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Before the Committees on Health and Human Services
Council of the District of Columbia

Public Joint Oversight Roundtable Regarding:
The DC Access System (DCAS) and Implementing SNAP and Medicaid Work Requirements

October 29, 2026

Legal Aid DC[1] submits the following testimony regarding DCAS and SNAP and Medicaid work requirements. Our Public Benefits team represents low-income District residents in unlawful benefit reductions, terminations, and other adverse actions regarding their SNAP, Medicaid, TANF, and other public benefits.

Since H.R. 1 passed, there has been an enormous drop in SNAP participation. Tens of thousands fewer people receive SNAP, and this drop in enrollment started even before work requirements went into effect in the District.[2] Work requirements have also created

[1] Legal Aid DC is the oldest and largest general civil legal services program in the District of Columbia. The largest part of our work is comprised of individual representation in housing, domestic violence/family, public benefits, and consumer law. We also work on immigration law matters and help individuals with the collateral consequences of their involvement with the criminal legal system. From the experiences of our clients, we identify opportunities for court and law reform, public policy advocacy, and systemic litigation. For more information, visit www.LegalAidDC.org.

[2] As of May 30, 2026, only 130,000 individuals received SNAP, compared to October-December 2025 and FY2025, where 140,000 individuals and over 170,000 individuals received SNAP, respectively. DC Department of Human Services (DHS) Responses *to Public Hearing on B26-0753, the "Health and Human Service Programs and Benefits*

more barriers to the program, including new confusing notices and forms, processing delays, and incorrect work requirement determinations.

We are deeply concerned about District residents who are in need of food assistance. We are also concerned about how these same systemic flaws may impact the nearly 80,000 District residents who will be subject to Medicaid work requirements beginning in January 2027. [3]

Finally, as we get closer to Medicaid work requirements taking effect, we urge the Council to start planning for the thousands of District residents who may not meet an exemption and may be unable to meet work requirements. We must find a way for those District residents to maintain other health coverage and access health care.

We ask that:

1. **The Department of Human Services (DHS) and the Department of Health Care Finance (DHCF) engage legal service advocates and other community partners** to work collaboratively in addressing the administrative barriers discussed below, including allowing enough time for meaningful input from advocates who work closely with affected District residents;

2. **DHS and DHCF create a plan to address DCAS errors and continue training staff on work requirement exemptions,** to improve accuracy and implement automatic exemptions from work requirements; and

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Eligibility and Delivery Data Sharing Clarifications Amendment Act of 2026", and the "Green Workforce Pilot Amendment Act of 2026", dated October 15, 2026, Question 1; DC DHS Responses to FY 2025 Pre-Hearing Oversight Questions, dated February 23, 2026, Question 177(a), available at: https://lims.dccouncil.gov/Hearings/hearings/2105.

[3] The Department of Health Care Finance (DHCF) anticipates that 79,106 Medicaid beneficiaries will be subject to Medicaid work requirements. DHS Responses *to Public Hearing on B26-0753, the "Health and Human Service Programs and Benefits Eligibility and Delivery Data Sharing Clarifications Amendment Act of 2026", and the "Green Workforce Pilot Amendment Act of 2026",* dated October 15, 2026, Question 8.

3. **DHCF and the Council develop a plan for DC residents who will not meet an exemption and will lose health insurance** due to being unable to comply with new Medicaid work requirements.

We welcome the opportunity to work collaboratively with District agencies and D.C. Council on these issues.

The Department of Human Services' Mass Communication About SNAP Work Requirements Caused Confusion and Fear

Since July 2025, impending SNAP work requirements have been national news, creating an atmosphere of fear and confusion among DC residents. Once the Department of Human Services (DHS) started sending information directly to District residents about the upcoming changes, they used mass mailings and robocalls to disseminate general information, rather than using data already in its system to target affected beneficiaries.

This universal communication method was not DHS's only option. DHS could have assuaged fears and cleared up misinformation by using data in DCAS about beneficiaries such as their age, their children's ages, sources of income, disability, and other data to send more targeted messaging.

