

**Understanding Supplemental Security Income (SSI):
A Guide for TANF Staff Members**

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Overview

Policymakers and program operators have long worked to understand how state and federal programs can best serve low-income families headed by a parent (or parents) with a disability. The Temporary Assistance for Needy Families (TANF) program, administered by the Administration for Children and Families (ACF), serves low-income families, some of which include individuals who have work limitations or disabilities. The Supplemental Security Income (SSI) program, administered by the Social Security Administration (SSA), serves low-income individuals who are aged, blind, or disabled. While ACF and SSA have common goals of supporting vulnerable populations while encouraging their self-sufficiency and employment, the two agencies' differing missions, definitions of disability, and rules and incentives related to work pose challenges to coordinating their efforts.

In order to understand how best to help TANF recipients with disabilities, ACF and SSA contracted with MDRC to conduct the TANF/SSI Disability Transition Project (TSDTP). The goals of the TSDTP are to explore the overlap between the two programs, build knowledge about ways to encourage work among TANF recipients with disabilities, facilitate informed decisions about applying for SSI when appropriate, and help eligible SSI applicants receive awards as quickly as possible while also reducing administrative costs. Through MDRC's close collaboration with ACF, SSA, and participating state and county TANF agencies, the TSDTP conducted field assessments of existing services for TANF recipients who may have disabilities, tested pilot programs targeted to this population, and analyzed national- and state-level program data.

TANF is a program built around an expectation of work. States are required to track and document recipients' participation in work activities. Yet because TANF also serves some individuals with work limitations, administrators face the dual challenge of supporting these recipients while meeting federal work participation requirements. SSI may be a more appropriate option for some TANF recipients with disabilities; however, being considered unable to work by a state or local TANF agency does not necessarily signify eligibility for SSI, and a large proportion of TANF recipients who apply for SSI are not approved. Through the field assessments conducted as part of the TSDTP, the project team found that state and local TANF staffs from participating TSDTP sites are generally not well informed about SSI's rules and eligibility process. The project team also found that those staffs have substantial interest in learning more so they can better inform their clients about the SSI program and its requirements.

This brief describes the basic SSI disability determination process and compares and contrasts it with several procedures different TANF agencies use to identify recipients who meet TANF work-limitation criteria in states or localities. It goes on to discuss some of the different strategies TANF agencies use to gauge which individuals are most likely to qualify for SSI and thus should perhaps apply for it. It includes some observations about the key decisions facing clients with disabilities in navigating the two programs. Lastly, it reviews the employment support programs that both SSA and state TANF agencies provide to people with disabilities who can work.

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Introduction

Temporary Assistance for Needy Families (TANF) is a federal block grant that provides funds to states for a range of purposes. With these funds, which are granted by the Administration for Children and Families (ACF) in the U.S. Department of Health and Human Services (HHS), states operate an assistance program that is designed to help move recipients into employment, while providing time-limited income support. Under the TANF statute, grantees must engage a certain percentage of families in work activities or face financial penalties. Yet many families supported through TANF include individuals with disabilities or other work limitations. A 2009 study found that about one in four adult TANF recipients has a disability, defined as a physical, mental, or emotional problem that keeps the individual from working or that limits the kind or amount of work that he or she can do.¹ This presents a challenge for state TANF programs, which must both provide temporary financial support for such individuals and also encourage work and self-sufficiency.

Some TANF recipients with disabilities may choose to seek benefits offered by Supplemental Security Income (SSI), a means-tested income-support program specifically created for individuals with disabilities and the elderly. SSI is a federal program administered by the Social Security Administration (SSA). Unlike TANF, which is limited to 60 months over an individual's lifetime (less in some states), SSI does not impose work requirements and provides benefits as long as the individual's disabling condition persists. SSA does offer work incentives designed to increase employment among adults with disabilities, such as earned-income disregards and quick reinstatement of benefits if the individual stops working.² SSI may be an option for some TANF recipients with disabilities; however, being considered disabled by a state or local TANF agency does not necessarily signify eligibility for SSI. Some TANF recipients who apply for SSI are not approved.³

As part of the TANF/SSI Disability Transition Project (TSDTP), MDRC interviewed and held focus groups with TANF staff members, administrators, and a small number of recipients. From these discussions, MDRC learned that some TANF recipients hold unrealistically optimistic expectations about being approved for SSI, and many worry that any effort to prepare for employment could affect their eligibility for SSI. Staff members reported that they were generally unable to provide recipients strong guidance about SSI, and that they wanted to better understand the program.^{4,5} Yet SSI may well be a more appropriate means of support for people with work-limiting disabilities.

This brief describes the basic SSI disability determination process and compares and contrasts it with procedures TANF agencies studied in the TSDTP use to identify recipients who meet state disability definitions. It goes on to discuss some of the different strategies TANF agencies use to help individuals apply for SSI. Recipients may face financial hardship if they rely on the income support from either TANF or SSI alone. Therefore, the brief reviews some

employment support programs that both SSA and state TANF agencies provide to people with disabilities who can work.

