

# MassHealth Updates: Continuous Eligibility

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# MassHealth 1115 Demonstration Waiver

**December 22, 2021**: MA EOHHS announced its submission of a Request to Extend the MassHealth Section 1115 Demonstration to CMS

**September 28, 2022**: CMS approved Massachusetts' request to extend the MassHealth Section 1115 Demonstration

**October 1, 2022 - December 31, 2027**: The \$67 billion waiver is in effect

# What is Continuous Eligibility?

- **Continuous Eligibility:** Once someone is found eligible for MassHealth, they will remain enrolled in MassHealth for the duration of the continuous coverage period *regardless* of changes in circumstances
  - Circumstances that typically lead to loss of coverage (increases in income, missing paperwork/deadlines, etc.)
    - i. MassHealth population & income fluctuations
- The demonstration approves continuous eligibility for two groups:
  - 12-months continuous eligibility for **people re-entering the community from incarceration**
  - 24-months continuous eligibility for **people who have been confirmed as homeless for 6+ months**
- They will receive the benefits of the Medicaid eligibility group according to their most recent eligibility determination

# Continuous Eligibility Exceptions

## **An individual will not be eligible for continuous coverage if:**

- They are no longer a Massachusetts resident
- They request termination of eligibility
- They are deceased
- The agency determines that eligibility was erroneously granted at the most recent determination, redetermination, or renewal of eligibility because of agency error or fraud, abuse, or perjury attributed to the individual

# Continuous Eligibility for Justice-Involved Individuals

**Eligible Populations:** MassHealth eligible individuals under age 65 released from a correctional institution

- Including County Correctional Facilities (CCFs), State Department of Corrections (DOC) Facilities, and Department of Youth Services (DYS) juvenile justice facilities

**Duration of Continuous Eligibility:** 12 months following release date

- Eligibility period begins at the **date of release** and will **extend through the end of the 12th month** following release.
- If eligibility determination is made after release date (but within 12 months of release), the individual will be eligible for continuous eligibility through the end of the 12th month following release.
  - This may result in continuous eligibility periods of less than 12 months for some individuals.

**How are eligible members identified?**

- Existing procedures notify MassHealth when a member is in custody or is being released
- Information provided on an application
- MassHealth system will flag their record to receive continuous eligibility

**Implementation Date:** April 1, 2023

# Continuous Eligibility for Individuals Experiencing Homelessness

**Eligible Population: MassHealth eligible individuals under age 65 with a confirmed status of homelessness for at least 6 months**

- “**Confirmed status of homelessness**” is verified through Statewide Homeless Management Information System and/or from the Department of Housing and Community Development, Emergency Assistance shelter system for families

**Duration of Continuous Eligibility: 24 months following release date**

- “24-month continuous eligibility period for individuals experiencing homelessness will begin *no later* than the third month before the month of application or on the effective date of the most recent renewal of eligibility”