We heard from people in their 80s and parents of young children who were very confused about the changes. Many residents thought they were no longer eligible for SNAP because they weren't working. For example, a Legal Aid client who only received SNAP for her U.S. citizen children said that she was going to give up on SNAP because she was not working and thought that meant she was no longer eligible, which was not true. DHS should have disseminated more targeted information earlier to beneficiaries to try to prevent people from leaving the program based on misinformation or misunderstanding. DHS's failure to do so may have contributed to the significant drop in SNAP participation.

DCAS Is Not Accurately Exempting People from SNAP Work Requirements, Raising Concerns About the Implementation of Medicaid Work Requirements

Now that SNAP work requirements are in effect, DHS has stated, and we appreciate their effort, to exempt as many people as they can from SNAP work requirements based on data in their system.

However, we have seen mixed results in our legal practice.

At times, DHS uses information from DCAS to automatically exempt people; for example, we've seen DHS approve automatic caregiver exemptions when DCAS shows another household member receives SSI benefits. This is exactly how DHS *should* be using information in DCAS to automatically exempt people and thereby relieve the burden on beneficiaries to prove their eligibility for an exemption.

However, we have also seen cases where DHS fails to act on the information it possesses. For example, we've seen DHS ask individuals in their 80s to provide proof of their disability to exempt them from work requirements, when they shouldn't be screened at all because of their age. We've also seen notices where DHS screened young children for work requirements, who also shouldn't be screened at all due to their age.

In another case, DHS exempted one parent from work requirements based on the age of their young child but inexplicably did not exempt the other parent in the same SNAP household. Another client who should have been exempt due to receiving unemployment insurance was not exempted.

We don't know how widespread these exemption problems are. But, every time that DHS gets it wrong, and a beneficiary has to appeal a decision, or DHS asks the person to fill out yet another form or submit yet another document, there is a risk that the person will fall through the cracks and not obtain food assistance that they desperately need and are eligible for.

These errors also raise concerns about how successful DCAS will be in automatically exempting beneficiaries from Medicaid work requirements. Similar to SNAP, there are a number of exemptions to Medicaid work requirements. We understand that the Department of Health Care Finance (DHCF) is planning on also relying on DCAS to automatically apply exemptions in 2027.[4] Because of the errors we've seen with DHS's use of DCAS to approve SNAP exemptions, we are worried that similar mistakes will be made with Medicaid, which will put people's health insurance at risk. We hope the Council will ensure that DCAS will be programmed to better implement automatic exemptions, and that staff will be better trained on these new changes.

[4] DHCF DCAS Pre-Roundtable Responses, dated October 22, 2026, Q. 8.

Other Administrative Barriers Put District Residents' Benefits at Further Risk

We also see DC residents continue to face other administrative barriers in accessing their benefits, and these problems have increased since SNAP work requirements went live. These barriers include:

- Difficulty reaching DHS to complete SNAP interviews. Clients report calling DHS multiple times and sometimes must wait hours on hold;
- Confusion over the lengthy SNAP work requirement exemption forms amongst beneficiaries and community and medical providers who also must complete forms;
- Requests from DHS to resubmit information that DHS already has in its system during recertifications, such as social security numbers and proof of residency, despite no changes occurring; and
- Long processing times review of recertifications and verifications, sometimes leading to termination of benefits despite beneficiaries submitting information on time.

Some of these problems are not exclusive to SNAP, but also prevalent in other benefits programs. For example, one Legal Aid client received a request for over 40 verifications at her family's TANF and SNAP recertification. DHS even re-requested documents showing family members' social security numbers and birth certificates even though DHS already had this information for the family. The family's benefits terminated despite the client responding to DHS's requests on time.

These agency-level barriers risk eligible people losing access to critical benefits that they desperately need.[5] We are concerned that these barriers will only worsen when an already strained agency becomes further strained when Medicaid work requirements go into effect.

[5] *See* Moynihan, Donald, Pamela Herd, and Hope Harvey. *Administrative Burden: Learning, Psychological, and Compliance Costs in Citizen-State Interactions.* 25 J. of Pub. Admin. Rsch. and Theory 43. (2014). Available at: DOI:10.1093/jopart/muu009

Conclusion

We hope to work collaboratively with DHS and DHCF to make sure that people who remain eligible for assistance continue to receive their benefits without interruption.

Thank you for the opportunity to testify today, and I welcome any questions.