

Local Law 134 of 2017 Annual Report 2022: January 1 - December 31

Local Law 134 of 2017 requires the New York City Human Resources Administration (HRA) to submit to the Speaker of the City Council the following annual report for 2022 regarding the department’s activities with respect to supplemental nutrition assistance enrollment and recertification for seniors.

Such report shall provide an overview of the department’s activities with respect to supplemental nutrition assistance enrollment and recertification for seniors, including the public campaign and the enrollment and recertification program, and shall include (i) the number of seniors enrolled in the supplemental nutrition assistance program in the previous calendar year; (ii) the number of seniors recertified for the supplemental nutrition assistance program in the previous calendar year; and (iii) a comparison of the annual rate of enrollment for seniors versus the number of seniors in the city that the department estimates are likely to be eligible based on readily available community data such as census data. Beginning on February 1, 2019, the report shall indicate how the data required by this subdivision compares to the previous year. The report shall further indicate the method by which seniors enrolled in or recertified for the supplemental nutrition assistance program, whether online, by mobile application, by telephone, by paper application, or by other means.

Method of Enrollment and Recertification for SNAP

To make SNAP enrollment even easier, as of October 2020, a new Simplified SNAP Application/Recertification form (LDSS 5166) became available for seniors (60 years of age and older) and New Yorkers with disabilities, whose households are without earned income. Clients can access the Simplified SNAP application online at <https://www1.nyc.gov/site/hra/help/snap-benefits-food-program.page> or they may call Infoline to request that a paper version be mailed to them.

Pursuant to a waiver granted by the U.S. Department of Agriculture Food and Nutrition Service which the New York State Office of Temporary and Disability Assistance (OTDA) pursued at HRA/DSS' request, cases with all adults 55 years of age or older and/or cases where all adults are disabled can also recertify for the SNAP benefits by phone using an automated Interactive Voice Response System (IVRS), if there is:

- No budgeted earned income (from job or self-employment);
- No change to unearned income (Supplemental Security Income [SSI], Social Security, pension, etc.); and
- No change in residence or household composition.

Seniors may also apply and recertify (if they have changes to residence or income) or manage their SNAP case using the ACCESS HRA (AHRA) website or mobile application using a smartphone or tablet. They may also submit documentation using the ACCESS HRA Mobile app. Clients who lack internet access or internet-ready mobile devices, or who need additional in-person assistance, may also visit an open HRA center or a partnering Community-Based Organization. In addition, HRA has partnered with Benefits Data Trust (BDT) and Hunger Free America to take SNAP applications and recertifications from seniors or individuals with disabilities over the phone who are unable to avail themselves of the aforementioned methods. HRA's partnership with Hunger Free America included targeted outreach to recipients of NYC's GetFoodNYC delivery program who were likely eligible but not enrolled in SNAP, and the organization continues to assist seniors and other individuals who may be homebound or digitally disconnected with applying for SNAP over telephone by utilizing a verbal signature.

Prior to COVID-19, HRA secured a waiver permitting all SNAP eligibility interviews to be conducted by phone "On-Demand" by client initiating a call to HRA at their convenience, rather than waiting for a call from an HRA employee in a rigid four-hour window, or visiting a center for an in-person interview, unless they chose to. On-demand interviews for SNAP recertification have been available citywide for more than four years and in September 2018, on-demand interviews for new SNAP

applicants were made available citywide. However, due to the global pandemic, significant changes were made to the SNAP enrollment and recertification processes to address new needs and to maintain client and staff safety.

From its onset and throughout the COVID-19 pandemic, HRA has advocated for and received significant temporary waivers of State and Federal regulations providing clients greater access to benefits and easements of requirements to maintain those benefits. In late March 2020, HRA received a temporary waiver of the telephone interview requirement for both new applicants and households recertifying for SNAP if all eligibility criteria were able to be verified through documentation submitted or by collateral contact. In instances where clients did not submit all documentation necessary to make an eligibility determination or where the information contained in the documentation was unclear or questionable, HRA calls the client's number on record to conduct the telephone interview. With the new waiver drastically reducing the need for telephone interviews and to protect clients and staff, HRA temporarily suspended On-Demand telephone interviews. These waivers continued in 2021 and eliminated the need for a telephone interview for many applicants and recertifying clients. The COVID-19 interview waivers expired on June 30, 2022, however, On-Demand was brought back online June 1, 2022, for applications submitted on or after June 1, 2022, and Recertification cohorts which expired on July 31, 2022, and thereafter.

