

MassHealth 2023: Preparing for what's ahead

BBT Health Access Training, Feb. 27, 2023

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Massachusetts Law Reform Institute

- Poverty law & policy center; state-wide support for local legal services and community partners
- MLRI engages in state and legislative initiatives, administrative advocacy, trainings, coalition building and litigation

MLRI advocacy focuses on the following substantive law areas:

- Health care
- Food security and economic security
- Immigration
- Housing law- public and private tenant rights
- Employment and unemployment compensation
- Family law and domestic violence
- Child welfare
- Race equity and language access

What we'll cover in this session

- Medicaid continuous coverage through Mar 31, 2023
- Redeterminations beginning April 1, 2023
- MassHealth's Redetermination Plan
- MassHealth members at risk of losing coverage
 - Administrative terminations/denials
 - Changes in eligibility
- What advocates can do
- Other changes in 2023
- Referral resources

MassHealth Eligibility: Business as usual

- Eligibility criteria: residence, citizenship/immigration, financial
 - Financial limits affected by family size, age, health status
- Administrative requirements
 - Completing initial application or annual renewal
 - Submitting requested information by deadlines
- Eligibility decisions for MassHealth
 - Initial approval if found eligible
 - Continuing eligibility until found ineligible
 - Integrated with eligibility for HSN, CMSP and ConnectorCare/APTC
- Reasons for denial/termination
 - Administrative/procedural reasons for people who may be eligible (“churning”)
 - Reasons based on failing to meet eligibility criteria

What are administrative terminations?

- Administrative terminations occur when additional information is needed to determine ongoing eligibility.
- States making the most of available data to automatically renew eligibility avoid administrative terminations.
- Historically, many individuals who lose coverage for procedural reasons remain eligible but become uninsured.

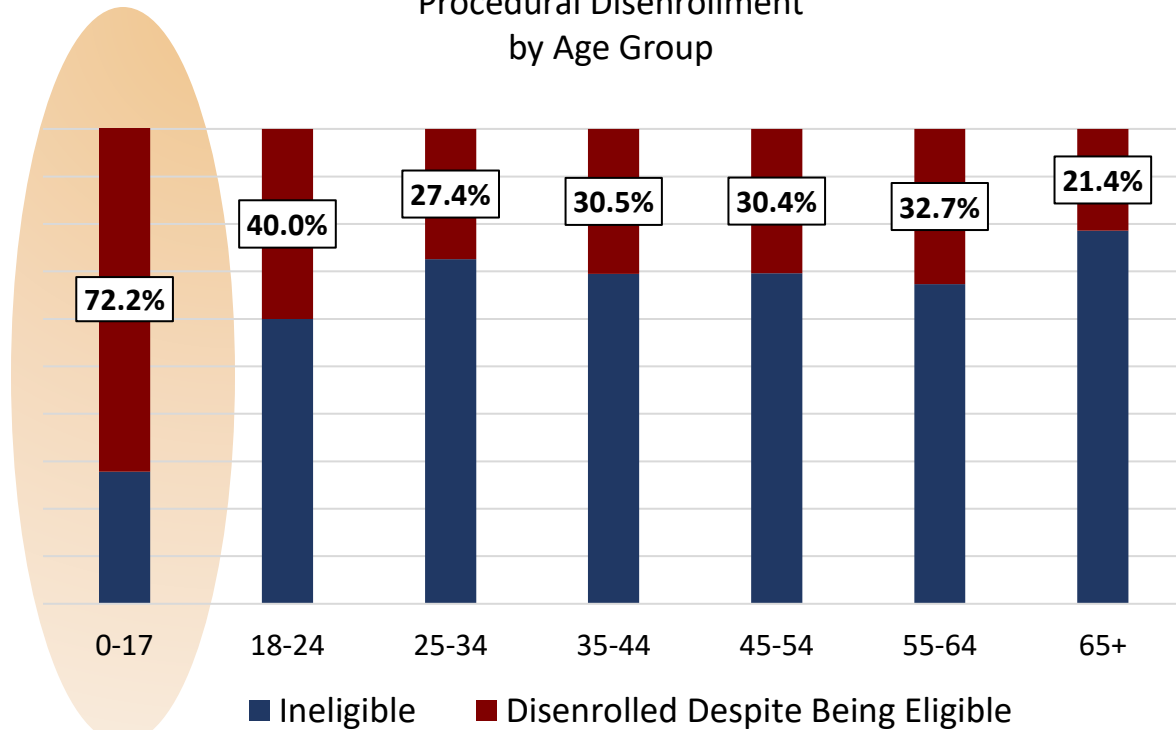
Many will reapply, leading to additional work, gaps in coverage, and increased costs

Why do they occur?

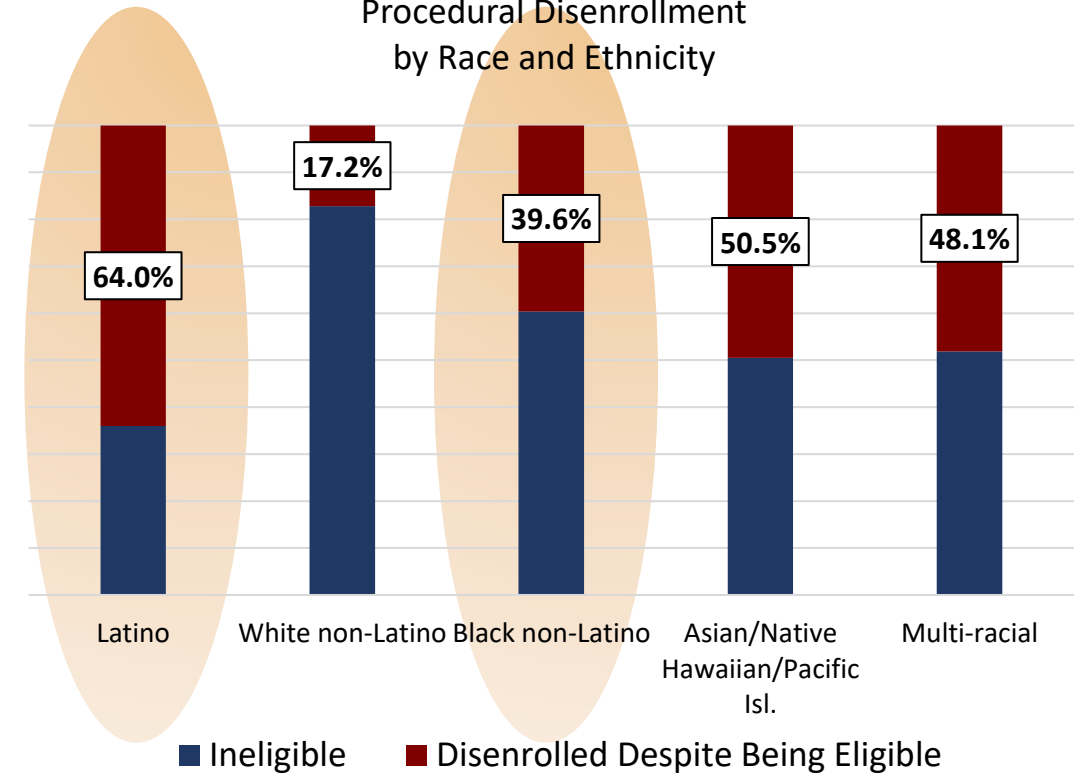
- Enrollee did not receive the notice, or it was never delivered.
- The notice was confusing or not in the enrollee's preferred language.
- Enrollee was unable to get through to the call center to get help.
- The state lost the paperwork submitted by the individual.
- The individual was unable to obtain paper documents to prove eligibility.

High Risk of Administrative Terminations, Especially for Children and People of Color

Predicted Medicaid Coverage Loss Due to Ineligibility vs. Procedural Disenrollment by Age Group



Predicted Medicaid Coverage Loss Due to Ineligibility vs. Procedural Disenrollment by Race and Ethnicity



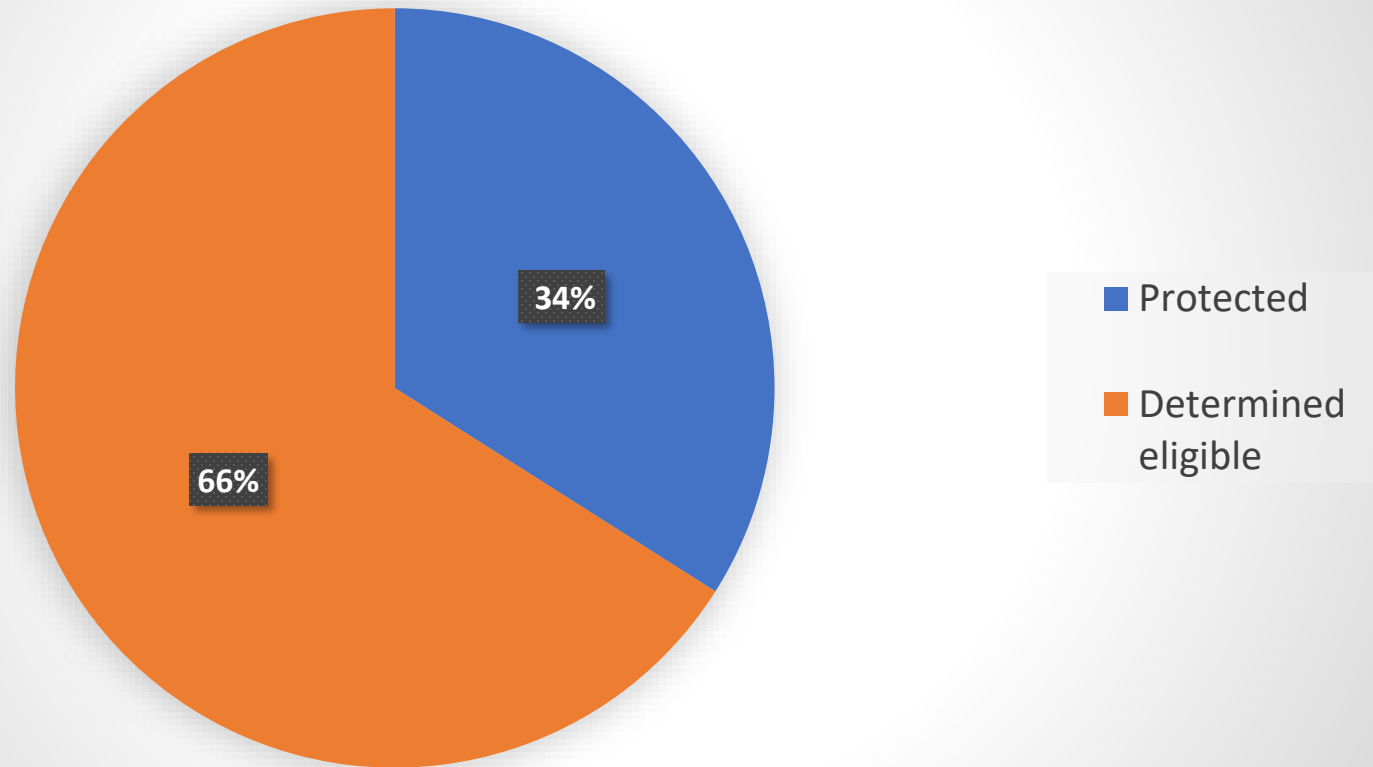
Protection from loss of coverage:

