An Advocate's Guide to Online Multi-Benefit Applications

Coalition on Access and Opportunity

Coalition on Access and Opportunity

▸ The Coalition for Access and Opportunity is a collaboration of advocates, researchers, and practitioners working to improve access to and better coordinate the range of federal income and work supports. Our effort is uniquely focused on coordination across programs.

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Software/Webinar Logistics

To Type your question:
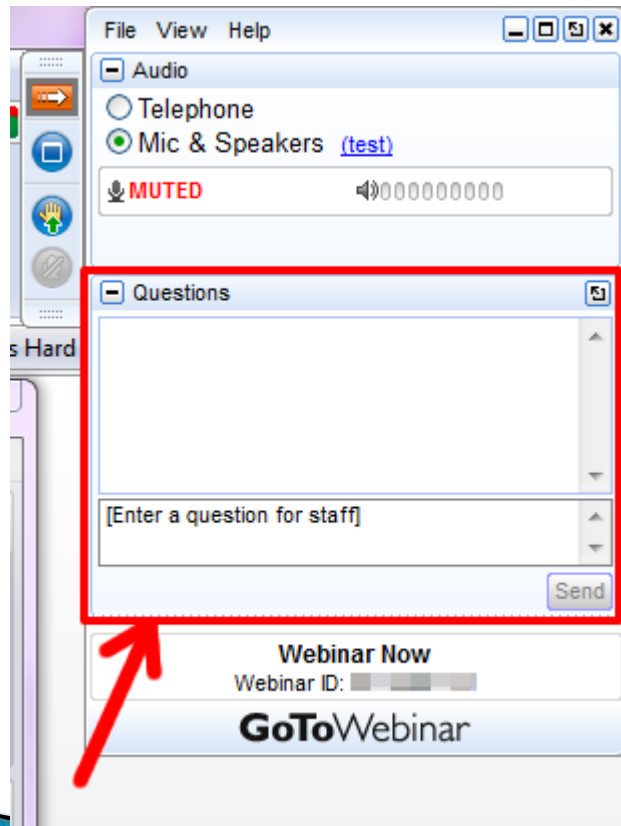
- Copies of the presentation will be sent around to everyone.
- The presentation will be recorded.

Our Plan for Today

1. **Why it is Important to Review Online Multi-Benefit Applications and Key Areas to Review:** Ty Jones, Center on Budget and Policy Priorities
2. **State Perspective:** Cemere James, CLASP
3. **Advocates on the Ground:** Val Greenfield and Cindy Huddleston, Florida Legal Services
4. **Q & A**

Online Multi-Benefit Application Review

Ty Jones

Center on Budget and Policy Priorities

Trends in Developing Modernized Systems

- As a part of modernization projects states began to develop:
  - Online applications,
  - Call centers,
  - Online case management systems,
  - Document imaging, and
  - Reducing offices and/or staff.
- Incentives for states were large.
  - Increases productivity
  - Saves money
  - Could receive federal money
- ACA requirements

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Why Is This Important?

Increase Access

- Convenient
- 24 hour availability
- Modern customer service

Decrease Accessibility

- Assistance not always available
- Flaws in technology
- Not everyone can complete
- Access is uneven

Elements of the Application That Present Problems

- In multi-benefit applications there are areas that specifically concern us with states' online multi-benefit applications.

  1. Ability to file an incomplete application,

  2. Requiring non-applicant household members to provide sensitive information,

  3. Identity proofing early in the process,

  4. Complicated/confusing ACA questions, and

  5. Splitting of programs.

Other Concerns Not Discussed in Presentation

  – Long and required pre-application registration.

1. Ability to File an Incomplete Application (SNAP)

The three things to look for:

1. Can an applicant submit an application after providing name, address, and signature? Is that opportunity only offered once?

2. Are applicants made aware early in the process that they are able to file an incomplete application?

3. Does the application when combined with another program, for example health, have more required questions?

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Print

Help

Hello, Tiffany. You are logged in.

Logout

The Right to File an Incomplete Application for SNAP

By federal law, SNAP eligibility begins as of the date the application is filed. To set this "filing date," individuals have the right to submit an "incomplete applictaion" for SNAP. This is an application that only contains the applicant's name, residence address, and a valid signature. **You will still need to complete a full application and interview in order to be determined eligible for SNAP and start receiving benefits.**

What this means to you:

- If you want to submit an incomplete application, the only program you can apply for is SNAP. Your application will not contain any of the other programs that are available through inROADS. If you want to apply for additional programs, you'll need to start a new application for those programs.

