

A stylized graphic of several overlapping, curved leaf-like shapes in shades of blue, positioned in the upper right corner of the top banner.

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Using Supplemental Nutrition Assistance Program (SNAP) Information to Facilitate Medicaid Enrollment and Renewal

Manatt Health

September 12, 2016
3:00 – 4:00 pm ET

Setting the Stage



- 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

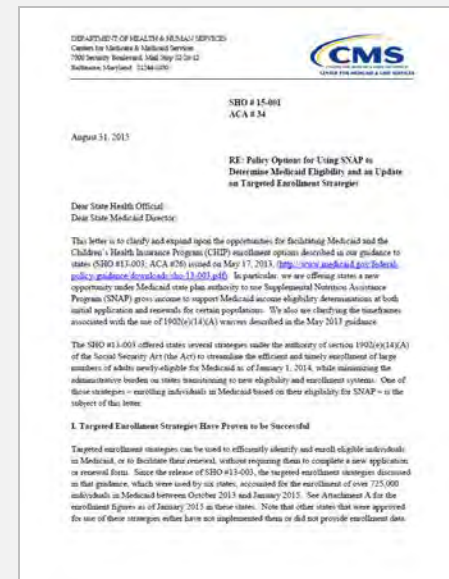
Enrollment Using Targeted Strategies from October 2013 to January 2015

State	Populations Transferred	Enrollment
Arkansas	SNAP	63,465
California	SNAP/Parents*	406,027
Illinois	SNAP	35,900
New Jersey	SNAP/Parents	6,921
Oregon	SNAP/Parents	43,697
West Virginia	SNAP/Parents	70,574
Total		726,584

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

Implementing the 2015 SNAP Guidance and SPA Authority

Facilitating Medicaid Enrollment and Renewal for Eligible SNAP Participants



Identify MAGI Medicaid Eligible SNAP Participants



Verify Non-Financial Eligibility Criteria



**Collect Additional Information, Provide Program Notice, and
Meet Minimum Application Requirements**

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

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

Income cross-walk to identify income sources that differ across Medicaid and SNAP

Income Type	SNAP	MAGI
AmeriCorps earnings	✗	✓
Child's earnings exceeding \$6,100 if <18 and in school or GED program	✗	✓

Align State-Specific SNAP Income Requirements to Medicaid

State Specific

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

No additional action required

State to either:

- Exclude these SNAP participants for strategy; OR
- ! Collect the amount of self-employment income under MAGI rules

State Specific

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

No additional action required

State to either:

- Exclude these SNAP participants for strategy; OR
- ! Collect the amount of child support payments under MAGI rules



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

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


States to either:

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

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:

- 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

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



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

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

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STATE PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT
STATE OF _____
SECTION 2: COVERAGE AND ELIGIBILITY

2.1 Application, Determination of Eligibility and Furnishing Medicaid (continued)

____ (f) Using the Income Determination from another Means-Tested Public Benefit Program to Support Medicaid Determinations

(1) The state elects the option to use income determined by the following means-tested public benefits program(s) to support Medicaid eligibility determinations:

— SNAP _____
— TANF _____
— Other Means-Tested Program: _____

In electing this option, the state assures that it:

(a) Verifies citizenship and non-citizen status consistent with Medicaid statutory and regulatory requirements in Section 1137 of the Social Security Act, 42 CFR 435.406, and 435.407.

(b) Complies with Medicaid reporting requirements with respect to participants enrolled through this strategy.

(c) Provides applicants with program information required under 42 CFR 435.505, such as information about available services and the rights and responsibilities of applicants and beneficiaries.