March 18, 2020-March 31, 2023

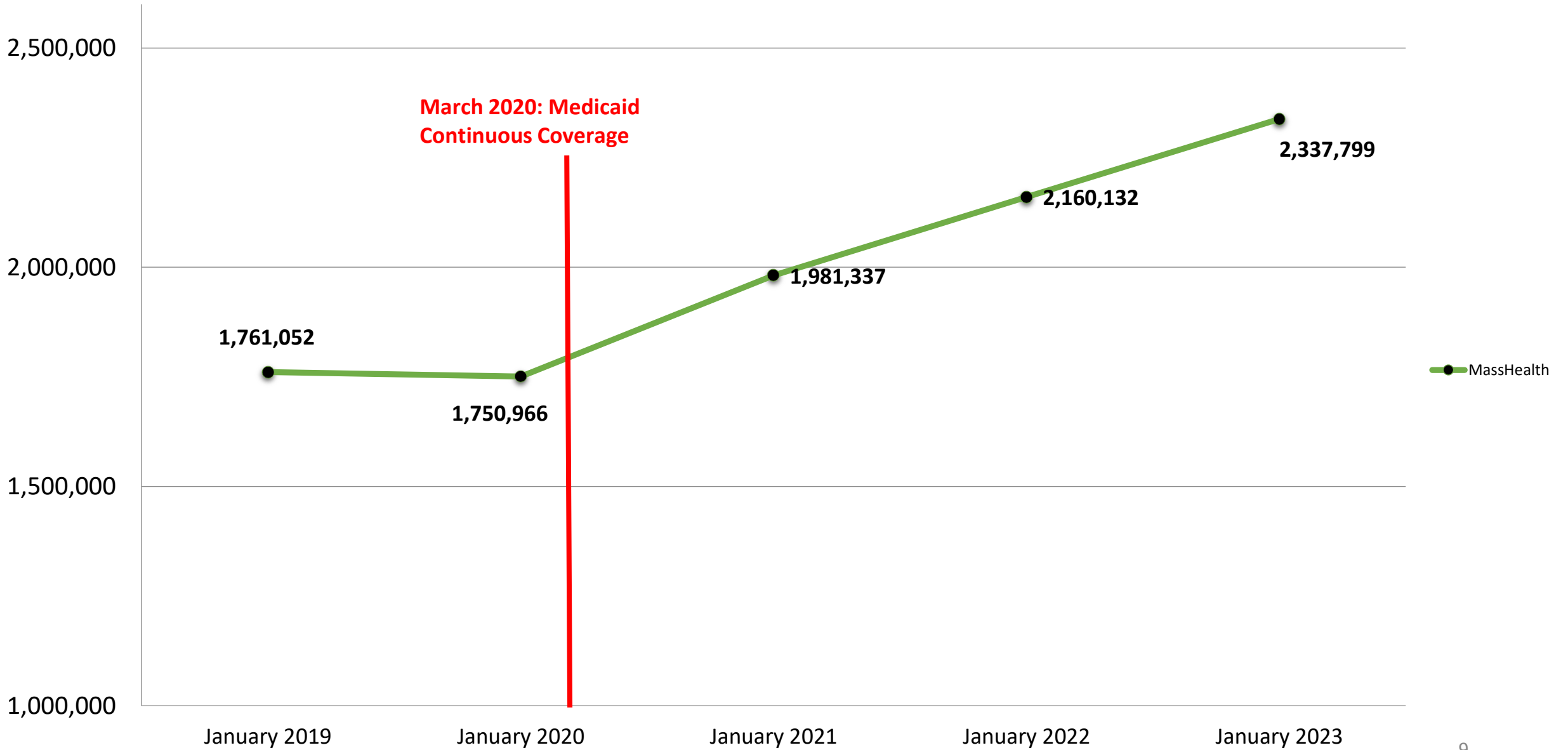
- No one enrolled in Medicaid on 3.18.20 or later should lose coverage except if moved out of state or requested end of benefits*
- Year 1: MassHealth suspended all but automatic renewals ~ 50% of caseload can be automatically renewed in current or better coverage
- Years 2 & 3: MassHealth resumed sending renewal forms but with no terminations
 - People who completed renewal & were no longer eligible for current coverage were protected
 - People who did not complete renewals were protected
 - Response rate of people sent renewals as of May 2022
 - 10% ≥ age 65
 - 27% age 0-64
- **VAST MAJORITY of PROTECTIONS WERE FOR NOT RETURNING FORMS**

~785,000 MassHealth members “protected” from loss of coverage since March 18, 2020 (as of 9/30/22)