In addition to the existing option of applying and recertifying online through ACCESS HRA, recertifying via IVRS (Interactive Voice Response System) for seniors and disabled individuals, and submitting documentation through the AHRA mobile app, HRA published a fax number for submission and installed drop boxes at its open centers for clients to drop-off applications, recertifications and supporting documentation. HRA also secured a temporary waiver to permit verbal attestation in lieu of recording telephonic signatures on applications and recertifications so that HRA staff can take SNAP applications over the phone for clients who lack internet access or internet-ready devices or who need application assistance due to a disability; a waiver request to permit CBO staff to take applications over the phone in such cases was denied.

To help clients maintain their benefits, HRA also requested and secured waivers to temporarily suspend negative actions for clients who do not submit their SNAP periodic reports and to extend SNAP recertifications for up to six months to eliminate the need for clients to submit recertifications and potentially lose benefits if not submitted timely. The COVID-19 waiver for SNAP Periodic Reports expired on March

31, 2022 and beginning in April 2022, households were required to submit their periodic mailer to prevent their case from being closed.

Further assistance to clients has been granted in the form of increased benefits. In addition to regular SNAP benefits, the Families First Coronavirus Response Act of 2020 authorized states to issue emergency supplemental SNAP benefits during the public health emergency only to SNAP households that did not receive the maximum benefit for the household's size from March 2020 to April 2021. In April 2021 the USDA issued updated guidance to states that households already at the maximum SNAP benefit amount for their household size, or for whom the difference between the maximum benefit amount for their household size and their actual budgeted amount was between \$1 and \$95, may be issued an Emergency Allotment of \$95. For households where the difference between the maximum for their household size and their actual budgeted amount exceeds \$95, they are issued that amount. These temporary allotments were issued for the entire calendar year of 2022. As they do every October, the USDA updated the Thrifty Food Plan resulting in a permanent increase in the maximum SNAP allotments. HRA continues to innovate internally to ensure the best service delivery during the continuing public health emergency and to work with its State oversight agency on waivers to ensure that clients receive the assistance they need during these precarious times.

SNAP Campaign Advertising in 2022

Senior Campaign

Our SNAP campaign last year ran from May to June 2022 and it included social media ads, neighborhood advertising, transit and bus shelter ads, and ethnic and community newspapers. For this campaign, seniors were among our main target audiences which also included single mothers. In 2023 we will launch an outreach campaign targeting existing clients, including seniors; this campaign will include collateral to be distributed at Benefits Access Centers, food pantries, community-based organizations, libraries, and senior centers.

SNAP Outreach Senior Center Engagement

In April 2022, DSS Outreach resumed in-person services at community locations that re-opened to the public, including senior serving partner organizations, after more than two years of conducting virtual and telephonic activities. From April 2022 – December 2022, DSS Outreach provided recurring in-person services at sixteen (16) senior centers and accepted client referrals from a broad network of senior centers and senior serving partner organizations.

ACCESS HRA, ACCESS HRA Provider Portal, and SNAP application trainings also continued to be offered virtually. In 2022, DSS conducted a total of 113 trainings, which included 1,602 attendees, in using these tools to submit SNAP and other benefit applications. Training attendees include staff from other municipal agencies and community partner organizations, including senior center staff. These trainings were also a forum for questions and concerns from providers and advocates working directly with HRA and DHS clients, including seniors.

(i) the number of seniors enrolled in the supplemental nutrition assistance program in the previous calendar year

- There were 546,848 seniors on SNAP during 2022. This is an unduplicated count over the course of the year.
- There were 513,830 seniors on SNAP during 2021. This is an unduplicated count over the course of the year.
- There were 490,793 seniors on SNAP during 2020. This is an unduplicated count over the course of the year.
- There were 481,520 seniors on SNAP during 2019. This is an unduplicated count over the course of the year.
- There were 477,290 seniors on SNAP during 2018. This is an unduplicated count over the course of the year.
- There were 470,197 seniors on SNAP during 2017. This is an unduplicated count over the course of the year.

(ii) the number of seniors recertified for the supplemental nutrition assistance program in the previous calendar year

213,168* seniors were recertified for SNAP during 2022. Recertifications take place at the case level, but since the Local Law reporting requirement is for senior individuals, we looked at the case recertification information and then counted the number of seniors on the case.

It is important to note that just because someone was on SNAP during 2022 does not mean that they had to recertify in 2022.

2022 SNAP Recertification Rate

All SNAP		NCA SNAP	
All Individuals			
74.3%		75.3%	
Seniors Only			
82.2%		82.4%	

105,461* seniors were recertified for SNAP during 2021. Recertifications take place at the case level, but since the Local Law reporting requirement is for senior individuals, we looked at the case recertification information and then counted the number of seniors on the case.

It is important to note that just because someone was on SNAP during 2021 does not mean that they had to recertify in 2021.

2021 SNAP Recertification Rate

All SNAP		NCA SNAP	
All Individuals			
77.3%		78.0%	
Seniors Only			
79.9%		80.0%	

91,002* seniors were recertified for SNAP during 2020. Recertifications take place at the case level, but since the Local Law reporting requirement is for senior individuals,

* In late March 2020, HRA received from NYS OTDA a temporary waiver of the telephone interview requirement for both new applicants and households recertifying for SNAP if all eligibility criteria were able to be verified through documentation submitted or by collateral contact. Recertifications during the subsequent months were rescheduled to later dates, resulting in lower recertification numbers than would have occurred without the waivers.

we looked at the case recertification information and then counted the number of seniors on the case.

It is important to note that just because someone was on SNAP during 2020 does not mean that they had to recertify in 2020.

2020 SNAP Recertification Rate

All SNAP	NCA SNAP
All Individuals	
76.7%	76.9%
Seniors Only	
80.4%	80.7%

2019 NUMBERS: 186,536 seniors were recertified for SNAP in 2019. Recertifications take place at the case level, but since the Local Law reporting requirement is for senior individuals, we looked at the case recertification information and then counted the number of seniors on the case.

It is important to note that just because someone was on SNAP during 2019 does not mean that they had to recertify in 2019.

2019 SNAP Recertification Rate

All SNAP	NCA SNAP
All Individuals	
79.5%	78.1%
Seniors Only	
84.5%†	88.2%†

2018 NUMBERS: 150,460 seniors were recertified for SNAP in 2018. Recertifications take place at the case level, but since the Local Law reporting requirement is for senior individuals, we looked at the case recertification information and then counted the number of seniors on the case.

It is important to note that just because someone was on SNAP during 2018 does not mean that they had to recertify in 2018.

2018 SNAP Recertification Rate

All SNAP	NCA SNAP
All Individuals	
79.8%	78.6%
Seniors Only	
81.9%	81.7%

2017 NUMBERS: 159,190 seniors were recertified for SNAP in 2017. Recertifications take place at the case level, but since the Local Law reporting requirement is for senior individuals, we looked at the case recertification information and then counted the number of seniors on the case.

It is important to note that just because someone was on SNAP during 2017 does not mean that they had to recertify in 2017.

2017 SNAP Recertification Rate

All SNAP	NCA SNAP
All Individuals	
79.9%	79.1%
Seniors Only	
84.1%	84.6%

(iii) a comparison of the annual rate of enrollment for seniors versus the number of seniors in the city that the department estimates are likely to be eligible based on readily available community data such as census data

The data in the section below compare the annual rate of enrollment for seniors to the number of seniors in the City that DSS/HRA estimates are likely eligible based on readily available community data.

The 2021 senior (age 60+) SNAP participation rate was 71.9% (456,630 enrolled/634,753 estimated eligible for SNAP), lower than the 2019 senior SNAP participation rate of 75.6% (429,118 enrolled/567,986 estimated eligible for SNAP)—although the number of older adults served in SNAP has increased. (We use age 60+ as the senior cutoff because SNAP eligibility rules define seniors as age 60+. We compare to 2019 because the 2020 Census data used in the calculation are considered “experimental;” see Table 1 note below.)

