



## TEXAS HEALTH AND HUMAN SERVICES COMMISSION

KYLE L. JANEK, M.D.  
EXECUTIVE COMMISSIONER

February 28, 2013

To Whom It May Concern:

The Texas Health and Human Services Commission (HHSC) appreciates the opportunity to provide comments on the draft of the federal single streamlined application for eligibility determinations for Insurance Affordability programs and enrollment in the Exchange, Medicaid, and the Children's Health Insurance Program (CHIP), as issued in the *Federal Register* on January 29, 2013, by the Centers for Medicare and Medicaid Services (CMS) [CMS-10440 (OCN: 0938 - NEW)].

HHSC is the single state agency responsible for administering the Medicaid program and CHIP in the State of Texas. HHSC determines eligibility using an integrated system for Medicaid, CHIP, Supplemental Nutrition Assistance Program (SNAP), and Temporary Assistance for Needy Families (TANF). Therefore, HHSC must determine whether to use the federal single streamlined application developed by CMS for Medicaid and CHIP eligibility or develop a state-specific application, as well as determine the impact to integrated programs of the single streamlined application.

HHSC is primarily concerned with the following issues with the draft federal application.

- The draft federal application does not collect sufficient information to build the household for groups whose income eligibility is based on Modified Adjusted Gross Income (MAGI), as required under federal regulations.
  - CMS must include additional questions in order for state Medicaid and CHIP agencies to conduct MAGI eligibility determinations from the streamlined application without asking for additional client information.
  - In absence of this information on the application, CMS would place a significant burden on states. Each single streamlined application received by a state Medicaid/CHIP agency would require staff intervention to request the missing information from the client, which would delay timeliness and increase the burden on applicants.
- It is unclear whether CMS will provide flexibility for states with a federally-facilitated Exchange to develop a state single streamlined application to meet the specific needs of states.

- It is unclear the extent to which a state that elects the federal application may customize the application (e.g., adding barcode scanning for state processing efficiency).

As you know, states must make significant policy, operations, and systems changes to implement a new single streamlined application, which will impact agency eligibility staff, vendors, clients, and other stakeholders. Pending a final federal application, it is a significant challenge for states to identify the application that best meets a state's needs and develop policies, design efficient business processes, automate systems, and effectively communicate changes to clients and stakeholders by the proposed federal implementation dates.

As we have with comments on other Affordable Care Act (ACA) regulations and guidance, Texas urges the U.S. Department of Health and Human Services and CMS to recognize states' unique needs and enable each state to tailor its Medicaid and CHIP programs in accordance with the intent of its elected and appointed representatives. HHSC appreciates the opportunity to provide comments on the federal single streamlined application.

Sincerely,

Stephanie Muth  
Deputy Executive Commissioner  
Office of Social Services