November 7, 2022

Stephanie Bell  
Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
Attn: CMS-241-P, P.O. Box 8016  
Baltimore, MD 21244

RE: Streamlining the Medicaid, Children's Health Insurance Program, and Basic Health Program Application, Eligibility Determination, Enrollment, and Renewal Processes Proposed Rule, 87 FR 54760

Dear Ms. Bell,

As the bipartisan, national membership association for state and local health and human services agencies, the American Public Human Services Association (APHSA) represents public executive leaders and their subject matter experts that administer programs that promote health and well-being, including the Supplemental Nutrition Assistance Program (SNAP). In most states, public agencies align access to and processing of Medicaid and SNAP benefits through a joint application and integrated eligibility system. For the many customers who dually participate in Medicaid and SNAP, this process alignment allows for more seamless access, enrollment, and recertification of benefits. However, when eligibility requirements and processing rules between SNAP and Medicaid come into conflict, it can unintentionally create more administrative burden, delays, and inefficiencies for customers. In CMS’ proposed rule, changes in rules for updating household addresses and required time periods for response from customers will create conflicts with related rules in SNAP that will create conflicts in providing seamless customer services to dually enrolled households. Before this rule goes into effect, CMS and the USDA Food and Nutrition Service (FNS) should issue joint guidance on how these changes will affect SNAP and provide flexibilities for how to move toward greater program alignment that truly does streamline enrollment in Medicaid and other integrated human services programs.

Updating Addresses
The proposed rule outlines a new process for how Medicaid should update the address on file for clients for returned mail, including accepting updates received by the National Change of Address (NCOA) database or from managed care plans. In integrated eligibility systems, a single address is recorded for both the Medicaid and SNAP case file. SNAP may accept addresses that have been accepted by Medicaid if the programs are co-located, but otherwise, information from the NCOA would require that state agencies contact the customer before updating the address. Additionally, updating of an address for a SNAP case without collecting shelter cost information from the customer can result in a significant reduction in benefits since agencies deduct shelter costs when determining benefit levels. To help streamline these processes in SNAP, agencies typically update address information at either the recertification (at the end of a 12 or 24-month certification period) or at the periodic report (the half-way point of the certification period). These options allow SNAP to minimize the number of times that eligibility staff are reaching out to customers, and in turn limits the number of times during a year that customers are required to provide response to the agency.
Currently, FNS is offering state SNAP agencies a temporary, 12-month waiver to be able to update addresses in SNAP based on information verified through Medicaid. State SNAP agencies must still send a letter to customers to confirm the address update, but if they do not receive a response, they are permitted to wait until the next certification action to update shelter expenses.1 This means that customers will not lose their benefits or see a decrease until their next certification or periodic report, but still creates additional burden for states in the process of sending the letter and requesting response. This waiver was created as a temporary support to state agencies to better align SNAP and Medicaid during the unwinding process. However, should CMS finalize its proposed rule, state SNAP agencies would like to see a more permanent solution put in place that both fosters alignment with Medicaid and minimizes additional burden on agencies and customers. Ahead of this rule being put into effect, it is important CMS and FNS issue joint guidance on what flexibilities will be made available permanently and how the agencies will reconcile differing rules related to change of address in order to help state and local agencies better align program processes and ensure more seamless customer service.

Processing Timelines
State SNAP agencies are also concerned about the response timelines that have been outlined in the proposed rule, including the required 30 days to wait for customer response to verify a change in address. SNAP agencies already have programmed timelines in their system to request response from customers based on SNAP regulation, which have been put in place to ensure that benefits are processed in a timely manner. To require that agencies extend their current timelines would require a systems change, and could unnecessarily delay benefits to households. A difference in timelines for required response for SNAP and Medicaid would also create confusion for dually enrolled customers and could result in churn, meaning that people would lose their benefits and be required to reapply. Instead, the new rule should allow for states to set their own timelines for response that are aligned across the two programs.

Conclusion
As we look back on lessons learned to streamline access to programs, we must proactively be considering how to better align the systems that people interact with to create a more person-centered and seamless design that responds to the needs of customers. When changes are proposed to Medicaid or SNAP, there must be adjustments in the other program to ensure that the burden is not put onto the customer. Additionally, state program alignment should result in reduced administrative burden for agency staff, which creates more time for them to respond to other customer needs. APHSA continues to work with our federal partners at FNS to raise these concerns and would welcome the opportunity to help create spaces for Medicaid and SNAP leaders at the state and federal levels to convene on topics such as this and the greater opportunities for system alignment across programs.

For further discussion, please reach out to Chloe Green, Senior Policy Associate for Food and Nutrition Services at cgreen@aphsa.org.

Sincerely,

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Cathy Buhrig
Chair
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