The calculation of the SNAP participation rate equals: “the average monthly number of seniors on the SNAP caseload” divided by the “number of seniors who appear SNAP-eligible in NYC based on Census Bureau American Community Survey data.”

The latest data on SNAP participation in NYC overall—see Table 1 below for details. In brief:

- NYC’s SNAP caseload increased 11 percent between 2021 and 2019, from a monthly average of 1.5 million to 1.7 million in 2021. This primarily reflects the increased hardship experienced by NYC families during the COVID-19 pandemic.
- Along with these increases in the NYC SNAP caseload, NYC saw increases in the poverty rate, such that NYC’s Program Access Index (PAI; see definition below) shows that **the reach of SNAP remained relatively stable**, relative to the number of poor and near-poor New Yorkers, declining slightly from 91.4% in 2019 to 90.2% in 2021.
- The estimated SNAP **participation rate in 2021**—that is, the proportion of NYC SNAP-eligible individuals who received SNAP each month—**was 72.1%, compared to 74.7% in 2019.**

Table 1. Supplemental Nutrition Assistance Program Access and Participation Rates for 2010–2021*

Program Access Index (PAI)				Participation Rate	
Year	United States	New York State	New York City	Year	New York City
2021	Not Yet Published	Not Yet Published	90.2%	2021	72.1%
2019	70.1%	83.7%	91.4%	2019	74.7%
2018	70.9%	80.8%	88.3%	2018	72.6%
2017	73.2%	81.1%	84.8%	2017	70.9%
2016	75.0	81.6	83.6%	2016	72.4%**
2015	75.6%	79.1%	79.4%	2015	72.5%
2014	74.1%	79.1%	80.0%	2014	73.9%
2013	75.2%	82.0%	85.9%	2013	77.0%
2012	74.2%	80.2%	83.7%	2012	76.6%
2011	72.0%	77.9%	84.2%	2011	76.4%
2010	69.0%	78.1%	84.9%	2010	76.8%

* This chart’s data is limited to years 2010-2021 because HRA/DSS researchers estimate the City’s SNAP participation rate for operational use, and 2022 data won’t be available until late 2023. There is a lag because we rely on Census Bureau survey data for the calculations. Also note that 2020 estimates are not included. Due to challenges faced by the US Census Bureau in administering the American Community Survey (ACS) during COVID-19 pandemic, 2020 ACS survey data (released in late 2021) are considered “experimental,” and are less robust than data from previous years.

** This rate applies the eligibility rules in effect through June 2016 on the average caseload during the first half of the year, and then takes into account the increased gross income limit for working households (to 150% versus 130% FPL) for the second half of the year. This rule change led to a substantial increase in the number of SNAP-eligible individuals, but only a small increase in recipients (individuals in this income range would likely be eligible for only a small SNAP benefit), thus notably lowering the overall participation rate estimate for 2017.

Sources: US and NYS PAI: USDA, "Calculating the SNAP Program Access Index: A Step-By-Step Guide," updated annually. NYC: NYC Human Resources Administration administrative data for SNAP enrollment; U.S. Census Bureau American Community Survey, Table S1701 located at data.census.gov for number of residents below 125% of the official poverty level, and DSS OER analysis of Public Use Microdata Sample 1-year files for estimated number of residents eligible to receive SNAP benefits.

Table 2. Supplemental Nutrition Assistance Program Participation Rates for Seniors, 2013–2021	
Year	NYC Seniors (age 60+)
2021	71.9%
2019	75.6%
2018	72.9%
2017	73.0%
2016	70.9%**
2015	68.2%
2014	69.5%
2013	68.4%

* This chart’s data is limited to years 2010-2020 because HRA/DSS researchers estimate the City’s SNAP participation rate for operational use, and 2023 data won’t be available until late 2023. There is a lag because we rely on Census Bureau survey data for the calculations. Also note that 2020 estimates are not included. Due to challenges faced by the US Census Bureau in administering the American Community Survey (ACS) during COVID-19 pandemic, 2020 ACS survey data (released in late 2021) are considered “experimental,” and are less robust than data from previous years.

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Sources: NYC Human Resources Administration administrative data for SNAP enrollment; U.S. Census Bureau American Community Survey, Public Use Microdata

Sample 1-year files for estimated number of residents eligible to receive SNAP benefits.