



The Impact of the Public Health Emergency on Medicaid

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***What has changed during the
Public Health Emergency?***

When did the Public Health Emergency Begin?

- **January 31, 2020**: the US Health & Human Services Secretary declared a Public Health Emergency for the entire United States.
- **March 18, 2020**: For Medicaid recipients as of this date, states receiving enhanced funding (that is, the temporary increase in the Federal Medical Assistance Percentage) must maintain continuous eligibility, per the Families First Coronavirus Response Act (FFCRA).
Bottom Line: Do not close Medicaid cases except in a few circumstances.

Operationalizing the CMS Rule

- Renewals/redets should be processed, but if not returned, or if verifications are not returned, or if changes would render the recipient ineligible, extend eligibility
- Continue eligibility if reported changes would render recipient ineligible
- Continue eligibility for SSI deletions
- Continue eligibility for 65-year-olds
- Process PARIS alerts for closure only if recipient or other state confirms move

Operationalizing the CMS Rule

Exceptions to Extending Eligibility:

- deceased and is in a household of one
- confirmed as moved out of state
- requested that the Medicaid case be closed
- transferred from a nursing facility to the community and another Medicaid coverage group
- moved to another Medicaid coverage group that offers the same level of benefits
- approved for the Medicare Savings Program:
 - Qualified Medicare Beneficiaries (QMB)
 - Specified Low-Income Medicare Beneficiaries (SLMB)
 - Qualifying Individuals (QI)

Other CMS relaxed rules for eligibility

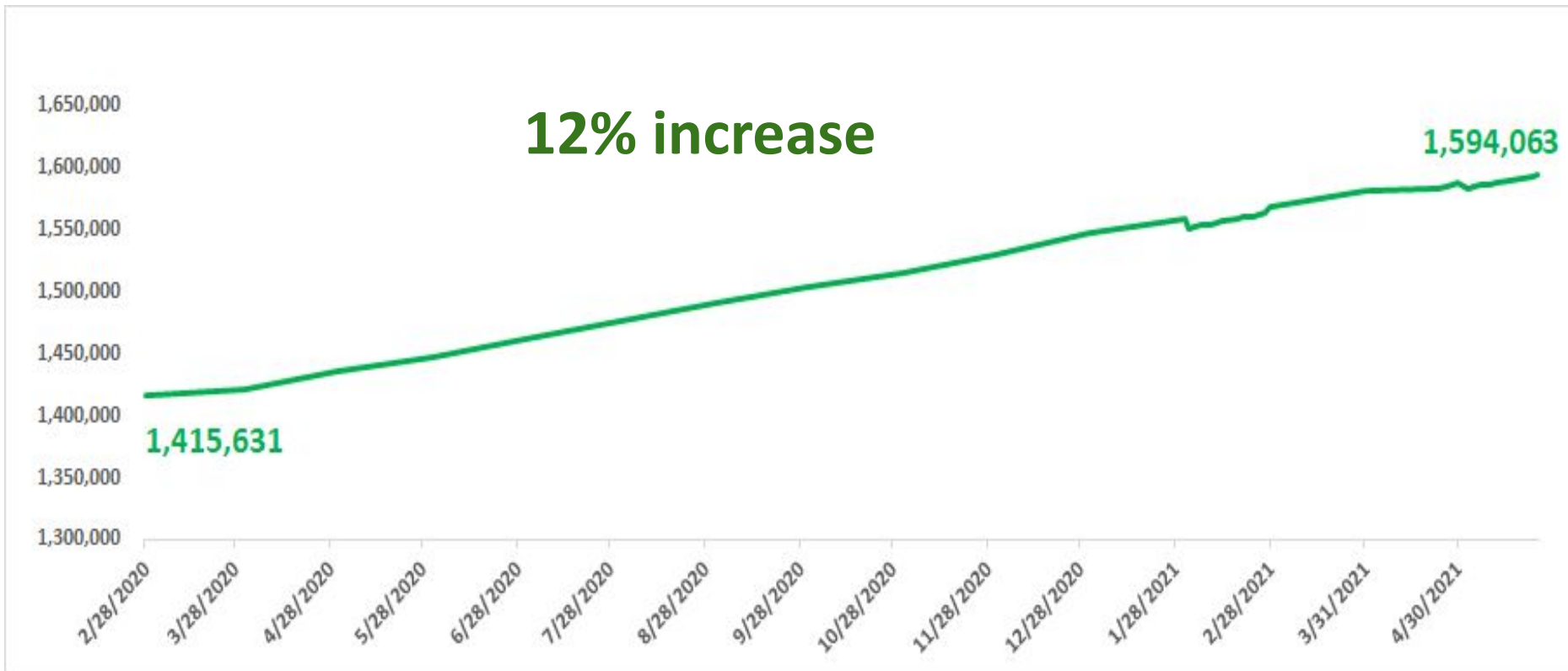
- Process Non-MAGI applications based on attested information on the application
- Allow case managers to accept applications and other case actions by telephone, which enabled teleworking staff to continue providing customer service
 - To date, 25,000 applications were taken by telephone by LHDs, with reviews performed by MDH Central staff
- Extend deadlines for appeals and state fair hearing requests