- inROADS will collect only basic information such as the name and address of the applicant. Information such as jobs and additional household member details will not be collected, but are still required in order to receive benefits.

- You will still need to complete a full application and interview in order to be determined eligible for SNAP and start receiving benefits.

- inROADS will not be able to determine if your application should be expedited.

Would you like to file an "incomplete application" for SNAP?   No ▼

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Example 2 – AZ

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>> About You   >> **About Your Family**   >> Confirm Income   >> Additional Information   >> Next Steps

Household Summary

The following error(s) have occurred:

Please indicate if this person has a Social Security Number (SSN).

Tell us more about Tiffany Smith

Does Tiffany Smith use any other names (Maiden name, nicknames, etc.)?	○Yes ●No
Date of Birth	01/01/1980
Gender	○Male ●Female
Does Tiffany Smith have a Social Security Number?	○Yes ●No
Has Tiffany Smith applied for SSN?	○Yes ○No
Is Tiffany Smith a U.S. citizen?	○Yes ○No

? Help and Hints

Program Status

Medical Assistance Programs
Tiffany Smith   Not Applying
Trevor Smith   Applying

Nutrition Assistance Program
Applying

Cash Assistance Program
Not Applying
Add the Program

✎ Submit a Program

[Previous]   [Cancel]   [Save and Close]   [Next →]

View Application Summary

App ID: 201405521364

2. Barriers for Mixed Status Families

The three things to look for:

1. Does the application allow for non-applicants?

2. Are non-applicants required to disclose their citizenship or immigration status?

3. Does the application require SSNs of everyone in the household? Are consumers told how SSNs will be used?

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Now we need to get personal information for other people in your home.

Personal Information

* First Name:	Middle Name :	* Last Name:	Suffix:
Michael		Smith	--

* Gender : ● Male ○ Female

< click here to choose >
Alabama
Alaska
American Samoa
Arizona
Arkansas
California
Colorado
Connecticut
Delaware
District Of Columbia
Federated States of Micronesia
Florida
Georgia
Guam
Hawaii
Idaho
Illinois
Indiana
Iowa
Kansas
Kentucky
Louisiana
Maine
Marshall Islands
Maryland
Massachusetts
Michigan
Minnesota
Mississippi

* Date of Birth :

* What is this person's place of birth?

Is this person a resident of Montana ?

In the past year did this person:

☐ Change jobs   ☐ Stop working   ☐ None of these

What is this person's marital status?

Program Selection

You selected the following programs on the prior screen. If this individual do[...]ce selected below, please uncheck the box.

☐ SNAP   ☐ TANF   Assistance

3. Identity Proofing

The three things to look for:

1. Does the application require an adult in the unit to complete ID proofing in order to submit an application online?

2. Does the application's proofing process primarily rely on information from credit history records?

3. Is there an alternative ID proofing process for people who don't have credit histories and does the alternative work for mixed status families?

- Note: This is not required under SNAP.

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DELAWARE ASSIST

Contact Us   FAQ   Help   Site Map   Log Out

e-Application # W9300540

View/Print My e-Application   Cancel e-Application   Save e-Application & Finish Later

- Getting Started
- Household
- Benefits
- Individual Details
- Income
- Expenses
- Tax Deduction
- Insurance
- APTC / CSR
- Resources
- Summary
- Next Steps
- Verification
- Submit e-Application

Identity Proofing   Verifications

Once you click on the 'Next' button, you will be taken to ID Proofing questions.

Only the head of household (Tiffany Smith) will be ID Proofed. Please ensure that he/she is present before clicking the 'Next' button.

In order to have an immediate determination made regarding the Medical Eligibility for your household, the identity of Tiffany Smith must be verified. The identity of Tiffany Smith will be verified by a process called Identity Proofing. You will be asked to answer 3 -5 questions about Tiffany Smith. Successfully answering these questions will allow us to obtain information from electronic data sources and possibly determine Medicaid eligibility immediately.

If the questions are not answered correctly or you choose not to use Identity proofing, you may still submit the application. A case worker will determine your eligibility.

○ I do wish to use ID Proofing at this time.

○ I do not wish to use ID Proofing at this time. I will submit my application without Identity proofing. I understand that I will not be provided with an immediate determination of Medicaid eligibility.

Return to Summary   Previous   Next

4. New ACA-Related Questions

The three things to look for:

1. How does the application ask about income?

2. How does the application gather tax filing plans?

3. Is everyone required to answer questions about access to minimal essential coverage? Are the questions understandable? What happens if they are unanswered but the person is eligible for Medicaid?

