

Appendix P. National Council on Aging Public Comments



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VIA ELECTRONIC SUBMISSION: <http://www.regulations.gov>; Michael.burke@usda.gov

Tameka Owens, Assistant Administrator
Food and Nutrition Service
U.S. Department of Agriculture
1320 Braddock Place
Alexandria, VA 22314

RE: Federal Register, Vol. 88, No. 64, 19903-19904, Improving Coordination Between SNAP and Medicaid in State Agencies

Dear Assistant Administrator Owens:

The National Council on Aging (NCOA) is pleased to provide the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) with comments on "Improving Coordination Between SNAP and Medicaid in State Agencies." The following includes a brief overview of NCOA and recommendations on selected topics: a) the necessity of proposed information collection and b) ways to minimize data collection burden.

NCOA Background

For over 70 years, NCOA has been a respected national leader and trusted partner helping people aged 60+ meet the challenges of aging. Our mission is to improve the lives of millions of older adults, especially those who are struggling. NCOA's work is based on our direct experience working with government agencies, community-based organizations, senior centers, State Health Insurance Assistance Program (SHIP) counselors, Benefit Enrollment Center staff, and other partners.

NCOA Recommendations

a) Necessity of Proposed Information Collection

NCOA supports FNS's interest in collecting information to improve the performance of the agency's functions. Specifically, we encourage FNS to study and operationalize administrative simplification and streamlining for the Supplemental Nutrition Assistance Program (SNAP). Greater streamlining within a single tool has the potential to reduce the administrative burden for states and enrollees.

d) Ways to Minimize Information Data Collection Burden

NCOA encourages FNS to collect the proposed information to aid in the creation of a tool that can significantly reduce beneficiary confusion and increase program uptake. A tool such as this would help enrollees and states.

Enrollees. Low-income older adults may encounter a multitude of programs that can help them, but applying for the services can be confusing because of the complex sets of eligibility rules, enrollment procedures, and program and state variations. For example, following their initial enrollment, applicants must fill out and submit separate reenrollment applications for each program annually. In addition, eligibility redetermination periods may not align across programs, resulting in individuals having to gather updated income and asset data from varying entities multiple times throughout the year.

As a result, NCOA supports FNS's proposal to study a tool that would provide a consolidated redetermination application across multiple programs. We believe that even if the eligibility criteria differ across programs, a streamlined tool would make it more likely that qualifying applicants would remain enrolled in the programs because the enrollment process is less burdensome.

States. Greater streamlining of enrollment procedures with a single tool has potential benefits for states. NCOA's research on administrative streamlining of applications supports the case for FNS collecting this information. *(NCOA would be happy to share the high-level findings of the feasibility study if FNS is interested.)*

In partnership with the Department of Health and Human Services (HHS) Administration for Community Living (ACL),¹ NCOA investigated whether creating a universal, streamlined, and automated tool for determining eligibility and facilitating enrollment would be feasible or produce desired outcomes. In brief, we found the following:

- Most program alignment tools only integrate SNAP and Medicaid. Of the systems integrating these two programs and others, we discovered that completely integrated eligibility and application tools sometimes require manual actions to occur outside of the tool. In some cases, screening and application assistance are not integrated into the tool.
- The eligibility and application functionalities are available in some tools but not in others. Using the available reviewed literature, the research team identified the most critical features and areas for integration across benefit programs to create a streamlined system.
- There are several policy barriers to creating an integrated tool.

Thank you for the opportunity to submit comments. For additional information or questions, please contact: Brenda.Sulick@ncoa.org or Matthew Hubbard at matthew.hubbard@ncoa.org.

Sincerely,



Brenda Sulick, Ph.D.
Chief Advocacy and Engagement Officer
National Council on Aging

¹ NCOA worked with L&M Policy Research, LLC, and Benefit Kitchen.