

## Making Public Benefits Easier to Access

# The Path Forward for State and Federal Agencies

For millions of low-income older adults, the process of applying for public benefits is cumbersome. Yet, benefits are essential to helping them afford the costs of daily living such as food, housing, and health care. On behalf of the National Council on Aging (NCOA) and with funding from the U.S. Administration on Community Living (ACL), L&M Policy Research examined ways that federal and state policymakers can streamline and automate the processes for key public benefits enrollment. This brief is one of four summaries in a larger study and offers policy recommendations to better streamline benefits enrollment.

## In This Brief

**F**rom language differences to mobility issues, older adults face many barriers to completing benefits enrollment. Meanwhile, benefit agencies are overworked and under-resourced due to lack of funding, technology, and coordination. After reviewing best practices in streamlining enrollment and outreach tailored to applicant needs, the study team identified potential solutions to better coordinate the process and keep older adults from slipping through the cracks, while reducing administrative burden for multiple benefit agencies.

# Five Policy Recommendations



## 1. Simplify and Standardize Eligibility Rules

### **Standardize definitions of common eligibility criteria across programs**

- Eligibility requirements vary across programs and can be an administrative barrier to enrollment. For example, older adults are defined as age 65 and above for Medicare, but age 60 and above for the Low-Income Home Energy Assistance Program and the Supplemental Nutrition Assistance Program (SNAP). Creating a uniform set of definitions for common eligibility criteria such as income and household size will make it easier to verify if an older adult is eligible for additional benefits.

### **Review program eligibility criteria**

- Agencies could explore if some of the strict eligibility requirements could be adjusted to ease the application process or eligibility. The U.S. Department of Agriculture waived SNAP interview requirements during the COVID-19 public health emergency. In addition, a recent study showed that in states that relaxed asset limits for SNAP, the chance of enrollees having more than \$500 in their bank accounts went up by 8%. Fewer requirements mean more households will be able to save money and benefit agencies will have less paperwork.



## 2. Identify Ways to Improve the Application Process

### **Streamline and integrate public benefit applications**

- This involves reviewing the benefit enrollment process for ways to reduce paperwork, such as using the same application to sign up for multiple benefits. Only one-third of older adults eligible for SNAP alone are enrolled, in many cases because of cognitive and mobility issues made worse by lengthy benefit applications.<sup>1</sup> Several states have reviewed their applications for ways to simplify, such as Minnesota, which created an all-in-one online application for nine benefit programs that reduced application time from 110 minutes to less than 20.<sup>2</sup>

### **Increase consumer options for completing applications**

- Multiple application formats are necessary for older adults who aren't native English speakers, have limited digital literacy, or lack regular internet. Benefit administrators can reach more people through mobile-friendly online applications and options to complete them via phone. For example, the federal Food and Nutrition Service lets state SNAP program administrators get electronic or telephonic signatures from applicants and could provide technical assistance to states that need help providing this option for enrollees.<sup>3</sup>

<sup>1</sup> Ganong, P., Liebman, J. (2018). The Decline, Rebound, and Further Rise in SNAP Enrollment: Disentangling Business Cycle Fluctuations and Policy Changes. *American Economic Journal: Economic Policy*, 10 (4): 153-76. DOI: 10.1257/pol.20140016

<sup>2</sup> Code for America. (n.d.). Integrated benefits applications: Making it easier for people and families to access all their benefits in one place. <https://codeforamerica.org/programs/social-safety-net/integrated-benefits/>

<sup>3</sup> U.S. Department of Agriculture. (2014). SNAP Telephonic Signature Guidance. <https://www.fns.usda.gov/snap/snap-telephonic-signature-guidance>

# Five Policy Proposals:

## ***Use other administrative data to review and approve applications***

- This involves using an older adult's data, such as income, across different applications to speed up enrollment and asking an applicant's permission to prepopulate forms with basic information such as their name and address. The Centers for Medicare & Medicaid Services (CMS) recently proposed a rule to encourage states to use an applicant's Medicare Part D Low-Income Subsidy (LIS) data to jumpstart a Medicare Savings Program application and to use standard definitions for income and wealth across both programs.