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yearly income

Do you expect ▭'s yearly income to be the same as what was reported on her 2012 federal income tax return?

○ Yes

● No/I don't know

What do you expect ▭'s yearly income will be in 2014?

▭ Amount

[   ]   ☐ I don't know

$XXX,XXX.XX

You may be asked to provide proof of your income. If you're not sure what your income will be, give us your best guess. Later on, if your income does change, you can report the change.

SAVE & CONTINUE

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5. Splitting Health and Human Services

- Some applications that were multi-benefit applications pre-ACA implementation are no longer.

- Multiple streamlined applications may not be more effective than one multi-benefit application.
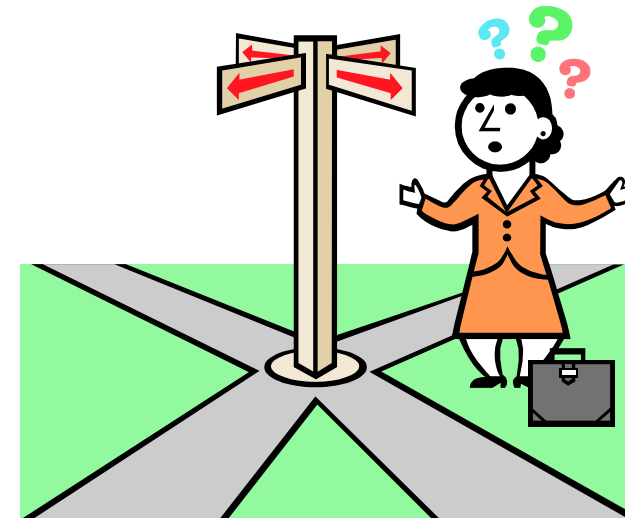
What Can You Do?

- Review your state's online application.

- Contact your state agency for a meeting to discuss findings.

- Share your concerns with FNS, CMS, and ACF.

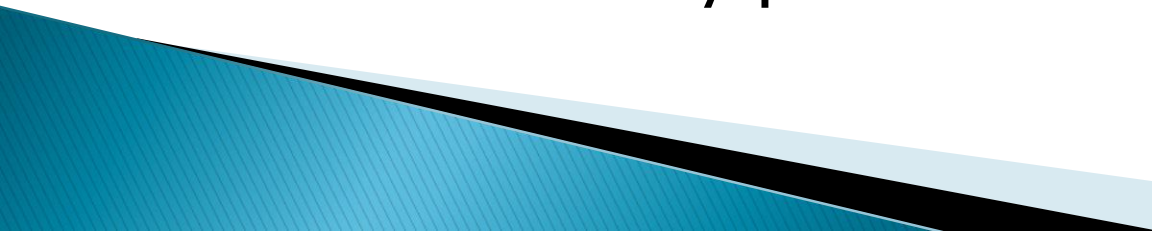- Engage your networks on this issue.

- ACA will necessitate a change in ALL health applications.

