BenePhilly Final Report 2012

This report was supported by the Center for Hunger-Free Communities at Drexel University’s School of Public Health.
“BenePhilly has successfully infused millions of dollars into the pockets of seniors. It has helped thousands of older Philadelphians cover the cost of food, shelter, medicine and healthcare...Beyond the help that BenePhilly provides to individuals, it creates a tremendous economic stimulus for our City. The money individuals save and the benefits they receive are spent right here in our community...at pharmacies, farmers’ markets and bodegas.”

Mayor Michael A. Nutter, City of Philadelphia
The BenePhilly SNAP Demonstration Project (henceforth “BenePhilly”) represents an innovative and successful approach to streamlining access to public benefits. Launched in June 2010 in partnership with the Pennsylvania Department of Public Welfare, and funded by a demonstration grant from the U.S. Department of Agriculture Food and Nutrition Services (USDA), BenePhilly sought to increase participation in the Supplemental Nutrition Assistance Program (SNAP, formerly the Food Stamp Program) among eligible senior households in Philadelphia.

To do this, BenePhilly proposed to make use of existing state and federal data in order to (1) outreach to seniors 60 and over who are likely eligible for, but not participating in, SNAP and (2) simplify the SNAP application and enrollment process.

BenePhilly was designed by a group of experienced practitioners from both inside and outside of government who sought to maximize benefits for low-income seniors while minimizing the administrative burden on the state agency. To launch BenePhilly, the state agency exercised a number of state options and requested federal waivers from the USDA. Sophisticated technological infrastructure at Benefits Data Trust (BDT) allowed application modifications to be closely monitored and evaluated.

BenePhilly exceeded its application goals. Over 8,200 SNAP applications were submitted on behalf of senior households, which surpassed BenePhilly’s original goal (5,000–7,000 applications) by 20%. Among households screened as eligible, more than half chose to complete SNAP applications.

**Preliminary Findings:** This report summarizes preliminary findings from BenePhilly’s 18 months of operation (June 2010–December 2011). Major project findings are described below.

- **Targeted outreach is effective.** Mail and outbound phone outreach resulted in a 41% contact rate. 90% of contacted households were found likely eligible for SNAP benefits.

- **Express Lane Eligibility processes reduce the amount of paperwork applicants must submit.** 50% of BenePhilly applications required no verification documents. 93% of these applications were approved.

- **Streamlined application assistance achieves high approval rates.** 86% of submitted SNAP applications were approved, far surpassing the application success rate in Pennsylvania (66%). This represents a 23% increase in participation among seniors in Philadelphia since 2009.
Policy Implications: BenePhilly’s success has far reaching implications for future federal and state efforts to streamline benefits enrollment. In addition to summarizing key findings, this report suggests several policy recommendations for consideration.

- **Federal and state agencies should explore cross-agency data sharing agreements in order to simplify the application process, improve administrative efficiency, and increase access for eligible individuals.** BenePhilly demonstrates that verified state data is useful for two distinct purposes related to benefits enrollment: targeted outreach and simplified verification. By working together, the PA Department of Public Welfare and the PA Department of Aging created clean, useful data files that served both purposes. As states continue to prepare for a broad expansion of Medicaid in 2014, such data sharing may be a key strategy for achieving administrative efficiency.

- **The USDA should provide guidance on how states and community-based organizations can collect telephonic signatures.** The BenePhilly experience suggests that now is the time to extend telephonic signature technology to other areas across the country. BDT recommends that the USDA works to ensure that telephonic signatures are incorporated into state planning for broad benefit coordination in 2014 and beyond.

- **The USDA should consider expanding access to the medical expenses waiver.** The medical expense waiver has the potential to significantly reduce the application burden on senior and disabled households eligible for SNAP. Under the USDA’s demonstration authority, BenePhilly was granted a waiver which allowed senior applicants to self-report medical expenses. The state agency was still able to verify the most common deduction (Medicare Part B premiums) for households receiving Social Security. Eliminating the federal requirement to verify all medical expenses would bring the policy in line with other expense categories (such as shelter and child care expenses), simplifying future state efforts to streamline SNAP enrollment.

“Do you know that it got so bad that I was skipping my medicine to save. My doctor gets mad and says there is no ifs, ands or buts—you have a heart condition and you must take your medicine. But I can’t afford it.”
INTRODUCTION

The BenePhilly Demonstration Project (henceforth “BenePhilly”) represents a unique approach to reducing barriers to public benefits enrollment. The project’s primary goal was to enroll low-income seniors, ages 60 and older, in the Supplemental Nutrition Assistance Program (SNAP, formerly Food Stamps), as nearly two-thirds of eligible seniors are not participating in the program. The reasons for low senior participation are fairly well known; they include lack of awareness, fear of stigma, application barriers, and communication barriers. The BenePhilly Demonstration Project was designed to minimize each of these barriers in order to significantly improve SNAP participation rates among eligible seniors. The purpose of this report is to summarize project outcomes, identify key findings, and suggest policy implications.

