County of Los Angeles

Chief Executive Office

Service Integration Branch

Disabled General Relief Participants and the Supplemental Security Income Application Process:

A Statistical Analysis

Submitted to:

County of Los Angeles, Department of Public Social Services

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Summary

This report is intended to provide guidance to Los Angeles County's Department of Public Social Services (DPSS) in its efforts to boost the effectiveness of the advocacy services provided to permanently disabled General Relief (GR) recipients seeking to gain approval for the Federal Supplemental Security Income (SSI) program. The results reported in what follows are based on a sample of 24,766 GR recipients who applied for SSI over a 51-month period spanning from January 2008 through March 2012. Rigorous statistical methods were applied to this population to identify the types of GR recipients most and least likely to gain approval for SSI. One of the most critical findings reported here is the decidedly inverse relationship between the duration of GR tenure and the probability of gaining approval for SSI. As all three measures of GR tenure increase – i.e. the number of months on GR, the number of GR spells, and the length of the longest GR spell – the odds of gaining approval for SSI decline. This suggests additional steps should be considered to ensure recipients with serious and permanent disabilities are routed to SSI advocacy services at GR intake. Homelessness also poses a barrier to SSI approval, particularly long episodes of homelessness. At the same time, applicants who were continuously disabled for the entire time they were on GR had better chances of gaining approval for SSI by comparison with those with intermittent disabilities. Three years after submission of their SSI applications, 71% of the recipients who were disabled continuously during their time on GR gained approval for SSI, versus 44.2% of those whose disabilities were episodic. By extension, recipients with no history of employment during their GR tenures were much more likely to gain approval for SSI than those who had any history of employment at all. In more general terms, this report shows that the SSI application process, from submission to the final decision, appears to be protracted. The median duration of time for this process is approximately 2.5 years, which includes those who were not approved within the 51-month study period. Slightly fewer than ten percent of the observed applicants were approved for SSI one year after submission of their applications; 35.2% were approved after two years; and 63.6% were approved after three years.

Policy Recommendations Designed to Maximize the SSI Approval Rate

Maximizing the SSI approval rate for the disabled segment of the GR population is in the interests of both the recipients themselves and the County more generally. With this in mind, the results elaborated in this report are coupled with policy recommendations designed to help DPSS identify those with the best chance of gaining approval for SSI, as well as to remove barriers to approval, in order to provide them with advocacy services as early in their GR tenures as possible.

Background

GR Restructuring and Permanently Disabled GR Recipients

DPSS and the Chief Executive Office (CEO) are currently taking steps to restructure the GR Program, which provides cash assistance and social services to indigent adults in Los Angeles County. The current economic downturn has had a dramatic impact on the County's GR caseload. According to records published by the California Department of Social Services (CDSS), GR participation in Los Angeles County grew by 52% between December 2007[i] and December 2012.[ii] Responding to concerns raised by the Board of Supervisors regarding the continued growth in GR participation, DPSS and the CEO are working to make the program more efficient in its promotion of self-sufficiency. Additionally, DPSS has taken steps to heighten the effectiveness of the advocacy work conducted on behalf of permanently disabled and unemployable GR recipients applying for SSI. Administrative records kept by DPSS indicate that a substantial portion of the GR caseload is disabled, mentally or physically. Insofar as the GR program categorizes these participants as unemployable, they are not time limited in their receipt of cash aid, nor are they mandated to participate in the General Relief Opportunities for Work Program, the Welfare-to-Work component of GR. Disabled recipients can continue receiving aid for as long as they have conditions that prevent them from working, many of which are permanent.

SSI: A Favorable Alternative to GR for both Recipients and the County in General

SSI is a Federal program administered by the Social Security Administration (SSA) and is a favorable alternative to GR, not only for the adults in question but for the County more generally. When GR recipients successfully make the transition from GR to SSI:

> ➤ They become eligible for the State of California's Medi-Cal health insurance program, in which case mental and physical health services previously paid for with County funds are assumed by the State.

> ➤ The monthly cash aid recipients receive through GR ($221/month), which is paid for through the County General Fund, is replaced by a federally-funded monthly SSA grant that is four times larger than the benefit they receive through GR ($854/month).