State Perspective
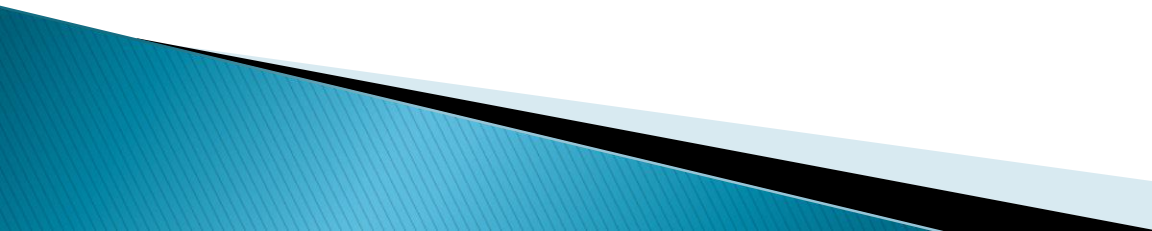
Cemere James
CLASP

Life Changed for States

ACA Changes

Redesigned Business Process

Demands on State Staff and Budget

New Eligibility Systems

Increasing Caseloads
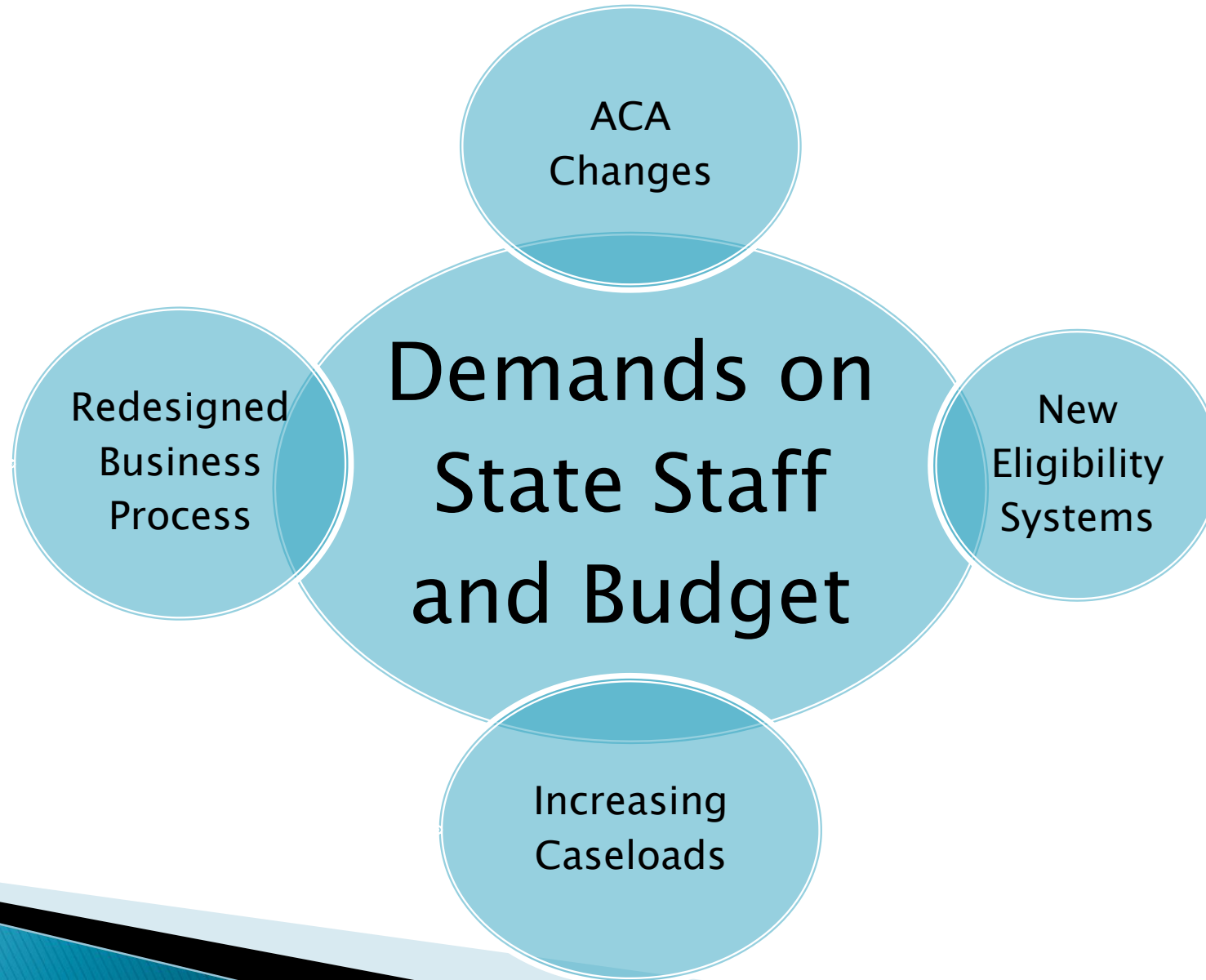
Business Process for Online Applications

- By implementing online applications, some states have created an entry point for applications without the business processes to support it on the backend.

- States should ensure they have dedicated staff or staff time to devote to processing online applications.

- States should provide guidance and training to local offices on how to incorporate reviewing and processing web applications into their daily practices.

What Can You Do?

▸ Contact your state agency for a meeting.

▸ Ask to review your state's process and timeline for reviewing and processing online application.

▸ Request information from the agency on what they did to fix their application.

Try these questions:

- How quickly do you review and begin processing web applications? What is the first step in the review process?

- Does your system flag SNAP applications that are potentially expedited? How long does it take for a caseworker to screen potentially expedited web application?

- Can customers upload verification along with their applications?

Try these questions:

- Do you have dedicated staff or staff time to address web applications? How many or how much time daily?