BACKGROUND

BenePhilly evolved out of the BenePhilly Enrollment Center first launched in 2008 by Benefits Data Trust (BDT) in coordination with the Philadelphia Mayor’s Office and the Pennsylvania Department of Aging (PDA). The BenePhilly Enrollment Center initially used state-generated enrollment lists to outreach to low-income seniors who were likely eligible for but not participating in multiple federal and state benefits programs. By creating a single point of access, the BenePhilly Enrollment Center sought to dramatically simplify the application and enrollment process for these seniors. In its first two years of operation, the BenePhilly Enrollment Center submitted over 13,000 benefits applications for prescription drug assistance (State Prescription Assistance Program and Medicare Low-Income Subsidy), energy assistance (LIHEAP), food assistance (SNAP), and senior housing assistance (Property Tax and Rent Rebate). During this timeframe, the BenePhilly Enrollment Center helped Philadelphians apply for more than $35.8 million in state and federal benefits.

FIGURE 1: BDT’s unique model addresses the entire process of benefits enrollment, from client identification and outreach through application approval and evaluation. BDT’s robust technological infrastructure enables the BDT model to monitor success and achieve scale.
After the BenePhilly Enrollment Center’s efforts proved successful, BDT decided to combine its effective outreach strategy with expanded partnerships and an innovative approach to lowering documentation barriers. In 2009, BDT, the Pennsylvania Department of Public Welfare (DPW), and key community partners received a two-year demonstration grant from the U.S. Department of Agriculture (USDA). With grant funds and special demonstration project authority, the BenePhilly Demonstration Project was able to make use of verified data elements from state benefit enrollment lists in order to create a streamlined application process for SNAP. After a nine month planning period, the BenePhilly Demonstration Project officially launched in June 2010 and operated through December 2011.

**METHODOLOGY**

Benefits Data Trust, The PA Departments of Public Welfare (DPW) and Aging (PDA), along with The Greater Philadelphia Coalition Against Hunger and Community Legal Services, developed a project that utilized state level data in order to (1) conduct targeted outreach to seniors 60 and over that are likely eligible for, but not participating in, SNAP and (2) simplify the SNAP application and enrollment process.

In order to identify seniors who were likely eligible for SNAP, DPW and PDA reviewed lists of Medicaid recipients and State Prescription Assistance Program (SPAP) enrollees and identified nearly 60,000 households with income levels at or below 200% of the federal poverty line that were not enrolled in SNAP. BenePhilly then sent letters and placed outbound phone calls on DPW’s behalf to help individuals apply for SNAP benefits. BenePhilly’s Benefits Outreach Specialists screened all responders to see if they were eligible for one of four special pilot groups that were allowed to complete a streamlined application process for SNAP.

“We need this so desperately. Thank you. My husband worked his whole life and we never, ever collected any kind of Food Stamps or prescription help…A lot of people are embarrassed and go without food and prescriptions. Thank you for reaching out to me.”
To streamline the application, BenePhilly used existing program data, federal waivers, and state administrative permissions. For qualified applicants, data already verified by the state or federal government was used to complete the SNAP application and eliminate the need for additional documentation. Qualified applicants were also permitted to self-declare shelter and medical expenses, further simplifying documentation requirements. Finally, BenePhilly utilized a federal waiver to modify the requirement to have an interview with the County Assistance Office (CAO).

This report will further discuss the methodologies that BenePhilly utilized over the course of the pilot and subsequent outcomes through the lens of the barriers to SNAP enrollment that the pilot sought to overcome.

**OVERCOMING BARRIERS**

According to the USDA, approximately 4.2 million seniors nationwide are eligible for but not participating in SNAP. According to DPW’s records, only 24,000 seniors 65 and over in Philadelphia participated in SNAP in 2009, with another 64,000 seniors who were eligible but not participating. The primary barriers to SNAP participation among seniors include (1) awareness of eligibility, (2) fear of stigma, (3) an arduous application process, and (4) communication challenges with local SNAP offices. Below is a description of how the BenePhilly process was designed and implemented in order to help households overcome the aforementioned barriers.

**Awareness of Eligibility**

**Barrier:** Many senior households are unaware that they are eligible for public benefits such as SNAP. Unlike rent or property tax payments, food is not a fixed expense and seniors often skimp on nutrition when money is tight. Even when seniors are aware of SNAP, they often misunderstand the program’s entitlement structure, believing that by accessing the benefit themselves, they are taking the opportunity away from someone else. BenePhilly actively addressed these issues through targeted outreach.

**Methodology:** BDT worked closely with the Department of Public Welfare (DPW) and the Department of Aging (PDA) to identify senior households that were likely eligible for but not receiving SNAP benefits. To do this, the State analyzed existing enrollment data to identify households with income below 200% of the federal poverty line. Households that were already enrolled in SNAP benefits were removed from the list. Through a confidential data sharing agreement, BDT used this list to complete targeted outreach on DPW’s behalf. Because of the list’s high quality, outreach was conducted to a pre-screened and targeted population of likely eligible households.

BenePhilly’s two primary outreach methods were personalized, easy-to-read letters signed by a state official and personal outbound phone calls. Households received up to two outreach letters and three outbound call attempts. These methods allowed BDT to educate households about their potential eligibility and provide personalized support and assistance over the phone. In addition to contacts made through mail and phone outreach, BDT received referrals from community organizations. Each week, BDT mailed approximately 400 letters, placed 200–600 outbound phone calls, and received 50–75 weekly referrals from community organizations.

