

Spotlight

Improving SNAP Uptake Among Eligible Older Adults: Federal Policy Options to Simplify and Streamline Administrative Processes

Olivia Dean

AARP Public Policy Institute

Madeleine Levin, Marian Negoita, Anne Paprocki and Mahika Rangnekar Social Policy Research Associates

Although many older adults are eligible for the Supplemental Nutrition Assistance Program (SNAP), a variety of barriers, such as a burdensome application process, may keep many from participating in the program. This paper highlights policy options that could simplify and streamline administrative processes to improve SNAP access for older adults.

Millions of adults ages 50 and older rely on the Supplemental Nutrition Assistance Program (SNAP)—the nation's largest antihunger program—to put food on the table. SNAP provides financial assistance to low-income individuals and families to buy food. The program helps reduce food insecurity and may also improve health and well-being¹ and lower health care costs among older adults. For example, research shows that SNAP enrollment among older adults is associated with fewer hospital and emergency room visits and longterm care admissions.² The program has taken on added importance during the COVID-19 pandemic, which resulted in widespread economic and food hardship.

Despite the program's potential benefits, eligible older adults participate in SNAP at much lower rates than those in younger age groups. Although the participation rate among eligible older adults has grown significantly over the past two decades, the US Department of Agriculture (USDA) reported that fewer than half of eligible adults ages 60 and older were participating in the program in fiscal year 2018.³ A previous AARP Public Policy Institute and Mathematica report found that the share participating is even lower—less than one-third—when calculated based on state-specific eligibility rules (which vary widely) rather than federal criteria.⁴

Federal Policy Options to Improve SNAP Access for Older Adults

- 1. Streamlining SNAP enrollment for recipients of Supplemental Security Income
- 2. Medicaid–SNAP data sharing for outreach and enrollment
- 3. Extended certification periods
- 4. Telephonic signatures without audio recording

"[SNAP] is a great program. I don't have to choose between bills or pills and eating."

- Older Adult SNAP recipient³²

The SNAP participation rate among older adults remains low for many reasons. For example, older adults often perceive SNAP application requirements as time consuming and difficult to understand, required documentation of income and assets as burdensome and an invasion of privacy, and interactions with SNAP personnel as often unpleasant.^{5,6,7,8} In an attempt to

address such access barriers, Congress has authorized USDA to allow states to apply for and implement policy waivers and demonstration projects designed to make it easier for eligible people to access SNAP. Demonstration projects are designed to test innovative strategies that could improve program efficiency and delivery of SNAP benefits.

In this paper, we propose four federal policy options (see sidebar) that build on documented successful efforts to improve SNAP access and participation among eligible older adults. The list is not meant to be exhaustive; moreover, efforts to improve SNAP access for older adults will be most successful when combined with a variety of policy and programmatic efforts at all levels of government.

Federal Policy Options to Improve SNAP Access Among Older Adults

1. Streamlining SNAP enrollment for SSI recipients

Combining application processes for SNAP and Supplemental Security Income (SSI)⁹ boosts enrollment of eligible older adults in SNAP. A decades-long USDA demonstration project called SSI-Combined Application Project (SSI-CAP) allows individuals in demonstration project states to apply for SSI and SNAP at the same time through a combined application.¹⁰ Currently implemented in 17 states, CAP is intended to reduce administrative burden for both applicants and agency staff.

The success of SSI-CAP has been well documented in evaluation research, including an AARP Public Policy Institute and Mathematica study report that found that states implementing SSI-CAP could expect to see a 7 percent increase in their SNAP participation rate among adults ages 60 and older, holding all other variables constant. 11,12,13

Because CAP is currently a demonstration project, federal policymakers could adjust the current statute so all states could implement a version of CAP as routine SNAP policy. This change could reduce administrative burden

at the state and federal levels and allow states to improve SNAP participation among eligible older adults. Two options to expand CAP at the federal level are described as follows.

"When I went to the Social Security office, they automatically filled out the paperwork for me there. And I applied. So, they approved it. . . . For me, that's a blessing."

