Facilitating Remote Application Assistance for SNAP During COVID-19: Recommendations for States and Application Assisters

May 2020

Executive Summary: The COVID-19 pandemic has increased the need for food assistance and made it harder for people to get the help they need. While some people can apply for benefits online, others need more personalized assistance. States can unlock new capacity by taking steps to allow community-based "application assisters" to help people apply over the phone. This brief is written in two parts: Part One outlines three concrete steps that states should pursue to facilitate remote assistance. Part Two summarizes best practices for organizations that are new to helping people over the phone.

Introduction

The financial hardship the COVID-19 pandemic has inflicted on American households has unleashed an increased need for help from the Supplemental Nutrition Assistance Program (SNAP). While many individuals successfully apply for SNAP online on their own, others have limited access to the internet, are unfamiliar with the application process, are less adept with at using technology, and/or simply prefer talking to a person. The latter population often benefits from the individualized support that SNAP application assisters provide.

Social distancing may persist for many months, or longer. Because a significant share of SNAP application assistance is typically carried out in person, outreach partners will need to establish new ways to remotely assist people. Policy and practice modifications made now can streamline the application process at this critical time, and beyond. If the right policies are in place, SNAP outreach partners and other community-based application assisters will be a critical resource to help millions of newly eligible households navigate the SNAP application process.

The United States Department of Agriculture (USDA), state agencies, and application assisters can work together to make it possible for people to apply for SNAP remotely. States can update policies that inadvertently make it harder for SNAP outreach partners and other application assisters to provide help during the pandemic and seek waivers where needed. With these hurdles cleared, application assisters can focus on ensuring that they are prepared to provide remote assistance.

For 15 years, Benefits Data Trust has operated a contact center that provides phone-based benefits assistance to complete eligibility screenings and submit SNAP applications via state online application portals on behalf of SNAP applicants. This policy brief outlines recommendations for state agencies and application assisters based on our experience submitting more than 200,000 SNAP applications through over-the-phone assistance in six states (Colorado, Maryland, New York, North Carolina, Pennsylvania, and South Carolina) since 2014.
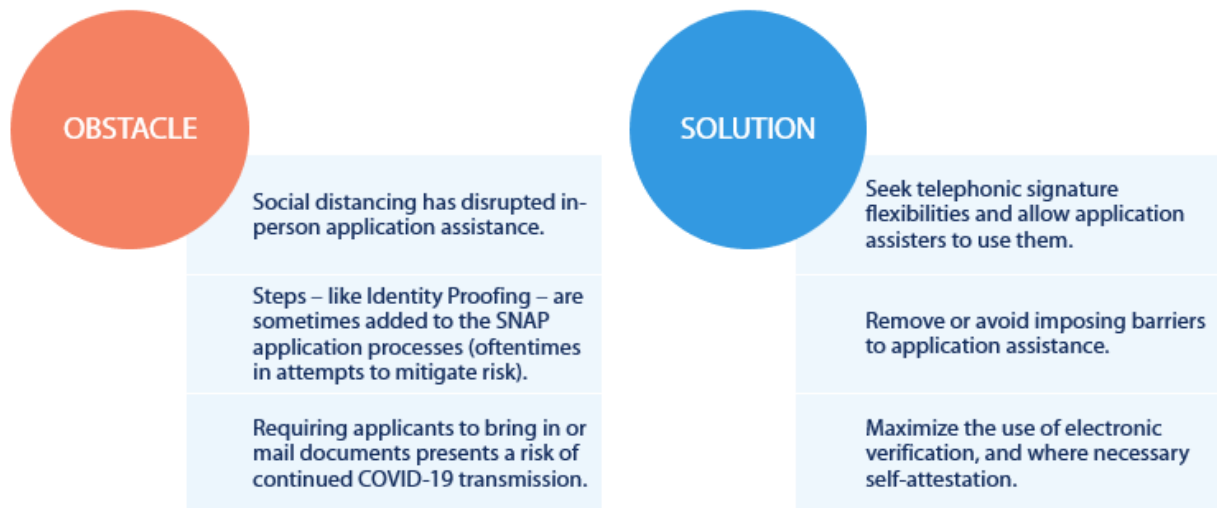
Part One – Recommendations for State Agencies

In addition to helping clients complete SNAP applications over the phone, BDT works closely with state agencies to ensure efficient and compliant operations. Our recommendations to help application assisters better serve households struggling due to the pandemic include:

1. Work with assisters to set up telephonic application solutions.
2. Remove or avoid imposing barriers to application assistance like remote identity proofing requirements; and
3. Maximize the use of electronic verification, and, where necessary, self-attestation.