Noted Medicaid household changes

- Household income decreased
- Earnings were replaced by Unemployment Insurance and other PHE-related income
- Household composition changed
- Recipients moved out of state
- Recipients had challenges reporting changes
- Recipients had challenges returning renewals/redets or verifications
- Now, new or resumed employment

***How has the PHE affected
Medicaid Enrollment?***

Enrollment in Medicaid February 2020 - May 2021



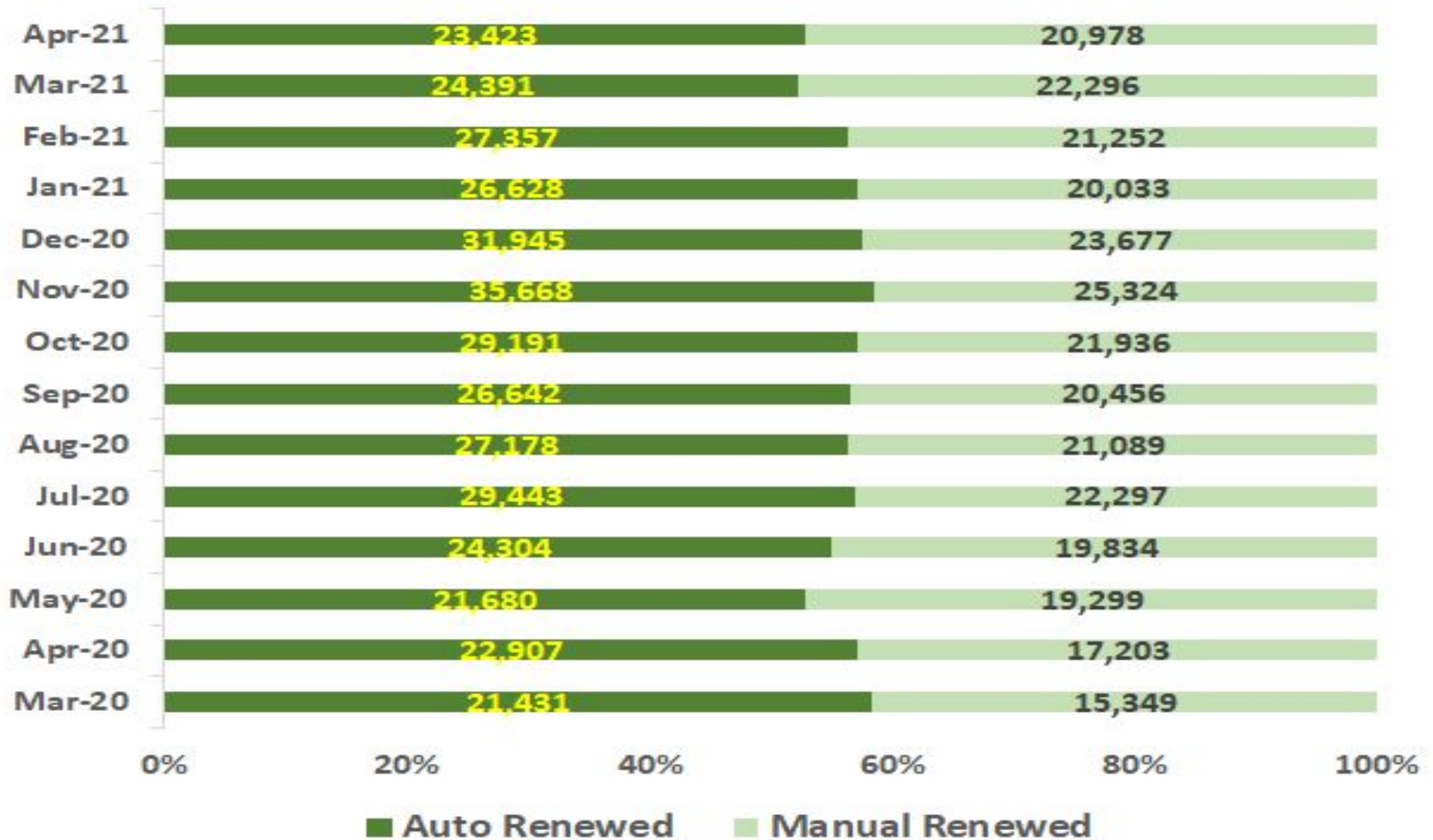
Source: MMIS enrollment data

Renewals and Redets

- Maryland Health Connection (MAGI) renewals were mailed out as scheduled during the PHE:
 - Auto-renewals were processed
 - Manual renewals were processed, if possible, or extended
- CARES/E&E (Non-MAGI) redets began to be mailed out in April 2021 for July 2021 certification end dates
- Upcoming system enhancements in MHC will include data from Unemployment Insurance (by Fall 2021), thus increasing auto-renewals
- LHD case managers continue to contact renewing consumers to assist, troubleshoot and encourage

MHC Renewals

MHC Renewals, Auto-Renewals and Manual Renewals



MHC Renewal Data

This is the renewal data included in the monthly MCO Liaison Meeting