**Implementation Date: December 1, 2023**

# Continuous Eligibility for Individuals Experiencing Homelessness (Cont.)

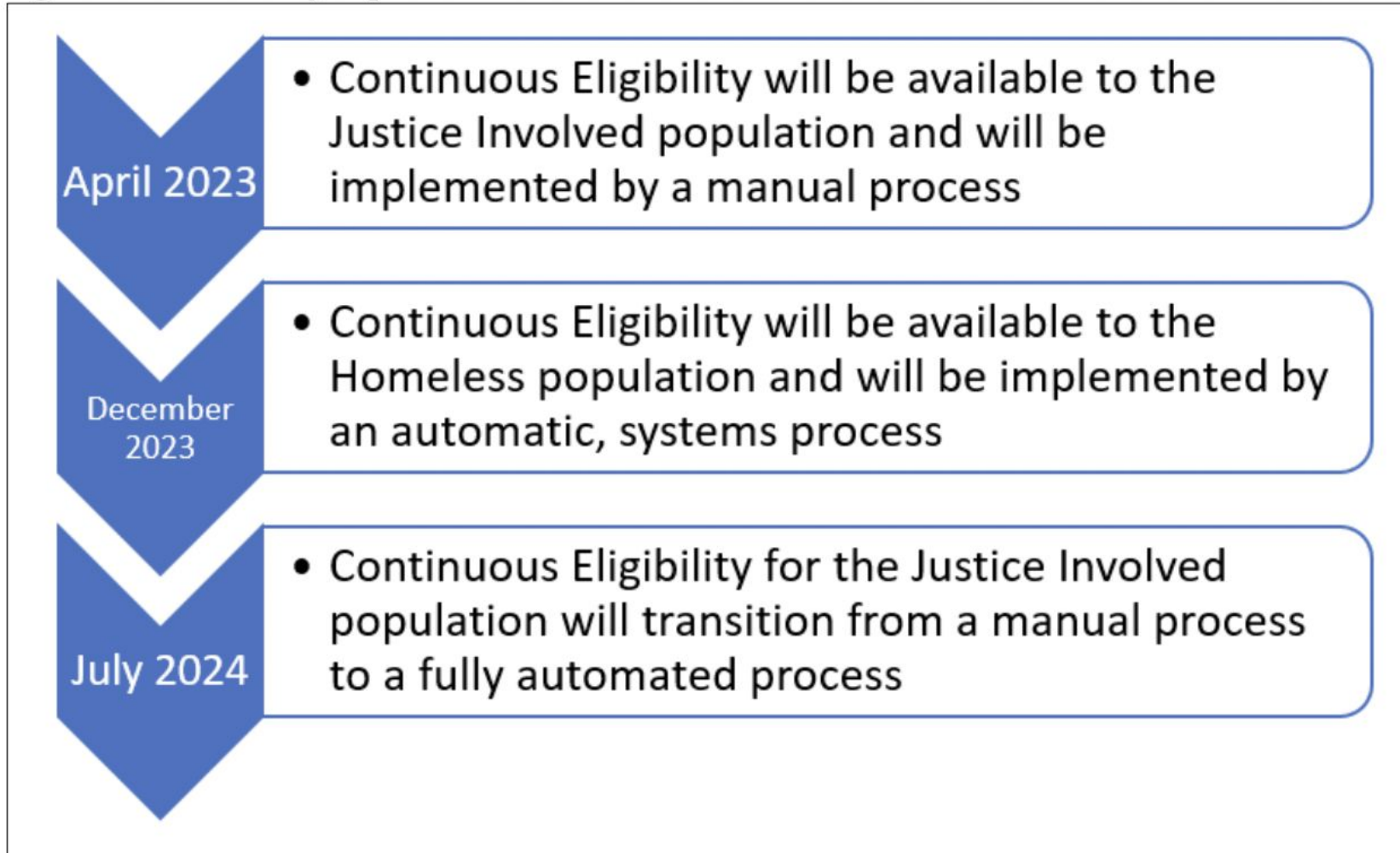
**12 Month Verification**: 12 months into the 24-month continuous eligibility period, MassHealth will make a reasonable effort to confirm that the individual still meets the continuous eligibility criteria before resuming the remainder of the 24-month eligibility period

- MassHealth will utilize available data sources and standard member outreach procedures in an attempt to verify information. The termination of continuous eligibility would only result in the event of a response affirming out of state residency, death or voluntary withdrawal.
- This is a federal requirement (42 CFR 435 952(d) and 42 CFR 457.380)

**NOTE**: Mail being returned or undelivered **will not result in a termination of benefits or an interruption in the continuous eligibility period** unless there is sufficient evidence indicating reason for termination

# Continuous Eligibility Implementation

*Figure 1: Overview of Implementation Timeline*





# Ending the Continuous Eligibility Period

- At the end of the continuous eligibility period, MassHealth will attempt to **automatically renew** coverage
- If they are unable to autorenew, a **request for renewal** will be sent to the member
- If a member does not submit a completed eligibility renewal following the end of the continuous eligibility period, benefits will be determined based on available data sources during a “**systematic program determination**”

# Sources & Additional Information

**CMS, MassHealth Demonstration 1115 Waiver Approval Letter (September 28, 2022):**

**<https://www.medicaid.gov/medicaid/section-1115-demonstrations/downloads/ma-masshealth-ca1.pdf>**

**CMS, Continuous Eligibility Implementation Plan (May 19, 2023):**

**<https://www.medicaid.gov/medicaid/section-1115-demonstrations/downloads/ma-masshealth-ca-demstrtn-aprvl-05192023.pdf>**

**If you have any questions about continuous eligibility or are interested in more information on MassHealth for justice-involved individuals, you can email me (Isabel Wanner) at [iwanner@mlri.org](mailto:iwanner@mlri.org).**