- How many web applications do you receive daily?
  - Compare the number of applications received daily to number of staff processing web applications. Does it add up?

- How does timeliness for applications compare to timeliness for in-person, mail or phone applications? What is the state doing to address discrepancies?

Idaho's approach

▸ Idaho made a conscious decision hold off on launching web applications until they were prepared to implement backend processes.

▸ ID was giving same-day service on the phone and in-person and they wanted to give the same level of service online.
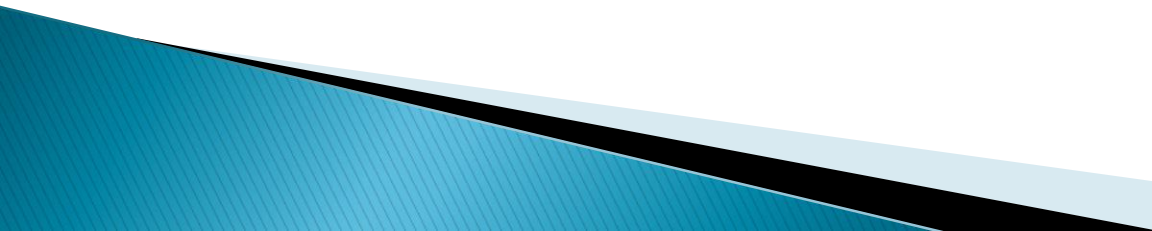
Advocates on the Ground

Val Greenfield & Cindy Huddleston

Florida Legal Services

History of Modernization in Florida

- Online application went live in 2005
- Local offices started closing
- Call center developed
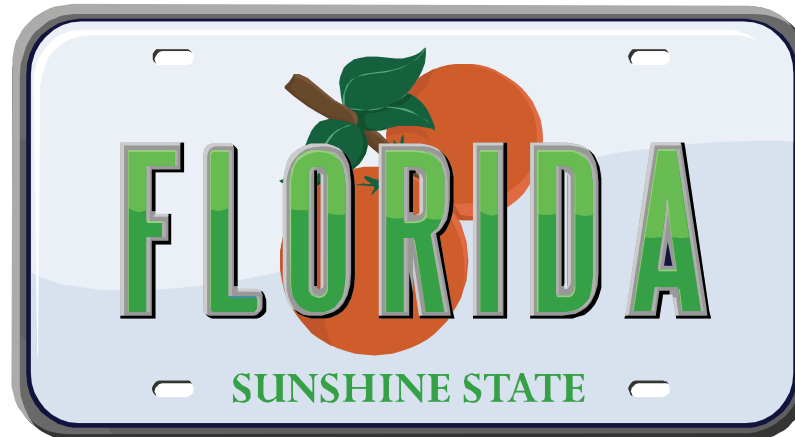
If We Knew Then, What We Know Now!

- Don't focus on just fixing words on the application
  - Understand the larger process
- Advocate to preserve the infrastructure.
  - Keep local offices,
  - Increase call center capacity, and
  - Make sure assistance is available.
- Do an actual application.
  - Go start to finish and then try different scenarios.
- Explore compliance with all protected rights.

Victories

- Made the state adopt the online application as a rule.
- Individual case for ADA accommodations that resulted in training for all workers.
- Petitioned to create a means for caretaker relatives to apply.
- HHS doing a compliance review of Florida's system,
- Changes to ability to file an incomplete application
- Even more victories are coming, because it is no

Key Take-Aways for Advocates

- Hang onto the infrastructure,
  - Offices
  - Phone lines
- Build up the infrastructure
- Applications are constantly changing there is no end,
- Connect with other people in your state working on applications,
- Stay engaged, and
- Use all your resources.

Resources/Links

- ## FNS Guidance
  - http://www.fns.usda.gov/snap/rules/Memo/2011/121710.pdf
  - http://www.fns.usda.gov/snap/rules/Memo/pdfs/Tri-Agency_Guidance_Memo-021811.pdf
  - http://www.fns.usda.gov/snap/government/pdf/Non-Citizen_Guidance_063011.pdf
- ## Tri-Agency Guidance
  - http://www.fns.usda.gov/snap/rules/Memo/pdfs/triagencyletter.pdf
- ## CBPP – Coordinating Human Services Programs with Health Implementation, State Agency Toolkit
  - http://www.cbpp.org/cms/index.cfm?fa=view&id=3791
- ## CBPP Online Benefits Papers
  - http://www.cbpp.org/cms/index.cfm?fa=view&id=1414

We are Here to Help

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Questions

- To Type your question: