State Health Reform Assistance Network
Charting the Road to Coverage
Using Supplemental Nutrition Assistance Program (SNAP) Information to Facilitate Medicaid Enrollment and Renewal

Manatt Health

September 12, 2016
3:00 – 4:00 pm ET
Historically, states used SNAP data to make Medicaid eligibility determinations for children under Express Lane Eligibility authority.

In May 2013, CMS released guidance that established 1902(e)(14) waiver authority allowing states to enroll targeted SNAP children and adults into Medicaid.

In August 2015, CMS:
- Extended the 1902(e)(14) authority
- Established new State Plan Amendment (SPA) authority that allows states to leverage SNAP data for Medicaid enrollment
- In May 2016, CMS released a SNAP SPA template

The focus of today’s session is to:
- Review the federal guidance and 2015 SPA authority requirements
- Identify implementation considerations
- Discuss opportunities for leveraging this authority at application and renewal

Review of Federal Authority
1902(e)(14) Waiver Authority

- Permits states to use 1902(e)(14)(A) waiver authority to enroll highly likely to be eligible non-elderly, non-disabled SNAP participants into Medicaid

- Provides opportunity to facilitate enrollment when:
  - Experiencing an eligibility and enrollment system constraint
  - Addressing a renewal backlog
  - Expanding Medicaid

- Removes administrative burden of conducting MAGI-based determinations for a defined period of time

- Requires on-going renewal of waiver authority

- Mandates states conduct full MAGI eligibility determination at renewal

### Enrollment Using Targeted Strategies from October 2013 to January 2015

<table>
<thead>
<tr>
<th>State</th>
<th>Populations Transferred</th>
<th>Enrollment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arkansas</td>
<td>SNAP</td>
<td>63,465</td>
</tr>
<tr>
<td>California</td>
<td>SNAP/Parents*</td>
<td>406,027</td>
</tr>
<tr>
<td>Illinois</td>
<td>SNAP</td>
<td>35,900</td>
</tr>
<tr>
<td>New Jersey</td>
<td>SNAP/Parents</td>
<td>6,921</td>
</tr>
<tr>
<td>Oregon</td>
<td>SNAP/Parents</td>
<td>43,697</td>
</tr>
<tr>
<td>West Virginia</td>
<td>SNAP/Parents</td>
<td>70,574</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>726,584</strong></td>
</tr>
</tbody>
</table>


* “Parents” refers to parents enrolled based on info contained in case record of enrolled children.
SNAP SPA Authority Overview

August 2015 CMS Guidance

- Establishes a targeted Medicaid enrollment strategy for individuals receiving SNAP (or other means tested benefits)
- Requires the identification of a subset of SNAP participants who are **certain to be income-eligible** using MAGI-based methods
- Identifies MAGI-based eligibility criteria that states must apply to SNAP participants before enrollment in Medicaid
- Allows states to use strategy for administrative renewals
- Permits on-going SPA authority once approved

Louisiana was the first state to receive SNAP SPA approval

Sources: Centers for Medicare & Medicaid Services, “Policy Options for Using SNAP to Determine Medicaid Eligibility and an Update on Targeted Enrollment Strategies,” SHO #15-001, ACA #34, 2015.
Implementing the 2015 SNAP Guidance and SPA Authority
Facilitating Medicaid Enrollment and Renewal for Eligible SNAP Participants

1. Identify MAGI Medicaid Eligible SNAP Participants
2. Verify Non-Financial Eligibility Criteria
3. Collect Additional Information, Provide Program Notice, and Meet Minimum Application Requirements

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Identify Sub-Set of SNAP Participants to Enroll in Medicaid

SNAP enrollees eligible for MAGI Medicaid enrollment must be:

- Non-disabled
- Under age 65
- MAGI Medicaid eligible (e.g., certain to meet MAGI household composition and income rules)
- Immigrant eligible for Medicaid (e.g., not subject to five year bar)
- Not eligible for Medicare
- Not already enrolled in Medicaid
Apply MAGI Household Composition Rules

SNAP enrollees eligible for Medicaid enrollment must meet the following household requirements:

- All SNAP household members must be eligible for SNAP

- SNAP household members must not be part of a tax household that includes individuals who live outside the home

- The household must fall into either of the following groups:
  1. Household includes:
     - Individuals who live alone;
     - Parents living with their children; or
     - Married couples (with or without children).

OR

  2. Household includes other members, but total household income is below the applicable Medicaid standard for a household of one.