- Older Adult SNAP Recipient³³

Automatic enrollment in SNAP of SSI recipients

An automatic enrollment approach—the standard approach states use for SSI-CAP—could have a large impact on SNAP participation among older adults. In this model, all individuals 60 and older who newly enroll in or have a redetermination for SSI and are not already enrolled in SNAP would be automatically enrolled. SNAP recertification (a process by which state agencies periodically determine SNAP households' continued eligibility) would then be done through automatic verification of SSI status and would require no recertification or eligibility checks beyond the SSI redetermination requirements.¹⁴ The feasibility of this approach has been demonstrated through SSI-CAP implementation in many states, and it would also be similar to the approach many states currently use that enables SSI recipients to automatically receive Medicaid.

In practice, state SNAP agencies could issue and mail a SNAP Electronic Benefits Transfer card to all new SSI enrollees with funds on it along with an explanation of their benefits and a notification to contact an eligibility specialist to review their benefit amount. The SNAP benefit amount could initially be set at the minimum level (typically \$23 a month in fiscal year 2023 for a one- or two-person household) to prevent overissuance of benefits that require

State SNAP Outreach Plans

One way for states to work toward improving SNAP participation is by having a SNAP outreach plan, which the Food and Nutrition Service (FNS) recommends that all states create. State outreach plans outline partnerships and strategies to provide underenrolled groups of people with information about SNAP. For example, a 2022 policy memo from FNS lists veterans, students, older adults, and Black and Latino individuals as groups that states should consider prioritizing for outreach. For older adults, FNS suggests that state SNAP agencies contract with organizations connected with older adults, such as Area Agencies on Aging. FNS reimburses state agencies up to 50 percent of outreach costs and provides guidance with outreach plans.

repayment. However, to ensure that newly enrolled individuals can access the maximum benefit amount for which they are eligible, SNAP agency staff could help make adjustments on an individual basis according to their expenses. This is already being done in most SSI-CAP states. State or local agencies could maintain a separate call center number for older adults to meet a potentially higher need for help with adjustments and other questions. Social Policy Research Associates (SPR) estimates that automatic enrollment in SNAP of all SSI recipients (standard CAP expansion) would increase the older adult (60+) SNAP participation rate in non-CAP states by 11 percent.¹⁵

"I get frustrated because I'm certified and now... I just don't have the patience to go through it... I've tried to go in and update it and I'm saying if everything is the same, why can't I just somehow say nothing's changed?"

Older Adult SNAP Recipient³⁴

Application distribution and outreach to SSI recipients

Under current law, applicants for or recipients of SSI must be informed about SNAP and provided with a "simple application" at their local Social Security Administration (SSA) office.¹⁶ However, this does not always happen,

which could be due to reasons like SSA caseworkers not knowing SNAP eligibility rules or simply forgetting.¹⁷ Although the Food and Nutrition Service (FNS) and SSA should continue to assess barriers and explore solutions, one option could be for federal policymakers to expand "modified" CAP, implemented through the CAP demonstration project in 10 states as of January 2023.¹⁸ In this approach, the federal government could require state SNAP agencies to send simplified SNAP applications to SSI recipients not yet enrolled in SNAP. The SSI recipient could then complete the application and send it back to the state SNAP agency in order to be determined eligible for SNAP.

This approach requires more steps for the SNAP applicant and would result in less program take-up compared with automatic enrollment. However, it could still help ensure that all SSI recipients are given information about and the opportunity to apply for SNAP.

FNS could also establish SSI recipients as a priority area for state SNAP outreach plans (see box) to encourage state SNAP agencies to include efforts to conduct additional follow-up with SSI recipients regarding these SNAP applications after they are mailed, either by state SNAP staff or through community-based outreach partners.

SPR estimates that distribution of SNAP applications to SSI recipients (modified CAP expansion) would increase the older adult participation rate between one and two percentage points, less than the automatic enrollment option.¹⁹ They estimate it would

also cost the federal government more due to outreach and administrative costs, but the cost for both options would be small in the context of the overall cost of the program, at under 0.2 percent of the overall SNAP budget for either option.

2. Medicaid-SNAP data sharing for outreach and enrollment

Federal policymakers could pursue options to encourage states to conduct systematic data sharing between SNAP and Medicaid, a public health insurance program for low-income individuals and families. Data sharing can identify older adults who are enrolled in one program but are potentially eligible for both and can help agencies with outreach and enrollment efforts. Improving data sharing across SNAP and Medicaid could make it easier and more efficient for older adults to enroll in and recertify for programs they are eligible for and reduce administrative burden for agency staff.

