

# SSI & TCA PARTICIPATION AMONG LONG-TERM DISABLED CASES

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Maryland's Temporary Cash Assistance (TCA) program serves customers who have a wide range of needs. Although the ultimate goal of cash assistance is for adult recipients to find stable employment and become self-sufficient, this may not be possible for all recipients. TCA recipients experiencing a disability or illness that renders them unable to work are considered part of the *long-term disabled* population on TCA.

Long-term disabled clients are those with medically certified disabilities or serious illnesses expected to last more than 12 months. As a condition of receiving TCA, long-term disabled clients are required to submit applications for Supplemental Security Income (SSI), a federal program that supports low-income aged, blind, and disabled adults and children. To be eligible to receive these benefits, an individual must have limited income and a medical condition that is expected to last at least one year, and that individual must be unable to participate in substantial gainful activity as a result of this condition (SSA, 2018c).

Prior to October 2015, TCA benefits for long-term disabled cases were paid solely through state funds, exempting them from the federal work participation rate (WPR).<sup>1</sup> However, the percentage of long-term disabled cases grew considerably, increasing from 10% of the 2010 caseload to 16% of the 2014 caseload (Hall & Passarella, 2016). As a result of this growth, the payment source of TCA benefits for long-term disabled cases was switched to federally reimbursable funds in October 2015. This shift meant that long-term disabled clients would be included in the WPR, although they would not necessarily be required to participate in work-related activities.

Making the transition from TCA to SSI can result in more stable, generous, and long-term assistance for families experiencing disability. The maximum monthly TCA benefit for a family of three in 2015 was \$636 (DHS, 2014). In contrast,

## KEY FINDINGS

- ❖ Most long-term disabled cases had individuals who submitted at least one application for SSI, and the majority of applicants applied multiple times.
- ❖ One in six cases with an application received SSI during the two-year follow-up period.
- ❖ Most SSI application denials were related to a client's disability, and capacity for substantial gainful activity accounted for over half of all denials.
- ❖ SSI recipient cases were more likely to be work-exempt—and excluded from WPR calculations—than SSI non-recipient cases.
- ❖ SSI recipient cases were less likely to re-open after closure than non-recipient cases.
- ❖ The most common TCA case closure reason among both groups was non-cooperation with the eligibility process.

<sup>1</sup> See WPR description on page 2.

eligible individuals were entitled to receive \$733 per month in SSI benefits in the same year (SSA, 2018a). In order to help long-term disabled clients successfully transition from TCA to SSI, FIA utilizes a contractor to provide assistance to clients during the application, appeals, and approval processes.

Because TCA is intended to be temporary, it is important that long-term disabled recipients apply for and receive SSI if eligible. In this report, we examine the trajectory of former long-term disabled cases after the October 2015 policy change. In particular, we focus on whether these cases applied for SSI, whether they were approved, and whether they continued to receive TCA. Examining the characteristics of long-term disabled cases and their transition to SSI is key to ensuring families are receiving the assistance they need.

## Methods

This report examines individuals on cases designated as long-term disabled who received TCA in July, August, or September 2015 (n=4,157), which is state fiscal year (SFY) 2016. The first month in the state fiscal year that a family actually received benefits is the first month included in the analysis. The *four-year study period* refers to two years before and two years after the first month of TCA receipt in SFY 2016; the *two-year follow-up period* is two years after the first month of receipt in SFY 2016.

Analyses in this report are based on data from the Client Automated Resources and Eligibility System (CARES) and the Social Security Administration. CARES is an administrative database maintained by the State of Maryland that provides individual-and-case level program participation data

## Work Participation Rate (WPR)

As a condition of receiving assistance, work-eligible individuals are required to participate in federally defined work activities for 20 to 30 hours per week. States are assessed on whether work-eligible individuals meet this requirement with the work participation rate. The denominator of this rate is the number of all work-eligible individuals in the state, and the numerator is the number who have participated in work activities for the required number of hours. States must meet a 50% WPR, although this can be reduced through a caseload reduction or maintenance of effort credit. If the WPR is not met, the state may receive a financial penalty.

for TCA recipients. Through the State Data Exchange, the Department of Human Services receives an extract of data related to the Supplemental Security Income (SSI) program from the federal Social Security Administration. This extract was used to determine whether individuals applied for SSI, whether they were denied, and whether they received SSI payments.