- SNAP households must include people who live and purchase and prepare food together

- MAGI Medicaid tax-filer households may include tax filer/tax dependents who live outside the home

⚠️ At application, state to collect additional information (see model notice)

At Medicaid renewal state to ask if household has changed

# Apply Medicaid Income Requirements

- SNAP participants’ household gross income must be equal to or below the applicable Medicaid MAGI threshold
- States must identify income that is countable for determining Medicaid but excluded for determining SNAP eligibility

⚠️ States will need to **collect information on excluded income** through:
  - Data sources
  - Information collected on means tested application/renewal form
  - New Medicaid form

- At renewal, state to ask if anyone has a new type of income

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### Example Analysis of Income Included in Medicaid MAGI Determinations and Excluded from SNAP

<table>
<thead>
<tr>
<th>Income Type</th>
<th>SNAP</th>
<th>MAGI</th>
</tr>
</thead>
<tbody>
<tr>
<td>AmeriCorps earnings</td>
<td>✗</td>
<td>✓</td>
</tr>
<tr>
<td>Child’s earnings exceeding $6,100 if &lt;18 and in school or GED program</td>
<td>✗</td>
<td>✓</td>
</tr>
</tbody>
</table>

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Align State-Specific SNAP Income Requirements to Medicaid

SNAP household members’ income must not include **self-employment** income based on simplified methodology. For SNAP, states either use:

- IRS methodology to calculate gross income in SNAP
- A simplified methodology to calculate gross income in SNAP do not have self-employment data in the SNAP system

SNAP household members’ gross income must not exclude **child support payments** to children living outside the home. For SNAP, states either:

- Deduct child support payments to non-household members
- Treat child support payments to non-household members as an income exclusion

At renewal, state to ask if anyone has a new type of income

See the Appendix to find out how your state treats self-employment income and child support payments in SNAP
Verify Non-Financial Eligibility: Non-Medicare and Citizenship/Immigration Status

**Medicare Eligible**
- States must exclude SNAP participants who are eligible for or enrolled in Medicare coverage

**Citizenship/Immigration Status**
- State must verify U.S. citizenship and immigration status of all SNAP enrollees eligible for Medicaid enrollment
- SNAP and MAGI Medicaid have different citizenship requirements (e.g., SNAP participants are not subject to 5-year bar)

States to either:
- Identify Medicare eligibility via data/systems; OR
- Develop “Medicare proxy” (e.g., over 65 and SSI eligible)

States to either:
- Exclude non-citizen SNAP participants for strategy; OR
- Collect additional citizenship/immigration information from participants at application

At renewal, states to ask if there is any change in citizenship/immigration status
Collect Additional Eligibility Information from SNAP Enrollees and Provide Program Information

Example State Notice Content

You may be eligible for Medicaid. To confirm your eligibility, please provide the following information:

**Example Household Questions:**
Your SNAP household includes Person A, Person B, and Person C.
- Does anyone above file a tax return that claims someone as a dependent and that person does not live with you?
- Is anyone above listed as a dependent on an income tax return filed by someone who does not live with you?

**Example Income Questions:**
- Do any household members receive AmeriCorp income? If so, how much?
- Is anyone in your household above age 18 and make above $x? If so, how much?

**Example Immigration Questions:**
- If you are not a U.S. Citizen, when did you enter the country?

**Program Information:**
- Where to receive information on covered services
- Rights and responsibilities
- Assignment of rights to third party benefits
- Cooperation with medical support enforcement

Signature __________________________Date__________

States can use program notices to collect eligibility information that is not available via data sources

States required to provide Medicaid program information

Sources: See Louisiana Model Notice available athttp://dhh.louisiana.gov/assets/HealthyLa/Resources/Sample_of_SNAP_Offer_Letter.pdf
Meet Minimum Application Submission Requirements Including Obtaining a Signature

States may obtain a signature in the following ways:

○ The household applies for Medicaid by requesting a Medicaid determination through the **SNAP application**

○ The household applies for Medicaid during a **SNAP recertification**

○ Individual receives a Medicaid card at the time the SNAP household member is notified of enrollment/recertification and individual
  ▪ Activates it online or by phone
  ▪ Selects a Medicaid managed care plan, if applicable

○ Individuals sign and return a separate form completed:
  ▪ On paper
  ▪ By telephone
  ▪ Online
  ▪ By other electronic means

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No signature is required if a state elects to use this strategy at Medicaid renewal

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SNAP SPA Template Requirements

- Identification of the means-tested public benefit program the state will use to support Medicaid determinations (SNAP, TANF, or Other)

- Description of the procedures that will be used to:
  - Collect household and income information to determine eligibility
  - Ensure individuals are enrolled in the correct eligibility category
  - Exempt eligible American Indians or Alaska Natives from cost sharing and/or premium requirements, as applicable
  - Obtain signature and provide Medicaid program information
  - Assign rights to third party benefits and enforce medical support

- Articulation of whether authority will be used at application and/or renewal

- Affirmation that the state will ensure only “certain to be eligible” individuals will be enrolled
Discussion
Thank you!

Kinda Serafi, Counsel
kserafi@manatt.com
(212) 790-4625
States’ Decisions for Treating Self Employment Income in SNAP

States’ Decisions for Treating Child Support Income in SNAP