



Michael Burke
USDA Food and Nutrition Service
1320 Braddock Place
Alexandria, VA 22314

June 5, 2023

RE: Improving Coordination Between SNAP and Medicaid in State Agencies, 88 FR 19903

Dear Mr. Burke,

On behalf of the American Public Human Services Association (APHSA) and the National Association of Medicaid Directors (NAMD), we are writing to provide our comments in support of the proposed research to improve the coordination between Supplemental Nutrition Assistance Program (SNAP) and Medicaid in state agencies. As the national peer associations for state SNAP and Medicaid agencies, we believe the current state of unwinding from the public health emergency and the increasing emphasis of human-centered design in human services, make it now more vital than ever to better align these programs that serve as lifelines for health and well-being to tens of millions of children and families across the country.

We commend the USDA Food and Nutrition Service (FNS) for taking this important step to conduct in-depth research with states and counties across the country, and we extend our broad support to this effort. This study will help both FNS and the public better understand the current state of SNAP and Medicaid coordination and suggest promising practices for the nation. However, as witnessed through our member conversations, we realize that there is a plethora of diversity in how states operate across their programs and the different constraints that they face. As the peer associations for these agencies, APHSA and NAMD encourage FNS and CMS to continue to leverage our existing structures to continue to gain insights for what policy and practice supports are needed in states.

As FNS works to select the five states to focus on for this study, we suggest prioritizing variation within the cohort among: 1) State versus county administration, 2) integrated and non-integrated systems, 3) joint processing and how the programs deploy their staff, and 4) racial makeup of SNAP and Medicaid participants in that state. Additionally, among the list of desired respondents to interviews and case studies, we suggest adding Quality Control staff that can speak to QC impacts of coordination across SNAP and Medicaid, as well as current customers

in that state that are dually enrolled in SNAP and Medicaid to understand how the coordination (or lack thereof) contribute to customer experience.

This research represents just one important step toward achieving comprehensive coordination across SNAP and Medicaid. While the proposed study focuses only a limited number of states, it is crucial to recognize that the landscape of program implementation and challenges varies significantly across the nation, and there will be more work ahead to help states understand and operationalize best practices for aligning these programs to both decrease administrative burden for agencies and customers, as well as improve customer experience and reduce churn for children and families who rely on SNAP and Medicaid.

APHSA and NAMD look forward to continued partnership with both FNS and CMS on this research and the broader effort to increase coordination across SNAP and Medicaid. To further discuss opportunities for engagement with our members, please reach out to Matthew Lyons, Senior Director of Policy and Practice, at mlyons@aphsa.org and Jack Rollins, Director of Federal Policy at jack.rollins@medicaiddirectors.org.

Sincerely,



Tracy Wareing Evans
President and CEO
American Public Human Services Association



Kate McEvoy, Esq.
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