Proportion of All MassHealth Members Enrolled based on Protection

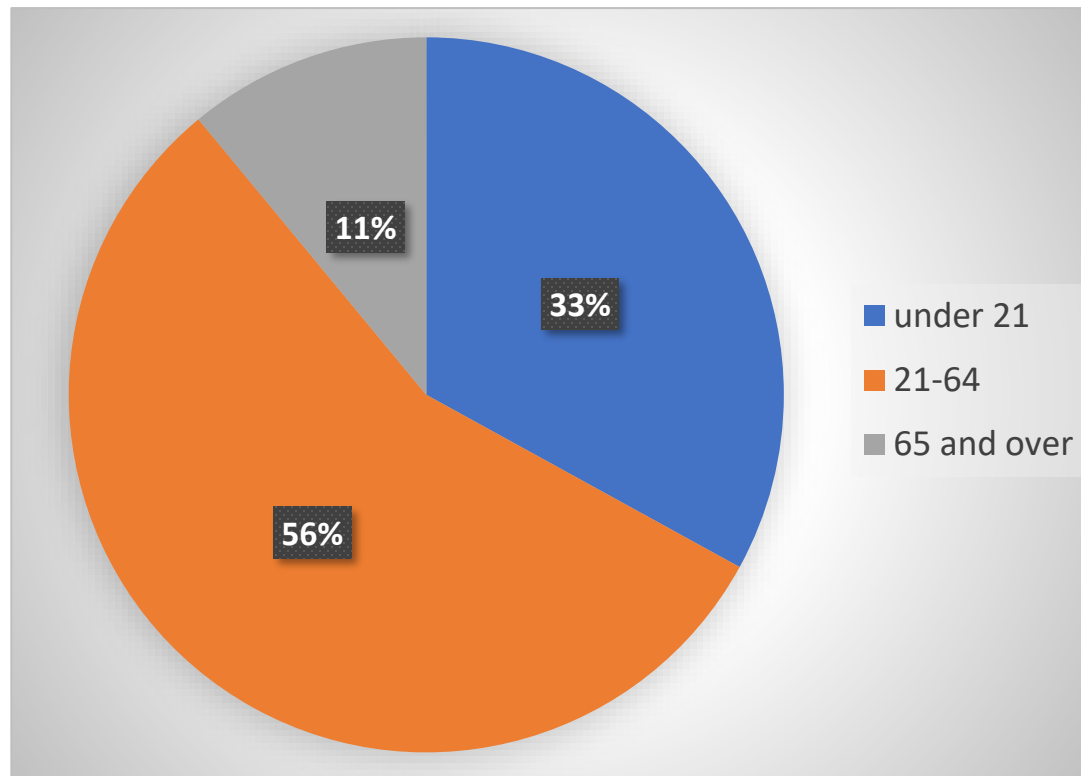


MassHealth Enrollment 2019-2023

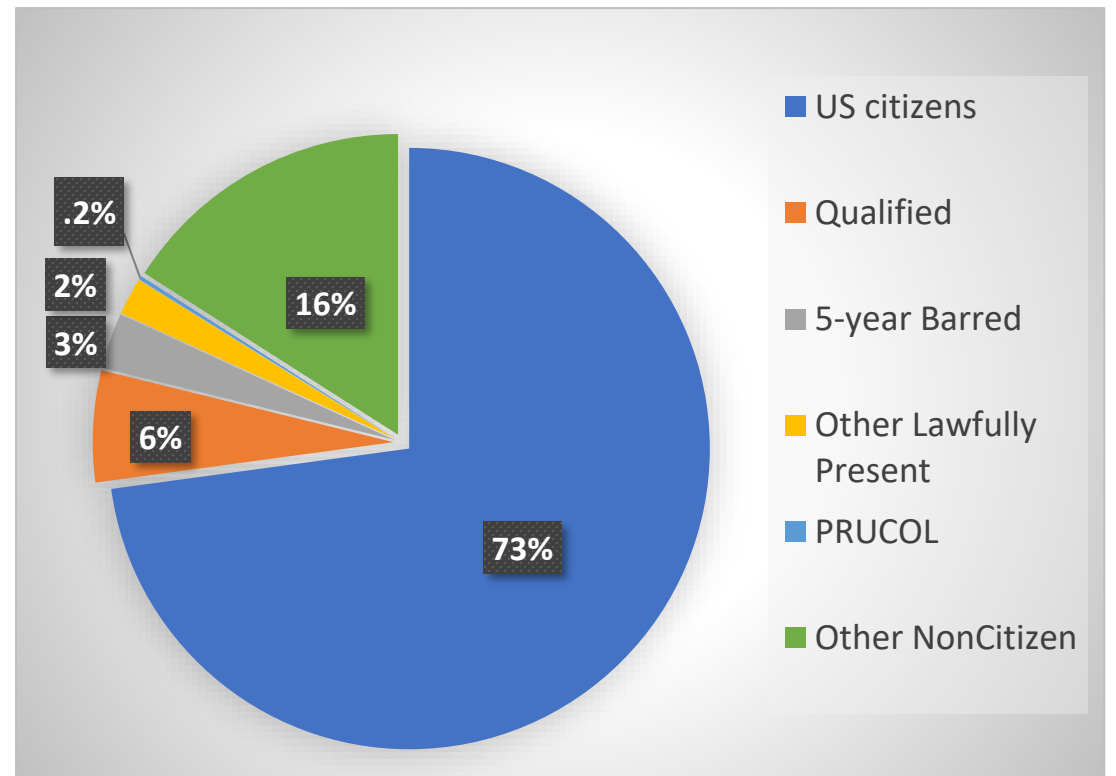


Characteristics of “protected” members at risk of losing coverage (as of 9/30/22)