BDT stands ready to support state agencies that are interested in exploring and implementing these recommendations.

How can state agencies support efficient and effective SNAP application submission during the COVID-19 pandemic?

OBSTACLE	SOLUTION
Social distancing has disrupted in-person application assistance.	Seek telephonic signature flexibilities and allow application assisters to use them.
Steps – like Identity Proofing – are sometimes added to the SNAP application processes (oftentimes in attempts to mitigate risk).	Remove or avoid imposing barriers to application assistance.
Requiring applicants to bring in or mail documents presents a risk of continued COVID-19 transmission.	Maximize the use of electronic verification, and where necessary self-attestation.

1) Work with assisters to set up telephonic application solutions.

Federal regulations require SNAP applications to be signed by an adult member of the applicant household or an authorized representative. These regulations present a challenge to application assisters in the pandemic environment. Because of social distancing, assisters cannot connect directly with clients to have them sign for themselves or to obtain written permission from the client allowing the assister to act as an authorized representative. There are two ways states could help assisters set up telephonic application solutions: 1) Get assisters approved to collect telephonic applications under existing regulations, and/or 2) request a waiver from FNS to allow assisters to sign applications as limited authorized representatives.

Getting Assisters Approved to Collect Telephonic Signatures

Some application assister organizations have the technical capacity and resources to comply with existing SNAP telephonic signature regulations. For organizations where this is the case, the state agency can work to get them approved to collect telephonic applications. This approach has the advantage of providing a permanent alternative access point for those who have difficulty navigating

other application methods, like [older people](#). BDT has implemented telephonic application solutions across six states and is available to help states and assisters set up telephonic applications.

<u>Requesting a "Verbal Assent of Authorized Representative Designation" Waiver from FNS</u>

Some application assisters are not able to collect telephonic signatures but may be otherwise ready to help submit SNAP applications on behalf of those seeking assistance. Where this is the case, state agencies can request approval from FNS to allow application assisters to act as authorized representatives for the purpose of signing applications for clients. To date, FNS has approved [Delaware](#) and [Illinois](#) to use this alternative procedure. This could also be applied to paper applications in states where online applications are not available. Importantly, assisters under this waiver are not able to access or use an approved household's SNAP benefits, unlike regular authorized representatives.

Under the terms of the currently approved waivers, the assister must document the date and time that the client gave assent over the phone and report this information. In currently approved states, the assister reports this information in the *comments* field of the online application. If a state's online application does not have a *comments* field or an online application is not available, the state could work with assister organizations to find another way to flag that an application is being signed under this waiver authority and for the assister organization to report to the state agency the date and time assent was given for each applicant assisted.

Adopting this approach will resolve the logistical challenges application assisters face. In addition, states will receive more SNAP applications electronically, which will, in turn, save eligibility workers time that would otherwise be spent manually entering information from paper applications. With record volumes of applications, shaving minutes off processing time for each application can generate substantial operational efficiencies when eligibility worker resources are spread thin.

2) Remove or avoid imposing barriers to application assistance like remote identity proofing requirements.

Requiring application assisters to conduct remote identity proofing – i.e. requiring applicants to authenticate their identity – prior to assisting an applicant creates unnecessary barriers and is largely unfeasible in this time of crisis. There is no business reason to impose this step because application assisters do not have access to sensitive information that an individual calling and misrepresenting themselves could obtain. In addition, identity proofing does not improve program integrity since all SNAP applications are subject to verification regardless of whether or not an application assister facilitated their submission. The multiple electronic data matches states conduct against an application are as well-suited to mitigate the risk of misrepresentation now as they are under normal operating conditions. Finally, people willfully seeking to misrepresent information are more likely to apply on their own than seek help from trained application assisters.