## ***Leverage mobile applications and other electronic methods to verify documents***

- Submitting documents for applications is an enrollment hurdle, and a study of SNAP-eligible adults found 40% cited this requirement as the main reason to not even apply.<sup>4</sup> Allowing older adults to upload documents electronically to verify eligibility can reduce application time. After Pennsylvania launched a mobile application in 2017 for applicants to submit documents to multiple programs, it resulted in nearly 5.4 million electronic verifications to date.<sup>5</sup>

## ***Strengthen relationships with stakeholders to improve benefits outreach***

- States can provide retroactive benefits to protect older adults from financial burdens, while using it as an opportunity to boost enrollment in other public benefit programs. State Medicaid programs can encourage health care professionals to recommend their patients apply for public benefits such as Medicaid and other wraparound services. State benefit agencies can also spread the word about available services through partnerships with community-based organizations, utility companies, and more.

## **3. Reduce Lapses In Benefits**

### ***Extend eligibility periods based on other program approvals***

- States could use a person's eligibility criteria for one public benefit to recertify them for others to avoid a lapse in services. States can follow the lead of some federal programs such as the Social Security Administration, which automatically recertifies LIS benefits for people who qualify for Medicaid.<sup>6</sup> Because states are required to reassess SNAP eligibility every 6-12 months, they could use the same criteria to determine eligibility for other programs. South Carolina invested \$540,000 in technology that used SNAP records to determine Medicaid eligibility and ultimately saved \$1.6 million in administrative costs.<sup>7</sup>



<sup>4</sup> Bartlett, S., Burstein, N., Hamilton, W., Kling, R. (2004) Food Stamp Program Access Study. United States Department of Agriculture. [https://www.ers.usda.gov/webdocs/publications/43390/30283\\_efan03013-3\\_002.pdf?v=0](https://www.ers.usda.gov/webdocs/publications/43390/30283_efan03013-3_002.pdf?v=0)

<sup>5</sup> Wikle, S., Wagner, J., Erzouki, F., Sullivan, J. (2022). States Can Reduce Medicaid's Administrative Burdens to Advance Health and Racial Equity. Center for Budget and Policy Priorities. <https://www.cbpp.org/research/health/states-can-reduce-medicoids-administrative-burdens-to-advance-health-and-racial>

<sup>6</sup> National Council on Aging. (2020). Redeeming, Redetermination, and Reassignment in Extra Help. <https://www.ncoa.org/article/extra-help-redetermination>

<sup>7</sup> Isaacs, J., Katz, M., Amin, R. (2016). Improving the Delivery Efficiency of Benefit Outcomes from the Work Support Strategies Evaluation. Urban Institute. [https://www.urban.org/sites/default/files/publication/85851/improving-the-efficiency-of-benefit\\_delivery\\_report\\_2.pdf](https://www.urban.org/sites/default/files/publication/85851/improving-the-efficiency-of-benefit_delivery_report_2.pdf)

# Five Policy Proposals:

## ***Standardize eligibility periods and redetermination dates across programs***

- Aligning eligibility and recertification deadlines across multiple benefit programs would allow states to use recertification data from one benefit—particularly one with strict requirements—to approve older adults for additional benefits. North Carolina’s 2012 pilot program to align Medicaid and SNAP recertification periods improved enrollment and the user experience.<sup>8</sup>

## ***Leverage administrative data to recertify applicants***

- Using existing data to recertify older adults for public benefits can cut down application processing time, but the technology needed to capture data from other programs can be costly to states. Using Medicaid as an example, state Medicaid programs are encouraged to use federal Medicaid matching grants to cover IT costs needed to share applicant data during the recertification process. CMS could also provide states technical assistance because, while states are federally required to use available data before asking applicants for documents to recertify, as many as 11 states process fewer than 25% of renewals this way.
- A September 2023 new Medicaid rule will streamline the Medicaid application process for Medicare Savings Programs (MSPs) by further automating the application process for people with Medicare Part D Low-Income Subsidy and automatically enrolling some Medicare beneficiaries, including those who receive Supplemental Security Income. The rule builds on existing CMS guidance on accepting leads data from SSA to initiate MSP application. Furthermore, the new enrollment includes people who enroll in MSPs because of the new rule and additional months of coverage among people who would have enrolled and now face fewer administrative barriers to doing so and gain more months of coverage. The rule encourages states to align MSP eligibility processes with SSA; it requires states that have not aligned to accept applicant confirmation of information as part of the application process.

