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Leveraging SNAP Information to Renew Medicaid Eligibility in a Post-Unwinding World

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States’ “unwinding” of pandemic-era Medicaid continuous coverage protections has elevated the importance of using data to keep eligible people enrolled at renewal.¹ To reduce coverage losses during the unwinding process, many states have taken advantage of temporary waivers — commonly known as e14 waivers — that allow a state to enroll or renew individuals in Medicaid based on their participation in the Supplemental Nutrition Assistance Program (SNAP).² These waivers have allowed Medicaid agencies to renew more enrollees through the *ex parte* process (i.e., using electronic data sources to confirm eligibility without requiring an enrollee to fill out a form) by relying on SNAP information. While the waivers are expected to sunset in June 2025, *states can continue to leverage SNAP information to complete ex parte renewals by transitioning to other strategies*. States that haven’t used the waivers can also consider the strategies outlined in this paper to increase *ex parte* rates.

The strategies to best leverage SNAP data for Medicaid renewals depend in part on whether a state has integrated administration of SNAP and Medicaid or the programs are in separate systems; they also differ for MAGI enrollees (children, parents, and expansion adults, whose eligibility is based on their modified adjusted gross income or MAGI) and non-MAGI enrollees (older adults and people with disabilities). This paper addresses the various options available to states, focusing on how states using the e14 waiver can transition to Express Lane Eligibility (ELE) and the Targeted Enrollment State Plan option, described below, to continue leveraging SNAP information for Medicaid renewals on a permanent basis.

¹ CBPP, “Unwinding Watch: Tracking Medicaid Coverage as Pandemic Protections End,” updated May 13, 2024, <https://www.cbpp.org/research/health/unwinding-watch-tracking-medicaid-coverage-as-pandemic-protections-end>.

² Centers for Medicare & Medicaid Services (CMS), “COVID-19 PHE Unwinding Section 1902(e)(14)(A) Waiver Approvals,” <https://www.medicare.gov/resources-for-states/coronavirus-disease-2019-covid-19/unwinding-and-returning-regular-operations-after-covid-19/covid-19-phe-unwinding-section-1902e14a-waiver-approvals/index.html>.

TABLE 1

Approaches for Using SNAP Data for Medicaid Renewals

Approach	Description	Applicable Medicaid Population	Best suited for . . .
“Pushing Forward” Medicaid Eligibility Period Based on SNAP Action	Conduct early <i>ex parte</i> Medicaid renewal when acting on SNAP case	All MAGI and non-MAGI enrollees	States with integrated SNAP and Medicaid administration
Using Specific SNAP Income Data	Use verified specific income from SNAP case during Medicaid renewal	All MAGI and non-MAGI enrollees	Integrated states, but can also be used in non-integrated states if Medicaid can access details of SNAP system
Express Lane Eligibility (ELE) State Plan Option	Use income findings from another program (which can be SNAP) in making Medicaid eligibility determination	Limited to children (but can be extended to adults through an 1115 waiver)	Non-integrated states, since Medicaid can waive differences in household and income determinations and use gross income determined by SNAP for Medicaid renewal
Targeted Enrollment State Plan Option	Use income findings from SNAP to conduct Medicaid renewal (with some restrictions)	All MAGI enrollees (and some non-MAGI enrollees)	Non-integrated states, since Medicaid can use gross income determined by SNAP for Medicaid renewal
1902(e)(14)(A) Waiver	Temporary waiver to allow use of income findings from SNAP for Medicaid renewal	All MAGI enrollees (and non-MAGI enrollees in some cases)	Non-integrated states, since Medicaid can use gross income determined by SNAP for Medicaid renewal

States With Integrated Administration of SNAP and MAGI Medicaid

Most states that have SNAP cases and MAGI Medicaid cases in the same eligibility system can leverage SNAP information for Medicaid renewals without a waiver. Integrated states that chose to use the waiver during unwinding due to limitations with their eligibility systems may transition to ELE and the Targeted Enrollment State Plan option discussed below.

In integrated states, SNAP cases typically are touched more often than Medicaid. This presents opportunities for the agency to “push forward” an enrollee’s Medicaid eligibility period through an

ex parte renewal in conjunction with SNAP actions.³ Medicaid can be renewed at any of the following touchpoints:

- **SNAP periodic/interim report**, if data sources are checked.⁴ (Medicaid can't be pushed forward if the state processes "no change" periodic/interim reports without checking data sources.)
- **SNAP recertification**. Renewing Medicaid in conjunction with SNAP recertification is useful when enrollees' SNAP and Medicaid eligibility periods aren't aligned.
- **SNAP change report**, if data sources are checked.

In addition, agencies can use SNAP data as part of the regular Medicaid *ex parte* renewal process. Medicaid can use specific SNAP income data and "run eligibility" based on information already recorded in the case, since most integrated systems are already programmed to identify the income type and earner and to determine whether that income is countable for Medicaid. The Centers for Medicare & Medicaid Services (CMS) has stated that information should be considered reliable for purposes of *ex parte* renewals if it has been verified within the last six months;⁵ this means SNAP information is usually a reliable source for *ex parte* Medicaid renewals due to the frequency with which SNAP cases are reviewed.

