

Community Legal Services Comment, DHS Docket No. USCIS-2010-0012

ATTACHMENT A: PA Impacts of Proposed Rule in MA, SNAP, and Part D Subsidy Programs

	Immi-grant families enrolled <sup>1</sup>	Estimated value of benefit received per family, annual federal dollars	Federal dollars per year in PA	PA economy gain from federal dollars received	35% reduction-families who will lose benefits	35% reduction-direct loss of federal funds	35% reduction-Loss to PA economy
Federal MA	107,114	\$6,264 <sup>2</sup>	\$632.7 M	\$1.26 B <sup>3</sup>	37,489	\$234,831,096	\$469,662,192
SNAP	50,400	\$2,438 <sup>4</sup>	\$122.8 M	\$219.8 M <sup>5</sup>	17,640	\$43,006,320	\$76,981,312
Pt. D Subsidies	5,502 <sup>6</sup>	\$4,900 <sup>7</sup>	\$27.4 M	N/A	1,925	\$9,432,500	N/A
					Total: 57,054	Total: \$287.2 Million	Total: \$546.6 Million

<sup>1</sup> PA Department of Health and Human Services data, November 14, 2018. See Attachment B.

<sup>2</sup> Average cost per federal MA enrollee in 2017 was \$7,950. See U.S. Department of Health and Human Services, 2017 Actuarial Report on the Financial Outlook for Medicaid, available at <https://www.cms.gov/Research-Statistics-Data-and-Systems/Research/ActuarialStudies/Downloads/MedicaidReport2017.pdf>. The federal government pays between 52.25% and 89.58% of federal MA costs in Pennsylvania, or at least \$3,965 out of the \$7,950 average annual expense per federal MA enrollee. See U.S. Department of Health and Human Services, Federal Matching Shares for Medicaid, the Children's Health Insurance Program, and Aid to Needy Aged, Blind, or Disabled Persons for October 1, 2018 Through September 30, 2019, <https://www.federalregister.gov/documents/2017/11/21/2017-24953/federal-matching-shares-for-medicaid-the-childrens-health-insurance-program-and-aid-to-needy-aged>. PA Department of Health and Human Services data in Attachment B indicate that there are at least 1.58 people on average in each immigrant family enrolled in federal MA whose immigration status would make them potentially eligible for federal MA (U.S. citizens and refugee statuses).  $\$3,965 \times 1.58 = \$6,264$ .

<sup>3</sup> Every dollar in MA spending is estimated to produce two dollars in economic growth. See Fiscal Policy Institute, Only Wealthy Immigrants Need Apply, p. 8, available at <http://fiscalspolicy.org/wp-content/uploads/2018/10/NY-Impact-of-Public-Charge.pdf>

<sup>4</sup> In September 2018, there were 1,797,176 SNAP recipients in Pennsylvania and \$218,890,482 in SNAP benefits issued, for an average monthly SNAP grant amount of \$121.70 per person. See PA Department of Health and Human Services MA-TANF-GA-SNAP-Sept 2018 data table, available at <http://listserv.dpw.state.pa.us/Scripts/wa.exe?A2=ind18&L=ma-food-stamps-and-cash-stats&F=&S=&P=7714>. PA Department of Health and Human Services data in Attachment B indicates that at least 1.67 people in immigrant families enrolled in SNAP have a citizenship status that would make them potentially eligible for SNAP (U.S. Citizens and refugee statuses).  $\$121.70 \times 1.67 \times 12 = \$2,438$ .

<sup>5</sup> Every one dollar in SNAP spending creates \$1.79 in economic growth during economic downturn. See U.S. Department of Agriculture, Supplemental Nutrition Assistance Program Linkages with the General Economy, available at <https://www.ers.usda.gov/topics/food-nutrition-assistance/supplemental-nutrition-assistance-program-snap/economic-linkages/>

<sup>6</sup> PA Department of Health and Human Services data in Attachment B show that 5,502 non-citizens are enrolled in Medicare Part B buy-in benefits. All Medicare Part B buy-in benefit enrollees are eligible for Medicare Part D subsidies. The income limits for Medicare Part D subsidies are higher than the income limits for Medicare Part B buy-in benefits. There are therefore very likely more than 5,502 non-citizens enrolled in Medicare Part D subsidies.

<sup>7</sup> The Social Security Administration estimates that Medicare Part D subsidies have an annual value of about \$4,900. See Social Security Administration, Apply Online for Extra Help with Medicare Prescription Drug Costs, p. 1, available at <https://www.ssa.gov/pubs/EN-05-10525.pdf>