The SSI Eligibility Determination Process and How It Compares with TANF Practices

During focus groups, MDRC learned that TANF staff members were unclear about whom to refer to SSI. They reported often relying on physicians for assessments, but medical professionals are generally not trained in vocational assessments or the SSI eligibility process. TANF staff members who understand the SSI eligibility determination process may be able to assess more appropriately whether SSI is a feasible option.

SSI Eligibility Criteria

SSA's concept of disability focuses on the significance of an impairment with respect to a person's ability to work. Individuals are considered to be "disabled" and eligible for SSI if they have medical disorders that prevent them from engaging in "substantial gainful activity."⁶ Medical disorders must also meet the duration requirement: that is, they must have lasted or be expected to last for a continuous period of at least 12 months, or be expected to result in death. SSA establishes a medical disorder based on appropriate medical documentation.

The first step in the SSI application process is filing an application with the local SSA field office. The field office determines whether the individual meets the nonmedical eligibility requirements regarding income, resources, and citizenship status. To be eligible for SSI, an individual must not only have a disability but also be a United States citizen or a noncitizen who meets other requirements, and have limited income and resources. The SSI resource limit is \$2,000 for an individual and \$3,000 for a couple.⁷ SSA does not count all income, as it excludes some earnings from its income limit calculations.⁸ Since in most states the resource limits for TANF are more stringent than those for SSI, most TANF recipients meet SSI's nonmedical eligibility requirements.⁹

The SSA field office also collects a disability report form. This form asks about the applicant's medical condition(s); the effect of the condition(s) on the applicant's work activity; the applicant's education and training, including attendance in special education classes; the applicant's job history before becoming unable to work because of the condition(s); the applicant's current medications; and the applicant's medical treatment(s). After SSA staff members collect the appropriate information and documentation and make a preliminary nonmedical eligibility determination, they send the case to the state Disability Determination Services (DDS) to determine whether the applicant's medical condition satisfies the medical eligibility criteria (that is, whether the applicant is considered to be "disabled").

DDS examiners use the five-step sequential evaluation process shown in Figure 1 and consider an applicant to be “disabled” if: (1) the applicant has a medical condition that meets or medically equals the criteria and severity of an impairment in SSA’s Listing of Impairments or (2) the applicant is unable to engage in any substantial gainful activity, given his or her “residual functional capacity” (that is, ability to work), age, education, and prior work experience.¹⁰

Determining Potential Eligibility for SSI

Under federal law, the TANF program does not have a disability exemption policy and individuals with disabilities are not excluded from states’ work participation rate calculations. However, states can use their own discretion in how they choose to serve recipients, and may choose to exempt recipients with disabilities from work requirements. In these instances states are still required to meet federal work participation rates. Most support exempt caseloads with state funding.

There are several key differences between the processes that state TANF agencies use to determine mandated work activity exemptions and SSA’s disability determination policy. Table 1 presents a comparative overview of the TANF exemption processes and the SSI eligibility criteria in the states profiled for the TSDTP. Unlike SSA when it makes a disability determination, the state TANF agencies profiled in TSDTP focus on approving deferrals and exemptions from mandated work activity for shorter-term and partial disabilities. Generally, the TANF agencies require less medical documentation, and their exemptions are not always tied to functional work assessments.