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## **4. Address Inequities through Better Service**

### ***Analyze administrative and enrollment data***

- This involves using a “burden audit” to identify which parts of the application process lead older adults—particularly LGBTQ people, people with disabilities, and those with limited income—to burnout and not finish. Incomplete applications could result from stress over understanding eligibility rules and the large amounts of time needed to fill out paperwork. Studies have shown that effects of administrative burden tend to disproportionately impact the most vulnerable beneficiaries of public benefit programs. The audit can lay the foundation for initiatives that would improve the user experience.<sup>9</sup>



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<sup>8</sup> North Carolina Department of Health and Human Services. (2014). Aligned Certification Periods for Medicaid and Food and Nutrition Services. <https://www.ncdhhs.gov/media/4862/download>;

<sup>9</sup> Altiraifi, A. (2020). A Deadly Poverty Trap: Asset Limits in the Time of the Coronavirus. Center for American Progress. <https://www.americanprogress.org/article/deadly-poverty-trap-asset-limits-time-coronavirus/>

# Five Policy Proposals:

## ***Ask applicants about ways to redesign the application***

- Using input from applicants about the benefit application process to create enrollment materials would ensure they are easy to read and designed to draw attention to key information. State benefit administrators can host focus groups, conduct surveys, or schedule in-person interviews about ways to improve the application process. They can also review all application materials to make sure they are written in plain language, offered in multiple languages, contain pre-populated forms to auto-fill basic information, and designed to highlight important words and relevant dates.

## ***Integrate multiple modalities and formats to meet user preferences and needs***

- States should provide applicants multiple ways to stay in touch with benefit administrators such as via phone, email, or text. They should also offer materials in different languages and formats for people who have difficulty hearing or seeing. In order to reach all kinds of older adults with varying levels of digital literacy, disabilities, and broadband access, states must invest in a variety of consumer assistance resources such as call centers, navigator programs, and Benefits Enrollment Centers to help answer enrollment questions. The Administration for Community Living's Eldercare Locator and Disability Information and Access Line (DIAL) and NCOA's Benefits Helpline are population-focused call centers and examples of why states should invest in training call center staff about the enrollment process to not only answer questions but identify common issues among people calling for help.

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## **5. Leverage Data to Improve the Benefits Process**

### ***Developing federal privacy law technical assistance and guidance***

- Creating “how-to” guides for rules on the legal sharing of data between multiple benefit agencies would clear up any confusion about hard-to-understand federal privacy laws and security policies. The Administration for Children and Families and CMS created technical guidance that included what types of information could be shared among their agencies, sample data sharing agreement language, and case studies.<sup>10</sup> States and nonprofits have also published “how-to” documents that guide states through the steps of successful data sharing.<sup>11</sup> The U.S. Department of Health and Human Services could create a resource of data sharing best practices that show the best examples happening in states today.



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<sup>10</sup> U.S. Department of Health and Human Services Administration for Children and Families (ACF) and Centers for Medicare & Medicaid Services (CMS). (2022). Toolkit: Data Sharing for Child Welfare Agencies and Medicaid. <https://www.acf.hhs.gov/sites/default/files/documents/cb/data-sharing-and-medicaid-toolkit.pdf>

<sup>11</sup> Saffold, J., Gibbons-Straughan, B., Weiss, A. (2023). Data Sharing to Build Effective and Efficient Benefits Systems: A Playbook for State and Local Agencies. Benefits Data Trust. [https://bdtrust.org/data-sharing-to-build-effective-and-efficient-benefits-systems\\_january-2023.pdf](https://bdtrust.org/data-sharing-to-build-effective-and-efficient-benefits-systems_january-2023.pdf)

# Five Policy Proposals:

## ***Establish data governance frameworks to increase data sharing***

- This involves creating a Chief Data Officer (CDO) to facilitate data sharing across state and federal agencies and incentivize agencies to share information to make the benefit application process easier. The Federal CDO Council and the State CDO Network both highlight data sharing best practices and sample data sharing agreement language that states with limited data governance infrastructure could model on their own.<sup>12</sup> It is also important to reward agencies for entering data sharing agreements either through funding or other types of awards.