Using SNAP Data to Renew Medicaid for People With No Countable Income

SNAP data is particularly useful as part of Medicaid *ex parte* renewals for individuals with no countable income. CMS has authorized e14 waivers during unwinding to allow *ex parte* Medicaid renewals when no information is returned from data sources for enrollees who previously had no income or income below the poverty line. This has allowed many states to significantly increase their *ex parte* success rates. However, some or all of these waivers may sunset in 2025, potentially leading to a decline in *ex parte* success rates.

Fortunately, SNAP data can be used to complete *ex parte* renewals for these enrollees without a waiver. A SNAP case with no income isn't the same as lack of income information in another data source because the SNAP data were attested to and verified during the SNAP eligibility determination or renewal process. Therefore, Medicaid agencies can use any of the strategies described in this paper to complete an *ex parte* renewal for households with no countable income that also receive SNAP.

³ While an agency cannot initiate renewals more often than once every 12 months, it may begin a new 12-month renewal period when it receives information about a change in the beneficiary's circumstances, including as part of a SNAP action. 42 CFR 435.916(d)(1)(ii). In addition, because the renewal is done *ex parte*, a separate signature on a Medicaid renewal form is not required.

⁴ A SNAP periodic or interim report is usually done at the six-month mark for households with a 12-month certification period. It doesn't require an interview and is usually a shorter form than the 12-month recertification.

⁵ CMS, "Ex Parte Renewal: Strategies to Maximize Automation, Increase Renewal Rates, and Support Unwinding Efforts," October 20, 2022, <https://www.medicaid.gov/sites/default/files/2022-10/ex-parte-renewal-102022.pdf>.

States With Separate Administration of SNAP and MAGI Medicaid

Strategies to leverage SNAP information for Medicaid renewals are especially critical for non-integrated states, where coordination between the two programs is more challenging. Many non-integrated states took advantage of e14 waivers during unwinding and found that using SNAP information improved their *ex parte* success rates. While the e14 waivers may end in 2025, non-integrated states can continue to see the benefits of leveraging SNAP information by transitioning to similar approaches that are available for the long term. The three main opportunities are:

1. Using specific SNAP income data
2. Express Lane Eligibility (ELE)
3. Targeted Enrollment State Plan option

Which strategy best fits a state may depend on system capabilities and existing data sharing agreements. States that can't directly access SNAP for specific income can use a combination of ELE and the Targeted Enrollment State Plan option to automatically renew Medicaid for many people who are also receiving SNAP.

Using Specific SNAP Income Data

Medicaid agencies check multiple data sources to verify income eligibility, such as the Social Security Administration, state quarterly wage data, and The Work Number (a commercial income-verification database). In addition to these sources, agencies can use SNAP data to verify information including:

- traditional “W-2” earned income;
- self-employment income;⁶
- unearned income when information isn't available in other databases (e.g., pension income); and
- absence of income for an individual or household.

Income information in the SNAP file usually specifies the type of income and who receives it. This information enables Medicaid to select income that is countable for Medicaid and received by individuals in the Medicaid household, while excluding SNAP income that is not countable for Medicaid (such as child support received).

This strategy can provide useful information for Medicaid *ex parte* renewals that can't be obtained from other data sources, especially self-employment income and confirmation that the household has no countable income. To use this strategy in a non-integrated state, however, the Medicaid agency must have access to the SNAP system as well as a detailed understanding of the system's coding to identify the types of income, who is earning it, and whether it is countable for Medicaid.

⁶ Medicaid may have to adjust the self-employment income calculated by SNAP, depending on how self-employment deductions are determined and captured in the eligibility system.

Express Lane Eligibility (ELE)

ELE allows Medicaid agencies to rely on income findings from another program, such as SNAP, to determine eligibility for or renew Medicaid — even when that program’s methodology for determining income and household size differs from Medicaid’s.⁷ Medicaid agencies can adopt ELE through a state plan amendment and use ELE to automatically renew Medicaid for children also receiving SNAP if their income, as determined by SNAP, is under the eligibility threshold for Medicaid.

ELE functions like the e14 waiver that was available during unwinding, but it can only be used for children unless the state receives a Section 1115 waiver to apply the authority to adults.⁸

Targeted Enrollment State Plan Option

Medicaid agencies can rely on SNAP gross household income data to renew Medicaid through the Targeted Enrollment State Plan option.⁹ The option, available for adults under 65 and children, allows states to renew Medicaid for individuals receiving SNAP who are certain to be eligible for Medicaid.

