

**MEDICAID FOOD  
SECURITY NETWORK**

# Medicaid Food Security Network Summit

**MAY 7-8, 2025  
WASHINGTON, DC**





# SNAP and WIC Data Sharing to Healthcare: The Value, Legal Rationale, Risks, and Case Studies

May 8<sup>th</sup>, 2025

**Medicaid Food Security Network Summit 2025**

# Session Facilitator



**Dr. Julian Xie**  
Director of Medicaid and  
Benefits Integrations,  
Share Our Strength

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# Session Speakers



**Jenee Saffold**  
Policy Attorney, Johns  
Hopkins MOREWIC!



**Kate Hanson**  
Executive Director,  
Meals4Families



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Director, Office of  
Nutrition Services,  
Washington DOH

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# Session Objectives

- Articulate the basics of the legal rationale for SNAP and WIC data-sharing to the healthcare sector (Medicaid agency, MCOs, etc).
- Learn how data sharing across sectors has been successful and how partners overcame challenges.
- Learn about existing enrollment gaps and how data sharing can support more direct pathways to enrollment/cross benefit enrollment and improve participant experience



# **SNAP and WIC Data Sharing with Healthcare Organizations: Legal Pathways & Considerations**

Jeneé Y. Saffold, J.D.

Medicaid Food Security Network National Summit  
May 8, 2025



# Introduction



## About the Speaker

Jeneé Y. Saffold, J.D.

Policy Attorney, The Johns Hopkins Bloomberg School of Public Health MORE WIC! project

Specializing in cross-agency data sharing for public benefit programs

## Focus Areas

Providing legal support to initiatives that use data to connect families with SNAP, WIC, Medicaid and other programs



# Why This Matters



## Enrollment Gap

Millions are eligible but unenrolled in SNAP and WIC



## Untapped Opportunity

Partnering with healthcare orgs offers a largely untapped opportunity to find them



## Health Outcomes

Food is Medicine - proper nutrition can lead to better health outcomes

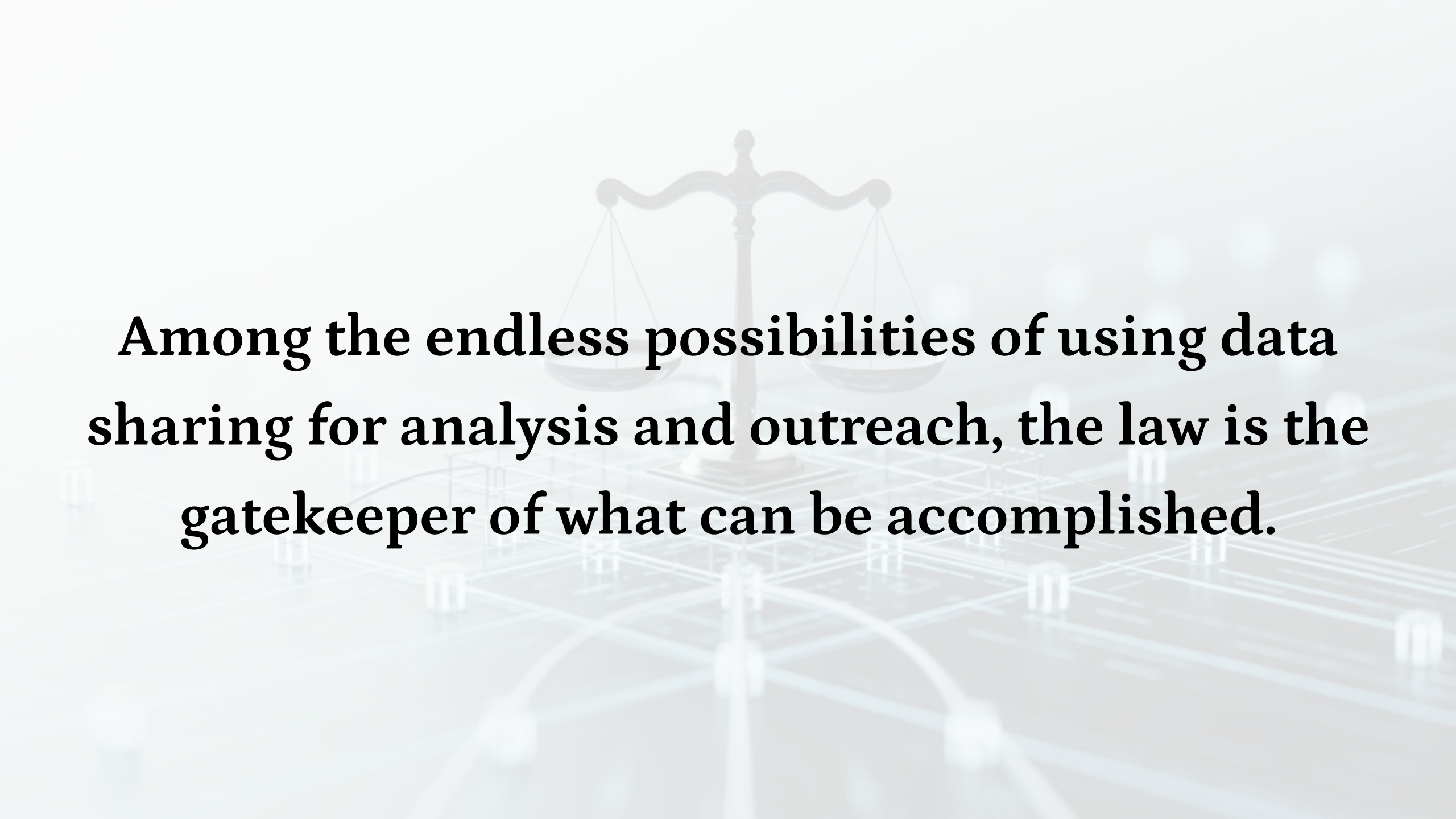
# **Legal Foundations for Data Sharing**