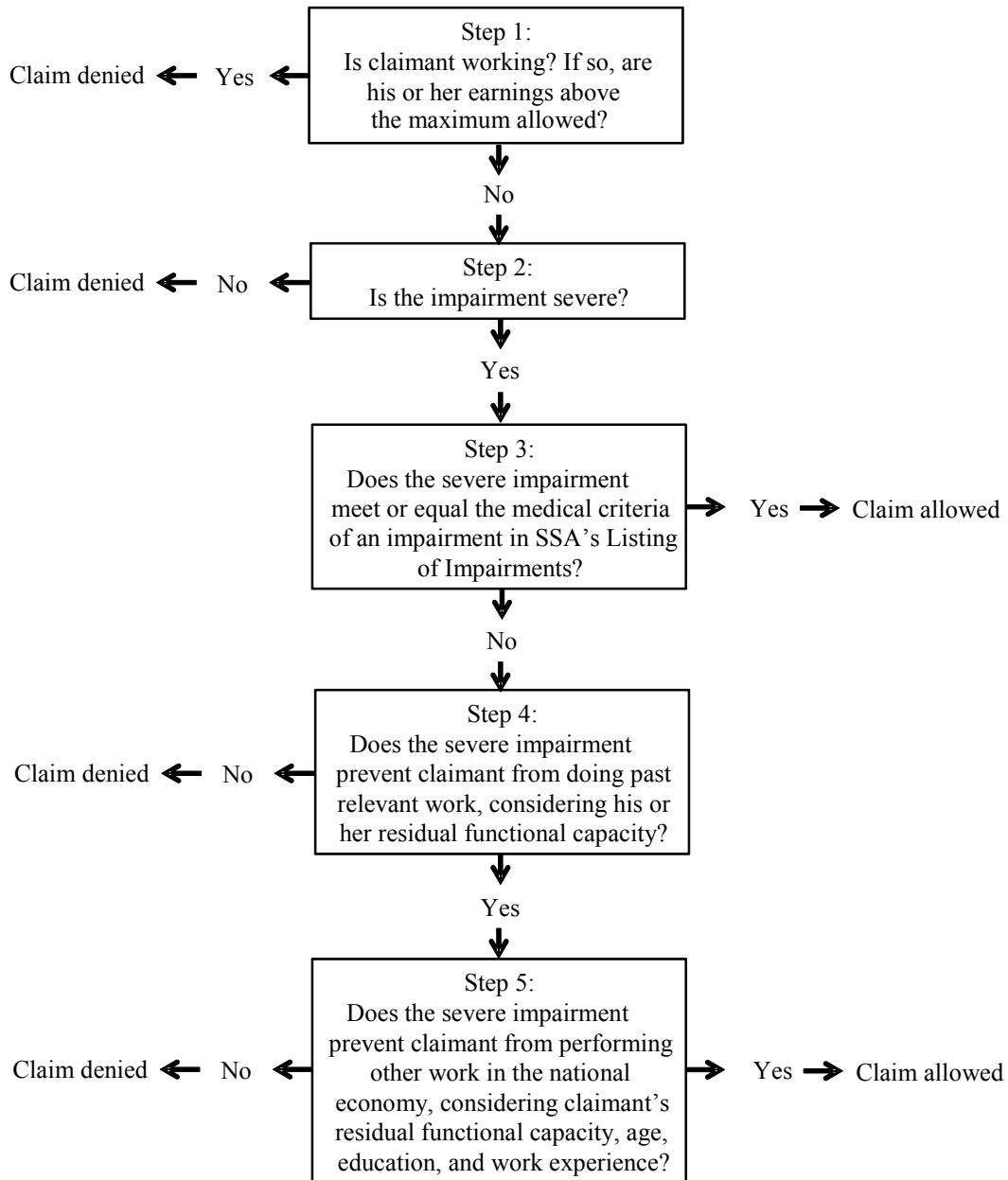
To make determinations for work activity exemptions, most of the profiled TANF programs rely heavily on self-reported disability questionnaires with written verification supplied by the TANF recipients’ personal physicians. Generally, the TSDTP TANF programs define “disability” as the inability to engage in mandated work activities, based on a physician’s assessment. While the Michigan TANF program makes exemption determinations through an internal office (called the Medical Review Team) that is in the same location as the local DDS, most of the programs require only minimal medical evidence. The TANF programs studied in the TSDTP rarely use vocational or work-readiness assessments to evaluate recipients who seek exemptions.

In contrast, SSA establishes physical and mental impairments based on medical evidence consisting of signs, symptoms, and laboratory findings. In the absence of sufficient medical evidence from the applicant, DDS will arrange and pay for a medical exam to obtain

The TANF/SSI Disability Transition Project

Figure 1

SSA's Five-Step Sequential Evaluation Process



SOURCE: U.S. Government Accountability Office (2005).

The TANF/SSI Disability Transition Project

Table 1

Criteria for TANF Work Activity Exemption and SSI Eligibility at the TSDTP Sites

| Site | TANF | SSI |
|-----------------------------------|---|---|
| Los Angeles County, CA | A medical professional completes a form verifying a recipient has a medical condition that limits his or her ability to work. The recipient is then considered “disabled” and is exempt from the welfare-to-work program. Specialized Supportive Services may conduct a subsequent assessment and determine the recipient exempt at a later time. | In all states, Disability Determination Services (DDS) assesses whether (1) the applicant has a medical condition that meets or medically equals the criteria and severity of an impairment in SSA’s Listing of Impairments or (2) the applicant is unable to engage in any substantial gainful activity, given his or her “residual functional capacity” (ability to work), age, education, and prior work experience. |
| Ocala Region, FL | While the TANF application asks about disabilities, adults with disabilities are not exempted from the work requirements and are required to register with the welfare transition program. Clients may be determined to be “excused” and must participate in work activities based on their medical ability to do so. | In both instances, the medical condition must have lasted or be expected to last, at a disabling level, for a continuous period of at least 12 months or must be expected to result in death. |
| Genesee and Muskegon Counties, MI | If a client reports a disability, TANF case managers have the ability to provide immediate deferrals from work and training requirements, up to 90 days, with a doctor’s note. If a doctor indicates a greater than 90-day deferral, the TANF staff provides a medical packet for the Medical Review Team (MRT). The MRT does not require the same level of evidence as DDS, does not consider residual functional capacity, and can make determinations on disabilities that are not expected to last 1 year. If the MRT determines the client is exempt, he or she is not required to participate in work activity. | |
| Hennepin and Ramsey Counties, MN | Clients with disabilities are required to provide documentation from a qualified professional, who can be a licensed physician or psychological practitioner. If found exempt from the federal work participation requirement due to a disability, a client is assigned to a special track. | |

the information needed. DDS evaluates the SSI applicant's ability to do both past work and other work in the national economy.