**Outcomes:** Despite the reduction of BenePhilly’s operating period from 2 years to 18 months, BenePhilly identified nearly 60,000 households for outreach, and were able to talk with and screen 18,188 individuals for SNAP and other benefits.
Over the course of the demonstration, BenePhilly was able to:

- Identify over 37,000 Medicaid and 22,000 SPAP enrollees, who were not participating in SNAP.
- Achieve a 41% contact rate, reaching 10,969 households through targeted outreach.
- Screen an additional 7,219 households through referrals and other program outreach (See Table 1 for additional details).

**TABLE 1: Outreach Summary**

<table>
<thead>
<tr>
<th>Type</th>
<th>Total Outreach</th>
<th>Total Contacts</th>
<th>Contact Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ob Calls</td>
<td>13,433</td>
<td>3,840</td>
<td>29%</td>
</tr>
<tr>
<td>Mailings</td>
<td>27,863</td>
<td>7,129</td>
<td>26%</td>
</tr>
<tr>
<td>Total Targeted Hh</td>
<td>26,658*</td>
<td>10,969</td>
<td>41%</td>
</tr>
<tr>
<td>Referrals</td>
<td>–</td>
<td>7,219</td>
<td>–</td>
</tr>
<tr>
<td>Totals</td>
<td>41,296</td>
<td>18,188</td>
<td>–</td>
</tr>
</tbody>
</table>

*A total of 41,296 outreach attempts to 26,658 households ultimately resulted in 10,969 contacts.

As Figure 2 below demonstrates, BenePhilly’s list targeting and outreach efforts not only achieved high contact rates, but also succeeded in identifying eligible households. Among the 10,969 households contacted via direct outreach (mail or outbound calls), only 10% were pre-screened as ineligible for SNAP benefits, 8% were already enrolled, and 51% chose to proceed with an application.

**FIGURE 2:** Contact Resolution amongst Households Targeted for Outreach

- Bad Address, 1%
- Already Enrolled, 8%
- Ineligible, 10%
- Started Application, 51%
- Not Interested, 29%
**Overcoming Stigma**

**Barrier:** BenePhilly was developed to simplify and streamline the SNAP application and enrollment process for a needy but reluctant senior population. Research shows that, in comparison to other demographic groups, seniors are especially deterred from applying for SNAP by the stigma associated with public benefits. Seniors are also very concerned about traveling to the County Assistance Office (CAO) to submit an application and required documents while in public view.

**Methodology:** With these very real barriers in mind, BenePhilly allowed seniors to complete the entire application and enrollment process from the comfort of their own homes. Benefits Outreach Specialists received ongoing training on effective ways to discuss SNAP with older applicants and how to overcome stigma-based objections. BenePhilly staff reassured applicants that everything could be done over the phone, and for pilot groups 1 and 2, the entire process could be completed in a single phone call. Once SNAP benefits were approved by the CAO, the Electronic Benefits Transfer (EBT) card was mailed to the newly enrolled household, and the card could be pinned by phone. In addition, BenePhilly bundled SNAP with other senior-focused benefit programs, such as prescription drug assistance and property tax/rent rebates.

**Outcome:** BenePhilly’s outreach and education process resulted in 8,854 senior households deciding to apply for SNAP (51% of successful contacts), with 8,313 households completing the entire application process (94%). This represents a 49% application conversion rate, which exceeded BenePhilly’s application goal by 20% (See Table 2 for details). In addition, 22% of households contacted through BenePhilly applied for benefits other than SNAP.

<table>
<thead>
<tr>
<th>TABLE 2: Initiated and Submitted Applications by Outreach Group</th>
</tr>
</thead>
<tbody>
<tr>
<td>Type</td>
</tr>
<tr>
<td>Ob Calls</td>
</tr>
<tr>
<td>Mailings</td>
</tr>
<tr>
<td>Total Targeted Hh</td>
</tr>
<tr>
<td>Referrals</td>
</tr>
<tr>
<td>Totals</td>
</tr>
</tbody>
</table>

**Simplifying the Application Process**

**Barrier:** The SNAP application process can be confusing and cumbersome for many households, especially for the elderly. After submitting a SNAP application to the local CAO, applicants must gather, photocopy, and submit various documents via mail, fax, or in person, within 30 days. Even after paperwork is submitted, it can be lost or misplaced at the CAO.

After the applicant household successfully submits all necessary paperwork to the CAO, they must wait to be contacted by a caseworker for a formal interview. Making contact with a caseworker and scheduling the interview can be a challenge and if the interview is not conducted in a timely manner, the entire process must begin again. In Pennsylvania, 34% of submitted SNAP applications are denied, with 38% of those denials resulting from the lack of verification paperwork and another 14% for failing to complete the interview.
Methodology: In order to help overcome such significant barriers, BenePhilly created a simplified application process that includes (1) telephonic application assistance, (2) reduced paperwork requirements using pre-verified data, (3) in-depth documentation assistance, (4) a telephonic signature process, and (5) a telephonic interview by BDT. Due to these simplifications, the entire screening and application process took just 20 minutes to complete, on average. This includes time taken to screen households for other benefits that they may be eligible to receive.