# Legal Disclaimer

The information in this presentation is provided for general information purposes only and is not intended to constitute legal advice. You should consult with your respective legal counsel to obtain advice on legal matters. I strongly recommend that you do not act or refrain from acting based on the information provided without first seeking legal advice from your own legal counsel.



**Among the endless possibilities of using data sharing for analysis and outreach, the law is the gatekeeper of what can be accomplished.**

# Use Cases in Practice



**Share SNAP or WIC enrollment data with:**

- Medicaid MCOs
- Hospitals & healthcare systems
- Community-based organizations (CBOs)



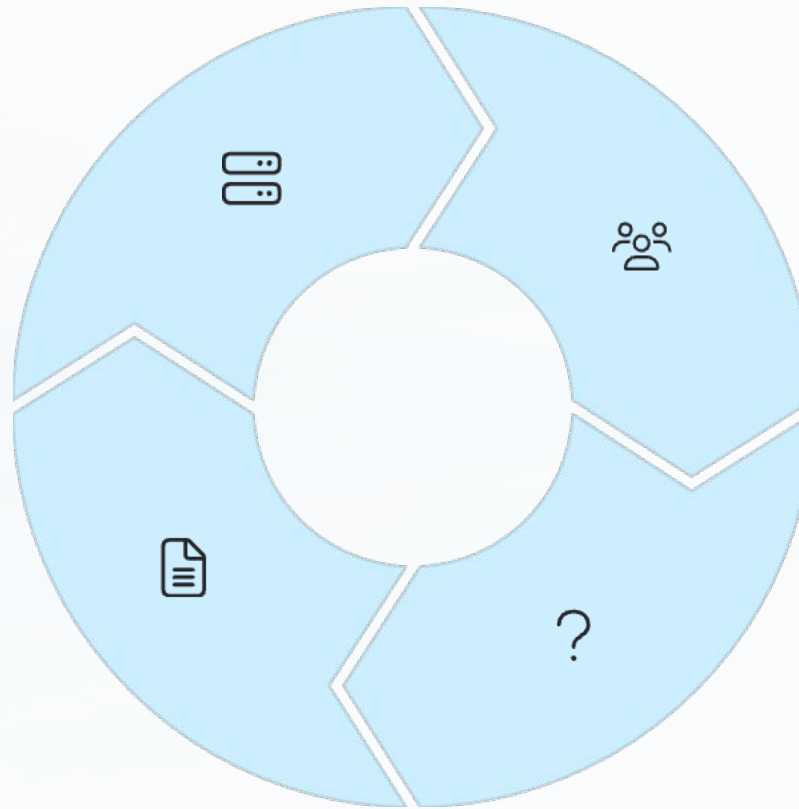
**Purposes:**

- SNAP/WIC outreach
- Evaluation & quality improvement

# Foundational Legal Questions

**What data?**  
What data are being shared?

**Data type?**  
What type of data is it?



**Recipient?**  
Who is receiving the data?

**Purpose?**  
Why is the data being shared?



# SNAP Data Sharing: Legal Framework



## Legal Authority

7 U.S.C. § 2020(e)(8); 7 C.F.R. § 272.1(c)



## Disclosure allowed if:

- Directly connected with the administration of:
  - SNAP
  - Other federal assistance programs
  - Federally-assisted state programs

# Evaluating SNAP Data Sharing

## Program Eligibility

Is it for SNAP administration?

## Connection Strength

Is it "**directly connected**" to  
**administration**?

- Is it included in the **SNAP Outreach Plan**?





# WIC Data Sharing: Legal Framework

## Legal Authority

7 C.F.R. § 246.26:

WIC information is confidential

## Disclosure Limitations

Disclosure only allowed to:

- Those **directly connected to WIC administration**
- With a need to know for WIC program purposes

# Evaluating WIC Data

## Sharing

Administration

### Connection

Is the healthcare organization

"directly connected" to WIC

program administration?

- Not defined in federal law

### Program Purpose

Is evaluation and quality

improvement a "WIC purpose"?

- Regulation includes  
"persons under contract  
with the State agency to  
perform research regarding  
the WIC Program"



# Legal Interpretation Challenges



## Historical Context

Statutes were not written with healthcare partners in mind



## Conservative Approach

State legal teams may take a conservative approach  
Lack of federal guidance adds uncertainty