	Redet Month	Total Redets (App Count)	Auto renewals (App Count)		Manual renewals (App Count)		Manual Renewals Extended (Consumer Count)	Manual Renewals Open (Consumer count)	Manual Renewals Open with override after Change Report (Consumer count)	Primary Deceased Consumers (Consumer count)
		#	#	%	#	%	#	#	#	#
2020	Mar	36,780	21,431	58%	15,349	42%	14,454	12,565	844	
	Apr	40,110	22,907	57%	17,203	43%	17,210	16,007	1,208	
	May	40,979	21,680	53%	19,299	47%	18,492	17,237	2,507	56
	Jun	44,138	24,304	55%	19,834	45%	23,573	19,425	2,818	70
	Jul	51,740	29,443	57%	22,297	43%	24,889	19,242	3,234	70
	Aug	48,267	27,178	56%	21,089	44%	21,821	19,731	2,750	103
	Sep	47,098	26,642	57%	20,456	43%	22,392	21,417	2,294	83
	Oct	51,127	29,191	57%	21,936	43%	25,527	24,091	3,001	80
	Nov	60,992	35,668	58%	25,324	42%	28,484	26,701	3,820	70
	Dec	55,622	31,945	57%	23,677	43%	26,000	25,343	3,267	86
2021	Jan	46,661	26,628	57%	20,033	43%	24,718	23,350	2,169	63
	Feb	48,609	27,357	56%	21,252	44%	28,643	27,013	2,521	69
	Mar	46,687	24,391	52%	22,296	48%	22,206	21,395	2,678	88
	Apr	44,401	23,423	53%	20,978	47%	18,886	17,923	2,126	95
	Total	663,211	372,188		291,023		317,295	291,440	35,237	933

MHC Updated Renewal Data

The **dark blue box** shows the updated counts of remaining open manual renewals that still need to be updated and are not already flagged as ineligible due to changes reported during the redet.