3) Maximize the use of electronic verification, and where necessary, self-attestation.

BDT has fielded numerous calls from worried applicants who do not know how they will gather the documents they need, or how to submit these documents once they are collected. The vast majority of clients who have reached out with concerns to our contact center during the health emergency are unable to copy or fax documents.

Requiring applicants to bring in or mail documents presents a risk of coronavirus transmission to applicants, assisters, and eligibility workers. Exchanging physical documents necessitates human-to-human contact, whether it's an applicant purchasing stamps at the post office or a caseworker picking up documents from a county office. States can instead process applications without unnecessary risk of virus transmission by using electronic databases and, where available, online or mobile document submission. Where electronic sources or collateral contacts are unavailable, states can accept self-attestation until the need for social distancing expires. Many states have already adopted policies that reduce reliance on paper verifications.

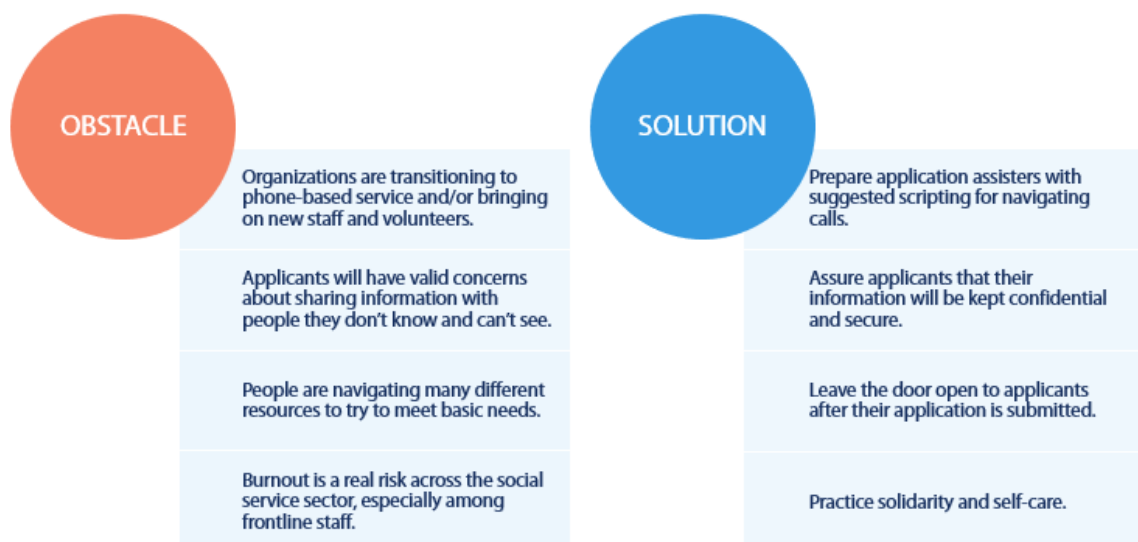## Part Two – Recommendations for Application Assisters

Application assisters who normally help individuals in person or mail applications to people to sign and submit have had to quickly adapt their operations in an uncertain environment. This challenge is made more difficult by the fact that many applicants will be seeking public assistance for the first time in their lives; others will be returning having thought they would never need it again. It is important that those of us helping people apply for SNAP remember that asking for help is an act of courage.

In addition to the recommendations for states outlined above, BDT has identified four key strategies to support providing quality remote assistance based on our experience conducting telephonic SNAP application assistance:

1. Prepare application assisters with suggested scripting for navigating calls;
2. Assure applicants that their information will be kept confidential, secure, and will not be used for any purpose other than applying for benefits (and make sure that all these things are true);
3. Leave the door open to applicants after their application is submitted; and
4. Practice solidarity and self-care.

We hope these recommendations help SNAP outreach organizations make the transition from in-person to remote assistance easier for everyone.

How can organizations adjust to providing remote services?