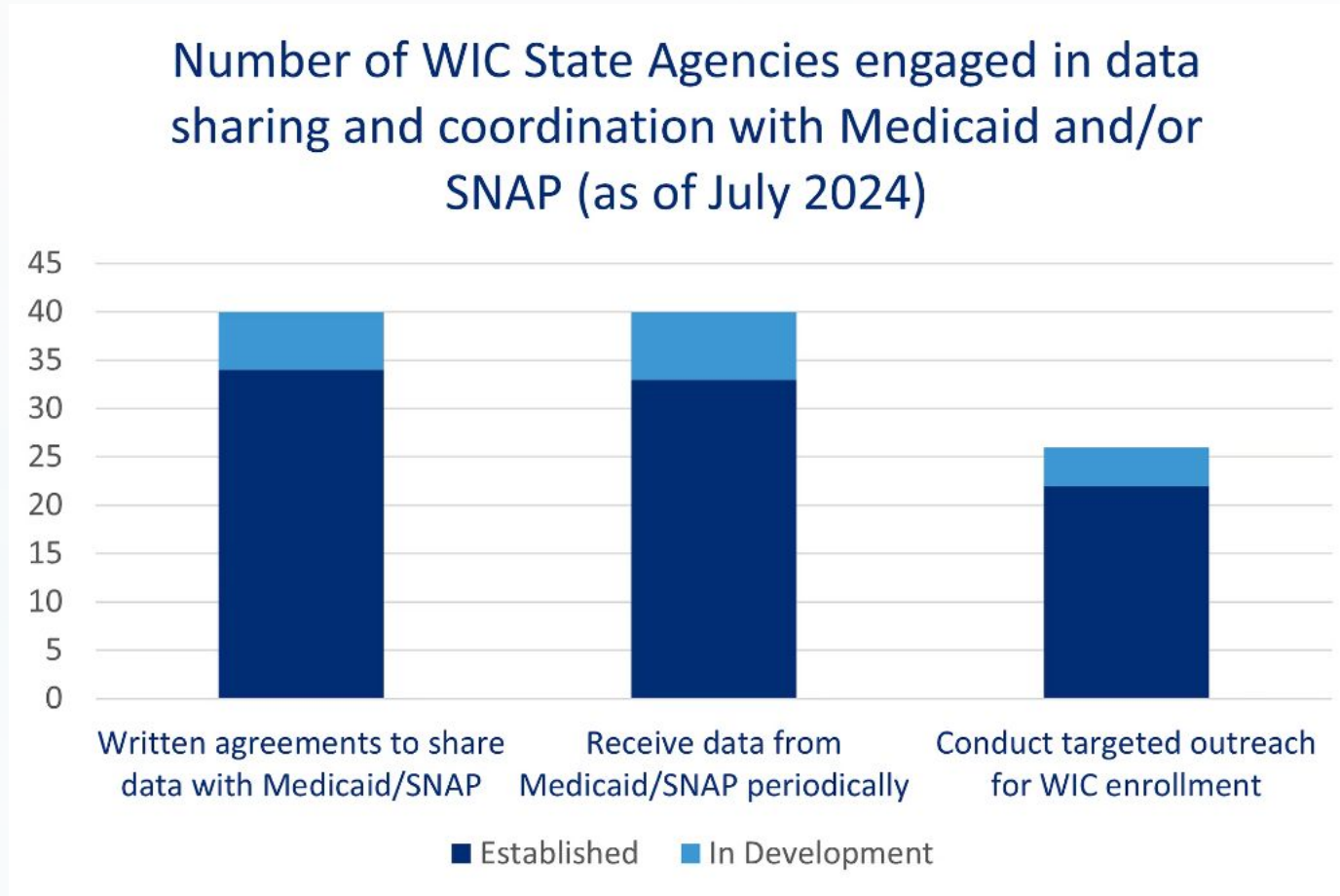


## Risk Factors

Risk tolerance varies by:

- Agency leadership
- State political climate
- Perceived legal precedent

# State Agency Recognition of Data Sharing Power



Source: Center on Budget and Policy Priorities, [“WIC Coordination with Medicaid and SNAP”](#) (2024)

# Federal Recognition of Data Sharing

## Power

In Spring 2023, USDA issued a policy memo to support data sharing for outreach between State benefit programs:



[WIC Policy Memorandum #2023-5](#)

Data Sharing to Improve Outreach and Streamline Certification in WIC

# Matching, Outreach, Referrals for Enrollment in WIC

## **MORE WIC! Overview**

**MORE WIC!** is a cooperative agreement with the USDA Food and Nutrition Service (FNS) led by the Johns Hopkins Bloomberg School of Public Health, with support from the National WIC Association (NWA).

MORE WIC! offers:

- ✓ **Funding** for data matching and outreach projects
- ✓ **Technical assistance** tailored to State agencies' needs
- ✓ **Community of Practice** for peer learning
- ✓ **Evaluation** and reporting on project results to contribute to national learning



## Current Projects We're Funding

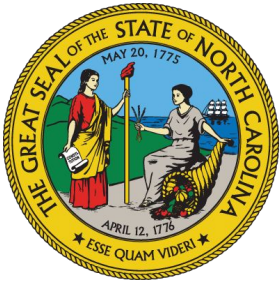
- Connecticut
- Inter Tribal Council of Arizona, Inc.
- Inter-Tribal Council of Nevada
- Mississippi
- Washington, DC