Telephonic Application Assistance
Once individuals were screened for and educated about SNAP, Benefits Outreach Specialists walked interested households through the application process. BDT collected all relevant information (i.e. address, birthdates, sources of income, expenses, etc.) over the phone and then keyed this information into COMPASS, Pennsylvania’s online benefits application system. After reviewing information with applicants and relaying their rights and responsibilities, BDT submitted the SNAP application to DPW on the applicant’s behalf.

Reduced Verification Requirements
In order to minimize the amount of paperwork needed and still meet federal verification requirements, BenePhilly proposed several modifications related to identity, residence, and income, based on information that DPW already had about low-income seniors applying for SNAP. Additionally, the project took advantage of federal flexibility on required verification documents, and requested a federal waiver to further reduce the burden of paperwork on applicants. See Table 3 for details on these modifications.

“My husband died of Alzheimer’s and we both worked all of our lives. His Alzheimer’s treatment ate up all of our money. His drugs were over $600 a month. Just thinking that someone wants to help me makes me happy.”
<table>
<thead>
<tr>
<th>Verification</th>
<th>Federal or State Requirement</th>
<th>BenePhilly Modification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identity</td>
<td>Federal requirement</td>
<td>Verified by DPW through state enrollment file.</td>
</tr>
<tr>
<td>Residency</td>
<td>Federal requirement</td>
<td>Verified by DPW through state enrollment file and/or mail exchange with BDT and/or receipt of Social Security benefits.</td>
</tr>
<tr>
<td>Eligible non-citizen status</td>
<td>Federal requirement</td>
<td>Non-citizens not receiving Social Security and not enrolled in a DPW program must verify eligible status by submitting documentation to CAO with support from BDT.</td>
</tr>
<tr>
<td>Income</td>
<td>Federal requirement</td>
<td>Social Security (SS) or Supplemental Security Income (SSI) verified by CAO through SSA database. Additional income must be verified by submitting documentation to CAO with support from BDT.</td>
</tr>
<tr>
<td>Medical expenses</td>
<td>Federal requirement, waiver granted</td>
<td>Medicare Part B premium payment can be verified by CAO through SSA database. Federal waiver authority allows other medical expenses to be self-declared.</td>
</tr>
<tr>
<td>Shelter expenses</td>
<td>State option</td>
<td>Rent/mortgage expenses are self-declared, unless verifiable through Property Tax and Rent Rebate enrollment file. Utility expenses are self-declared, unless verifiable by DPW through LIHEAP enrollment file. Standard utility allowance is applied.</td>
</tr>
<tr>
<td>Resources</td>
<td>State option</td>
<td>No resource test applied to applicants with income below 200% of the Federal Poverty Line, due to state adoption of broad-based categorical eligibility in 2008.</td>
</tr>
</tbody>
</table>
To ensure that BenePhilly’s unique application process was clear to CAO caseworkers, four application groups were designed based on the level of additional verification documents required to complete the enrollment process. Each pilot group is described in detail below.

**Group 1—Express Lane Eligible:** This group consisted of households that had their income verified within the past six months via applying or recertifying for another DPW program. The CAO used the verified information available in the Client Information System (CIS) and Income Eligibility Verification System (IEVS) to determine the SNAP benefit amount. No verification documents were required from the applicants, and the caseworker did not need to contact the applicant prior to determining eligibility, thus streamlining the process for both parties.

**Group 2—Social Security Income Only:** This group consisted of households with only Social Security and/or SSI income. The CAO used information available in CIS, IEVS and Systematic Alien Verification for Entitlements (SAVE) to verify income, identity, residency, non-citizen status (if applicable), and to determine SNAP eligibility. As with Group 1, no verification documents were required to complete the application and enrollment process.

**Groups 3 and 4—Income other than, or in addition, to Social Security:** This group consisted of households whose income had not been verified within the past 6 months and had forms of income other than Social Security or SSI. These households were required to provide documentation to the CAO to verify this additional income. Other than income, no additional verification was required for Group 3 applicants, as the CAO used information available in CIS, IEVS and SAVE to verify Social Security and/or SSI income, identity, residency, non-citizen status (if applicable), and to determine SNAP eligibility. Group 4 applicants were also required to provide verification of residency if the household did not receive Social Security benefits and was not already enrolled in another DPW program.

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**What is Express Lane Eligibility?**

One of several innovations tested through BenePhilly, Express Lane Eligibility allowed for recently verified income to be used as proof of income for a new SNAP application. This innovation was first used to support Medicaid and Children’s Health Insurance Program (CHIP) enrollment. DPW received approval from USDA’s Food and Nutrition Service to test the technique’s potential usefulness for SNAP.

Households potentially eligible for Express Lane Eligibility had verified income from another DPW program within 6 months of being contacted by BenePhilly. Those not reporting a change in income within the past 6 months were not required to re-submit verification documents. CAO caseworkers used the information on record to calculate SNAP benefits.

