

Appendix X. Thriving Transitions Public Comments

June 5, 2023

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Submitted via www.regulations.gov

Re: Improving Coordination Between SNAP and Medicaid in State Agencies; Request for Comments, 88 FR 19903 (April 4, 2023), Docket No. 2023-06956

Dear Mr. Burke,

Thank you for the opportunity to provide feedback on the proposed information collection to improve coordination between SNAP and Medicaid in state agencies. We appreciate FNS undertaking this information collection and are hopeful that it will help to streamline enrollment and retention across the two programs, and to reduce administrative burdens for individuals who qualify for these critical benefits. We are providing comments on the potential impact of this information collection for individuals leaving jails and prisons.

The Thriving Transitions Campaign is a coalition-led campaign designed to address the challenges faced by individuals who have been incarcerated and are returning to counties across the state of California. The campaign recognizes the high incarceration rates in the state and the need to create an infrastructure that supports connections to human services returns prior to release from prison and jails.

Research has shown that access to public benefits such as SNAP and SSI, housing, healthcare, and other resources play a crucial role in facilitating successful reentry. However, numerous barriers prevent many individuals from accessing these supports. The campaign aims to tackle these barriers and ensure returning citizens have the necessary resources to reintegrate into the community.

The consequences of these barriers are profound. Individuals exiting prison or jail are more likely to experience food insecurity and face increased poverty risks, including unemployment, homelessness, and ongoing economic hardship.

We offer the following feedback on the request for comments:

The information being collected could have significant practical utility in improving access to underserved populations such as formerly incarcerated individuals

FNS's effort to gather information to coordinate policies and processes across the two programs has the potential to improve efficiency and customer service by coordinating outreach and enrollment for the two programs and to improve program access by increasing the number of formerly incarcerated individuals who have CalFresh immediately upon release.

Understanding the factors that facilitate Medicaid enrollment and how they might translate into the SNAP context could ultimately help to improve SNAP enrollment. For example, many people leaving jails and prisons are eligible for both Medicaid (called “Medi-Cal” in California) and SNAP (called “CalFresh” in California). But Medi-Cal facilitates pre-release enrollment in a way that CalFresh policies do not, which results in many eligible formerly incarcerated individuals not having CalFresh upon release. Understanding what works in Medi-Cal/Medicaid and how that could translate to CalFresh/SNAP could help build a more accessible and effective SNAP pre-release process.

Implementing CalFresh pre-release in all California jails and prisons and streamlining the application process would have a huge impact on CalFresh enrollment and provide needed food benefits for newly released individuals. This is especially important as we see that a high percentage do not have a source of income upon release. A similar protocol already exists with Medi-Cal; let’s add CalFresh, too, literally meeting clients where they are. It would also be one less thing they need to worry about upon release and reduce stigma. No one would see the applicant apply for benefits because they will already have them at the date of their release. Ultimately, this would guarantee that every eligible person leaving prison or jail can leave with money to buy food.

Information collection can be enhanced by understanding in detail why differences exist between SNAP and Medicaid administration

Barriers exist in CalFresh that do not exist in Medi-Cal, and exploring how these barriers play out in policy and practice could help in developing ideas to reduce the impact of the barriers in CalFresh/SNAP. For example, states cannot process pre-release SNAP applications for individuals who are currently incarcerated unless they have a waiver from FNS; in California, only one county has this pre-release waiver. In contrast, Medi-Cal has no restriction on processing Medi-Cal applications for individuals who are currently incarcerated; individuals can be approved if eligible and be put into a “suspension” status. Individuals who were receiving Medi-Cal prior to incarceration can also retain their underlying Medi-Cal eligibility and simply be put into a “suspension” status, and have their Medi-Cal turned back on after their release. SNAP/CalFresh does not have a similar concept of “suspension” that allows individuals entering jails and prisons to retain eligibility and thus eliminate churn.

Providing a CalFresh/SNAP pre-release application and suspension process that is available to everyone without a time limit, as exists in Medi-Cal, would help align the two programs in a way that promotes access. Understanding where the two programs are currently not aligned may help get us there. This could include collecting information on statutory, regulatory, and operational barriers and facilitators that impact Medicaid and SNAP for individuals leaving jails and prisons, and what factors currently impede coordination between the two programs. For example, California is in the process of transitioning to a single statewide benefits platform for all of its key public assistance programs, and integration and alignment issues across benefit programs has come up with some frequency in this process. Information from this and other efforts may help us to understand what stands in the way of alignment, and how to overcome those challenges.

There may be additional challenges in enrolling formerly incarcerated individuals because of the need to coordinate with state or local corrections systems. Understanding how Medicaid systems handle this operationally right now could help with developing best practices to

increase SNAP enrollment for states and localities that obtain a pre-release waiver. It could also help with building SNAP systems that can better facilitate pre-release enrollment and the retention of a connection to eligibility during incarceration.

Thank you for the opportunity to provide these comments.

Respectfully submitted,

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Thriving Transitions