These discrepancies show that the procedures used to determine TANF exemption cannot accurately predict SSI eligibility. This presents a difficult challenge for TANF agencies; during TSDTP focus groups, staff members reported the need for strategies to assess whether SSI is appropriate for recipients with disabilities. Some TSDTP sites use innovative tools and procedures to predict SSI eligibility for such recipients.

- **Minnesota's State Medical Review Team (SMRT) for TANF clients:** In Minnesota, the State Medical Review Team (SMRT) is a unit that determines disability in order to determine eligibility for state medical assistance. SMRT uses the same criteria for determining eligibility as are used by SSA, though the financial criteria differ. SMRT is primarily used to identify General Assistance participants who may be eligible for SSI.¹¹ The model uses an algorithm that predicts disability based on administrative data, including 18 months of claims and benefit data. The program provides results to county social services offices that then make contact with the potentially eligible individuals, encourage them to apply for SSI, and connect them with the SSI advocacy program. The model has been adapted for use with the TANF population, and some counties have elected to receive the lists of their TANF clients who appear likely to have a disability so that they may follow up with additional assessments for these clients.
- **Michigan's Medical Review Team:** Michigan uses a Medical Review Team (MRT), which shares a building with DDS and uses a similar process, albeit different criteria, to make disability determinations for "long-term" TANF work-activity exemptions. The TANF staff can approve short-term (up to 90-day) deferrals for individuals with doctor's notes. If a TANF recipient claims a longer-term disability or limitation, that recipient's case is sent to the MRT. TANF staff members are required to prepare the MRT-specific forms with information gathered from the recipient. The MRT and DDS both use inability to work to define disability; however, the MRT requires less rigorous medical evidence and can make determinations for disabling conditions that are partial or last as little as 90 days (compared with a year for DDS). In addition, the MRT uses different forms than DDS; these and the divergent eligibility criteria sometimes result in different determinations than those from DDS (see *Developing Relationships Between SSA and TANF Offices* for more information). The MRT can determine that an individual does not have a disability and is therefore not exempt from work activity, is able

to work but with limitations, or does have a disability and may be appropriate for SSI. For those who are able to work with limitations, the MRT establishes each individual's functionality based on his or her limitations and shares a summary with the TANF staff. The MRT may recommend extra support from the TANF program for these individuals or a reduction in their mandated work hours. Those who are determined to have a disability are encouraged to apply for SSI. Michigan designed the MRT to make quicker, more accurate exemption determinations for TANF, compared with assessments made by personal physicians. It was also designed to identify appropriate referrals to SSA.

- **WeCARE in New York City:**¹² In 2005, New York City implemented the Wellness, Comprehensive Assessment, Rehabilitation and Employment (WeCARE) program for clients reporting that they cannot work due to mental or physical health conditions. Clients who are referred to WeCARE case managers undergo a comprehensive assessment that includes a medical evaluation, an integrated psychological and social evaluation, and laboratory tests. Using this assessment, WeCARE-contracted providers determine which of four main service tracks is most appropriate for the client: (1) vocational rehabilitation, for clients who are employable but with limitations; (2) treatment and development of a "wellness plan," for clients with unstable medical or mental health conditions; (3) SSI application assistance for clients who appear eligible for SSI; or (4) referral back to the general mandatory work program for clients who are fully employable without limitations. New York's Human Resources Administration also mandated participation in a wellness plan or another appropriate activity for clients who are referred to SSI. The program's emphasis on using comprehensive clinical assessments upon program entry rather than medical evaluations of specific ailments or disabilities is designed to develop a more holistic assessment of clients. An evaluation of the program's early implementation found that the design was not always translated into good practice and participants did not always receive the support and individually tailored services that they needed.¹³ The Human Resources Administration responded by directing contractors to implement client forums and suggestion hotlines, emphasizing the importance of individually tailored vocational rehabilitation plans, and creating a mechanism to ensure that contractors review the medical documentation provided by clients.¹⁴

Other Differences and Trade-Offs to Consider: What TANF Recipients May Want to Know

In addition to considering the likelihood that they may be eligible for SSI, TANF recipients may wish to take into account other factors when deciding to apply for SSI, such as their state's TANF policy on disability-related exemptions, programmatic work requirements, benefit levels, and available TANF services, as well as a number of individual and family needs and employment opportunities.

During interviews, the TSDTP found that some recipients indicated that an approved SSI application was their ultimate end goal. While it is true that SSI offers ongoing, stable benefits as long as an individual's condition continues to be disabling, and it is also true that the program generally provides more income support than TANF, other differences and trade-offs are worth considering. TANF and other eligibility staff may be involved in such conversations with recipients about the differences between TANF and SSI and can assist them in making the best choice, considering the various factors that affect them personally.