Protected individuals by Age

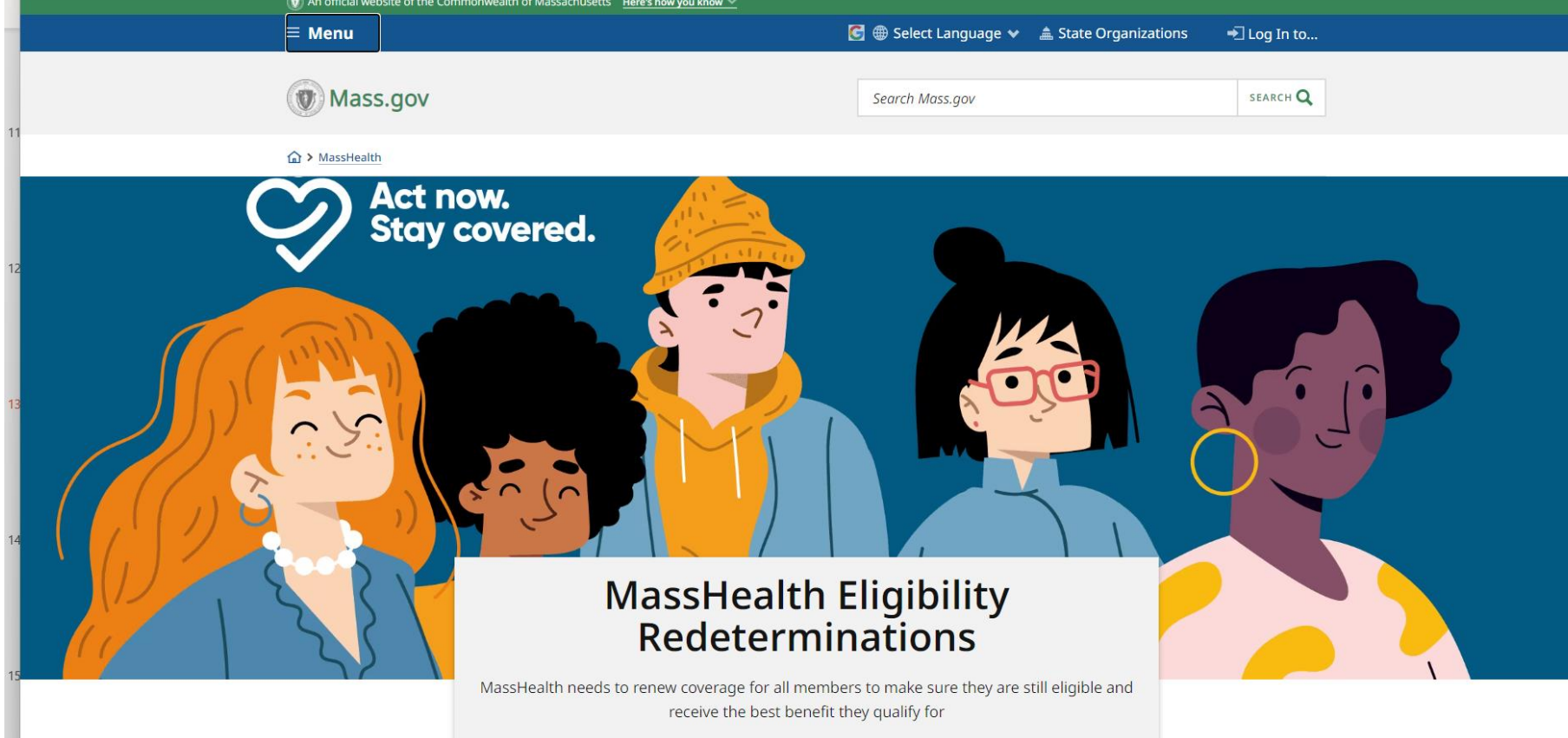


By Citizenship/Immigration status



MassHealth's Redetermination Plan

- Preparations for April 1, 2023 on multiple fronts
- Phase 1 outreach plan focuses on getting updated contact info-
launched Jan 20, 2023
- Phase 2 outreach plan focuses on getting renewal forms returned –
expected launch mid-March 2023
- From April 1, 2023-March 31, 2024 MassHealth will initiate renewals
for 2.3 million members
 - Roughly half will be auto-renewed in same or better coverage-no action
needed
 - The other half will need to take action to retain current coverage



mass.gov/masshealth-eligibility-redeterminations

Information for Providers, Health Plans, and Partners

[OUTREACH TOOLKIT](#)