**Kate Hanson**  
Executive Director,  
Meals4Families



# Partnerships are the foundation of this work.




NC DEPARTMENT OF  
**HEALTH AND  
HUMAN SERVICES**



**Division of Health  
Benefits**



  
**Duke**  
MARGOLIS CENTER  
for Health Policy  
  
**carolina  
complete health**



**Division of Child and  
Family Well-Being**



**NC FAST**  
North Carolina Families Accessing  
Services through Technology

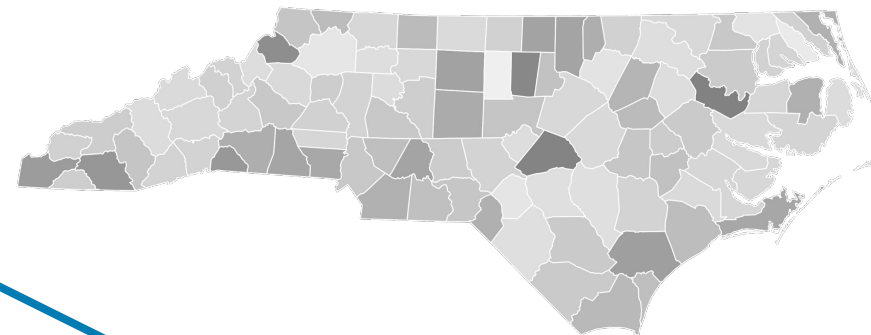
  
**ORANGE COUNTY**  
NORTH CAROLINA  
Department of Social Services



**M4F** | MEALS FOR  
FAMILIES



# NC DEPARTMENT OF HEALTH AND HUMAN SERVICES



## Division of Health Benefits

**NCMEDICAID**  
FOR MORE **PEOPLE**

## Division of Social Services

## Division of Child and Family Well-Being



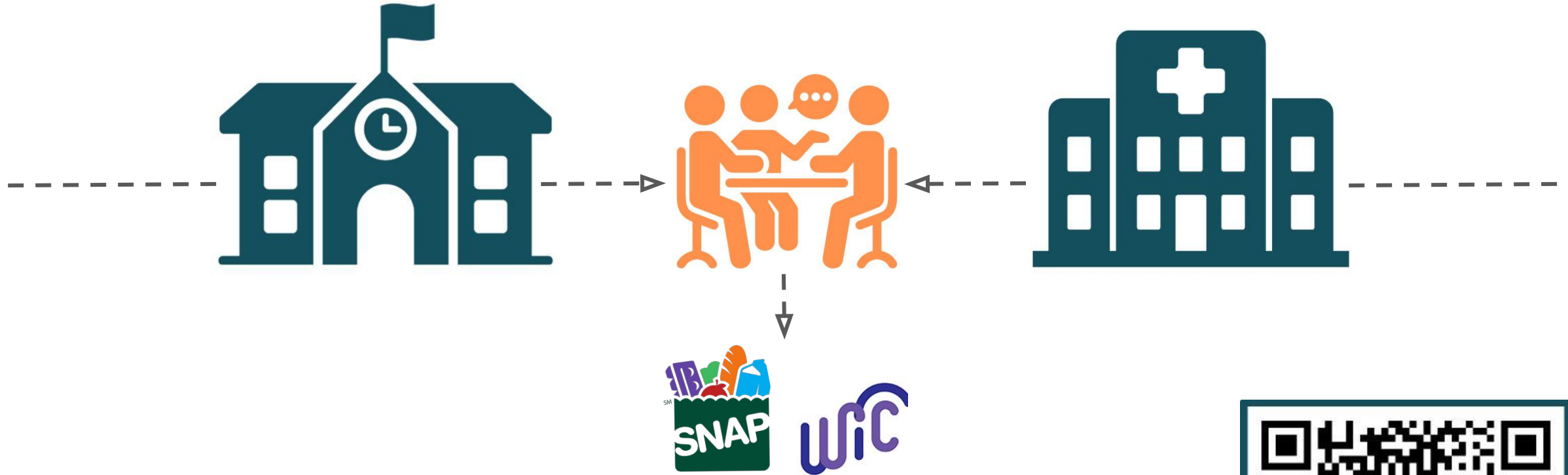
Food and Nutrition Services



Community Nutrition  
Services



# Meeting families where they are.



- ✓ community-wide outreach
- ✓ data-driven outreach to increase co-enrollment



# Using data to increase benefit co-enrollment.

- 1) Align the data. —————→
- 2) Share the data.**
- 3) Use the data.**



# NC Medicaid NICE pilot (Nutrition Insecurity Cross-Enrollment)

3 new flags added to the **Patient Risk List**

- WIC Eligible but Not Enrolled
- SNAP Enrolled
- SNAP Eligible but Not Enrolled



# NC Medicaid NICE pilot (Nutrition Insecurity Cross-Enrollment)



NCDHHS

Carolina Complete Health

Duke Population Health Management

More in My Basket

# Who is missing out?

Get to know your cross-enrollment gap.