> ➤ The SSA reimburses the County for all cash payments and health and housing costs incurred over the period during which the approved SSI case was assessed by the SSA. This is particularly significant because, as this report shows, approval for SSI can take more than three years.

DPSS' Enhanced SSI Advocacy Services

For these reasons, DPSS has taken steps to enhance the SSI advocacy services provided to disabled and unemployable GR recipients through its SSI and Medi-Cal Advocacy Program (SSIMAP). These enhancements include the following:

> Implementation of enhanced record retrieval procedures intended to locate and obtain health documents more efficiently.

> Collaboration with the Department of Mental Health (DMH) and the Department of Health Services (DHS) in conducting more intensive and thorough mental and physical health evaluations for SSI applicants in order to create documentary evidence of disabilities where none already exist.

> Provision of additional funds to disabled GR recipients for the purpose of purchasing needed ancillary items during the period when their SSI applications are under review by the SSA. These funds are intended to promote basic stability and are reimbursed by the SSA in cases where applicants are approved for SSI.[iii]

This Evaluation

Study Period and Methods

The present report, which complements the Service Integration Branch's (SIB) recently-released qualitative evaluation of DPSS' SSI advocacy efforts, provides information on GR recipients who applied for SSI between January 2008 and March 2012.[iv] The purpose of the analyses that follow is to show who these recipients are in terms of their personal histories, such as the amount of time they spend on GR, the extent to which they have employment histories, and the degree to which they experience spells of homelessness. Additionally, the report uses advanced statistical methods as follows:

o **Event History Analysis**: These methods control for the point in time at which participants submit their SSI applications and are deployed to analyze the amount of time it takes for particular types of GR recipients to gain approval for SSI, from the submission of the application to the final decision, while also providing information on those who never gain approval during the period of observation. An examination of the speed with which different types of recipients gain approval for SSI, if they gain approval at all, enables inferences to be made about those who are most likely to experience successful outcomes in the SSI application process.

o **Logistic Regression Analysis**: Logistic regression models are deployed to examine the independent effects of factors such as homelessness, employment, and the duration of GR tenure on the likelihood that GR recipients will gain approval for SSI. Combined with the results of the event history analysis, the logistic regression models provide

information that can help identify GR recipients with the best odds of gaining approval for SSI.

Study Sample

The sample observed in this report consists of individuals who received one or more month of GR between January 2008 and March 2012, a 51-month study period. The analysis only considers GR recipients who applied for SSI within the study period. Multiple SSI applications from the same participant are included in the analyses. Cases who have met with DPSS' SSI advocates, but for whom either application data or the status of a current application were missing, are excluded from the analysis. These criteria yielded a sample of 24,766 GR recipients who applied for SSI over the 51-month study period.[v]

Characteristics of the GR Recipients Observed in this Study[vi]

Table 1 shows summary statistics for this study's sample of GR recipients in the areas of GR receipt, homelessness and disability status[vii]. For each variable, *months* refers to the total number of months; *spells* refers to groups of consecutive months, each separated by a gap of at least one month without GR cash aid; *longest spell* measures the length of a GR recipient's longest spell in any of the measured categories.[viii] Homelessness is inferred from the address at which a GR participant receives mail. Months in which participants use DPSS offices for mail are coded as homeless.[ix]

Table 1. Basic Characteristics of GR Recipients, January 2008 – March 2012[x]

	Mean	Min	Max	Count
General Relief				
Months on GR	23	3	51	24,766
Longest Spell on GR	19	2	52	24,766
Spells on GR	1.7	1	9	24,766
Homelessness				
Months Homeless	20	1	51	12,606
Longest Homeless Spell	17	1	51	12,606
Spells of Homelessness	1.5	1	7	12,606
Disability				
Months on Disability	32	0	51	24,766
Longest Spell of Disability	27	0	51	24,766
Spells of Disability	1.9	0	12	24,766

Source: DPSS Los Angeles Eligibility Automated Determination Evaluation and Reporting (LEADER)

Tables 2 and 3 categorize the study sample's average number of months on GR, months homeless and months disabled, by race and employment history.[xi]