## SSI Applications

Because long-term disabled clients are required to apply for SSI as a condition of receiving TCA, it is important to track how many cases have individuals who submitted applications. Earlier reports examining long-term disabled TCA recipients found that the vast majority of individuals on long-term disabled cases do apply for SSI at some point (Williamson, Nicoli, & Born, 2013; Gleason & Nicoli, 2015). As shown in Figure 1, this trend has continued. On 86% of cases, at least one individual applied for SSI during the four-year study period, indicating that most long-term disabled TCA recipients are applying for SSI as required.

**Figure 1. Percent Applied to SSI**



**Note:** Represents any case member who applied (n=3,559) or did not apply (n=598) during the four-year study period.

To successfully apply for SSI, clients must submit to medical and asset tests to ensure they meet the requirements for assistance. Due to these tests, and the variety of paperwork that must be submitted during the application process, it is common for clients to submit multiple applications. In fact, most individuals on long-term disabled cases who applied for SSI did so more than once during the four-year study period, as shown in Table 1. More than half of families applied for SSI multiple times, with just under one third (30.7%) applying twice, about one in seven (15.3%) applying three times, and just under one in 10 (9.1%) submitting four or more applications. The fact that most applicants submitted multiple SSI applications is a positive sign, as it shows that many clients continue to comply with the requirement to apply for SSI, even if they face initial denials.

**Table 1. Number of SSI Applications**

Number of SSI Applications	%	n
1 application	44.9%	(1,598)
2 applications	30.7%	(1,094)
3 applications	15.3%	(543)
4 or more applications	9.1%	(324)

**Note:** Includes applications made by any case member during the four-year study period.

## SSI Receipt

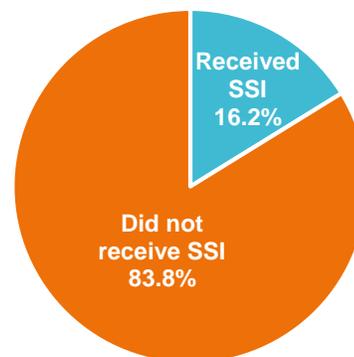
Although the majority of long-term disabled cases had individuals who submitted applications for SSI, many of these applicants did not ultimately receive SSI benefits during the two-year follow-up period. As displayed in Figure 2, about one in six (16.2%) applicants received SSI. The percentage of cases with SSI receipt is lower than in previous research on the long-term disabled

population. Examining SSI applications by the long-term disabled population in October 2011

showed that over one fifth (21.6%) of all long-term disabled cases had individuals who received SSI after one year (Gleason & Nicoli, 2015). This difference coincides with a decline in the number of new awards nationally during this time period. In the United States, the number of individuals with new SSI awards declined by 28% among adults ages 18 to 64 between 2011 and 2015 (SSA, 2018a).

Among those approved for SSI, half (50.9%) received SSI for one year or less, and another half (49.1%) received SSI for 13 to 24 months during the two-year follow-up period.

**Figure 2. SSI Receipt Among Applicants**

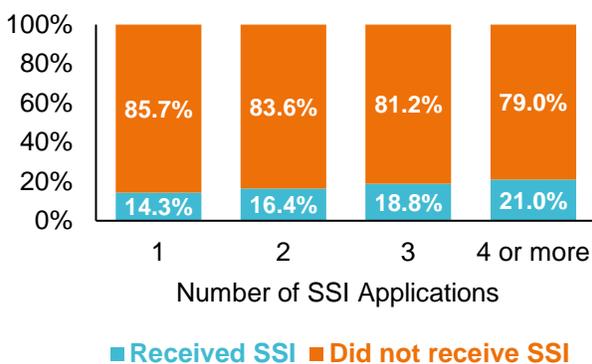


**Note:** Includes any case member who received (n=578) or did not receive (n=2,981) SSI during two-year follow-up period. Valid percentages reported.