# How do our data systems think about families?

Families are beautifully messy.



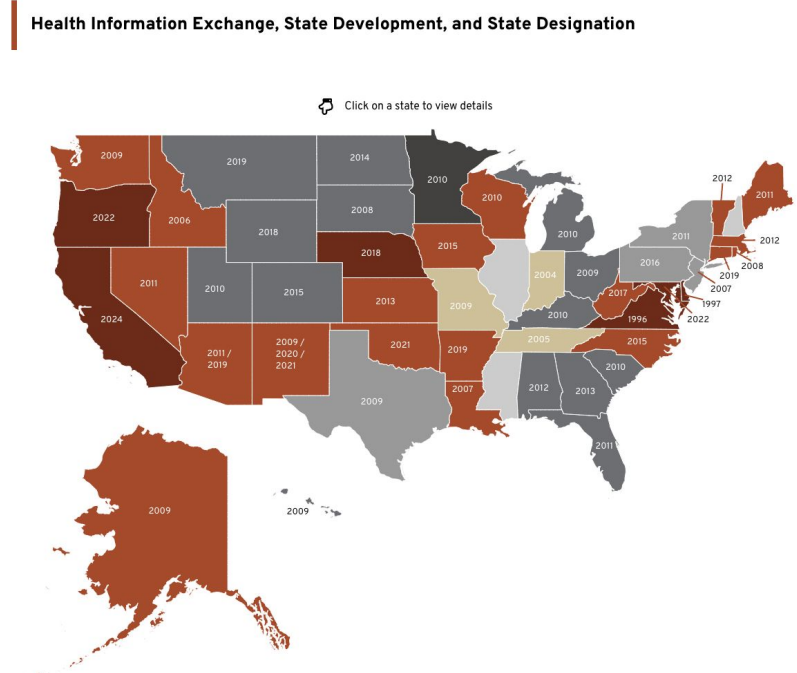
# What makes a good nudge?

Work on the full funnel to enrollment.



# Who sees cross-enrollment data?

Emerging role of HIEs and HDUs.



[civitasforhealth.org/health-data-utilities/](http://civitasforhealth.org/health-data-utilities/)