OBSTACLE

Organizations are transitioning to phone-based service and/or bringing on new staff and volunteers.

Applicants will have valid concerns about sharing information with people they don't know and can't see.

People are navigating many different resources to try to meet basic needs.

Burnout is a real risk across the social service sector, especially among frontline staff.

SOLUTION

Prepare application assisters with suggested scripting for navigating calls.

Assure applicants that their information will be kept confidential and secure.

Leave the door open to applicants after their application is submitted.

Practice solidarity and self-care.

1) Prepare application assisters with suggested scripting for navigating calls.

Suggested scripting will help guide successful conversations with applicants – which is particularly useful for organizations that are bringing on new staff and volunteers or transitioning to provide telephonic support for the first time. When developing scripting, it is important to consider the flow of application questions. Paper and online applications sometimes present questions in an order that doesn't align with the natural flow of conversation that is required to guide someone through the application process, particularly in a remote context. BDT welcomes the opportunity to engage with other application assisters about best practices for effective scripting.

2) Assure applicants that their information will be kept confidential, secure, and will not be used for any purpose other than applying for benefits (and make sure that all these things are true).

Applicants will have valid concerns about sharing personal information with people they don't know and can't see, particularly if they are used to being assisted in-person or have never sought help before. There are an increasing number of warnings of COVID-19-related fraudulent activity, and this will likely make people more hesitant to share sensitive information. Application assisters should retain only information that is absolutely necessary and communicate clearly to applicants what will be retained by the assister and why, what will be sent to the SNAP agency, and how their information will be securely stored.

In addition, application assisters should ensure that they are providing assistance in a location where the phone conversation can be private, computers used to submit applications online have an up-to-date operating system, browser, and antivirus software, and that physical records are stored in a secure place.

Build Trust	Follow Privacy Best Practices	Promote Security
Ensure assisters are highly trained and versed in benefit rules Establish proper scripting to ease legitimacy concerns Acknowledge scams when raised on calls	Retain only what information is absolutely necessary Communicate clearly to applicants: • what will be retained • why their retained information will be stored • what will be sent to the SNAP agency • how their information will be securely stored	Ensure phone conversations are private Confirm computers used to submit applications have updated operating systems, browsers, and antivirus software Store records in a secure place

3) Leave the door open to applicants after their application is submitted.

Before finishing a call, BDT recommends clearly recapping next steps and telling applicants what to expect moving forward. On our calls, we make sure that applicants know that they can call us back with any questions they might have. If staffing permits, it may even make sense to designate a "specialist" to handle the types of questions people often call back with after applying. Alternatively, a Frequently Asked Questions document can help ensure accurate information is shared among all

assisters. This will help ensure consistency as pandemic response may cause SNAP agency operations to shift quickly in the weeks and months ahead.

4) Practice solidarity and self-care.

Helping others in crisis is challenging on a good day. It's hard not to internalize the burdens of those we're helping. And there is no doubt we are all facing our own challenges right now, coronavirus-related and beyond. At BDT, we have created shared digital spaces to share trends and feedback (de-identified of applicant information) and provide support to one another. Those in supervisory roles facilitate regular one-on-one check-ins with front line application assisters to offer support where needed. These measures have worked well to maintain morale at BDT, and we can share more about these practices to assist other organizations doing similar work.

And we constantly remind ourselves: It's ok to take breaks, to take a day off, to do something that brings a little joy and distraction. These are challenging times, and we can't take care of others if we haven't taken care of ourselves. We're all going to need to take a breather from time to time as we navigate this crisis.

For more information and technical assistance:

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About Benefits Data Trust

Benefits Data Trust (BDT) is a national nonprofit that helps people live healthier, more independent lives by creating smarter ways to access essential benefits and services. Each year, BDT helps tens of thousands of people receive critical supports using data, technology, targeted outreach, and policy change. Since inception in 2005, BDT has screened more than one million households and secured over $7.5 billion in benefits and services. BDT employs more than 180 people and provides enrollment assistance to individuals in six states and policy assistance to states nationwide. For more information, visit www.bdtrust.org.