Appendix T. Benefits Data Trust Public Comments

Benefits Data Trust Response to the Proposed Information Collection Improving Coordination Between SNAP and Medicaid in State Agencies

88 FR 19903

Response Submitted by Benefits Data Trust

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Benefits Data Trust Response to Improving Coordination Between SNAP and Medicaid in State Agencies

Benefits Data Trust (BDT) is a national non-profit that helps people live more independently by creating smarter ways to access essential benefits and services. BDT partners with states and health care, higher education, and training organizations to (1) Provide outreach and assistance to individuals and (2) Modernize the system for efficiency and equity. BDT works in 14 states[1] to streamline access to benefits for eligible individuals and families, including providing enrollment assistance through our benefits centers in seven states.

BDT partners with government, education, and health care sectors to provide dignified services and engage in policy and system change initiatives. Our partnerships have informed us on what works and what does not work in the complex public benefit space.

Most recently, BDT has been working with the Center for Health Care Strategies, thanks to funding from the Robert Wood Johnson Foundation, to provide a national landscape analysis of how states are conducting data coordination across the Supplemental Nutrition Assistance Program (SNAP) and Medicaid. This was completed through a 50-state survey in which 46 states plus the District of Columbia responded.[2]

BDT applauds the United States Department of Agriculture (USDA) for the proposal to collect information to identify barriers and facilitators that impact data coordination across SNAP and Medicaid, with the goal of developing best practices that can improve coordination. As a result of our 50-state survey, we found that 90% of responding states share data with at least one other benefit program, but how data is shared varies significantly. In addition, 85% of responding states indicated they would benefit from more federal guidance on data sharing across SNAP and Medicaid, indicating a great need for this proposal.

Additional insight from our survey data that may be useful to the proposed collection of data include:

- More than half of state respondents (24 of 46) indicated they wanted to better understand what could and could not be shared between SNAP and Medicaid programs.
- Twenty-eight states expressed a continued need to align data-related policies to reduce the burden on applicants as well as confusion when processing applications, and to create greater administrative efficiencies.
- Twenty-four states specifically requested greater alignment in verification requirements.
- Some states specifically requested alignment of processing dates across SNAP and Medicaid.

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[1] California, Colorado, Kentucky, Louisiana, Maryland, Michigan, New York, North Carolina, North Dakota, Pennsylvania, Rhode Island, South Carolina, Texas, and Washington
[2] BDT. Bridging Gaps in Benefits Access: How Data Coordination Can Bolster Enrollment Across Programs

- Some states specifically requested income verification tools to be made available for all programs (i.e., through the Federal Data Services Hub).

The proposed information collection will provide more insights into states processes and needs for continued improvement in data coordination across SNAP and Medicaid. Thank you for your time and consideration for this comment.