

Recommendation 7

Evaluate the Impact

The Department of Human Services (DHS) should collect and publish data to fully evaluate the impact HR1 will have on Pennsylvanians.

HR1 will result in reduced Medicaid and SNAP enrollment rates and increased churn largely due to people being unable to navigate the complexities and burdensome paperwork requirements the law places on accessing benefits. The new law will also impact everyday operations of the County Assistance Offices (CAOs) and the routine interactions public benefit applicants and recipients have with DHS staff and systems across every public benefit program the CAOs administer. Data collection and publication will illustrate these impacts, permit DHS to identify and address problem areas, allow advocates to fully inform applicants and recipients about how to navigate these systems, and educate the public about the ways in which HR1 changes public benefit systems and impacts individuals.

Data should be collected starting now, to create a pre-HR1 baseline. Data should continue to be collected throughout HR1's implementation. We recommend minimally collecting and publishing the following, stratified by age:

- Procedural disenrollment rates in Medicaid, CHIP, SNAP, and TANF based on the date the renewal outcome occurred.
Being able to track procedural terminations as they happen will be one of the clearest ways to demonstrate the extent of HR1's impact on DHS' programs and its recipients. To be accurate, data must show procedural disenrollment determinations that reflect the date of the eligibility determination. This is distinct from data reported to the Centers for Medicare & Medicaid Services (CMS) during the unwinding which DHS stated was point in time data showing only the number of individuals who were still procedurally disenrolled three months after their renewal was due. That data did not capture anyone whose renewal resulted in a procedurally termination decision but who subsequently successfully renewed or reenrolled prior to the data being reported to CMS.
- Number of Medicaid, CHIP, SNAP, and TANF cases closed for procedural reasons and then returned to be reopened through a new application, reconsideration or appeal in each of the subsequent 1, 2, and 3 months following disenrollment. (Churn data.)
- Application processing times for Medicaid, CHIP, SNAP, and TANF.
- Renewal processing times for Medicaid, CHIP, SNAP, and TANF.
- Number of Medicaid applicants and recipients who are subject to the work requirements.
- Number of Medicaid application denials for failure to comply with work requirements.
- Number of Medicaid applicants denied for failure to comply with work requirements who then returned to be opened through a new application, reconsideration or appeal in each of the subsequent 1, 2, and 3 months following termination. Of those that were eventually

opened, how many were opened as exempt from work requirements, how many were non-exempt compliant, and how many were opened in a non-expansion category.

- Number of Medicaid terminations for failure to comply with work requirements.
- Number of Medicaid cases terminated for failure to comply with work requirements who then returned to be reopened through a new application, reconsideration or appeal in each of the subsequent 1, 2, and 3 months following termination. Of those that were eventually reopened, how many were opened as exempt from work requirements, how many were non-exempt compliant, and how many were opened in a non-expansion category.
- Number of Medicaid applicants denied for failure to meet HR1's immigrant eligibility criteria.
- Number of Medicaid terminations for failure to meet HR1's immigrant eligibility criteria.
- Number of requests for retroactive Medicaid coverage that were denied due to HR1's reduction of the retroactive period.
- Customer Service Center wait times and call abandonment rates by day.