



February 23, 2009

Office of Management & Budget
Attn: Desk Officer for SSA
OIRA_Submission@omb.eop.gov

Social Security Administration
DCBFM
Attn: Reports Clearance Officer
1332 Annex Building
6401 Security Blvd.
Baltimore, MD 21235
OPLM.RCO@ssa.gov

Re: SSA Agency Information Collection *Federal Register* Vol. 73, No. 249, pgs. 79537-79538

To Whom It May Concern:

On behalf of the American Public Human Services Association (APHSA) and the National Association of State Medicaid Directors (NASMD) we are submitting the following comments in response to the Information Collection Notice, published in the *Federal Register* by the Social Security Administration (SSA) on December 29, 2008.

APHSA/NASMD appreciates the opportunity to review and comment on Social Security's proposed revisions to its Application for EXTRA Help with Medicare Prescription Drug Plan Costs (SSA-1020). The Medicare Improvements for Patients and Providers Act of 2008 (MIPPA) (P.L. 110-275) requires SSA to refer Extra Help applicants who may be eligible for a Medicare Savings program to the appropriate state Medicaid agency for an eligibility determination. MIPPA also requires that states consider the referral of these individuals as an application for the Medicare Savings programs and process the referral as a full application. Both of these requirements become effective as of January 1, 2010. In response to this new law SSA has proposed changes to the SSA-1020 for which we have several concerns.

APHSA/NASMD request further changes to the Application for SSA's data transmittal to assure effective assistance for purposes of Medicaid's adjudication of applications for benefits under the Medicare Savings Program. While SSA is required to determine eligibility for the Extra Help program, MIPPA requires SSA to provide information to states to initiate the state's eligibility process. Thus, we respectfully request that SSA appropriately comply with MIPPA by obtaining additional information that would be

useful and beneficial to the states. APHSA/NASMD are asking that you add additional questions to the SSA-1020 to include:

- 1) The name, dates of birth, and Social Security Number of the person's spouse;
- 2) Information about the specific types of income being received by the applicant and spouse, including the names of the income sources;
- 3) The names, dates of birth, and types and sources of income being received by children who are 21 and younger that are living in the home; and
- 4) Information about whether the person claims to be a U.S. Citizen or non-citizen in legal status.

Additionally, Question 15 on the draft SSA-1020 application asks if a person wants to be referred to the State for a Medicare Savings Program eligibility determination. The only answer provided is "No" so if the person fails to answer this question they will be referred to the State. The form should allow the person to answer either "Yes" or "No" this will allow the applicant to make a specific request for such referral and if they fail to answer this question their response should be deemed to be a No.

Lastly, NASMD respectfully requests that before finalizing the LIS application, SSA work with State Medicaid programs to understand the essential changes needed to SSA's proposed application and why these changes are essential to the state Medicaid programs. NASMD's membership is eager to work with SSA to ensure that the appropriate changes can be made so that this information is most beneficial to SSA and to the states. Thank you for considering our comments. If you have any questions, please do not hesitate to contact me at (202) 682-0100 ext. 299.

Respectfully submitted,



Ann Clemency Kohler
NASMD Director

Cc: Jackie Garner