that many seniors preferred to use the phone as a way to seek information and ask questions. Because WASHCAP staff were trained specifically for, and dedicated solely to, WASHCAP SNAP cases, they were able to process their caseloads efficiently.

Moreover, staff in SSA offices will need to be trained on the change in policy and whatever process California establishes to enroll existing and newly eligible SSI individuals. Creating materials like FAQs, fact sheets, and scripts for the SSA call center staff could also help make the transition easier for SSI recipients.

## Conclusion

If California ends cash-out, it can consider a range of options for streamlining enrollment in CalFresh for SSI recipients. Evaluating these options will require decisions about the respective roles of federal, state and county agencies, the potential need for state policy changes, the ability to leverage existing technology, and one-time versus ongoing process and program changes. These decisions will ultimately determine whether seniors and people with disabilities in California are able to obtain the nutrition assistance they need in a manner that is least burdensome for them and most efficient for the state.

## Endnotes

1. Autumn Arnold and Amy Marinacci, "Cash-Out in California: A History of Help and Harm," California Food Policy Advocates, August 2003, [cfpa.net](#) (PDF).
2. Ibid.
3. "SSI/SSP Payment Standards," California Department of Social Services, January 2016, [caassistedliving.org](#) (PDF); "Poverty Guidelines," *Office of the Assistant Secretary for Planning and Evaluation*, U.S. Department of Health & Human Services, January 2016, [aspe.hhs.gov](#).
4. "AJR-35 Supplemental Nutrition Assistance Program: cash-out policy," *California Legislative Information*, U.S. Senate, August 16, 2016, [leginfo.legislature.ca.gov](#).
5. Sarah Strickhouser, James D. Wright, and Amy M. Donley, "Food Insecurity Among Older Adults," AARP Foundation, September 2014, [www.aarp.org](#) (PDF).
6. Ibid.
7. Marisa Agha, "Fighting poor nutrition among California seniors – with a food truck," *Tales From The Field*, California Department for Food and Agriculture, [blogs.cdfa.ca.gov](#).
8. Jung Sun Lee and Edward A. Frongillo Jr., "Nutritional and Health Consequences Are Associated with Food Insecurity among U.S. Elderly Persons," *The Journal of Nutrition*, 131(5), American Society for Nutritional Sciences, May 2001, [jn.nutrition.org](#).
9. "Senior SNAP Participation Visualization," National Council on Aging, Retrieved September 8, 2016, [www.ncoa.org](#).
10. SSI does not depend on prior work history, and individuals can receive SSI if they live alone, with others, or in an eligible institution. Living arrangements may affect the amount of SSI received if others are paying for housing and other basic necessities. SSA permits and encourages SSI recipients to work if possible so they can receive earned income while also receiving SSI. "Supplemental Security Income (SSI) Living Arrangements," Social Security Administration, [www.ssa.gov](#).
11. "SSI Recipients by State and County, 2014," Social Security Administration, Office of Retirement and Disability Policy, 2015, [www.ssa.gov](#) (PDF).
12. Ibid.