# Whose job is it to close cross-enrollment gaps?

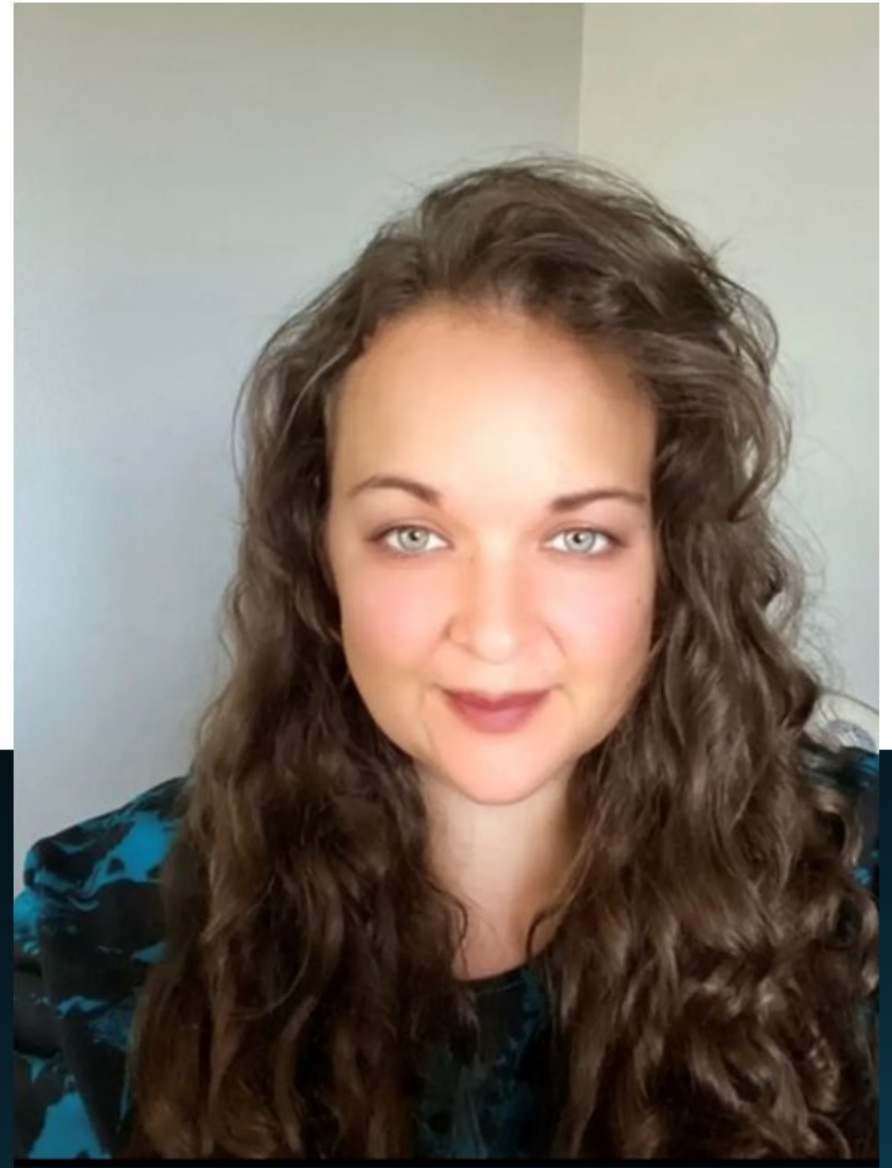


# Thank you! Let's stay connected.

[kate@meals4families.org](mailto:kate@meals4families.org)

# Washington WIC and Medicaid

Brittany Tybo  
WA WIC Director



# Overview

- Data Sharing Agreement between WIC and Medicaid
- Flow of Data
- Managed Care Organizations Contract Language



# Data Sharing Benefits

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- Families that participate in Medicaid are adjunctively eligible for WIC.
- WIC is required to make other programmatic and community referrals.
- Targeted outreach on both sides.