Table 2. Average Months on GR, Homeless and Disabled by Race

Race	Average Number of Months			
		General Relief	Homeless	Disabled
	White	20.6	7.9	30.4
	Black	23.8	12.4	33.0
	Native American	23.3	10.1	31.8
	Asian	20.7	3.7	30.2
	Pacific Islander	21.2	5.3	30.0
	Hispanic	22.5	8.6	30.9
	Overall	22.6	10.1	31.7

Source: DPSS LEADER

Table 3. Average Months on GR, Homeless and Disabled by Employment History (2008-2011)

Work	Average Number of Months			
		General Relief	Homeless	Disabled
	No Employment	23.7	10.1	33.3
	Some Employment	20.3	10.0	28.3
	Overall	22.6	10.1	31.7

Source: DPSS LEADER

Summary of Tables 1, 2 and 3

- Fifty-one percent of the sample was homeless at some point during the study period.

- The sample averaged 20 months of homelessness over an average of 1.5 spells.[xii]

- Disabilities are not necessarily permanent as participants typically transition in and out of the GR program's disabled status. The sample averaged 32 months of disability, spread out over an average of nearly two spells.

- Whites and Asians have the fewest months of GR on average (about 20), while Blacks and Native Americans have the greatest number of months on average (about 23).

- Asians and Whites also have the lowest number of months homeless (2.7 and 7.9 respectively), while Blacks have the highest average number (12.4).

- Recipients without employment spend more months on GR. This is expected since disabled GR recipients are typically placed in the unemployable category by DPSS, in which case they are not subject to the program's time limits.

- Recipients with no employment history average five months more of disability than those who have some employment.

How rapidly do Different Types of GR Recipients Gain Approval for SSI?

As noted above, event history analysis offers an accurate measure of the duration of the SSI application process by examining the proportion approved at a given number of days after submission of applications. The event history models constructed for this study control for the point in time at which applications are submitted to the SSA. The information yielded through this type of analysis makes it possible to infer the types of GR recipients who fare best in the SSI application process. Figures 1 and 2 give all GR recipients the same starting time – i.e. day *zero* is the day upon which the SSI application is submitted - and assess the results at a given number of days.[xiii]

The Average Time from Application to Approval is more than Two Years

Figure 1 shows the overall percentage of the sample (left-hand axis) that has yet to be approved at a given number of days (axis at bottom). Subjects begin the SSI application process at different points in time, but are compared according to the number of days since application regardless of the specific date of submission.

Figure 1. Overall Rate of SSI Approval in Days
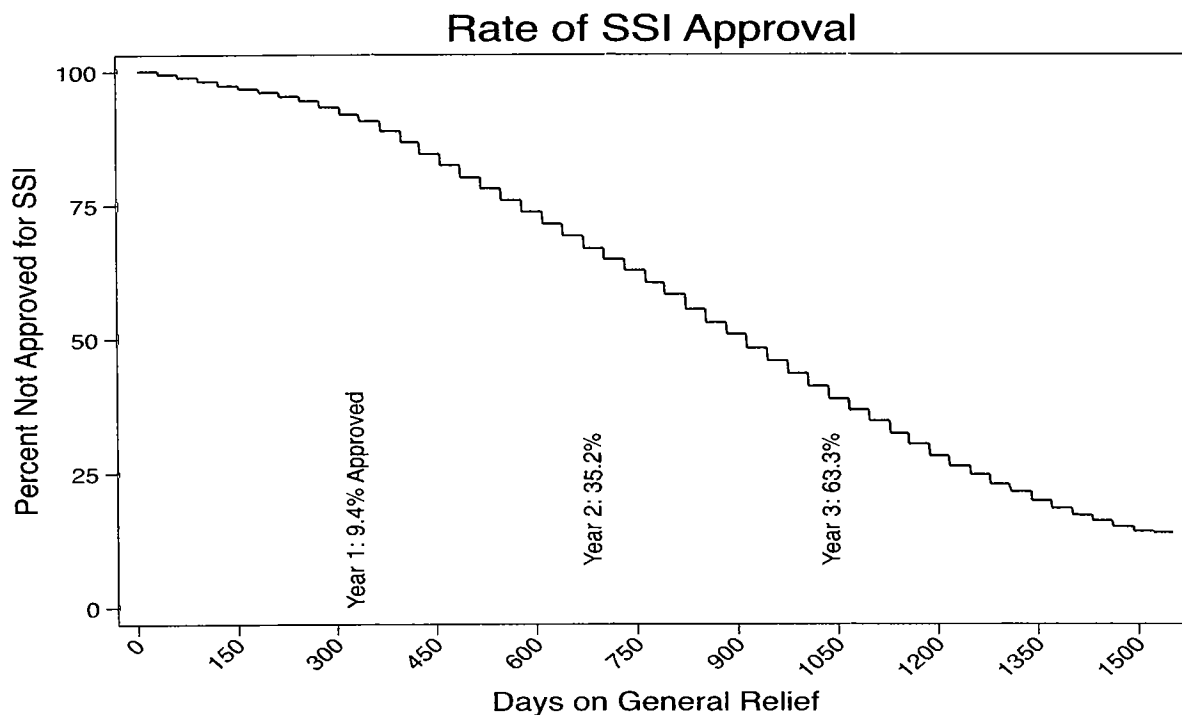
After one year of analysis time, 9.4% of the study sample was approved for SSI (vertical line at 365 days). After two years 35.2% was approved; after three years 63.3% was approved.