Most states already report sharing at least some data across SNAP and Medicaid, including enrollment status and demographic, household, financial, and qualitative information. Since 2014, the Centers for Medicare & Medicare Services has offered states a "fast-track" option in which they can use SNAP data to identify people who are likely eligible for Medicaid and help enroll them in the program, often by sending SNAP participants a form that requires some additional information from the participant to determine eligibility for Medicaid. Several states have implemented this option successfully, including Oregon and Arkansas.

Data sharing can also be used in the other direction; for example, multiple states have implemented effective outreach to Medicaid recipients who are identified as possibly eligible for SNAP, including Colorado, Massachusetts, Montana, and Virginia. Outreach is generally conducted by staff from community-based organizations to provide assistance with SNAP application completion, including submitting applications on behalf of individuals. To

support access for older adults, states could ensure that application assistance is available in person, online, and over the phone.

Data sharing between programs like Medicaid and SNAP can also be used for program recertification and renewal processes. For example, SNAP data can be used to automatically renew an enrollee's Medicaid coverage with no additional information or action needed from the enrollee under what is termed the *ex parte* renewal process.²³ States can also align Medicaid renewals with SNAP recertification timelines, which can reduce administrative burden for states and enrollees.²⁴

3. Extended certification periods

Federal policymakers could explore revising the Food and Nutrition Act to extend the maximum allowable certification period for older adults (60+) and people with disabilities without earned income. Once a SNAP case is approved, it becomes active for a certain period, known as the certification period. Certification periods last for 6, 12, 24, or 36 months depending on state policy and household context, with additional flexibilities put in place during the public health emergency (see box).

Certification Periods and the COVID-19 Public Health Emergency

During the COVID-19 pandemic, states requested to extend certification periods for an additional six months beyond the original recertification date (i.e., households with recertifications due in March 2020 were rescheduled to become due in September 2020). The flexibility around certification periods removed barriers to enrollment for new SNAP applications, maintained benefit access for current beneficiaries, and helped staff manage caseloads.³⁵

States can request a SNAP waiver from FNS to implement a demonstration project called the Elderly Simplified Application Project for households with only adults ages 60 or older and/or people with disabilities as well as no earned income, a project that can include a 36-month certification period. Evidence suggests that when certification periods are extended to 36 months, more people maintain their SNAP benefits. ^{25,26,27} Making this waiver option federal law, for example, could enable more streamlined implementation and reduce administrative burden (including paperwork) for state SNAP eligibility workers and FNS.

4. Telephonic signatures without audio recording

Federal policymakers could also explore revising the Food and Nutrition Act to simplify telephonic signatures, as allowed in temporary rules during the COVID-19 public health emergency.

SNAP applications require an applicant's signature, and current SNAP regulations allow eligibility staff to document that signature over the phone by recording the applicant attesting that the information presented in their application is accurate. However, the audio recording requirement can pose an administrative burden to some state and local agencies, especially those that do not have the right technology.²⁸

During the pandemic, FNS waivers allowed states to document telephonic signatures in writing in the case file, in which an applicant verbally attested to the information on the application, instead of requiring an audio recording. In August 2022, FNS announced it would approve waivers beyond 12 months after the federal Public Health Emergency is lifted because it would result in more effective and efficient administration of the program.²⁹

Some evidence shows that these waivers have improved efficiency in SNAP application processing.³⁰ By changing the waiver to a standard state policy option, states would no longer have to apply for the waiver and report on cost data to FNS, which would also reduce the burden on FNS staff to review the waiver applications and data.

Conclusion

As the nation's largest anti-hunger program, SNAP is crucial to helping individuals and families put food on their table, yet it remains underused by many older adults. Federal policymakers have many opportunities to help improve SNAP access and participation among older adults, including through legislation and rulemaking. The federal policy options presented in this report, some of which have already shown success through demonstration projects, could help enroll more eligible older adults in SNAP, which would improve food security, financial security, and wellbeing for many older people living on limited incomes. These options could also help reduce administrative burden on both SNAP staff and older adult applicants and participants. At the same time, additional efforts will be needed at all levels of government to address SNAP access barriers among older adults and help ensure that everyone who is eligible for these benefits can receive them.

"I can't imagine, without Medicare and [SNAP], what would I do? Especially now that I don't see well, I don't hear well.... I definitely need help."

- Older Adult SNAP Recipient³¹

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