Various factors may impact whether individuals receive SSI, and one of these factors is the number of times that they apply for assistance. Figure 3 shows the percent of individuals who received SSI during the two-year follow-up period by the number of applications they submitted. Cases with individuals who submitted multiple applications were more likely to be approved to receive SSI than those with one application. In fact, of all long-term disabled SSI applicants with one application during the four-year study period, only 14% received SSI. Cases with individuals who submitted four or more applications (21.0%) were seven percentage points more likely to receive SSI than those who submitted only one (14.3%).

Due to the intricacy of the SSI application process, successful applicants may need to apply multiple times to ultimately receive assistance. As such, applicants should be encouraged to continue to comply with the SSI application requirements even if their first or second applications are denied, as this could increase their chances of receiving SSI benefits.

**Figure 3. Receipt of SSI by Number of Applications**



**Note:** Includes applications made by any case member during the four-year study period (n=3,559).

## SSI Denials

While some individuals were successful in applying for and receiving SSI, a substantial portion of the long-term disabled population applied for SSI and eventually had their applications denied. The reasons why these applications were denied vary, and examining these denial reasons can provide a clearer picture as to why some cases are not approved for SSI.

Denials of SSI applications can be grouped into two main categories: denials related to disability and denials related to the application process. Table 2 shows all denials issued during the four-year study period. Since the majority of cases had individuals who submitted multiple applications, some denials may be for cases that are subsequently approved, and some individuals may have two or more denials included.

Most denials were related to the client's disability; in total, disability-related reasons accounted for 60% of denials. Application denials related to disability were most often due to the client's ability to engage in substantial gainful activity (SGA). SGA is defined as "work activity that involves doing significant mental or physical activities" and is the type of work usually done for pay or profit (Employee's Benefits, 2018). If a client is deemed to have the capacity for SGA, or has been engaging in SGA, the application for SSI may be denied. Capacity for SGA was the reason for denial in half (51.0%) of denied applications and was the most common denial reason overall. Other disability-related denial reasons included slight impairment (6.4%), engaging in SGA despite impairment (1.9%), and other disability-related reasons (0.9%).

**Table 2. SSI Denial Reasons among SSI Applicants**

Denial Reason	%	<i>n</i>
<b>Disability Related</b>	<b>60.2%</b>	<b>(3,919)</b>
Capacity for substantial gainful activity	51.0%	(3,319)
Slight impairment	6.4%	(418)
Engaging in substantial gainful activity despite impairment	1.9%	(122)
Other disability related reasons	0.9%	(60)
<b>Process Related</b>	<b>39.8%</b>	<b>(2,586)</b>
Insufficient or no medical data furnished	28.2%	(1,831)
Failure to submit to consult examination	7.1%	(459)
Failure to cooperate	1.9%	(122)
Income or resources exceed limitations	1.4%	(86)
Other process related reasons	1.4%	(88)

**Note:** This table includes all denials of SSI to any case member during the four-year study period, regardless of subsequent SSI approval (n=6,505). Because many cases applied and were denied more than once, denials for the same case are included. All other reasons each accounted for less than 1% of the total. Valid percentages reported.

Process-related denials were those in which the application process was unable to be completed for reasons including missing data or paperwork, failure to submit to examinations, or failure to cooperate. Two fifths (39.8%) of denials were related to the application process. The most common process-related denial reason was insufficient or no medical data furnished (28.2%), followed by failure to submit to consult examination (7.1%), failure to cooperate (1.9%), income or resources exceed limitations (1.4%), and other process related reasons (1.4%).