- The median number of days to approval is 912, two-and-one-half years. By extension, this means that 50% of the sample was not approved for SSI after two-and-one-half years, which includes those applicants who never gained approval over the entire study period.[xiv]

Recommendation: Consider conducting a comparison between GR recipients who apply for SSI and other sub-populations of SSI applicants, both in Los Angeles County and in other California Counties, to determine whether the duration from application to approval for GR recipients is comparatively protracted.

Recommendation: If comparative analysis shows that the SSI application and decision process is significantly longer for GR recipients in Los Angeles County, consider taking steps that would improve the efficiency of the process. Some potential enhancements towards this end are identified in SIB's recent qualitative process evaluation of the SSIMAP Program and include the following[xv]:

❖ Explore the feasibility of shortening the amount of time participants must wait to see a clinician when they are found to have mental health issues.

❖ Work with DMH to review current practices and availability of the mental health workers who conduct assessments of GR recipients claiming mental health disabilities at GR intake. Additionally, explore the feasibility of adding workers if necessary.

❖ Explore the feasibility of increasing the size of DPSS' GR eligibility staff in districts where the size of their caseloads causes delays and negatively affects the flow of participants through GR and SSIMAP, as well as the services Eligibility Workers provide to program participants.

Recommendation: Additional steps might also be taken to examine the most common reasons for denials in order to determine whether enhancements can be made that would strengthen the cases made on behalf of applicants before their applications are submitted to the SSA.

GR Recipients with Continuous Disabilities fare better in the SSI Application Process than those with Intermittent Disabilities, but Homelessness poses a Barrier to Approval

Figure 2 compares the time to approval between those in the sample who were continuously disabled and those who were only intermittently disabled. Continuous disability (blue/broken line) refers to cases which are classified as disabled for all months in which they receive GR, whereas intermittently-disabled participants (red/solid line) are those cases who are disabled for some fraction of their time on GR.