State Exemption Policies and Work Participation Requirements

State TANF agencies have freedom when deciding whether or not to exempt recipients with disabilities from work activity, subject to the pressures the state may face to meet federal work participation requirements. In many instances, there are divisions between policy and practice. Table 2 compares the policies and practices of states that are profiled in the TSDTP. Some states, such as New York (not shown in the table), exempt TANF recipients with disabilities from work activity but require those who are exempted to apply for SSI. The state allows these recipients to remain on TANF while they await a decision. Other states, such as Florida, request that TANF recipients apply for SSI if they submit a "medical deferral"; however, recipients are still required to participate in some type of activity, even if it is not at the federally mandated level, and their TANF time-limit "clocks" continue to count down.

Benefit Levels and In-Kind Trade-Offs

TSDTP focus groups and interviews showed that some TANF recipients make SSI application decisions based on the fact that SSI provides a higher benefit. And the financial benefits of SSI are higher than TANF; in the sites profiled for the TSDTP, a family of one adult and two children would gain on average \$625 more per month if the adult were receiving SSI instead of TANF.¹⁵ However, SSI benefits vary across states, and while they are higher than TANF payments in the TSDTP states, the monthly payments from both programs in 2010 were still below the federal poverty line for a family of three (which was about \$1,525 per month).¹⁶ Even recipients with children living in California, which provided the most generous SSI payments, could expect less than \$1,500 per month.¹⁷

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Table 2

TSDTP Sites' State Exemption Policies for Work Limitations

| State | Exemptions for Work Limitations | Practices in the Field |
|------------|--|---|
| California | Clients are not mandated to participate in work activities. | Exempt clients can volunteer for activities but are not required to participate in them. |
| Florida | Clients are mandated to register with the local workforce agency. | Participants with disabilities may be “excused” from work participation requirements. |
| Michigan | Clients are required to comply with service plans, which could include such activities as physical therapy, mental health support, drug treatment, or parenting classes, among others. | There are sanctions for recipients who do not take part in activities, although in practice sanctions are rarely invoked. |
| Minnesota | Clients are required to comply with employment plans, which include activities generally related to the treatment of their disabilities. | Clients who do not comply can be sanctioned, though several steps are required and as a result sanctioning is rare. |

Employment and Other Options for Self-Sufficiency

While SSI may provide a higher cash benefit than TANF, individuals and families will still face significant financial hardship if they rely on the income support from either TANF or SSI. In the long term, full-time steady employment or part-time employment together with income support from TANF or the Supplemental Nutrition Assistance Program may be a better financial option for many families and individuals. While some adults with disabilities cannot maintain steady work, data consistently show that many people with disabilities do work.¹⁸

Yet the TSDTP found that some TANF recipients are reluctant to pursue work-related activities out of fear that any work participation could jeopardize their SSI applications. The TANF staff members who were interviewed also worried that participation in work activities could hinder a person’s ability to obtain SSI payments. MDRC learned that some practitioners went so far as to reduce clients’ required activities while they waited for SSA’s decision. This is a potentially risky approach because many recipients, including those who are deemed disabled by the TANF agency, may ultimately not be approved for SSA. Depending on where they live, if recipients choose to forgo any work activity and their SSI applications are ultimately denied,

they could use up months of their TANF time limits without making any progress in improving their job prospects.

This may be the case for many SSI applicants. The TSDTP found new SSI applicants in Fiscal Year 2007 averaged 8.4 total months of processing time from their earliest application to the final decision on their last application.¹⁹ With this in mind, public assistance administrators may choose to identify opportunities to improve employment outcomes for people who have work limitations.

Employment Options on SSI

Though SSI does not mandate work activities in the way that TANF does, the program offers employment support programs and other aids to financial sustainability. The Ticket to Work and Self-Sufficiency Program gives recipients a wide range of choices for obtaining vocational services and gives vocational services providers incentives to serve SSI recipients effectively.²⁰ Most recipients become eligible for Ticket to Work when they become eligible for SSI payments. They can use Ticket to Work with vocational providers, which will receive some payments from SSA if they succeed in engaging SSI recipients in vocational activities and work. In addition to employment supports, SSA also offers several incentives for SSI recipients who work, including (1) earned-income disregards that create financial incentives for working, and (2) rules that allow recipients to work without fear that such efforts will trigger a review of their disability status or loss of cash payments.²¹ If an individual is working at an income level that disqualifies him or her for SSI payments but becomes unable to continue working at that level due to his or her physical or mental condition(s) within 12 months of his or her initial ineligibility for SSI, the program offers quick reinstatement of SSI payments. SSA also provides ongoing access to Medicaid even while an SSI recipient is working.²² While these programs and incentives provide real opportunities to move toward financial sustainability, the employment take-up rates for SSI recipients remain quite low.