13. Individual is income eligible as long as countable income is less than the federal benefit amounts and resources are beneath certain thresholds. For 2016, the maximum SSI federal benefit amount is \$733 for an individual and \$1,100 for a couple ([www.ssa.gov](#)). This amount decreases if a SSI recipient receives any countable income by subtracting the amount of the countable income from the maximum SSI federal benefit amount ([www.ssa.gov](#)). Countable resources must be less than \$2,000 for an individual and \$3,000 for a couple ([www.ssa.gov](#)).
14. Social Security Administration Program Operations Manual (POMS), Sections GN 00203.001 and SI 00601.060, [secure.ssa.gov](#) and [secure.ssa.gov](#).
15. List of data elements and their descriptions, Social Security Administration, [www.ssa.gov](#) (PDF).
16. "State Agreements", Social Security Administration, [www.ssa.gov](#).
17. Recertification every six years may be permitted if changes are not likely. POMS Section SI 02301.005, [secure.ssa.gov](#).
18. See 7 Code of Federal Regulations (CFR) § 273.2(e) for the Supplemental Nutrition Assistance Program (SNAP) requirements for initial applicant interview. See 7 CFR § 273.14(3) for SNAP recertification interview requirements. Initial interview for SNAP applicants can be done by phone rather than in-person for households without earned income or whose members are elderly or disabled.
19. "CalFresh Eligibility and Issuance Requirements," California Department of Social Services, [www.cdss.ca.gov](#).
20. California is considering developing a standard medical deduction rather than applying actual costs, which is currently done in 16 other states. See for example, Ty Jones, "SNAP's Excess Medical Expense Deduction: Targeting Food Assistance to Low-Income Seniors and Individuals with Disabilities," (Center for Budget Policy and Priorities, August 2014), [www.cbpp.org](#).
21. "A Quick Guide to SNAP Eligibility and Benefits," Center on Budget Policy and Priorities, November 5, 2015, [www.cbpp.org](#).
22. See 7 CFR § 273.2(e), § 273.2(k). Additional details of SSA' obligation are included in the "Memorandum of Understanding (MOU) between U.S. Department of Agriculture (USDA) and SSA.
23. 7 CFR § 273.2(k) POMS Section SI 01801.005, [secure.ssa.gov](#).
24. "Understanding Supplemental Security Income (SSI) and Other Government Programs: 2016 Edition," Social Security Administration, [www.ssa.gov](#).
25. "Social Security: Nutrition Assistance Programs," Social Security Administration, [www.ssa.gov](#) (PDF).
26. 7 CFR § 273.2(m) and 7 CFR § 273.2(k)(1)(i)(H).
27. "Senior SNAP Participation Visualization," National Council on Aging, [www.ncoa.org](#).
28. "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, [www.mathematica-mpr.com](#) (PDF).
29. "Combined Application Projects: Guidance for States Developing Projects," U.S. Department of Agriculture, Food and Nutrition Services, March 2005, [www.fns.usda.gov](#) (PDF).
30. "Fact Sheet: USDA Support for Older Americans," U.S. Department of Agriculture, Food and Nutrition Services, July 2015, [www.fns.usda.gov](#).
31. "Elderly Simplified Application Project Guidance," U.S. Department of Agriculture, Food and Nutrition Services Program Development Division, Fiscal Year 2015-2016, [www.fns.usda.gov](#) (PDF).