Figure 2. Differences in SSI Approval by Disability Status
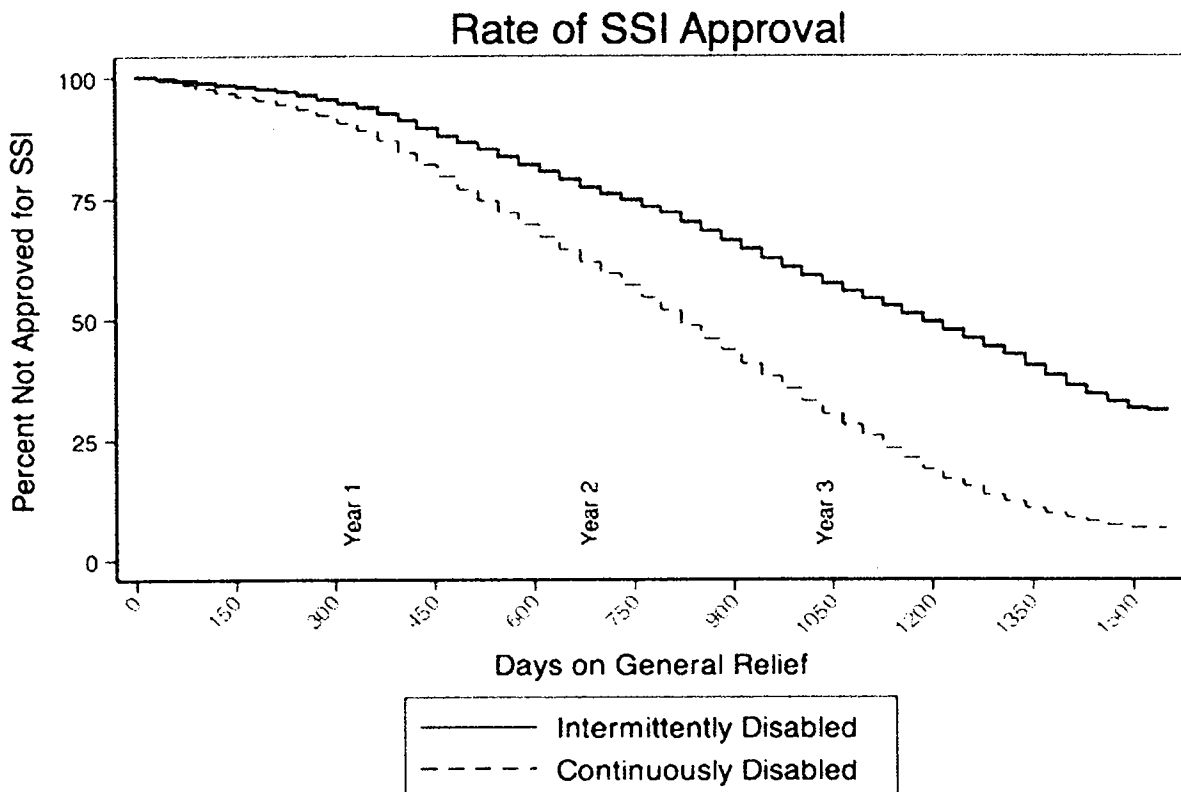
The continuously disabled group was approved more quickly than the intermittently disabled group. At one year, 11% of the continuously disabled group was approved for SSI; at two years, 40% was approved, and at three years, 71.7% was approved.

The intermittently disabled group, by contrast, had an SSI approval rate of 6.2% at one year, 24.1% at two years, and 44.2% at three years.

Another way to summarize the same data is to examine outcomes in terms of the median number of days. The continuously disabled group required 821 days to reach the 50% approval rate, whereas the intermittently disabled group required 1186 days, a difference of exactly one year.

Extending the implications of the analysis of disability (which is frequently a barrier to employment), further analysis shows that recipients with any history of paid employment while on GR reached the 50% approval rate for SSI in 1,004 days, as compared to 851 days for those who never worked while on GR, a difference of approximately six months.

Additional event history analysis comparing GR recipients who were ever homeless during their time on GR with those who were never homeless shows the following:

- Homelessness poses a small but statistically significant disadvantage in the time it takes to be approved for SSI.

- It took the homeless segment of the study sample 943 days to reach a 50% approval rate for SSI, which is about one month longer than the time it took for the study population as a whole to reach the same benchmark.

- By contrast, the segment of the study population that was never homeless reached the 50% approval threshold in 851 days, which is approximately three months faster than the homeless segment.

Factors that Increase and Decrease the Likelihood of Gaining Approval for SSI

The results of the event history analyses in the previous section can be used to infer a general profile the types of GR recipients who fare best in the SSI application process, namely those who have sustained disabilities which have prevented them from recent employment, but who also have managed to remain housed. The results of logistic regression analyses reported in this section deepen this profile by directly measuring the effects that a variety of individual, structural and program traits have on the odds that an applicant will gain approval for SSI.[xvi] Table 4 summarizes the findings with the most important policy relevance and is followed by additional elaboration.

Table 4. Factors Affecting the Odds of Approval for SSI

Increased Odds of Approval	Decreased Odds of Approval
Sustained Disability: The total number of months of disability and the length of spells of disability.	*Long GR tenure*: The total number of months on GR, the number of spells of GR, and the length of the longest spell on GR.
No Employment History: The absence of any history of earned wages.	*Homelessness*: Having ever been homeless and the longest spell of homelessness.
No Previous History of GR: The absence of any previous record of GR receipt.	*Intermittent disability*: Cycling in and out of disabled status.