For BDT, it was crucial to know when each potential Express Lane household had originally verified their income in order to maximize outreach attempts within the Express Lane timeframe. For example, if BDT learned in January that an Express Lane Eligible household would need to recertify income in April, they would prioritize outreach to this household over those recertifying in July.

During the 18 month project, 2,166 households applied as Express Lane Eligible (Group 1), with a 93% SNAP approval rate.
**In-Depth Follow-up Assistance to Complete Documentation**

For Groups 3 and 4, as well as non-pilot eligible households, BDT developed a documentation follow-up process to ensure that all required verification paperwork was submitted to the appropriate County Assistance Office (CAO). BDT sent follow up letters and placed phone calls to gather all necessary information. Among households that requested follow-up assistance, BDT made an average of 2–4 follow up attempts (1–2 letters and 1–2 calls) each. If households did not respond to verification requests within 8 weeks, BDT submitted the incomplete application. **Figure 3** demonstrates BenePhilly’s documentation follow-up process in detail.

BenePhilly applicants required to submit documentation were given the option to have their application submitted immediately if they wished to provide verification documents to the CAO directly. Approximately 226 households (out of 4,580, representing 5%) chose to submit their applications right away. This does not include individuals in pilot groups 1 and 2, or those screened as eligible for expedited benefits, since these applications were submitted immediately in every case.

**FIGURE 3:** Documentation Follow-up Process

![Diagram of documentation follow-up process]

- Application completed via phone. Initial follow-up letter mailed.
  - Complete response received
  - Incomplete response received
  - No response received
    - Follow-up phone call placed to client
      - Responder follow-up letter mailed
      - Complete response received
      - Incomplete/no response received
        - Incomplete/no response received
          - Non-responder follow-up letter mailed
            - Incomplete/no response received
              - Complete response received
              - Application submitted
BDT’s documentation assistance improved the SNAP enrollment process in additional ways. BDT securely stored submitted documentation in PDF format in case the CAO reported losing or never receiving the information. Benefits Outreach Specialists advised applicant households on which documents would be accepted by CAO staff. Finally, BDT served as a resource for CAO caseworkers who needed to request additional verification from applicants. When this occurred, BDT acted as a liaison between caseworker and applicant household, ensuring that additional verification was collected and submitted to the CAO.

**Telephonic Signatures:** After BDT initiated an electronic SNAP application on COMPASS, applicants were able to sign their COMPASS application using BDT’s telephonic signature process. Telephonic signatures were authorized for use with SNAP applications in the 2008 Farm Bill and specifically approved by USDA for this demonstration project. BDT’s telephonic signature parallels the process of collecting and submitting paper signatures, but does not require the individual to be physically present or engage in a time-consuming and sometimes unreliable mail exchange. BDT recorded and stored applications, including the telephonic signature and interview, in a secure manner and archived any documentation received from applicants.

**Interview:** As previously described, a central goal of BenePhilly was to allow seniors to complete the entire SNAP application process, including the interview, in a single telephone call. In order to do this, BenePhilly received a waiver of the requirement that applicants complete an interview with a state caseworker. Instead, the same Benefits Outreach Specialist who completed the household’s application was authorized to conduct the required interview. BDT explained to each applicant that a CAO caseworker was still responsible for reviewing and authorizing the SNAP application. If the assigned caseworker found information on the application or in checked databases to be questionable, (s)he could contact the household directly, or request additional verification.

**Outcomes:** BenePhilly’s original enrollment goal was to submit applications for 5,000–7,000 seniors with an anticipated 80% success rate, resulting in 4,000–5,600 new enrollments. BenePhilly exceeded this goal, submitting 8,260 unduplicated applications with an 86% success rate. This represents a 23% increase in SNAP participation among seniors in Philadelphia since 2009.
Among the 6,296 pilot eligible households who applied for SNAP (Groups 1 through 4), 70% were able to do so without submitting verification paperwork (Groups 1 and 2). These applicants had an enrollment rate of 93% and received an average SNAP benefit between $91 and $102 per month. See Table 4 for additional details.

### TABLE 4: SNAP Enrollments by Pilot Group

<table>
<thead>
<tr>
<th>Pilot Group</th>
<th>Applied</th>
<th>Duplicates</th>
<th>Applied Less Duplicates</th>
<th>Enrolled</th>
<th>Enrolled Rate</th>
<th>Average Initial Benefit Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Group 1</td>
<td>2,170</td>
<td>10</td>
<td>2,160</td>
<td>2,000</td>
<td>93%</td>
<td>$102</td>
</tr>
<tr>
<td>Group 2</td>
<td>2,260</td>
<td>18</td>
<td>2,242</td>
<td>2,103</td>
<td>94%</td>
<td>$91</td>
</tr>
<tr>
<td>Group 3</td>
<td>1,629</td>
<td>7</td>
<td>1,622</td>
<td>1,395</td>
<td>86%</td>
<td>$63</td>
</tr>
<tr>
<td>Group 4</td>
<td>247</td>
<td>1</td>
<td>246</td>
<td>198</td>
<td>80%</td>
<td>$144</td>
</tr>
<tr>
<td>Not Pilot Eligible</td>
<td>2,007</td>
<td>17</td>
<td>1,917</td>
<td>1,374</td>
<td>69%</td>
<td>$132</td>
</tr>
<tr>
<td>Total</td>
<td>8,313</td>
<td>53</td>
<td>8,260</td>
<td>7,070</td>
<td>86%</td>
<td>$98</td>
</tr>
</tbody>
</table>

Even among pilot eligible households that were required to submit some verification documents (Groups 3 and 4), enrollment rates remained impressive at 80–86%. As expected, non-pilot eligible applicants (i.e., those with someone under 60 years old in the household) had the lowest enrollment rates at 69%. Interestingly, BenePhilly’s approval rate for non-pilot eligible households appears to be as good, if not better, than other USDA-supported application assistance initiatives.