Options for TANF Recipients Not Eligible for SSI

Many TANF recipients with work limitations will not meet SSI's criteria for long-term disability benefits, and depending on the state they live in, their time-limited TANF benefits could eventually expire. Specific programs and individually tailored, ability-focused supports may have a positive effect on employment outcomes for TANF recipients with work limitations. The following are a number of approaches that TANF administrators can consider:

- **Motivational interviewing:** This tool was used in the Michigan pilot of the TSDTP. Motivational interviewing is effective in helping individuals see past their current situations and work toward sustainable plans. It encourages col-

laborative interactions between clients and staff members that focus on positive change, and in other vulnerable populations it has been shown to increase motivation and engagement in goal-based activities.²³ It is currently being provided in several state TANF programs and is part of the Welfare Peer Technical Assistance Network's training curriculum.

- **Disability-specific services:** The Michigan pilot project of the TSDTP incorporated individually tailored services for people with work limitations. This type of program focuses on identifying a client's abilities and skills, resolving employment barriers, providing on-the-job-training and support, and working with employers to reduce the stigma associated with disability. Organizations may also offer rehabilitative services, including help with disease management (for example, medication management, contact with doctors or therapists, and relapse prevention); home management (for example, cooking, proper nutrition, and cleaning); and stabilization (for example, crisis intervention and access to treatment). Though no rigorous study has been performed of these services' effectiveness, they have been identified as promising practices.²⁴ Minnesota's pilot program also provided services focused on people with disabilities, as discussed below.
- **Supported employment:** Individualized Placement and Support is a supported employment model used as part of the Minnesota pilot project of the TSDTP. The core principles of the model include finding competitive jobs in the community that fit participants' needs and interests; fully integrating mental health services; using a rapid job search approach to help participants find jobs directly rather than providing lengthy assessments, training sessions, and counseling; and designing goals and plans that are based on individuals' preferences, strengths, experiences, and abilities. State TANF agencies may benefit from partnering with community-based vocational service providers that offer similar programs. Individualized Placement and Support was found to be effective in mental health programs serving individuals with severe mental illness, and research studies are currently underway to determine whether it is effective with TANF recipients.²⁵

Helping TANF Recipients Apply for SSI: What TANF Can Do

Once TANF recipients decide to file for SSI, they can face a number of challenges in navigating the complex and lengthy application process. Many clients may need support gathering medical documents or articulating detailed work histories.

SSI Advocacy Services

“SSI advocacy” is a broad term for services provided to assist individuals with SSI applications. Services differ across states in terms of designated providers, service models, and funding. They can include conducting developmental and functional assessments, working with clients to gather medical evidence or to order additional testing, writing descriptions of work history, and coordinating the entire application process. Table 3 presents examples of SSI advocacy strategies from the TSDTP study sites.²⁶ These strategies are generally implemented on a small scale and there are no current evaluations of their impact on SSI applications. TANF administrators may want to consider a number of desired outcomes when assessing the value of SSI advocacy services, compared with outcomes for recipients who apply independently: (1) the percentage of advocacy program clients who are accepted into SSI on initial review, compared with the number of unassisted SSI clients accepted on initial review; (2) the percentage of advocacy program clients who avoid a DDS-requested medical exam for verification (and, therefore, extra review time), compared with the percentage of unassisted SSI applicants for whom the DDS requests a medical exam; (3) the percentage of advocacy program clients screened out or diverted from SSI due to a high likelihood of ineligibility; and (4) the percentage of advocacy program clients referred to appropriate services or support programs other than SSI.

As noted, SSI advocacy is provided in various forms. Some programs focus on helping candidates for whom an SSI approval is unlikely without the extra support. Others try to ensure quicker determinations for those who will probably be approved either way. Some states profiled in the TSDTP contract out SSI advocacy services to private organizations and compensate them for successful SSI applications. Like other performance-based contracting practices, this approach may induce contractors to select those cases most likely to be approved for SSI. Moreover, though award rates may look promising, there is no rigorous evidence to date on these approaches, and further rigorous research is warranted.

SOAR: The SSI/SSDI Outreach and Recovery Model

SSI/SSDI (Social Security Disability Insurance) Outreach and Recovery (SOAR) is a multiagency federal initiative that provides training and technical assistance to states to develop SSI/SSDI advocacy initiatives.²⁷ The model was originally designed to help community-based caseworkers develop the means to expedite processing of SSI (and SSDI) applications for homeless individuals. Although the model was developed to serve the homeless population, the Michigan TSDTP pilot program used a variation of SOAR in working with TANF clients. TANF staff members reported that the training and technical assistance in SSI processes improved their understanding of the SSI program. They noted that it helped them understand how SSI determined eligibility and helped them better explain this information to TANF