- **General Relief Receipt**: The longer a recipient is on GR, the less likely he or she is to be approved for SSI. As all three GR measures increase – the number of months, the number of spells, and the length of the longest spell – the odds of approval for SSI decline. For example, comparing someone who receives GR for one year to someone who receives GR for 23 months (the average), the latter participant is 50% less likely to be approved for SSI.[xvii]

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- **Homelessness**: Consistent with results from the event history analysis, logistic regression models indicate that homelessness is a barrier to SSI approval. The data show that the odds of gaining approval increase progressively as the total number of months homeless and the longest spell of homelessness decrease. Moreover, an overall indicator for those who were "ever homeless" during the study period also shows a reduced chance for SSI approval.

Recommendation: *In keeping with SIB's recent evaluation of DPSS' GR Housing Subsidy Expansion Project, which shows that receipt of a subsidy improves the odds of gaining approval for SSI, and where resources are available, take additional steps to remove barriers to SSI approval for homeless GR recipients by encouraging participation in the housing subsidy program.* [xviii]

- **Disability**: The odds of gaining approval for SSI improve with each month of disability and with a long spells of disability. At the same time, just as the event history results show that recipients with intermittent disabilities are at a disadvantage by comparison with those who have continuous disabilities, logistic regression analysis shows that repeated spells of disability have a particularly negative impact on the odds of gaining approval for SSI. While these findings are likely indicative, in part, of participant difficulties in complying with GR program rules related to verification of disabilities, the findings also suggest that the SSA tends not to deem episodic disabilities as serious enough to justify approval for SSI.

- **Employment**: Consistent with the event history results, further analysis shows that nine of every ten recipients in the study sample with no work history gained approval for SSI.

Recommendation: *Examine the GR program's disability screening procedures in order to verify that the process is sufficient to identify those who are most likely to gain approval for SSI, i.e. those who do not have an extended history of GR receipt, those with sustained as opposed to episodic disabilities, and those with no history of employment.*

Recommendation: *Additionally, evaluate the level of coordination between disability screening procedures and SSIMAP to ensure that GR recipients with the best chances of gaining approval for SSI are engaged by DPSS' SSI advocacy staff as early in the program process as possible.*

Conclusion: SSI Advocacy and the GR Restructuring Efforts

Data collected at the State level by CDSS suggests that, while Los Angeles County's GR caseload may have peaked in 2010, the number of adults receiving assistance through GR continues to be high by historical standards.[xix] The ongoing collaborative efforts DPSS and the CEO are undertaking to restructure GR are intended to decrease dependency on the program by enhancing the program's emphasis on work readiness and self-sufficiency for employable recipients and boosting the SSI approval rate among recipients who are unemployable due to permanent disabilities.

As noted at the outset of this report, there are significant stakes in play when a GR recipient applies for SSI. When a recipient's application is approved, a considerable portion of the responsibility for their material well-being and health shifts from the County to the State and Federal governments, and the monthly cash assistance provided to SSI recipients is four times higher than the amount made available to them through GR. For these reasons, maximizing the effectiveness of DPSS' SSI advocacy services is a central objective of the efforts to restructure GR. With these stakes in mind, the findings and recommendations offered in this report, along with those presented in SIB's recently-released qualitative process evaluation of DPSS' SSI advocacy services, are designed to help in the identification of GR recipients with a comparatively high probability of gaining approval for SSI, in order to engage them quickly and efficiently with advocacy services that improve the likelihood of successful outcomes.

Endnotes

[i] December 2007 is the date identified by the National Bureau of Economic Research (NBER) as the point at which the last recession began in the United States. The NBER's recession start and end dates are widely utilized and cited by policymakers and researchers.

[ii] As of this writing, CDSS' most recently revised data on GR participation in Los Angeles County indicates that the County's caseload grew from 71,420 in December 2007 to 108,798 in December 2012, an increase of 64.6%. (CDSS, *General Relief and Interim Assistance to Applicants for SSI/SSP: Monthly Caseload and Expenditure Statistical Report*, December 2007, December 2012).