CUSTOMER COUNTS, Maryland Health Connection							7 Consumers Potentially Ineligible due to Reported Changes (but not yet scheduled for Renewal)
	1	2	3	4	5	6	
Redet Month	Original Counts: Manual Renewals Extended As of the end of the Redet month	Updated 6.11.2021 Manual Renewals Open (only MCOs)	6.11.2021 Manual Renewals Extended but Potentially Ineligible	6.11.2021 Manual Renewals Still Open and Potentially Still Eligible (Col.2 minus Col.3)	% of Original Manual Extended Renewals Still Needing to Renew (Col. 4 divided by Col. 1)	% Potentially Ineligible Post-PHE due to Reported Changes at Renewal (Col.3 divided by Col. 2)	
2020	Mar	14,454	5,978	628	5,350	37.01%	10.51%
	Apr	17,210	8,492	1,076	7,416	43.09%	12.67%
	May	18,492	9,126	601	8,525	46.10%	6.59%
	Jun	23,573	12,175	1,345	10,830	45.94%	11.05%
	Jul	24,889	15,161	1,206	13,955	56.07%	7.95%
	Aug	21,821	15,712	649	15,063	69.03%	4.13%
	Sep	22,392	17,156	744	16,412	73.29%	4.34%
	Oct	25,527	18,285	1,041	17,244	67.55%	5.69%
	Nov	28,484	20,707	1,096	19,611	68.85%	5.29%
	Dec	26,000	20,336	693	19,643	75.55%	3.41%
2021	Jan	24,718	19,908	627	19,281	78.00%	3.15%
	Feb	28,643	23,362	479	22,883	79.89%	2.05%
	Mar	22,206	16,790	506	16,284	73.33%	3.01%
	Apr	18,886	14,567	480	14,087	74.59%	3.30%
	May	19,050	15,527	870	14,657	76.94%	5.60%
Total	336,345	233,282	12,041	221,241	65.78%	5.16%	73,691

*Of the original extended customers, 66% would need to respond to the renewal to maintain eligibility after the PHE ends.
Five percent of the extended consumers are likely ineligible after the PHE ends*

Note: If the PHE ends 12/31/2021, then the first month of Extended Renewals needing action would be those for July 2021. The action would be taken in January 2022.

MHC Updated Renewal Data (MCO only)

The **dark blue box** shows the updated counts of remaining open manual renewals that still need to be updated and are not already flagged as ineligible due to changes reported during the redet.

CUSTOMER COUNTS, Maryland Health Connection, MCO-enrolled Consumers Only

		1	2	3	4	5	6	7	
Redet Month	Original Counts: Manual Renewals Extended As of the end of the Redet month	Updated 6.11.2021 Manual Renewals Open (only MCOs)	6.11.2021 Manual Renewals Extended but Potentially Ineligible	6.11.2021 Manual Renewals Still Open and Potentially Still Eligible	% of Original Manual Extended Renewals Still Needing to Renew	% Potentially Ineligible Post-PHE due to Reported Changes at Renewal	Consumers Potentially Ineligible due to Reported Changes (but not yet scheduled for Renewal)		
				(Col.2 minus Col.3)	(Col. 4 divided by Col. 1)	(Col.3 divided by Col. 2)			
2020	Mar	We do not have the original counts for just the MCO-enrolled renewal customers in MHC	5,381	552	4,829	We do not have the original counts for just the MCO-enrolled renewal customers in MHC	10.26%	This data was not provided by month; the reported changes were received for consumers who have not yet experienced a renewal	
	Apr		7,606	940	6,666		12.36%		
	May		8,167	530	7,637		6.49%		
	Jun		10,512	1,158	9,354		11.02%		
	Jul		12,962	959	12,003		7.40%		
	Aug		13,707	465	13,242		3.39%		
	Sep		14,607	466	14,141		3.19%		
	Oct		15,819	749	15,070		4.73%		
	Nov		17,959	746	17,213		4.15%		
	Dec		17,231	443	16,788		2.57%		
	2021		Jan	17,096	365		16,731		2.14%
			Feb	20,551	387		20,164		1.88%
Mar		14,760	342	14,418	2.32%				
Apr		13,053	302	12,751	2.31%				
May		13,924	555	13,369	3.99%				
Total		203,335	8,959	194,376		4.41%	65,047		

Four percent of the extended consumers are likely ineligible after the PHE ends

Note: If the PHE ends 12/31/2021, then the first month of Extended Renewals needing action would be those for July 2021. The action would be taken in January 2022.

Source: MHBE, 6/11/2021

MHC Updated Renewal Data

As shown on the preceding tables, some of those customers whose eligibility was extended have been renewing after their scheduled renewal month.