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Table 3

Examples of SSI Advocacy Programs Offered at the TSDTP Sites

| State | Population Served | Services Offered |
|-------------------------------|---|--|
| California (Riverside County) | Recipients who report one or more mental health conditions and have been exempt for 12 months (or have a condition that is expected to last at least 12 months). | County employees provide mental health services and assist with the SSI application process, specifically focusing on the initial application and the appeals process. |
| Michigan | State-funded TANF or state disability assistance ^a recipients — in other words, those who are disabled or blind and are determined to be exempt from federally mandated work activity. | Clients are voluntarily referred to state-employed advocates who assist them with the SSI application and appeals process. Responsibilities of the SSI advocates vary based on the needs, procedures, and geographic limitations of the offices they serve, but can include reviewing local TANF office referral processes for determining SSI eligibility, reviewing medical packets for clients who have disabilities, authorizing, requesting medical evidence to support SSI applications, training or consultation to local TANF staffs, representing clients at SSA administrative hearings, and making referrals to legal services. |
| Minnesota | Recipients who have been exempted due to disability for at least 12 months. | Services are contracted to local organizations across the state. The Ramsey County contractors took a case management approach; they discussed each client's case, scheduled doctors' appointments, and accompanied the client to the SSA field office to complete the application. |

NOTE: ^aState disability assistance is cash assistance provided to adults who have a disability and who do not have dependent children.

recipients. Yet they also noted that the elements of SOAR used in the pilot program led to a lengthy process and called for additional staff resources. Further research is required to understand whether the SOAR model is appropriate for TANF programs and to determine its costs and benefits.

Developing Relationships Between SSA and TANF Offices

It is likely that both SSI advocacy and SOAR's success depend on open communication and consistent coordination between SSA/DDS offices and the staff members assisting clients in applying, and on agreement on a common objective. Yet based on TSDTP field research, current interactions among TANF, SSA, and DDS are generally limited and are often informal, locally based, and driven by personal relationships. Two of the TSDTP sites pilot-tested innovative initiatives to improve cross-agency relationships in efforts to share information, make appropriate referrals, better assist clients, and improve the application process. Results from the pilot tests described here will be available in the TSDTP final report.

Los Angeles County Pilot Project

- The Los Angeles County Department of Public Social Services' SSI advocates help TANF recipients apply for SSI if they are exempt from work participation due to a disability. As part of the pilot intervention, local SSA or DDS staff members gave the advocates training that was designed to strengthen the quality of SSI applications. Advocates were taught how to complete functional assessments and provide better descriptions of past work history.
- DDS provided continual feedback on the quality of applications received from the SSI advocates. That feedback helped to reinforce effective practices as well as strengthen areas that needed improvement.
- The Department of Public Social Services, SSA, and DDS established local liaisons to develop effective work flows, facilitate coordination and communication regarding the SSI application process, and address problems with specific cases as appropriate.

Muskegon County, Michigan, Pilot Program

- As noted earlier, Michigan uses its MRT to make determinations for TANF work exemptions. The MRT can determine that an individual is not disabled, has a short-term or partial disability, or is disabled and may be eligible for SSI. Although the MRT shares a building with DDS, it does not require the same level of evidence, does not follow the same process, and uses different forms to make determinations. In addition, a direct pathway from TANF exemption to SSI application does not exist. The TSDTP pilot program attempted to create that pathway for individuals who the MRT determined to

have a disability, by aligning operational and decision-making processes, and by creating relationships.

- To better align MRT and DDS decisions, the pilot project attempted to replicate the SSI application processes for the MRT. In addition, specialized TANF staff members were trained in identifying work limitations using SSI medical evidentiary standards in order to improve applications to the MRT, and potentially SSI. All TANF staff members participating in the pilot program attended training sessions on the SSA's programs, its processes, and its eligibility criteria. MRT staff members with SSA training were regularly available to answer questions and provide feedback on applications.
- As noted, the pilot program attempted to replicate the SSI application process for the MRT, and as a result align application outcomes. Under this design, any individual deemed by the MRT to have a disability would ideally receive the same determination from DDS, and the MRT application could potentially support an SSI/SSDI application. If an individual was determined by the MRT to have a disability and that individual had not already applied for SSI, the TANF staff automatically forwarded the application and communicated with DDS. The individual was not required to complete additional paperwork to apply for SSI and potentially faced a shorter wait time for an SSI determination. An analysis of the pilot program's outcome findings can be found in the final report of the TSDTP.

Conclusion

Although the SSI program may be an alternative support for certain TANF recipients with disabilities, individuals have multiple points to consider when making the decision to apply. SSI's disability determination criteria are much more stringent than the policies that TANF programs use to exempt clients with work limitations from required activities. State TANF agencies can replicate innovative initiatives such as Minnesota's State Medical Review Team or New York City's WeCARE program to make more accurate and holistic disability determinations.