[iii] More recently, DPSS has piloted a collaborative SSI advocacy partnership in its South Special District with St. John's Well Child and Family Center, a Federally Qualified Health Center. The purpose of this partnership is to enhance the efforts of DPSS' SSI Advocates by leveraging the CBO's familiarity with the community and taking advantage of services not offered through DPSS. However, as of this writing countywide implementation of this type of partnership is pending the results of an evaluation of its effectiveness and is listed the other enhancements that are now in place.

[iv] Chief Executive Office/Service Integration Branch/Research and Evaluation Services. *A Qualitative Process Evaluation of the Department of Public Social Services' Supplemental Security Income Advocacy Efforts.* Submitted to County of Los Angeles, Department of Public Social Services. September 2013.

[v] DPSS initially provided a file containing records for roughly 79,000 disabled cases in the GR system between January 2008 and March 2012. This initial number was not yet unduplicated. Since the primary focus of this report is on the outcomes of the SSI eligibility process, an analytical decision was made to exclude approximately 37,000 records from the initial file because, while these cases were referred to SSI Advocates employed by DPSS, they showed no record of any other SSI-related activities, including the actual submission of an application. Another 1,000 cases were dropped because key data elements were missing, which prevented them from being included in the analysis. This left approximately 40,000 cases. Once the cases were unduplicated, 24,766 participants were left for analysis.

[vi] Please note that technical details revealing how statistical results were derived are available in the longer version of this report, which includes a technical appendix.

[vii] Throughout this report, GR participants in the observed sample are counted as being disabled at a particular point in time if DPSS' records for them indicate that the GR Program has recorded them as being disabled.

[viii] For example, consider a GR recipient who receives GR for nine consecutive months, followed by a period of ineligibility, followed by receipt of GR for another six months. This person has 15 *months* total, two *spells*, and a *longest spell* of nine months.

[ix] Homelessness statistics are calculated only for those who are homeless one or more months during the observation time period. Therefore, homeless statistics refer to a smaller subsample.

[x] Homelessness statistics are calculated only for those who are homeless one or more months during the observation time period. Therefore, homeless statistics refer to a smaller subsample.

[xi] Disabilities here include both physical and mental disabilities. It should also be noted that a tabulation based on gender is excluded here because the number of months on GR does not generally differ by gender. Additionally, while Women experience fewer months of homelessness on average than men (7.9 compared to 11.6 months), months of disability differ only slightly.

[xii] The homeless numbers presented in Table 1 only include GR recipients with at least one month of homelessness.

[xiii] It should be reemphasized that event history analysis imposes statistical controls that neutralize the uneven effects of the point in time within the study period when participants apply for SSI. For example, those participants who applied for SSI in January of 2012 and still had the applications pending at the end of the observation period are weighed differently than those who applied for SSI in January of 2009 and still had their applications pending at the end of the study period.

[xiv] The use of the median number of days as a reference point is customary in event history analysis because it is not sensitive to the inclusion of extreme values (i.e. statistical outliers), such as those participants who are approved for SSI in an unusually short period of time.

[xv] Chief Executive Office/Service Integration Branch/Research and Evaluation Services. *A Qualitative Process Evaluation of the Department of Public Social Services' Supplemental Security Income Advocacy Efforts*. Submitted to County of Los Angeles, Department of Public Social Services. September 2013.

[xvi] These statistical significance tests produced by the regression models for this report are shown in more detail in Table 8 of the longer technical version of this report.

[xvii] The sample estimate is that each month on GR decreases the odds of approval 4.5%. See Table 7 in the long version of this report.

[xviii] Consistent with what is recommended here, the evaluation of the GR Housing Subsidy Expansion Project also recommended that DPSS take steps to further aligning the provision of housing subsidies with DPSS' SSI advocacy services by implementing outreach efforts through SSIMAP for disabled participants who face particularly difficult challenges in locating housing.

[xix] CDSS data indicate that Los Angeles County's GR caseload in December 2012 (108,798) was 2.3% lower than the caseload number given for December 2010 (111,335), but the December 2012 caseload number was nevertheless 52% higher than the number CDSS reported for December 2007 (71,420).