Previous research suggests that initial denials are more likely to be related to an applicant’s disability, and denials for subsequent SSI applications are more likely to be related to non-cooperation with the application process or missing documentation (Williamson et al., 2013). Initial denials for disability-related reasons do not necessarily mean clients will not eventually be approved for SSI, as the condition may worsen over time or clients may have better documentation of their condition in subsequent applications.

### TCA Participation

Virtually all long-term disabled cases continued to receive TCA after submitting SSI applications, and examining this receipt can provide valuable insight into the TCA outcomes of long-term disabled clients. While SSI recipient and SSI non-recipient cases were similar in terms of length of TCA receipt, these groups had differing outcomes in terms of caseload designation, case closures and re-openings, and case closure reasons.

SSI recipient and non-recipient cases were remarkably similar in the length of time they received TCA, both before and after the October 2015 policy change. Table 3 shows TCA participation among SSI applicants both before and after the first month of TCA receipt in SFY 2016. During the previous five years, both groups received TCA for 33 months, on average. During the two-year follow-up period, SSI recipient cases received TCA for slightly less time than SSI non-recipient cases, on average (16 months vs. 17 months).

**Table 3. TCA Participation among SSI Applicants**

	Received SSI		Did Not Receive SSI	
	%	n	%	n
<b>Cumulative Receipt in Previous 5 Years</b>				
Average [median]	33.2	[33]	32.9	[33]
<b>Cumulative Receipt in Two Follow-up Years</b>				
Average [median]	16.1	[18]	16.7	[20]

**Note:** Represents TCA receipt during the four-year study period.

It is worth noting that SSI applications generally take three to five months to process and can take longer depending on the submission of medical records and other materials (SSA, 2018c). Thus, applicants who received SSI during the two-year follow-up period likely had at least several

months between application and receipt during which time they may have still received TCA. Applicants who applied multiple times may have spent even longer on TCA during the application processing period. Additionally, an individual receiving SSI is not eligible to receive TCA, but that does not necessarily disqualify other case members from TCA receipt. For example, a child or another adult on the case may still be eligible for TCA benefits.

Another way SSI recipient and SSI non-recipient cases differed was in terms of caseload designation, which categorizes cases into groups based on families' needs and the appropriate interventions for those families.<sup>2</sup> Table 4 shows caseload designations for long-term disabled cases in the last month of TCA receipt during the two-year follow-up period.

**Table 4. Caseload Designation by SSI Receipt among SSI Applicants**

	Received SSI		Did Not Receive SSI	
	%	n	%	n
<b>Work-eligible</b>	<b>58.6%</b>	<b>(332)</b>	<b>88.9%</b>	<b>(2,604)</b>
Single-parent cases	51.5%	(292)	76.1%	(2,230)
Earnings cases	3.2%	(18)	6.1%	(180)
Short-term disabled	1.2%	(7)	2.8%	(83)
Legal immigrant	0.2%	(1)	0.6%	(19)
Domestic violence	2.1%	(12)	2.4%	(70)
Two-parent cases	0.4%	(2)	0.8%	(22)
<b>Work-exempt</b>	<b>41.4%</b>	<b>(235)</b>	<b>11.1%</b>	<b>(326)</b>
Child-only	24.3%	(138)	1.4%	(42)
Child under one	0.5%	(3)	1.0%	(28)
Long-term disabled	3.4%	(19)	4.3%	(126)
Caring for disabled family member	13.1%	(74)	4.0%	(116)
Needy caretaker relative	0.2%	(1)	0.5%	(14)

**Note:** Includes all case members who applied for SSI and continued to receive TCA during the two-year follow-up period. Caseload designations are for the last month of TCA receipt during the two-year follow-up period. The long-term disabled designation is made up of cases that closed by October 2015. Valid percentages reported.

<sup>2</sup> See sidebar on page 7 for more information on caseload designation.