The Targeted Enrollment State Plan option is more narrowly tailored than the e14 waiver and requires the state to exclude certain individuals whose enrollment in SNAP is *not* certain to mean they are eligible for Medicaid, because of program differences in who is counted in a household and/or income counting rules. While the federal criteria appear complicated, the exclusions apply to relatively few households and can be programmed into a state’s eligibility system through the following steps:

1. States must first identify Medicaid enrollees due for renewal, excluding those who, based on the information already known to the state from the existing Medicaid case:
 - a. are claimed on the taxes of someone outside the home;
 - b. file taxes jointly with someone outside the home; or
 - c. are claiming a dependent outside the home.
2. The resulting list of Medicaid enrollees should then be matched against SNAP enrollment, excluding SNAP cases that:
 - a. are receiving SNAP transitional benefits alternative. (Approximately half of the states have adopted transitional benefits alternative for households recently leaving TANF).¹⁰

⁷ ELE can be used to meet any Medicaid eligibility criterion except verification of citizenship. However, at renewal, verification of citizenship isn’t required since it’s not a factor subject to change.

⁸ Massachusetts has a waiver that allows ELE to apply to adults, and Maryland has applied for one as well.

⁹ CMS, “SHO #15-001 Re: Policy Options for Using SNAP to Determine Medicaid Eligibility and an Update on Targeted Enrollment Strategies,” August 31, 2015, <https://www.medicaid.gov/sites/default/files/Federal-Policy-Guidance/downloads/SHO-15-001.pdf>.

¹⁰ See USDA, Food and Nutrition Service, “SNAP State Options Report,” 15th Edition, 2023, <https://fns-prod.azureedge.us/sites/default/files/resource-files/snap-15th-state-options-report-october23.pdf>.

- b. have a SNAP-eligible household member (e.g., ineligible college student, ineligible person who is an immigrant, etc.).
- c. have income that is included in MAGI-based income but excluded for SNAP. (This is very rare; it may include personal injury awards in some circumstances.)
- d. have self-employment income and live in one of the 24 states that use a method other than actual expenses for SNAP's self-employment deduction (these simplified methods cannot be used for Medicaid income determinations).¹¹
- e. have a gross income exclusion for child support payments to someone outside the home (in the ten states with this exclusion).¹²
- f. *Don't* fit one of the following criteria:
 - i. the SNAP household includes only parents living with their children; or
 - ii. the SNAP household includes only a married couple (with or without their children); or
 - iii. the household's SNAP gross income is under the Medicaid eligibility threshold for a household of one.

If these criteria are met, Medicaid can use gross income as determined by SNAP (disregarding the differences between SNAP and Medicaid in who is counted in a household and income counting rules) to determine eligibility for an *ex parte* Medicaid renewal for children and adults under 65. Though this is more complicated to implement than the e14 waiver, an analysis found that about 75 percent of SNAP households with members to whom MAGI rules apply would meet these criteria.¹³

Non-MAGI Medicaid

Most states' eligibility rules for non-MAGI Medicaid enrollees include a resource test as well as an income standard. In SNAP, all but about a dozen states have eliminated the asset test by adopting broad-based categorical eligibility for most participants, so the SNAP case doesn't contain enough information to renew Medicaid.¹⁴ However, Medicaid can still leverage SNAP data to verify *income* for a Medicaid renewal, and can verify *resources* through an asset verification system (AVS), which collects asset information directly from financial institutions.¹⁵

¹¹ *Ibid.*

¹² *Ibid.*

¹³ Dottie Rosenbaum, Shelby Gonzales, and Danilo Trisi, "A Technical Assessment of SNAP and Medicaid Financial Eligibility Under the Affordable Care Act (ACA)," CBPP, revised June 6, 2013, <https://www.cbpp.org/research/a-technical-assessment-of-snap-and-medicaid-financial-eligibility-under-the-affordable-care>.

¹⁴ USDA, "Broad-Based Categorical Eligibility," <https://fns-prod.azureedge.us/sites/default/files/resource-files/BBCE-States-Chart-Jan-2024.pdf>.

¹⁵ Farah Erzouki and Jennifer Wagner, "Using Asset Verification Systems to Streamline Medicaid Determinations," CBPP, June 23, 2021, <https://www.cbpp.org/research/health/using-asset-verification-systems-to-streamline-medicaid-determinations>.

Medicaid can rely on specific SNAP income data to verify income eligibility for the Medicaid case. Where non-MAGI cases are in a separate eligibility system than SNAP cases, the agency can also use the Targeted Enrollment State Plan option to verify income for disabled individuals under 65.

Implementation

Any state can implement strategies to maximize the use of SNAP data to determine Medicaid eligibility, regardless of whether it has integrated or separate administration of SNAP and Medicaid. Integrated states may find it easier to rely on specific SNAP income data, since Medicaid eligibility is in the same system and the coding is shared. States with separate systems may find it easier to rely on ELE and the Targeted Enrollment State Plan option, since these approaches only require Medicaid to access the total income calculated by SNAP.

Medicaid agencies that successfully leveraged the e14 waiver to use SNAP information for Medicaid *ex parte* renewals during unwinding can use one or a combination of these strategies to maximize *ex parte* success rates and significantly reduce the burden on beneficiaries and agencies.