- LHDs are reaching out to those consumers who are scheduled for renewal.
- The next few slides explain how CMS has directed us to handle renewing customers once the Public Health Emergency ends. In brief:
 - Spread out the work
 - Inform customers now regarding the end of the PHE
 - Open cases immediately if they closed erroneously

***What will happen when the
Public Health Emergency ends?***

When will the PHE end?

- CMS has provided a “likely” date for the end of the PHE: **12/31/2021**
- For now, MDH has extended eligibility until **12/31/2021**
- As that date approaches, MDH will move the extension to another date in the future if CMS issues official guidance to do so

CMS Rules for When the PHE ends

- During the 6 months after the PHE ends, spread out the work:
 - Process the renewals/redets if eligibility was extended during the previous 6 months
Example: In January 2022, process July 2021 renewals for those cases that were extended. In February 2022, process August 2021 renewals for cases that were extended, etc.
 - Process current renewals/redets
Example: In January 2022, process January 2022 renewals
 - Process the SSI deletions, 65+ year olds, PARIS alerts
 - If an “advanced notice” was mailed to the household about the extension of eligibility instead of closure, those cases would close at the end of the PHE with a Notice of Adverse Action (Cancel Notice), with closures spread out over 6 months.

CMS Rules for When the PHE ends

Advanced Notice relevant text (began in April 2021):

Important – Information About Your Medicaid Eligibility

The purpose of this notice is to inform you that even though the following members were determined to be ineligible for Medicaid, federal rules allow us to continue your coverage because of the COVID-19 public health emergency. The Medicaid coverage will continue until the end of the public health emergency.

Why am I getting this letter?

When the public health emergency ends, you will receive another notice letting you know when your Medicaid coverage will end. You will have an opportunity to respond to the notice before the end of that month. Even if your Medicaid coverage ends at that time, you may be eligible for a low-cost private health plan.

It is important that you continue to report all household and income changes in your Maryland Health Connection account or call the call center at 800-642-8572. These changes may affect your future eligibility for Medicaid. If you choose not to continue your Medicaid, you can log into your account to cancel your coverage.

Maryland Health Connection Renewals

Renewal timeline in MHC for July Renewals:

(In italics are the temporary Public Health Emergency processes.)

- During the days June 3 - June 10, MHBE ran renewals for cases in which the certification periods end July 31.
 - Auto-renewals are tested against the eligibility criteria during the run and if eligible, are updated for the next certification period.
 - For Auto-renewals that do not meet eligibility criteria (for example, turning 65 years old or ending postpartum), *the Advanced Notice is sent instead of the Cancel Notice, and eligibility is extended.*
 - For Auto-renewals not eligible due to income or change in household size (affecting the income standard), the consumer is then put in the Manual renewal process.
 - Manual renewals are identified and emailed/mailed out.
 - The manual renewal notice informs the consumer to complete their renewal by July 16 or your coverage will end on July 31, 2021 if you fail to renew.

Maryland Health Connection Renewals

Renewal timeline in MHC for July Renewals:

(In italics are the temporary Public Health Emergency processes.)

- During the rest of June and during July (until July 26th), consumers are updating their Manual renewals (and caseworkers are processing verifications that are returned as Work Items).
- During the last five days of July, Cancel Notices are emailed/mailed out to those consumers who did not return renewals or did not return verifications. *However, during the PHE, instead of the Cancel Notice, the Advanced Notice is being sent instead.*
- For any renewals in which caseworkers have not processed the verifications returned by the consumer, those cases are left open.

Other CMS Rules for When the PHE ends

- During the 6 months after the PHE ends, determine eligibility for Non-MAGI applications that were processed using attested information
- During the 2 months after the PHE ends, process all overdue applications
- Discontinue interim emergency procedures for telephone applications
- Discontinue processing applications using attested information
- End extensions for filing appeals

Planning for the Post-PHE Activities

- Planning meetings with MHBE
 - Advanced Notice added 4/30/2021
- Planning meetings with DHS & MD THINK
 - Advanced Notice scheduled to be added before 6/30/2021
- Separating the work to be done into the 6 months after the PHE ends
 - Planning meetings now underway for this
- Communicate with recipients, providers, community partners and local office staff

Questions

Please contact us if you have any questions or suggestions for our Post-Public Health Emergency Planning

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