## CASELOAD DESIGNATION

### Work-Eligible Cases

#### Single-Parent Cases

Traditional TCA cases with a single parent

#### Earnings Cases

Client has earnings below the eligibility threshold

#### Short-term Disabled

A member of the assistance unit has a disability lasting less than 12 months

#### Legal Immigrant<sup>^</sup>

Qualified immigrants who do not meet the requirements to receive federally-funded TCA

#### Domestic Violence

A victim of domestic/family violence who receives a good cause waiver for certain requirements

#### Two-Parent Cases<sup>^</sup>

Two able-bodied adults who share a child

### Work-Exempt Cases

#### Child-Only

Cases in which only children are included in the calculation of the cash assistance benefit

#### Child Under One

Single parent with a child under the age of one

#### Caring for a Disabled Family Member

Client is caring for a family member with a disability, such as a spouse or child

#### Needy Caretaker Relative

A non-parent relative who is caring for a child

<sup>^</sup> These cases do not receive federal TANF funding and are not included in the federal work participation rate.

In general, SSI recipient cases were more likely to be work-exempt and child-only, whereas SSI non-recipient cases were more likely to be work-eligible and single-parent. In both groups, the majority of cases were designated as single-parent cases. Slightly over half (51.5%) of SSI recipient cases were single-parent, compared to three fourths (76.1%) of SSI non-recipient cases. SSI recipient cases were much more likely to be child-only; almost one quarter (24.3%) of these cases were child-only, compared to 1% of non-recipient cases. Additionally, cases with SSI receipt were more likely to have the designation of caring for a disabled family member (13.1%) than cases without SSI receipt (4.0%).

Caseload designations for the long-term disabled population can have implications on the federal WPR, as work-exempt cases are not required to participate in work activities and are thus not included in the WPR. SSI recipient cases were substantially more likely to be designated as child-only or caring for a disabled family member than SSI non-recipient cases, making them more likely to be work-exempt and excluded from the WPR. The work-exempt designation of cases that do not have employed individuals, such as those designated as child-only or caring for a disabled family member, potentially benefits the state by improving the WPR.

Case closure may indicate that families no longer need TCA benefits, so case closures and returns to assistance after closure are important when examining TCA receipt among SSI applicants. Table 5 displays case closures and re-openings for SSI recipients and non-recipients. While more than eight in 10 cases in both groups closed, SSI recipient cases were much less likely to re-open than SSI non-recipient cases. Just under three fifths (57.0%) of SSI recipient cases re-opened after the first closure, compared to slightly less than three fourths (71.6%) of SSI non-recipient cases implying that these families still require assistance. Conversely, SSI recipient cases were less likely to re-open, suggesting that the 43% of TCA cases that did not re-open were able to transition off TCA with the assistance of SSI benefits.

In addition to SSI non-recipient cases being more likely to re-open, these cases were also more likely to close multiple times. Cases with applicants who did not receive SSI were more likely to close at least three times than cases with applicants who received SSI.<sup>3</sup>

<sup>3</sup> Analysis not shown.

**Table 5. TCA Case Closures & Re-Openings among SSI Applicants**

	Received SSI		Did not receive SSI	
	%	<i>n</i>	%	<i>n</i>
<b>Case closed</b>	<b>83.7%</b>	<b>(484)</b>	<b>86.1%</b>	<b>(2,567)</b>
Case re-opened	57.0%	(276)	71.6%	(1,837)
Case did not re-open	43.0%	(208)	28.4%	(730)

**Note:** Includes all cases that applied for SSI & closed at least once during the two-year follow-up period.

Case closures can occur for a wide range of reasons. There were two substantial differences in the closure reasons between SSI recipient cases and SSI non-recipient cases, as shown in Table 6. Cases with no SSI receipt were more likely to close due to non-cooperation with the eligibility process (35.4% vs 28.1%), and cases with SSI receipt were more likely to close due to an income above the limit (15.9% vs 10.1%).

