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February 1, 2016

Food and Nutrition Service  
Department of Agriculture  
Attention: Rosemarie Downer  
3101 Park Center Drive, Room 1014  
Alexandria, VA 22302

Re: **Agency Information Collection Activities: Proposed Collection; Comment Request—  
Follow Up to An Assessment of the Roles and Effectiveness of Community-based  
Organizations in the Supplemental Nutrition Assistance Program**

To whom it may concern:

Thank you for the opportunity to provide comments on the December 2015 Notice of Proposed Information Collection regarding the Assessment of the Roles and Effectiveness of Community-Based Organizations in the Supplemental Nutrition Assistance Program (the Assessment).

Benefits Data Trust (BDT) is a national, not-for-profit organization committed to transforming how individuals in need access public benefits. Since its inception in 2005, BDT has submitted more than 112,000 Supplemental Nutrition Assistance Program (SNAP) applications on behalf of vulnerable individuals, in addition to completing nearly 400,000 applications for other benefits programs. To accomplish this, BDT partners with state agencies and community partners to develop scalable, data-driven, and person-centered enrollment strategies, and is active in Pennsylvania, Maryland, New York, Colorado, and South Carolina.

BDT has considerable experience implementing the community-based interview under demonstration authority from the Food and Nutrition Service (FNS). In June 2010, BDT partnered with the Pennsylvania Department of Public Welfare to launch the BenePhilly Demonstration.<sup>1</sup> One key component of the BenePhilly Demonstration was a waiver of the requirement that applicants complete an interview with a state caseworker. Instead, specially trained Benefits Outreach Specialists at BDT conducted the interview. During the 18 month implementation period, BDT successfully completed over 8,000 applications and associated interviews on behalf of low-income seniors, with a 90% application approval rate among demonstration eligible households. A [2014 report](#) from Mathematica Policy Research, under contract with FNS, found that the BenePhilly Demonstration “had

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<sup>1</sup> Benefits Data Trust. *BenePhilly Final Report 2012*. Retrieved on January 15, 2016, from [http://www.bdtrust.org/uploads/medium/file/235/2012\\_BenePhilly\\_Final\\_Report.pdf](http://www.bdtrust.org/uploads/medium/file/235/2012_BenePhilly_Final_Report.pdf)

a significant effect on SNAP in Philadelphia,” with a 23% increase in SNAP participation among seniors.<sup>2</sup>

From the experience gained during the Benephilly Demonstration, BDT identified two recommended areas for FNS’ evaluation regarding the effectiveness of community-based organizations (CBOs) conducting SNAP interviews:

**Recommendation 1:** Ensure that CBO partners implement standardized, high-quality training for interviews. One major reason for the Benephilly Demonstration’s success was the performance of the Benefit Outreach Specialists. Each Benefits Outreach Specialist underwent rigorous training that addressed detailed SNAP eligibility criteria, client rights and responsibilities, as well as potential client concerns about enrolling in the SNAP benefit, such as “welfare stigma.”

BDT believes that many of the quality control issues highlighted in the Assessment could be resolved using a more systematic staff training approach like the one BDT uses. CBOs approved to conduct interviews should be able to demonstrate a certain level of experience and capacity to implement high quality interview procedures. Such organizations could be supported by federal guidance and/or training. BDT is happy to share its expertise, as well as lessons learned, if FNS would find that helpful.

**Recommendation 2:** Leverage electronic verification to minimize caseworker time and the number of touches required to complete the application process. Electronic verification allows a CBO or state agency to utilize pre-existing state benefit enrollment information to confirm applicants’ eligibility characteristics in subsequent benefit application processes. During the BenePhilly Demonstration, BDT and the state agency were able to use electronic verification to validate applicants’ identity, residency, and Social Security or Supplemental Security Income.<sup>3</sup> Such electronic verification significantly reduced, and in some cases eliminated, the need for applicants to submit additional documentation. Utilizing such electronic verification not only decreased the burden on CBO partners and state caseworkers, but also resulted in higher application and enrollment rates.

BDT appreciates FNS’ consideration of these comments and looks forward to future opportunities to support and improve the implementation of CBO interviews for SNAP applications. With the right capacity and training of CBOs, BDT hopes to see additional states benefitting from the improved customer service and reduced caseworker burden that the community-based interview waiver can provide.

For additional information, please contact Rachel Cahill, Director of Policy, at [rcahill@bdtrust.org](mailto:rcahill@bdtrust.org) or 215-207-9108.

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<sup>2</sup> Mathematica Policy Research. *Reaching the Underserved Elderly and Working Poor in SNAP: Evaluation Findings from the Fiscal Year 2009 Pilots*. April 2014. Retrieved on January 15, 2016 from <http://www.fns.usda.gov/sites/default/files/SNAPUnderseved-Elderly2009.pdf>

<sup>3</sup> *Benephilly Final Report 2012* at page 9.