

## Recommendation 4

# Revise Application and Renewal Forms

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HR1 adds significant new eligibility requirements that will need to be captured in DHS' paper application, renewal form, and on COMPASS. Creating a single pipeline for eligibility information is more efficient and less confusing for both the County Assistance Offices (CAOs) and applicants/recipients. While making these revisions to its application forms, the Department of Human Services (DHS) should take the opportunity to modernize and clarify the application and renewal forms' overall language, format, and organization, so that people can more easily understand and use them.

The PA-600 should mirror any revisions to the COMPASS application. Applying for benefits should minimize the burden on the applicant, leverage existing data and databases, and be viewed as complete if all federal and state *requirements* are met. HR1 creates an opportunity to revisit the application's logic and language to create a more seamless, user-friendly process.

### 1. Revamp the application's organization, formatting, and language to make it more user-friendly

The current PA-600 is visually dense, includes redundant or unnecessary information, and is often written at a high school or college literacy level. While DHS is making the revisions to its application forms necessitated by HR1, we highly recommend that it take this opportunity to also trim unneeded questions and information from the forms, add more white space, and use language that is more widely and easily understandable.

Civilla has developed a series of recommendations and tested templates for user-friendly, efficient application forms for paper and electronic modalities that DHS can learn from.<sup>1</sup> Civilla's templates are uncluttered, easy to follow, use plain language, and explain terminology where needed. While adopting the look, feel, simplicity and some language from Civilla templates would go a long way toward improving DHS' materials, DHS should be cautioned, however, against adopting any language from those templates that is inconsistent with Pennsylvania policy choices and definitions around work requirements (e.g., medical frailty). For more information on Civilla's designs for engaging consumers and streamlining paperwork, go to:

<https://civilla.org/assets/files/Civilla-Report-Application-Templates-for-Medicaid-Work-Requirements.pdf>.

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<sup>1</sup> Civilla, Human Centered Application Templates for Medicaid Work Requirements: A practical toolkit for states implementing H.R. 1, *available at* <https://civilla.org/stories/medicaid-work-requirement-templates>. Civilla's full set of templates is available for download in a zip file at <https://www.civilla.org/assets/files/Civilla-HR1-Application-Template-Resources.zip>.

## 2. Redesign the application and renewal forms to integrate work requirements and exemptions, prioritizing clarity, efficiency, and cross-program alignment

### Collect exemption and work requirement information in the application, not as a separate step.

Every additional step in a benefits process causes applicants to lose coverage, no matter how well-designed that step is. DHS should collect exemption and work requirement compliance information through the application rather than by adding a post-application step. Reducing the number of forms, deadlines, and follow-ups eases the experience and will reduce churn.<sup>2</sup>

### Explain work requirements and exemptions clearly and with plain language.

Most applicants and recipients have never been presented with terms related to a “community engagement requirement” in a public benefit application process before and therefore will need more accessible, plain language terminology. Research shows that the terms used to describe compliance and exemptions are not widely understood and that questions about “exemptions” are often misunderstood as questions about taxes.<sup>3</sup> For reference, Civilla has user tested application templates that use language alongside words like exemptions to clearly signal what the word means.<sup>4</sup>

### Screen for work requirement exemptions before asking about work requirement compliance.

Both COMPASS and the paper applications should ask questions to identify those who are exempt before asking questions about work requirement compliance.

#### **COMPASS Applications**

Use internal logic to skip unnecessary questions. For example, do not ask exemption questions in COMPASS if the applicant’s responses already identifies:

- Monthly income equal to or greater than \$580.
- A child in the household under 14.
- SSI/SSDI or other disability income.

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<sup>2</sup> Ibid.

<sup>3</sup> Civilla, Human-Centered Work Requirements for Medicaid, Fall 2025, p. 4, *available at* <https://civilla.org/assets/files/Civilla-Human-Centered-Work-Requirements-Medicaid-Report.pdf>

<sup>4</sup> Civilla, Human-Centered Application Templates for Medicaid Work Requirements: A practical toolkit for states implementing H.R. 1, *available at* <https://civilla.org/stories/medicaid-work-requirement-templates>.

- Pregnancy.
- Former foster youth / foster youth status
- Residence in a county with high unemployment

If exemption status cannot be determined from existing information, do ask targeted questions about:

- Medical frailty or a serious health condition
- Veteran disability status
- Recent incarceration
- Member of a federally recognized tribe
- Caregiver, guardian of a child, someone with disabilities or an older adult
- Parent of a child not in the same household
- Parent of a person with a disability
- Having a substance use disorder
- Experiencing short-term hardship such as a hospital stay or travel for medical care,

Also ask about SNAP work requirement exemptions:

- In school or training at least half time
- Homeless
- Experiencing domestic violence
- Expect to return to work within 60 days
- In a vocational rehab program

### ***Paper Applications***

Clearly direct those who are exempt to skip over work requirement compliance questions. Moving through skip steps in an application can be challenging to grasp and therefore the application must be clearly designed and labeled to allow applicants to see a clear path for themselves. Avoid the word “skip” and use “go to” instead. Bold required questions and repeat directional instructions, for example: “Did you answer ‘No?’ then Go to question X.”