In order to continuously monitor success rates, BDT requested quarterly reports from DPW on individual applicants who had been approved for SNAP benefits. As of March 2012, 95% of households enrolled through BenePhilly continued to receive SNAP benefits.

“[I’m a retired police officer of 44 years and your staff thanked me for my service and it gave me goose bumps. I appreciate that because no one does that. It’s so frustrating when people lose their patience with elderly people...It’s great when an elderly person gets to talk to someone who is understanding; who doesn’t cut you off when you’re talking.]"
**Overcoming Communication Challenges with Administering Agency**

**Barrier:** One of the persistent challenges faced by community-based application assistance initiatives is finding reliable ways for clients and caseworkers to communicate. In many states, declining revenues have forced staffing cuts despite rapid caseload growth. With fewer caseworkers and clerical staff available to process SNAP applications, phone lines are often jammed and submitted paperwork can get lost. In this environment, SNAP applicants can quickly become confused and demoralized. This is especially true for senior households.

**Methodology:** Due to the streamlined nature of BenePhilly applications and strong leadership from Philadelphia County Assistance Office (PCAO) headquarters, the vast majority of BenePhilly applications were processed without issue by caseworkers at the local offices. When questions or problems did arise, BDT was able to communicate with the District Administrator in each office. On average, BDT contacted District Administrators regarding specific application issues three to six times per month, with more frequent contact at the beginning of implementation. The primary reasons for inquiry were to:

- Check on the status of applications that had not received a determination within 30 days.
- Clarify document requests from caseworkers regarding applicants in Groups 1 or 2.
- Request EBT cards for households whose cards were lost in the mail.

When problems related to pilot procedures were identified, BDT was authorized to contact PCAO headquarters for investigation and resolution. Overall, BDT’s requests for information, clarification, or corrections were responded to and resolved quickly.

**Outcomes:** Compared with traditional community-based SNAP application assistance, BenePhilly had significantly lower application denial rates. Out of 8,313 applications submitted by BenePhilly, 1,103 (13%) were rejected by DPW. Nearly half (47%) of rejected applications were due to missing verification. 11% of denials were due to a failure to meet either the gross or net income tests, and 8% of denials were due to a failure to be interviewed or keep an appointment. Additionally, 16% of applications were rejected for unknown reasons. Not surprisingly, non-pilot eligible applications accounted for 52% of all application denials. See Table 5 for additional details.

When comparing SNAP approval rates across County Assistance Offices (CAOs), enrollment rates fluctuate from 80–92%, which speaks to the relative uniformity of implementation across offices.
### TABLE 5: Top Ten Application Rejection Reasons

<table>
<thead>
<tr>
<th>Rejection Reasons</th>
<th>Pilot Group</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Group 1</td>
<td>%</td>
</tr>
<tr>
<td>Application Entered in Error</td>
<td>9</td>
<td>6%</td>
</tr>
<tr>
<td>Duplicate Application Rejection</td>
<td>11</td>
<td>8%</td>
</tr>
<tr>
<td>Failure to Be Interviewed</td>
<td>2</td>
<td>1%</td>
</tr>
<tr>
<td>Failure to Furnish Required Information</td>
<td>66</td>
<td>47%</td>
</tr>
<tr>
<td>Failure to Keep Appointment</td>
<td>2</td>
<td>1%</td>
</tr>
<tr>
<td>Gross Income Test</td>
<td>6</td>
<td>4%</td>
</tr>
<tr>
<td>Net Income Test</td>
<td>23</td>
<td>16%</td>
</tr>
<tr>
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<td>7%</td>
</tr>
<tr>
<td>Other Regulations</td>
<td>3</td>
<td>2%</td>
</tr>
<tr>
<td>Voluntary Withdrawal</td>
<td>8</td>
<td>6%</td>
</tr>
<tr>
<td>Total</td>
<td>155</td>
<td></td>
</tr>
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KEY FINDINGS

BenePhilly provided a tremendous opportunity for Benefits Data Trust (BDT) and the Department of Public Welfare (DPW) to test new outreach, application, and enrollment techniques for SNAP. From the very beginning, BDT identified the dissemination of lessons learned as a major project priority, with the goal of informing and improving benefits access across the country. This section describes five key findings and policy recommendations from Pennsylvania's BenePhilly experience.