32. "Policy Options for Using SNAP to Determine Medicaid Eligibility and an Update on Targeted Enrollment Strategies," Centers for Medicare and Medicaid Services, State Health Official Letter 15-001, August 13, 2015, [www.medicaid.gov](http://www.medicaid.gov) (PDF); "Strategies to Enroll and Retain Eligible Children in Medicaid and CHIP," Centers for Medicare and Medicaid Services Informational Bulletin, June 13, 2016, [www.medicaid.gov](http://www.medicaid.gov) (PDF); "Facilitating Medicaid and CHIP Enrollment and Renewal in 2014," Centers for Medicare and Medicaid Services State Health Official Letter 13-03, May 17, 2013, [www.medicaid.gov](http://www.medicaid.gov) (PDF).
33. "Express Lane Enrollment For CalFresh Eligible Adults And Children," All County Welfare Directors' Letter 14-06, California Department of Health Care Services, February 21, 2014, [www.dhcs.ca.gov](http://www.dhcs.ca.gov) (PDF).
34. See "Accepting SNAP Applicant and Client Signatures Electronically," U.S. Department of Agriculture, April 21, 2016, available at: [www.fns.usda.gov](http://www.fns.usda.gov) (PDF). Also see "SNAP Telephonic Signature Guidance," U.S. Department of Agriculture, May 12, 2014, available at: [www.fns.usda.gov](http://www.fns.usda.gov) (PDF).
35. "Supplemental Nutrition Assistance Program: Guidance for State Agencies on Novel Waivers," U.S. Department of Agriculture, May 13, 2014, [www.fns.usda.gov](http://www.fns.usda.gov).
36. "Supplemental Nutrition Assistance Program:: More Information on Promising Practices Could Enhance States' Use of Data Matching for Eligibility," U.S. Government Accountability Office, October 19, 2016, [www.gao.gov](http://www.gao.gov).
37. "Elderly Simplified Application Project Guidance," U.S. Department of Agriculture, Food and Nutrition Services, Program Development Division, Fiscal Year 2015-2016, [www.fns.usda.gov](http://www.fns.usda.gov) (PDF).
38. 42 United States Code § 1902(a)(10)(A)(i)(II)(aa) (Section 1634 of the Social Security Act). Section 209(b) of the Social Security Amendments of 1972 gave states the option of using their own criteria for eligibility for Medicaid for SSI recipients rather than provide categorical linkage. For a current list of states that do and do not automatically deem Medicaid eligibility to SSI recipients, see "List of State Medicaid Programs for the Aged, Blind and Disabled," SSA POMS Section SI 01715.020, [secure.ssa.gov](http://secure.ssa.gov).
39. "Policy Options for Using SNAP to Determine Medicaid Eligibility and an Update on Targeted Enrollment Strategies," Centers for Medicare and Medicaid Services, State Health Official Letter 15-001, August 13, 2015, [www.medicaid.gov](http://www.medicaid.gov) (PDF).
40. See 7 CFR §273.2(j)(1)(iv); §273.2(j)(2)(i)(D); §273.2(j)(2)(i)(E).
41. 7 CFR §273.2(j)(2)(v). SNAP eligibility criteria that are similar to SSI's include resource, gross and net income limits; Social Security Number; citizenship or immigration status; and residency. The SNAP agency must verify other eligibility factors not collected by SSA, such as determining which SSI household members "purchase and prepare food together." 7 CFR §273.2(j)(2)(v)(C).
42. "Elderly Simplified Application Project Guidance," U.S. Department of Agriculture, Food and Nutrition Services, Program Development Division, Fiscal Year 2015-2016, [www.fns.usda.gov](http://www.fns.usda.gov) (PDF).
43. See 7 CFR §273.2(j)(1)(iv); §273.2(j)(2)(i)(D); §273.2(j)(2)(i)(E).
44. For CalFresh's average benefit amount to all households, see [mycalfresh.org](http://mycalfresh.org).
45. Understanding Supplemental Security Income (SSI) and Other Government Programs: 2016 Edition," Social Security Administration, [www.ssa.gov](http://www.ssa.gov).
46. POMS Section EN-05-10100, [www.ssa.gov](http://www.ssa.gov) (PDF).
47. CalFresh recertification periods can vary from one month to two years, depending on whether there are expected changes in the household; see California Manual of Policies and Procedures (MPP) § 63-504.141(a) and § 63-504.1 for details. Households who only include elderly or disabled individuals are re-certified every two years. See 7 CFR § 273.10(f)(1); California MPP § 63-504.142.
48. 7 CFR §273.14(b)(3); "All County Letter 12-26," California Department of Social Services, May 31, 2012, [www.cdss.ca.gov](http://www.cdss.ca.gov) (PDF).
49. Continuing Disability Reviews (CDRs) are generally done every 3 years but can be earlier if the underlying medical condition could improve sooner or every 6-7 years if improvement is not expected. "Continuing Disability Reviews," Social Security Administration, [www.ssa.gov](http://www.ssa.gov).
50. POMS Section SI 02301.005. For a list of changes that must be reported to SSA, see [www.ssa.gov](http://www.ssa.gov).
51. Aaron Smith, "Older Adults and Technology Use," April 3, 2014, [www.pewinternet.org](http://www.pewinternet.org).
52. Susannah Fox, "Americans Living with Disability and Their Technology Use," Pew Research Center, January 21, 2011, [www.pewinternet.org](http://www.pewinternet.org).