### **Direct those who are not exempt to a single, simple work activity table they can fill out to provide information about the hours they participated in work activities**

Individuals may be performing a number of work activities that, combined, will bring them into compliance with both the Medicaid and SNAP work requirements. Providing applicants with a single place to capture all information about their work activities and the amount of time they are spending on each simplifies this reporting process for both applicants and the CAO, reducing the risk of confusion or missing information leading to wrongful denials. Only direct applicants to this table if they report below \$580 in income each month (below \$712 in earned income for SNAP) and do not meet an exemption.

## **Align questions about Medicaid work requirements with questions about SNAP work requirements wherever possible**

DHS should simplify application by combining questions related to Medicaid and SNAP exemptions and compliance so that both programs are covered at once. Both SNAP and Medicaid work requirements include exemptions related to caregiving, being in substance use treatment, and having health concerns. People who are not exempt can comply with both SNAP and Medicaid work requirements through work, school, and community service, among other activities. Participation in school or training at least half time counts as compliance for Medicaid and an exemption for SNAP.

## **Build technology to make online work requirement reporting easier**

Work requirement compliance will need to be reviewed at application and biannual renewals. Creating processes where people can report exemptions and work activity on their mobile devices, desktop, or tablet will allow people to keep up with this 100% increase in eligibility reviews.

## **Capture Seasonal Employment**

Pennsylvania businesses rely on seasonal workers year-round. Industries such as school districts, ski operations, summer resorts, camps, farms, landscaping, and tourist attractions employ workers for only part of the year. If these workers average \$580 a month over six months, they are compliant with work requirements.

To capture this information, it will be important to create a look-back question in the application. For applicants, the look-back question for work in the last six months should only be asked if an applicant did not work in the last month. For recipients completing a renewal, the look-back question should be for 6 months.

## **3. Change immigration status questions to ensure people can accurately answer and are informed of their rights**

HR1 significantly restricts immigrant eligibility for Medicaid and SNAP, while leaving immigrant eligibility rules for CHIP, TANF and LIHEAP the same. The restrictions HR1 imposes on SNAP are slightly different, and more extreme, than those imposed in Medicaid. Finally, while HR1 restricts which immigrants may receive SNAP and Medicaid, it does nothing to change the law pertaining to who is subject to and exempt from the five-year bars in each program. The application form needs to be updated so that people can give accurate information about their immigration status, which will permit DHS to accurately identify an immigrant's eligibility across multiple programs with different immigrant eligibility criteria.

DHS' current application forms are difficult for immigrants to use. These forms often mislead individuals into believing that everyone named on the application must provide immigration status information and SSNs, even though non-applicants and EMA-only applicants are not required to do so. The forms also fail to inform individuals who do not wish to have their immigration status

verified that they can choose to remove themselves from the benefit household. The more difficult it is for immigrants to use DHS' forms to provide clear information about their status, the more difficult it is for the CAO to accurately identify eligible immigrants.

We recommend that DHS revise its application forms so that:

- People are asked questions about immigration status that they are likely to be able to answer and that elicit only the information needed to make an eligibility determination.
- At points in the application when immigration questions are asked, people are given clear and accurate information about who needs to provide information about their immigration status and/or provide an SSN, and who does not.
- At points in the application when immigration questions are asked, people are given clear and accurate information about the option to remove themselves from the benefit household if they do not want their immigration status verified.

The Appendix provides an example of how these questions could be asked and this information provided in one section on an application form.

## APPENDIX

### CITIZENSHIP AND SOCIAL SECURITY NUMBER QUESTIONS

Are you applying for this person or are you only applying for other people in the household?

- Only applying for other people in the household. Skip to the next section.
- Applying for this person.

Is this person a U.S. citizen?

- Yes. Please provide this person's SSN: \_\_\_\_\_ . Then skip to the next section.
- No.

Is this person applying for Emergency Medicaid only?

- Yes. Skip to the next section.
- No. We will need information about your immigration status. Please answer the questions in the box below. Then move on to the next section.

We will also need to verify your immigration status. If you do not want us to verify your immigration status, you can decide not to apply for yourself and only apply for other people in your household.

A Number (this is also known as the USCIS number): _____
Immigration Document: _____
Receipt Number or Other Immigration Document Number: _____
Social Security Number (leave blank if you do not have one): _____
Does this person have an eligible status? <input type="checkbox"/> Yes