[MASSEALTH REDETERMINATION SLIDE DECK](#)

[SIGN-UP FOR EMAIL NOTIFICATIONS](#)



Executing outreach: Conduct outreach campaign with Health Care for All (HCFA)

HCFA received \$5M in funding from state legislature to support redeterminations. In partnership with MassHealth and the Connector:

- Held **member focus groups** to hear feedback on communications approach
- Identified **key messaging and branding** for the “Your Family, Your Health” campaign
- **Developed three key prongs of outreach campaign:**
 - **On-the-ground outreach** (canvassing as well as tabling at local events and community spaces) in target communities
 - **Grants to community-based organizations**, focusing on target communities and populations
 - **Community-oriented media buy** (radio, TV, newspaper, social media)



Targeted Outreach Communities

- Boston
- Brockton
- Chelsea
- Everett
- Fall River
- Framingham
- Lawrence
- Lowell
- Lynn
- Malden
- New Bedford
- Quincy
- Revere
- Springfield
- Worcester

Redetermination Time Frame

- Required that all get a new chance to renew on April 1, 2023 or later
- If successfully renewed April 1, 2022-March 31, 2023 renewal will be in 12 months (business as usual)
- ~50% of households can be automatically renewed (no action needed)
- If protected, renewal will be between April 1-Dec 31, 2023 (9 mo)
- If mixed Connector-MassHealth family, renewal will be late summer-fall 2023 (timed for 2024 open enrollment)

When and how to renew

- When to renew for all ages
 - If not renewed automatically, mailed renewal form in blue envelope with 45 days to return
 - If request for more information, 90 days from request to supply it
 - If deadlines missed, and benefits terminated but missing forms supplied in 90 days from termination date & if still eligible, reinstated back to termination date
- [How to renew for under 65](#)
 - Create an online account & renew online
 - Renew by telephone
 - Renew in person with CACs & Navigators or at MEC
 - Complete paper form and mail, fax or deliver it

Member Transitions



Massachusetts's integrated application system for MassHealth and Health Connector coverage will streamline the renewal process for members.

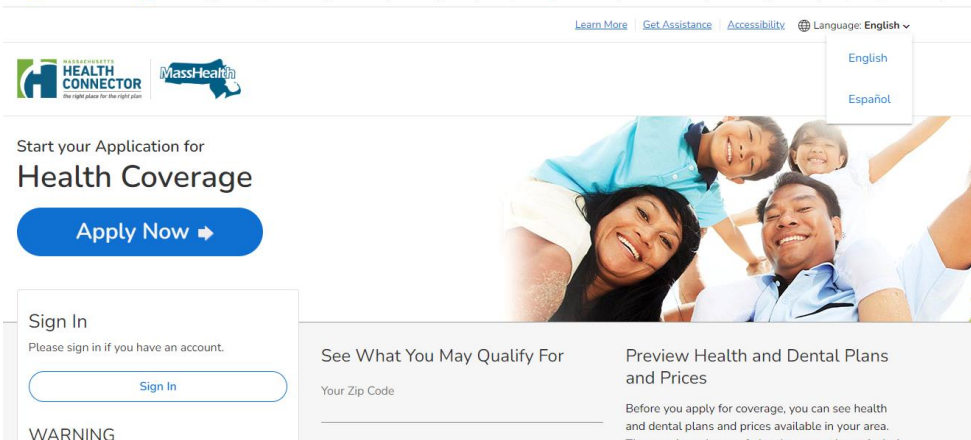


What advocates can do?