Partnerships Matter

Before BenePhilly was developed, BDT spent time cultivating relationships and building trust with state agency leadership and local advocacy organizations. BDT placed a strong emphasis on communication and compromise, especially during the initial design and implementation phase, to ensure that the project met the needs and expectations of each partner organization. Without the commitment, vision, and enthusiasm that each partner brought to the project, BenePhilly would not have come to fruition. This section describes these essential partnerships in detail and highlights what other state leaders can learn from BenePhilly.

- Seek early buy-in from the administering state agency.
  Without the initial interest of senior administrators within DPW, BenePhilly might still be just an idea. Fortunately, Pennsylvania has a history of being innovative when it comes to streamlining benefits enrollment, and DPW leadership saw the potential value of the proposal. Getting BenePhilly off the ground required senior staff to invest time and energy to design the pilot and develop a data sharing agreement with the Department of Aging and Benefits Data Trust. DPW was also responsible for submitting the formal proposal to the U.S. Department of Agriculture (USDA), negotiating terms of the grant, and cooperating with evaluators. In short, DPW’s willingness to invest time and energy in the project was crucial to BenePhilly’s success.

“...my vacuum broke and my microwave oven. Everything is broken. I just felt so sorry for myself and thought maybe you people could help me for my drugs because I haven’t bought anything new for five years. I thank you kindly. I mean that very sincerely.”
Collaborate with experienced local advocates to design the strongest possible program.
Even before bringing the project to the state’s attention, BDT worked closely with two experienced advocacy organizations—the Greater Philadelphia Coalition Against Hunger and Community Legal Services of Philadelphia—to brainstorm possibilities. Collaboration with advocates was essential to understanding what policy options could be considered based on which application modifications could be made by the state and which modifications required federal approval. Very early on, partners shared ideas and concerns based on their intimate knowledge of how the existing SNAP enrollment process functioned in Philadelphia. Most importantly, the advocates identified potential unintended consequences of the project design, always keeping the best interest of SNAP applicants in the forefront of negotiations.

Work closely with local offices to anticipate logistical challenges.
BDT quickly recognized the need to develop a strong partnership with Philadelphia County Assistance Offices (PCAO) to ensure that the project was logistically feasible. During the nine month pre-launch phase, BDT met regularly with PCAO headquarters to anticipate implementation challenges, and to ensure buy-in from all parties. A crucial design feature of the project was to ensure that caseworkers retained decision-making authority for each application, despite BDT’s involvement in streamlining the application and interview process. Before the project launched, BenePhilly leadership established a clear line of communication between BDT staff and District Administrators from each office. Throughout the two-year demonstration period, all members of the leadership team—including PCAO—participated in bi-weekly calls to ensure that issues were quickly resolved.

Engage community partners to generate referrals and assist with complicated cases.
After BenePhilly launched in June 2010, BDT worked closely with social service organizations in Philadelphia to extend the reach of the pilot to various communities across the city. The Philadelphia Corporation for Aging and Greater Philadelphia Coalition Against Hunger were among the biggest referral sources to BenePhilly, encouraging hundreds of their clients to call the BenePhilly Enrollment Center. In 2011, the Jewish Federation of Greater Philadelphia contracted with BDT to conduct a targeted enrollment effort to ensure that clients of their affiliated service organizations took advantage of BenePhilly’s streamlined enrollment process. BDT also offered several community partner trainings each month with staff of senior centers, senior residences, and other aging-services providers in the city to highlight the opportunity presented by BenePhilly.

Referrals from other community organizations, as well as from unrelated BenePhilly outreach, represented 36% of households (2,555 of 7,070) enrolled in SNAP through BenePhilly. Referred households most often fell into pilot group 2 and were just as likely (86%) as list sources to successfully enroll in SNAP. BenePhilly demonstrated that the entire social service community can benefit from a streamlined enrollment process.
**Application and Verification Modifications Work**

While BenePhilly is not the first initiative to show the positive impact that simplified application procedures can have on enrollment rates, the project does demonstrate that states can verify application information without requiring paperwork submissions from applicants.

When looking closely at which application modifications played the biggest role in the project’s success, several design elements stand out. First was BenePhilly’s ability to verify income through Express Lane Eligibility (Group 1) or receipt of Social Security and/or SSI (Group 2). Second was the applicants’ ability to self-declare shelter and medical expenses. The project was also aided by the interview waiver, which allowed applicants to complete the application process without having to set up a separate interview with a caseworker. While the interview waiver was not the most important modification tested by BenePhilly, the ability for BDT to keep communication with applicants consistent throughout the process contributed greatly to the project’s success.

**Cross-Agency Data Sharing Is Possible**

One of the most exciting policy implications of BenePhilly’s success is the lesson it provides for future cross-agency data sharing agreements. As states continue to prepare for the Affordable Care Act’s broad expansion of Medicaid in 2014, such data-sharing will be essential to achieving enrollment efficiency. For example, many households currently enrolled in SNAP and LIHEAP will become newly eligible for Medicaid, just as those applying for Medicaid may benefit from streamlined access to SNAP and LIHEAP application processes. States looking to design enrollment systems that maximize existing data can learn a great deal from Pennsylvania’s experience with BenePhilly.

BenePhilly shows the usefulness of state data for two distinctly different purposes: (1) targeted outreach and (2) simplified verification.