(d) Has procedures to ensure that eligible individuals are enrolled in the appropriate Medicaid eligibility group. Description: _____

(e) Has procedures to ensure that eligible American Indians or Alaska Natives enrolled through this strategy are exempt from cost sharing and/or premiums, consistent with section 1916A(b)(3) of the Social Security Act. Description: _____

Discussion

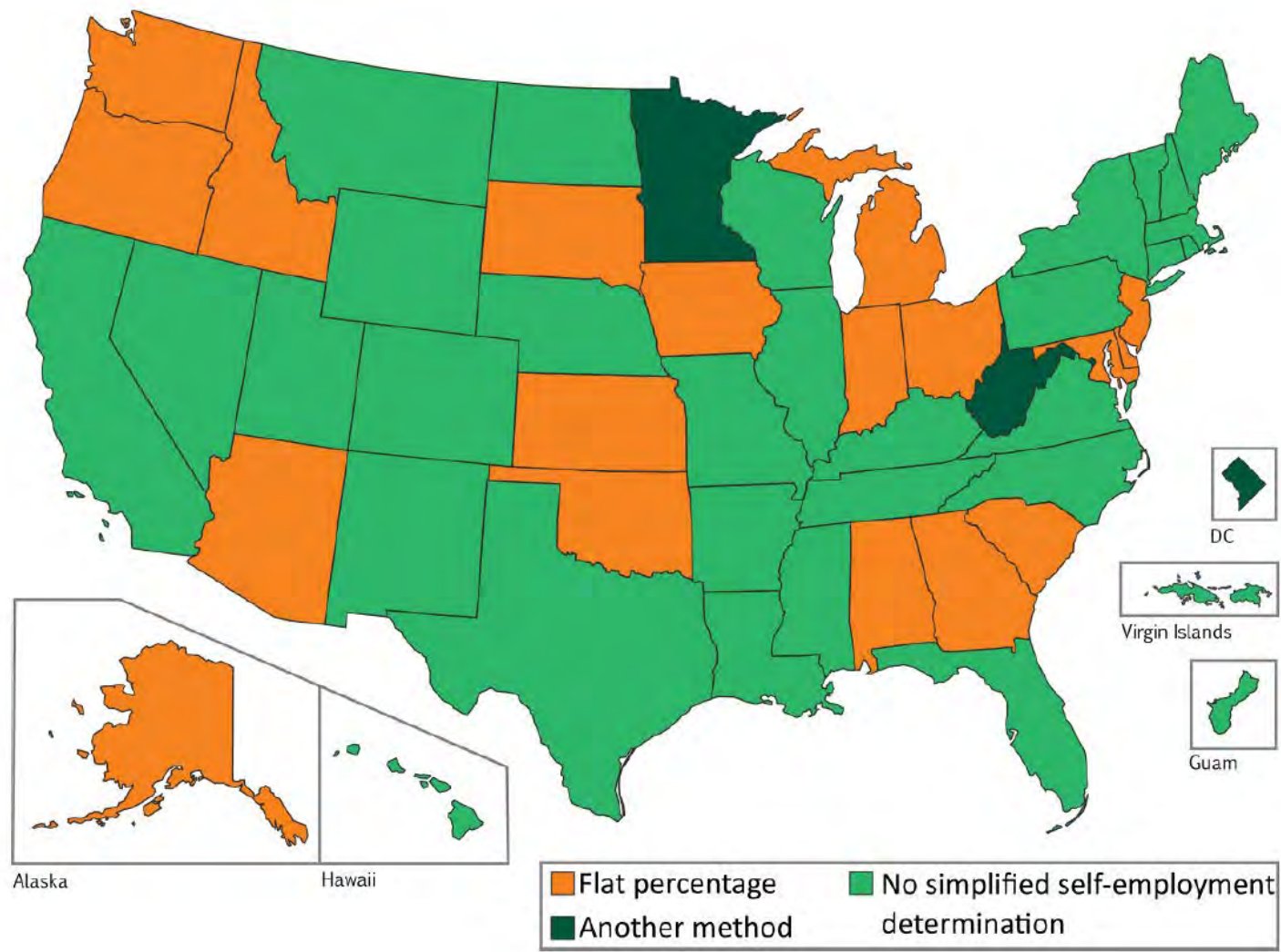


Thank you!

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Appendix

States' Decisions for Treating Self Employment Income in SNAP



States' Decisions for Treating Child Support Income in SNAP