# HCA – DOH WIC Data Exchange – Data Flow

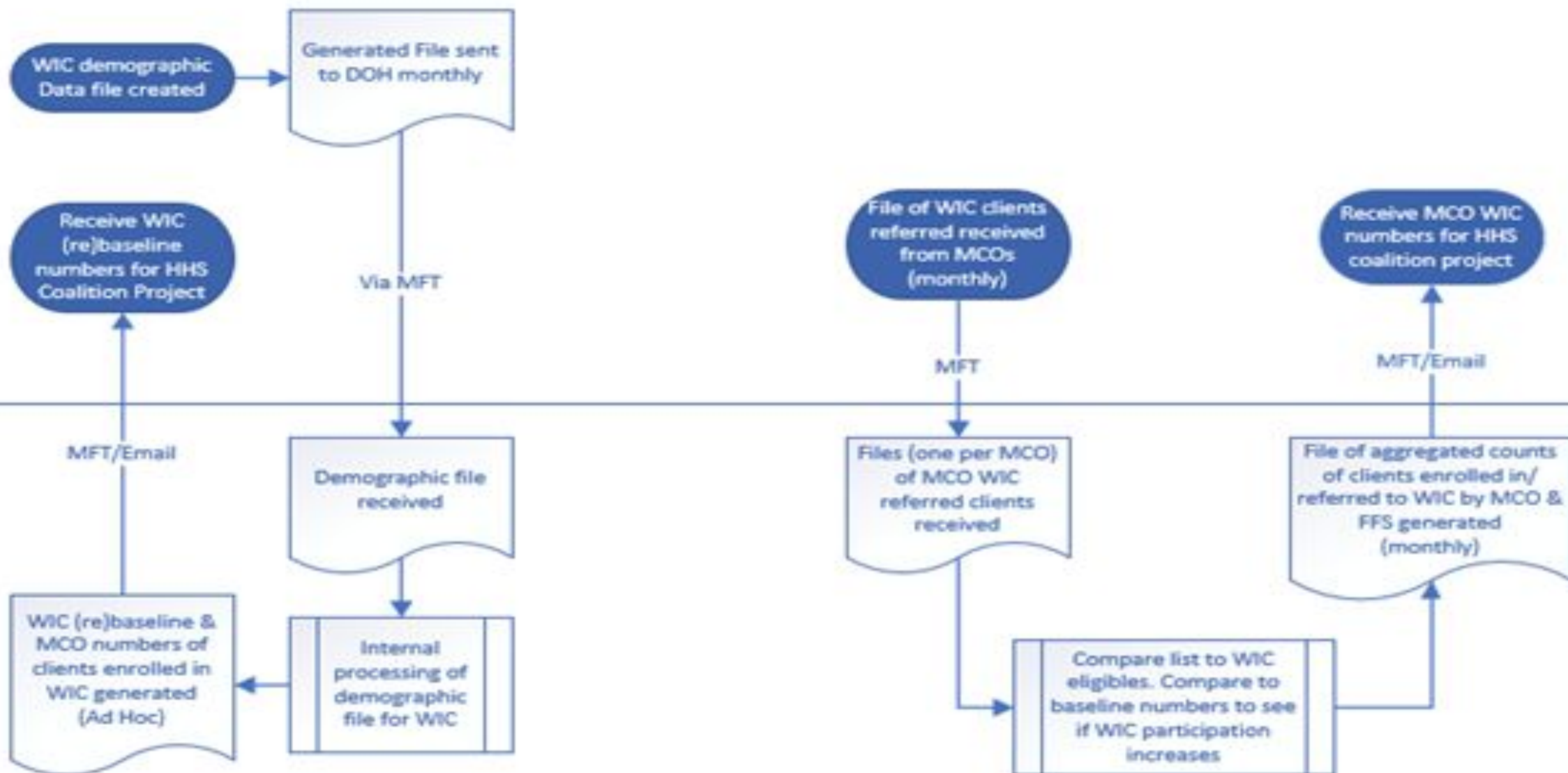
MQ = Message Queue

MFT – Message File Transfer

P1 = ProviderOne

HCA

DOH



# MCO Report/Client Roster

## Sample:

	A	B	C	D	
1	<b>MCO name</b>	<b>Reporting period</b>	<b>Client ID</b>	<b>Referral Method</b>	
2	CHPW	3/1/2025-3/31/2025	*	Website	
3	CHPW	3/1/2025-3/31/2025	*	Telephone	
4	CHPW	3/1/2025-3/31/2025	*	Website	
5	CHPW	3/1/2025-3/31/2025	*	In-person	
6	CHPW	3/1/2025-3/31/2025	*	Website	
7	CHPW	3/1/2025-3/31/2025	*	Text	
8	CHPW	3/1/2025-3/31/2025	*	Written	
9	CHPW	3/1/2025-3/31/2025	*	App	
10					

# Contract Language

*Women, Infants, and Children (WIC) Providers and programs; The Contractor shall provide Care Coordination and referral for all WIC eligible Enrollees. The Contractor shall submit the WIC Eligible Referral report by the 10th of the month for the prior months reporting period via MC-Track using the HCA provided template.*



# Q&A with Panelists

May 8<sup>th</sup>, 2025

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# THANK YOU

Your feedback is important to us, please take a moment to fill out our survey. The first 10 respondents get a \$10 e-gift card, and you can submit the survey multiple times if you think of more to share.