The most common closure reason across both groups was non-cooperation with the eligibility process. This closure reason is assigned to long-term disabled TCA cases in which clients do not apply for SSI as required, and the prevalence of this closure

reason may suggest that many of these recipients did not comply with the requirement to apply for SSI in a timely fashion or did not submit an appeal (DHS, 2015). As such, it makes sense that cases with individuals who did not receive SSI are more likely to close due to non-cooperation with the eligibility process. Further, the prevalence of this closure reason may contribute to over half of TCA cases re-opening after initial closure, regardless of eventual SSI receipt. Individuals who did not comply with this requirement and had their cases closed may have subsequently complied with the SSI application process in order to re-open their TCA cases.

An income above the eligibility limit may also cause a TCA case to close. SSI recipient cases were almost six percentage points more likely to close due to an income above the limit than non-recipient cases. Income usually involves earnings, but for SSI recipient cases, income may also include any SSI benefits received. Thus, it is not surprising that SSI recipient cases are more likely to close due to this reason.

**Table 6. TCA Case Closure Reasons among SSI Applicants**

Closure Reason	Received SSI		Did Not Receive SSI	
	%	<i>n</i>	%	<i>n</i>
Non-cooperation with eligibility process	28.1%	(136)	35.4%	(908)
No recertification of benefits	23.6%	(114)	22.3%	(573)
Income above limit	15.9%	(77)	10.1%	(258)
Work sanction	9.1%	(44)	10.1%	(259)
Not eligible	8.9%	(43)	6.6%	(169)
Eligibility/verification information not provided	5.2%	(25)	7.3%	(188)
All other reasons	9.3%	(45)	8.3%	(212)

**Note:** Includes primary reason for the first case closure during the two-year follow-up period. The all other reasons category includes cases that closed due to child support sanctions, requested closure, residency, whereabouts unknown, voided application, and more. Each of these reasons accounts for 3.5% or less of closures.

## Conclusions

In SFY 2016, TCA cases designated as long-term disabled experienced a major policy change. Previously, long-term disabled cases were paid solely through state funds, but they were switched to federally reimbursable funds in October 2015. This change placed long-term disabled cases in the population subject to the federal work participation rate (WPR), although individuals on these cases would not necessarily be required to participate in work-related activities. However, individuals on long-term disabled cases were still required to apply for Supplemental Security Income (SSI) as a condition of receiving assistance.

The vast majority of individuals on long-term disabled cases who received TCA in either July, August, or September 2015 applied for SSI at some point, and most applied more than once. This is a positive sign, as individuals on cases with multiple applications were more likely to receive SSI than those with just one application. Administrators should encourage applicants to reapply even if they experience initial denials, as this may increase their chances of ultimately receiving SSI benefits.

Of long-term disabled cases with applications, one in six had individuals who received SSI benefits during the two-year follow-up period. Typically, these individuals received SSI for about one year of this period. SSI application denials are common, even among those who are eventually approved. Most denials were related to the client's disability, and capacity for substantial gainful activity accounted for over half of SSI denials.

Almost all long-term disabled cases continued to receive TCA after applying for SSI, although SSI recipients and SSI non-recipients tended to have differing TCA outcomes. In terms of caseload designation, SSI recipient cases were more likely to be work-exempt and child-only, whereas non-recipient cases were more likely to be work-eligible and single-parent. Because SSI recipient cases were more likely to be designated as work-exempt, these cases were also more likely to be excluded from the WPR. Designating these cases as work-exempt ultimately benefits the state, as this improves the state's WPR by removing cases that are not working from the population included in WPR calculations.

Case closures highlight additional variation between SSI recipient and SSI non-recipient cases. Both groups of cases were very likely to close, but SSI recipient cases were less likely to re-open after closure. SSI recipient cases were more likely to close due to an income above the limit, whereas SSI non-recipient cases were more likely to close due to non-cooperation with the eligibility process.

Transitioning long-term disabled cases to SSI may enable families experiencing disability or illness to receive more generous, stable, and long-term assistance. Applying for SSI can be a difficult and lengthy process, and fortunately, TCA provides families with cash assistance during that time. The program's commitment to provide assistance to long-term disabled cases throughout the SSI application process may ensure that eligible individuals receive the benefits they need.

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