## ***Develop or enhance systems to streamline benefit processes***

- Federal agencies and CDOs can provide states the best data sharing technology for each part of the application process to reduce administrative paperwork. Because public benefits made up the largest chunk of state and local direct spending in 2019 and most public benefit spending happens on the state level,<sup>13</sup> federal agencies should partner with CDOs to help states roll out services such as recertification and new applications. The Eligibility APIs Initiative created the first open-source application programming interface—software that allows two applications to talk to each other—to determine SNAP eligibility. The API, a product of 18F, a technology consultancy group in the General Services Administration, has since been adapted to cover SNAP eligibility in all 50 states.<sup>14</sup>

## ***Address consumer privacy and security concerns***

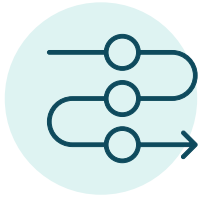
- This would include creating scripts or language for agency benefit administrators to use that address and relieve older adults' concerns about data privacy while explaining what they're consenting to. An example of ensuring informed consent is alerting a person who applied for SNAP that “families similar to yours” have applied for other programs such as Temporary Assistance for Needy Families, followed by an offer to submit their information for consideration and a list of their options before they make a decision.

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<sup>12</sup> Federal Chief Data Officer (CDO) Council. (n.d.). Data Sharing Workgroup. Office of Management and Budget. <https://www.cdo.gov/data-sharing/>

<sup>13</sup> Urban Institute. (n.d.). Public Welfare Expenditures. <https://www.urban.org/policy-centers/cross-center-initiatives/state-and-local-finance-initiative/state-and-local-backgrounders/public-welfare-expenditures>

<sup>14</sup> 10x.gsa.gov (n.d.). What if modern technology holds the key to unlocking how the government changes and communicates eligibility criteria for benefits programs? The Eligibility APIs Initiative. Retrieved January 2023 from <https://10x.gsa.gov/projects/eligibility-apis/>



## Next Steps to Reduce Barriers and Increase Enrollment:

### Form a workgroup to create universal public benefit program terms

Benefit agencies can use their authority under the Federal Advisory Committee Act to create a workgroup of themselves and state and federal stakeholders to discuss enrollment barriers and potential solutions. Priorities could be the creation of standard definitions for eligibility criteria, like household size, and considering lengthening enrollment periods across multiple programs. Examples of workgroups include the Federal Interagency Workgroup, which convened members of the U.S. Departments of Health and Human Services, Agriculture, and Education to develop Healthy People 2030, a roadmap to improving the nation's health.<sup>15</sup>

### Develop resources aimed at improving the public benefits process

Resource centers can offer agencies the tools to make the benefit application process user-friendly and include success stories. These centers could push for the use of APIs, which are a software-to-software interface that lets organizations extract and share data with each other to speed up the enrollment process. An existing center is the Beeck Center's Digital Benefits Hub, which features resources on how to streamline the application process and prevent lapses in services in its open-source reference library.<sup>16</sup>

### Use technical help to share eligibility data among benefit agencies

Benefit administrators are encouraged to use an older adult's existing benefits data to help enroll them in additional programs or recertify their applications, such as the regular use of personal information collected for SNAP to apply for Medicaid. However, this doesn't always happen due to barriers such as privacy restrictions. Conducting interviews with benefit administrators to discover their technical needs and barriers to data sharing can lead to investments in data sharing software, guides on best data sharing practices, and sample interagency data sharing agreements to grease the wheels between different agencies.

### Learn from consumer challenges to make the benefits process more accessible

User-friendly design studies can look at obstacles older adults face while applying for benefits, like a language barrier, and suggest multiple forms of communication to fill their needs, such as the use of text messages, call centers, and navigators. The study recommends state agencies complete a "burden audit" to identify enrollment barriers.

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<sup>15</sup> U.S. Department of Health and Human Services. (2021). Federal Interagency Workgroup. <https://health.gov/our-work/national-health-initiatives/healthy-people/healthy-people-2030/federal-interagency-workgroup>

<sup>16</sup> Beeck Center for Social Impact + Innovation at Georgetown University. (n.d.). The Digital Benefits Hub. <https://www.digitalbenefitshub.org/about>



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