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Appendix AB. Ohio Association of Food Banks Public Comments



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RE: Docket ID number FNS-2023-0021, “Improving Coordination Between SNAP and Medicaid in State Agencies”

Mr. Michael Burke,

The Ohio Association of Foodbanks appreciates the opportunity to comment on the Food and Nutrition, U.S. Department of Agriculture’s proposed information collection regarding improving coordination between SNAP and Medicaid in State Agencies.

The Ohio Association of Foodbanks represents 12 Feeding America foodbanks and 3,600 partner agencies serving all 88 counties in the state. We are writing to express our gratitude to USDA FNS for collecting and analyzing information to reduce administrative burden and improve customer outcomes, as well as provide suggestions on how to strengthen your data and information collection processes.

- a) whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility

We thank USDA FNS for its interest in continually improving communication and coordination across federal and regional agencies and offices as well as state and local agencies. Serving whole families and whole households has significant potential to reduce administrative burden on taxpayers and program beneficiaries while improving experience, customer service, churn rates, and outcomes. To the extent that this information collection will lead to successful models for achieving those shared goals and help to realize those models as fully integrated into FNS and HHS regional best practices and technical assistance, we find it necessary and valuable.

The extent to which this information is practical, useful, and impactful is also dependent upon whether and to what extent it is used to secure commitments to improvement from state and county agencies, to inform investments in modernization, to identify and make appropriate adjustments to commonly cited regulatory burdens to front line providers and program beneficiaries, and to ultimately raise the floor for nationwide expectations for coordination through funding, technical assistance, monitoring, and regulatory streamlining. In addition to developing a Best Practices Guide for states, USDA FNS and CMS should use the information



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collected to identify federal actions that would improve program efficiency, decrease barriers, and, ultimately, increase enrollment among people who are eligible.

- b) the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions that were used

The agency's estimates are grounded in a couple of assumptions that are not necessarily aligned with the landscape of SNAP and Medicaid service delivery in every state.

- a. For example, at the local level in Ohio and in other states, SNAP and Medicaid agencies are one in the same. As a county-administered state, almost all of Ohio's 88 counties have a County Department of Job and Family Services (JFS) that is responsible for administering both SNAP and Medicaid, in addition to other benefits and programs, at the county level.
- b. Some county JFS offices (for example, in less populated, rural counties) may have frontline staff that work both SNAP and Medicaid caseloads or that are assigned to specific households rather than by policy/benefit area; other county JFS offices (for example, in more populous, metro counties) may have frontline staff that work in units where cases are banked and handled in a queue and are specific to one benefit; still others may work in shared services units that include multiple counties and provide services through call center models. Keep in mind that collecting the experience of a handful of local frontline staff will not be largely informative of the variety of models for client interaction and case management.
- c) ways to enhance the quality, utility, and clarity of the information to be collected

Several key groups are not explicitly named as respondent groups. These include:

- SNAP and Medicaid participants. Program beneficiaries and their experiences should be collected as part of this data collection project. If these experiences cannot be collected through case studies, they can be collected at greater volume through other means, such as through surveys administered in partnership with third-parties such as community-based organizations, public benefit mobile app providers, managed care plans, SNAP retailers, Medicaid providers, etc. Recent case studies have been conducted with program beneficiaries by community-based organizations including studies conducted by The Center for Community Solutions as well as recent surveys that our organization completed with Medicaid participants in Ohio. Without fully integrating the end recipient experience in this data collection process, the results gleaned are incomplete and not fully representative of the actual impact of coordination models and strategies on program beneficiaries. Centering the voice of people impacted by policies is a key component of efforts to increase equity and should be modeled through this information collection.



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- Legal aid entities and community-based providers and application assisters should be specifically incorporated in the case study recruitment for “Business not-for-profit organizations” because of their intimate familiarity with the burdens that program beneficiaries and applicants face in navigating public benefit programs including SNAP and Medicaid. They can speak specifically to the challenges that vulnerable populations, including communities with limited English proficiency, immigrant communities, people with disabilities, rural communities without adequate high-speed Internet or cellular networks, and others, face when navigating the application and eligibility determination process.
- Third-party technology vendors. Most, if not all, states contract with third-party companies for their application and eligibility determination platforms as well as for benefit redemption and management platforms. Often, therefore, the state does not have the technical expertise to assess the viability of technology-driven solutions for improving coordination, nor the tools for holding those third-party vendors accountable to contractual obligations. This cohort would provide meaningful context for understanding technical barriers to implementing program efficiencies. In addition to interviews, USDA should consider collecting and reviewing contracts with third-party vendors. Best practices for increasing program efficiency may include considerations for drafting contracts with these vendors.
- County-administered states should specifically be named as case study subjects, given the unique differences in how they operate. In county-administered states, SNAP and Medicaid recipients can have drastically different experiences interacting with their local offices and caseworkers county-by-county. Staffing challenges, differences in how new policy changes are communicated, and the caseload volume can all impact the service that program beneficiaries experience. Especially when studying county-administered states, USDA should consider varying where they recruit “local frontline staff” and program beneficiaries to glean any insights on the differences in program access and coordination in urban vs. rural areas.

d) ways to minimize the burden of the collection of information on those who are to respond, including use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology

USDA should review various documents they have at their disposal when collecting information to minimize the burden on state agencies and other stakeholders. Some strategies mentioned already include reviewing survey data from projects that interview program recipients and reviewing state contracts with third-party vendors. Additionally, USDA can review state SNAP and Medicaid plans to see the work states are already doing to coordinate across various programs.



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The review of the states' Medicaid unwinding plans could provide additional insights in how states are alleviating administrative burden for their caseworkers while keeping enrollees on the program who are eligible. Many lessons can be learned from this process as Medicaid state agencies work to return to normal operations.

An internal review of the various state options and waivers USDA FNS and Medicaid CMS provides would also be worthwhile. USDA can review the impact state options and waivers have on the efficiency and effectiveness of caseworkers as well as which options eliminate or impose additional barriers to program access for beneficiaries. USDA FNS can offer recommendations to states based on these findings.

We support the USDA FNS' efforts to streamline and coordinate assistance programs that benefit and alleviate burden for program beneficiaries, caseworkers, and state agencies. We look forward to seeing the results of this information collection, including the best practices guide.

Thank you for the opportunity to submit comments and shape the work you are doing to improve coordination across programs.

Sincerely,

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