

**DHB ADMINISTRATIVE LETTER NO: 04-23,
MEDICAID PROCEDURES USING SUPPLEMENTAL
NUTRITION ASSISTANCE PROGRAM (SNAP) INCOME
DURING THE CONTINUOUS COVERAGE UNWINDING
(CCU) PERIOD**

DATE: March 7, 2023

SUBJECT: MEDICAID PROCEDURES USING
SUPPLEMENTAL NUTRITION ASSISTANCE
PROGRAM (SNAP) INCOME DURING THE
CONTINUOUS COVERAGE UNWINDING (CCU)
PERIOD

DISTRIBUTION: County Departments of Social Services
Medicaid Supervisors
Medicaid Eligibility Staff

I. BACKGROUND

In December 2022, the U.S. Congress passed the Consolidated Appropriations Act, 2023 (CAA), also referred to as the Omnibus Bill which decoupled the continuous coverage requirement from the Public Health Emergency (PHE).

On January 30, 2023, the White House announced the Public Health Emergency (PHE) will end on May 11, 2023. With the ending of the PHE and decoupling of the continuous coverage requirement, the Division of Health Benefits (DHB) has been approved by the Centers for Medicare and Medicaid Services (CMS) for waivers that are necessary to ensure that states establish income and eligibility determination systems that protect beneficiaries. Such waivers are time-limited and are meant to promote enrollment and retention of eligible individuals by easing the administrative burden states may experience considering systems limitations and challenges.

The purpose of this letter is to provide instructions and clarifications for circumstances where certain program changes are allowed during the Continuous Coverage Unwinding (CCU) Period. During this time, Medicaid eligibility may be renewed for individuals who are receiving Supplemental Nutritional Assistance Program (SNAP) benefits, known as Food & Nutrition Services (FNS) program in NC, despite the differences in household composition and income-counting rules.

II. INTRODUCTION

CMS has provided North Carolina authority to temporarily renew Medicaid eligibility for individuals who are eligible based on Modified Adjusted Gross Income (MAGI) and who are receiving benefits under the Food and Nutrition Services Program (FNS)..

There is no action that is required by the Medicaid caseworker. The information in this administrative letter is informational only.

III. NC FAST SYSTEM PROCESS

NC FAST will initiate a batch process to identify all MAGI beneficiaries who are actively receiving FNS benefits, 120 calendar days prior to the end of the current 12-month certification period. If the MAGI beneficiary's FNS gross income is at or below 130% of the FPL for the FNS case, NC FAST will then extend the current certification 12 months and enter the reason "SNAP e14" on the case. Any MAGI renewals that cannot be renewed using SNAP gross income, will proceed to the Straight Through Process (STP) batch process.

Ninety days (in the first week of the 10th month) prior to the end of the current certification period, NC FAST will initiate the STP Recertification batch process. If the system can successfully redetermine the MAGI individual(s) eligible for the same or greater benefit, either via the SNAP e14 or the STP batch process, it will generate and mail the DSS-8110 Notice of Modification, Termination, or Continuation of Public Assistance.

When a case falls out of the STP recertification batch, the caseworker will complete the recertification process outlined in [MA-3421 MAGI Recertification](#) policy.

If you have any questions regarding this information, please contact your [Medicaid Operational Support Team representative](#).

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Jay Ludlam
Deputy Secretary, NC Medicaid