During the outreach stage, the PA Department of Public Welfare (DPW) and the PA Department of Aging (PDA) used existing enrollment data to identify potentially eligible households. Other enrollment lists could have been used, such as the LIHEAP list, demonstrating that many untapped list sources exist for identifying likely eligible households. With additional time and resources, these lists could have been accessed to further increase SNAP enrollment. During the verification stage, Medicaid and Social Security enrollment data turned out to be the most valuable, as their availability to DPW allowed households to participate in pilot groups 1 and 2, both of which did not require households to submit any additional documentation.

As 2014 approaches, state agencies need clear guidelines for data matching in regards to data security provisions and use of verified data elements. Through Express Lane Eligibility, BenePhilly was able to consider the income of households already participating in a DPW program as verified under certain circumstances (see page 8 for additional details). This process could be expanded in the future to maximize existing enrollment data and improve administrative efficiency.
Encourage Wider Adoption of Telephonic Signatures

BDT first implemented its telephonic signature process in 2004 in order to submit SPAP and Medicare Low-income Subsidy (LIS) applications on behalf of Pennsylvania seniors. The telephonic signature process has proven to be a valuable tool for assisting hard-to-reach populations, including senior citizens, with benefits applications. To BDT’s knowledge, BenePhilly was the first project in the country to implement this technology for SNAP enrollment.

The BenePhilly experience suggests that now is the time to extend this technology to other high-need areas across the country. In order for this to happen, the USDA will need to move forward with the rule-making process in order to establish standard procedures for state agencies and community-based organizations to follow. BDT recommends that the USDA move as quickly as possible to ensure that telephonic signatures are incorporated into state planning for broad benefit coordination in 2014 and beyond.

Expand Access to Medical Expense Waiver

One of the most significant application modifications tested by BenePhilly was the federal waiver allowing applicants to self-declare medical expenses. Experience shows that submitting proof of insurance premiums and medical receipts, both of which significantly impact SNAP benefit levels, is one of the biggest challenges to SNAP participation among senior and disabled households. Under its demonstration authority, the USDA granted BenePhilly a waiver allowing senior applicants to self-report medical expenses, knowing that DPW would still be able to verify the most common deduction—Medicare Part B premiums—for households receiving Social Security. BDT’s experience is consistent with this expectation, as nearly all BenePhilly applicants claimed medical expenses, with Medicare premiums representing the most commonly reported expense.

The medical expense waiver is especially exciting from a policy perspective, as it has the potential to be more equitable than previous attempts to eliminate medical expense paperwork. For example, Massachusetts employs a standard deduction for medical expenses, similar to the standard utility deduction, which allows seniors with monthly medical expenses between $35 and $125 to claim

“I have received my SNAP card and it is in effect. I was amazed. Within two weeks I got my card. I also got the PACE card. I did get my [rent] rebate check, too! You’ve been helpful with everything.”
a $90 standard deduction without submitting verification. Seniors with more than $125 in medical expenses can still claim their full deduction, but are required to submit supporting documentation. The downside is that such a policy must be cost neutral to the federal government, which inevitably results in “winners and losers” in terms of the size of the deduction seniors can claim. By contrast, the BenePhilly medical expense waiver allows seniors to claim the exact deduction they are entitled to receive, while also encouraging the state to rely on existing data (through the Social Security database) to verify the most commonly claimed medical expense.

Although USDA will need to wait to judge the success of the medical expense waiver until quality control data has been formally evaluated, the waiver appears to have been successful. If quality control data supports this hypothesis, the USDA should consider re-evaluating the federal requirement that medical expenses be verified in all instances.

CONCLUSION

BenePhilly represents a new and creative approach to benefits enrollment that appears to have broad applicability across programs and localities. Rooted in strong partnerships with state agencies and robust technology, BenePhilly makes the most of existing state data to improve outreach and minimize barriers to enrollment. It is important to note that BenePhilly was designed to complement, rather than replace, traditional community-based application assistance. The BenePhilly model seeks to raise awareness and reduce application barriers on a large scale, while recognizing that some households—including the most complicated cases—will require more intensive case management. BDT believes that both strategies are necessary to achieve a meaningful community impact.

Although the USDA-supported demonstration project has ended, BDT will continue to invest in the BenePhilly Enrollment Center and to test new innovations. BDT will also explore opportunities to apply the lessons learned in BenePhilly to improve benefits enrollment throughout the country.

“We’re in a different place financially now than we were many years ago. I’ve never had to ask for help from anybody and this was just magical. It’s brought some optimism back into a dark situation. I would be lost and overwhelmed without you.”
This report was prepared by Rachel Cahill at the Center for Hunger-Free Communities at Drexel University School of Public Health. This report was developed separately from the formal evaluation of the USDA demonstration project that will be released by Mathematica Policy Research. Special thanks to the staff at Benefits Data Trust; David Chu and Ed Zogby, Department of Public Welfare; Tom Snedden and Darlene Shugart, Department of Aging; Louise Hayes, Community Legal Services; Julie Zaebst, Greater Philadelphia Coalition Against Hunger, Brian Gralnick, Jewish Federation of Greater Philadelphia; and the Mayor’s Office of Philadelphia, PA.