A number of trade-offs are associated with choosing either TANF or the SSI program. While individuals primarily consider the severity of their disabilities before applying to one or the other (as revealed by focus groups with a small number of TANF recipients), they may also weigh the in-kind benefits and exemption policies of their state's TANF program. Applicants should also know that although SSI payments are more generous than TANF cash assistance, they may still fall below the federal poverty line. To ensure TANF recipients' financial sustain-

ability and to take into account that not all recipients with disabilities are eligible for SSI, public assistance administrators can, when appropriate, identify approaches to improve employment and training opportunities for people with work limitations instead of exclusively considering alternative income support programs. Options include SSA's Ticket to Work and Self-Sufficiency Program, for applicants who are approved for SSI, as well as motivational interviewing and supported employment. Additionally, a number of programs in place are designed to support clients in applying for SSI and improving communication between TANF and SSA offices. By educating staff and implementing innovative support systems, TANF programs may be able to better inform TANF recipients and support strong applications for SSI.

Notes

¹Loprest and Maag (2009).

²Although SSI is means-tested, SSA does not count some income earned after an individual begins receiving benefits. When this happens it is known as an "earned-income disregard," and it allows SSI recipients to increase their incomes by combining work with benefits, providing them a greater incentive to work.

³Based on an analysis conducted as part of the TSDTP, just 38 percent of TANF recipients who initially applied for SSI in Fiscal Year 2007 were ultimately awarded benefits. For more information on how SSI award rates among TANF recipients compare to those of individuals without a recent history of TANF receipt, please see Skemer and Bayes (2013).

⁴In 2004, the U.S. Government Accountability Office conducted a qualitative study on the interaction between TANF and SSI, surveying county TANF offices. It found that the vast majority (95 percent) of TANF offices reported that their interaction with SSA could improve, and 57 percent reported that it would be useful to have training on the SSI application process and eligibility requirements. See U.S. Government Accountability Office (2004).

⁵Farrell and Walter (2013).

⁶The phrase "substantial gainful activity" describes a level of work activity that is both substantial and gainful. Substantial work activity involves the performance of significant physical or mental duties, or a combination of both, which are productive in nature. For activity to be substantial, it need not necessarily be performed on a full-time basis; work activity on a part-time basis may also be substantial. Gainful activity is work performed for pay or profit, or work of a nature generally performed for pay or profit, whether or not a profit is realized. For SSI purposes, the substantial gainful activity provision does not apply to blind individuals. In 2013, the monthly substantial gainful activity amount was \$1,040 for nonblind individuals. See Social Security Administration (2012).

⁷Social Security Administration (2012).

⁸SSI excludes the first \$20 per month of most income received, the first \$65 per month earned from working, and half the amount earned over \$65 per month. See Social Security Administration (2013a).

⁹Farrell and Walter (2013).

¹⁰For more information on SSA's Listing of Impairments, see Social Security Administration (2013b).

¹¹State General Assistance programs serve as safety nets for those who are very poor and who do not qualify for TANF.

¹²New York State participated only in the data analysis portion of the TSDTP and no site visits were conducted in New York as part of this project. However, MDRC visited and conducted an evaluation of PRIDE, the program on which WeCARE was built, as part of the Employment Retention and Advancement (ERA)

project. By the end of the ERA project, WeCARE was being implemented. See Bloom, Miller, and Azurdia (2007).

¹³Kasdan and Youdelman (2007).

¹⁴New York City Human Resources Administration, Department of Social Services (2009).

¹⁵This estimate considers federal cash assistance, TANF child assistance, and state supplements with the exception of Florida. The calculation does not consider that the families' Supplemental Nutrition Assistance Program benefits would be reduced with an increase of SSI income. The Florida estimate does not include the SSI state supplement, which is limited to families receiving assisted-living services. See Farrell and Walter (2013).

¹⁶Office of the Assistant Secretary for Planning and Evaluation (2010).

¹⁷The TANF benefit in California depends on the region in which the family lives. The estimates for California are based on the maximum benefit for families living in Region 1, which comprises the larger and higher-cost counties in the state (including Los Angeles County).

¹⁸According to September 2013 Bureau of Labor Statistics data, approximately 20 percent of people with disabilities participate in the civilian labor force. Bureau of Labor Statistics (2013).

¹⁹New SSI applicants are individuals who, according to available data, applied to SSI for the first time in Fiscal Year 2007 as adults in states that provided data on all of their active cases. The analysis included data on individuals who submitted multiple applications. The last application filed was calculated based on data available through 2009. Applicants could have applied again after that time.

²⁰For a complete overview of the Ticket-to-Work incentives, see Social Security Administration (2013d).

²¹In addition, SSA offers an earned-income exclusion for any student who is under age 22 and attends school regularly. For more information on SSI program work incentives, see Social Security Administration (2013c).

²²Thornton et al. (2007).

²³Burke, Arkowitz, and Melanchola (2003).

²⁴Kauff (2008).

²⁵Bond, Drake, and Becker (2008); Farrell and Walter (2013).

²⁶At the time of the TSDTP field assessment, Florida did not have a state-run SSI advocacy program and therefore is not included in the table.

²⁷SSDI pays benefits to disabled individuals if they are "insured," meaning that they worked a minimum number of years to qualify and paid Social Security taxes.

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