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Testimony of the Office for Family Independence
Before the Joint Standing Committee on Health and Human Services

In Opposition to LD 1305
An Act To Streamline Requests for Housing Assistance

Sponsored by: Representative Morales
Hearing Date: April 13, 2021

Senator Claxton, Representative Meyer, and Members of the Joint Standing Committee on Health and Human Services, I am Anthony Pelotte, Director of the Office for Family Independence for the Department of Health and Human Services. I am here today to testify in opposition to LD 1305, An Act to Streamline Requests for Housing Assistance.

This bill would require the Department to include a request for housing assistance on applications for Food Supplement Benefits, Temporary Assistance for Needy Families (TANF) and MaineCare, which are all programs administered by our office, OFI. As the bill is written, this new request on applications would include housing assistance from the Department or the Maine State Housing Authority.

The primary reasons the Department opposes this bill include the significant fiscal impact it would have on the Department, liability and confidentiality concerns, and the overall additional burden on the Department and more importantly challenges to the people that it's our mission to assist.

OFI generally receives an average of 10,000 applications per month. This volume often stretches our capacity to provide application decisions in the timely manner that is required by federal regulations and that responds to the immediate needs of Mainers. Adding a program request will further stress the capacity of OFI and our work processing timelines. Additional staff within OFI would be required to process these new requests, to manage additional staff, to train all staff on the various housing program application requirements, and to develop any required technology changes and manage data exchanges.

Adding a program whose authority lies with an agency outside of the Department poses risk to the Department. OFI staff are not in a position to advise or evaluate housing assistance requests and have no direct affiliation with the Maine State Housing Authority. In order to execute an effective and legal data-sharing agreement or memorandum of understanding OFI will require expertise in each particular security standard governing each housing subsidy. For example, Medicaid eligibility regulations provide very narrow opportunities for data sharing. If the Department is required to add this program to our application process a legal agreement would need to be developed between the Maine State Housing Authority and the Department related to

confidentiality and security requirements of both entities. The Maine State Housing Authority retains a network of third-party providers and contacts, and we anticipate that significant controls would be required to restrict the sharing of client details.

We agree that we want state assistance to be readily and intuitively available to those who are eligible. This is why we have initiated a review and modernization of My Maine Connection, the Department's central benefit application portal, to make it more user friendly and streamlined.

Programs administered by OFI each have specific and inflexible federal requirements of the application document and process. Any changes made to the application require approval from federal partners, like the Center for Medicaid Services or CMS. We are currently working on an updated online portal to continue our ongoing efforts to simplify the process for applicants. OFI has taken many steps to simplify and streamline our application process. Our application has been modified frequently and despite our best efforts to minimize the burden on applicants our paper application, with required additions, now stands at **18 pages**.

National experts advise states to simplify the application process for benefits.¹ The more information and questions that are included on an application makes the process more challenging for many of the state's neediest citizens. OFI has often received feedback from applicants and other stakeholders complaining that the current application document and process are too lengthy, when only the programs that OFI **must** administer are included. Additional program information and questions would further lengthen the application process and increase the burden on applicants. This may deter needy individuals from applying for assistance. Additional assistance in the application process would be needed by OFI staff as well as partner agencies that assist individuals with applying.

In summary, we acknowledge that there is overlap between applicants for OFI program benefits and housing assistance, however the same can be said of applicants of the WIC program, those request benefits from social security disability, unemployment, heating assistance, and tax credits. It's not reasonable to expect OFI's staff and system to respond to the needs of applicants beyond the programs that DHHS administers. One application that meets all needs may be the ideal, but we can't ignore that each of these programs receives authority from various federal agencies, are governed by individual regulations, and are implemented through a variety of systems.

We hope the Committee will oppose the passage of LD 1305. Thank you for your time and attention. I would be happy to answer any questions you may have and can make myself available for questions at the work session.

¹ <https://fns-prod.azureedge.net/sites/default/files/snap/Best-Practices-for-Online-SNAP-Applications.pdf>
<https://frac.org/wp-content/uploads/best-practice-improving-snap-access-people-with-disabilities.pdf>