- Phase 1: Help clients/patients update their contact info
 - Only casehead/head of household or ARD can update address for entire household; only casehead will get renewal form for household
 - Pitfalls if one or more members of household have changed –more later
 - Updating address with health care providers will not get it into MassHealth
- Phase 1 and 2: Work with community groups to get out information & resources & help monitor how it's going in your community
- Phase 1 and 2: Monitor and report back on how it's going in your community to state-wide advocacy organizations & state agencies
- Phase 2: Help individuals with administrative denials, erroneous decisions & transitions to other forms of coverage

MassHealth Phase I Outreach Campaign

- Phase 1 Posters & Flyers 
- Translations of poster/flyer into 8 other languages 3 weeks after campaign launch Jan 20
- The only method described for updating information is to create an online account
 - Only available for those under age 65 and with online access
 - MA Login Account information at www.mahix.org/individual is only in English & Spanish 



The screenshot shows the top navigation bar with links for 'Learn More', 'Get Assistance', 'Accessibility', and 'Language: English'. Below this is the 'MASSACHUSETTS HEALTH CONNECTOR' logo and a 'MassHealth' logo. The main heading reads 'Start your Application for Health Coverage' with a prominent blue 'Apply Now' button. To the left, there is a 'Sign In' section with a 'Sign In' button. Below the 'Apply Now' button, there are sections for 'See What You May Qualify For' (with a 'Your Zip Code' input field) and 'Preview Health and Dental Plans and Prices'.

Flyer (8.5" x 11")



The flyer features the headline 'MassHealth members will soon need to renew their health coverage.' and the slogan 'Act now. Stay covered.' with a heart-shaped logo. Below the text are three images: a construction worker, a family playing, and a woman on a phone. The flyer is divided into two main sections: 'What you need to do now' and 'Don't have an account?'. The 'What you need to do now' section contains two numbered steps: 1. Make sure MassHealth has your most up to date address, phone number, and email so you do not miss important information and notices from MassHealth. 2. Report any household changes. These include a new job, address, changes to your income, disability status, or pregnancy. The 'Don't have an account?' section provides instructions for users under 65 to visit mass.gov/masshealthlogin or scan a QR code. The MassHealth logo is at the bottom.

At risk individuals after April 1, 2023

- **Special populations:** Children, limited English proficient, unhoused/housing unstable, individuals with disabilities requiring accommodation to renew, older adults
- **People with increases in income**
- **Young adults who turned 21**
 - Both income & immigrant eligibility rules are more restrictive for most young adults at 21 or older
- **Older adults who turned 65**
 - Income limits are lower and the rules for counting income are different for most people at 65 or older
 - Most people age 65 or older must supply asset information to qualify

Young adults who turned 21

- Both income & eligible immigration status rules are more restrictive on turning 21
- Transition from MassHealth Standard or Family Assistance to CarePlus if
 - US Citizen or “Qualified” immigrant and
 - MAGI income of 138% FPL or less
- Transition from MassHealth Standard or Family Assistance into ConnectorCare if
 - MAGI income over 138% FPL (US citizen or Lawfully Present immigrant)
 - Lawfully present but not “Qualified” immigrant with income of 138% FPL or less
- Retaining MassHealth if
 - PRUCOL e.g. DACA with income 300% FPL or less (PRUCOL not eligible for Connector)
 - US citizen & Qualified individuals with disabilities & MAGI over 138% or certain other immigrants with disabilities


Young adult case example


- Family of 3: mother (47), father (56), young adult son (21); mother employed at \$150 week. No other income for family. Parents on MassHealth CarePlus, son on Standard as of summer 2022 when mailed renewal. Son had recently moved in with roommates in same town.
- Sent 40 pp Prepopulated renewal form. Mother completed it. Updated information for son to show he no longer resided in household and supplied his new address.
- Mother and Father still eligible for CarePlus
- MassHealth sent notice to son at his parents' address that his MassHealth was being terminated because "not in household." **What happened?**
- Son had just lost a job. He attempted to apply online on his own. Found eligible for private health plan at full cost. **What happened?**



Do you need help paying for health coverage?

There is currently no income limit for getting help with health coverage costs through the Health Connector. Choose "Yes" to see if you qualify for financial help.

*When you see a star (*), you must complete the field.*

When you see an , roll over it with mouse or select it by pressing tab with keyboard to get definitions and learn more.

Do you want to find out if you or your family can get help paying for some or all of your premium (cost) for health coverage? This could include MassHealth, ConnectorCare plans, and tax credits. * 

- Yes, I want to see if I can get MassHealth or help paying for health care
- No, I don't want any help paying for health care 
- I'm not sure 

Even working families can pay less for health coverage. You may qualify for a free or low-cost ConnectorCare plan, MassHealth, or a tax credit that can be used to lower your monthly premium right away.

Save and Continue

Back

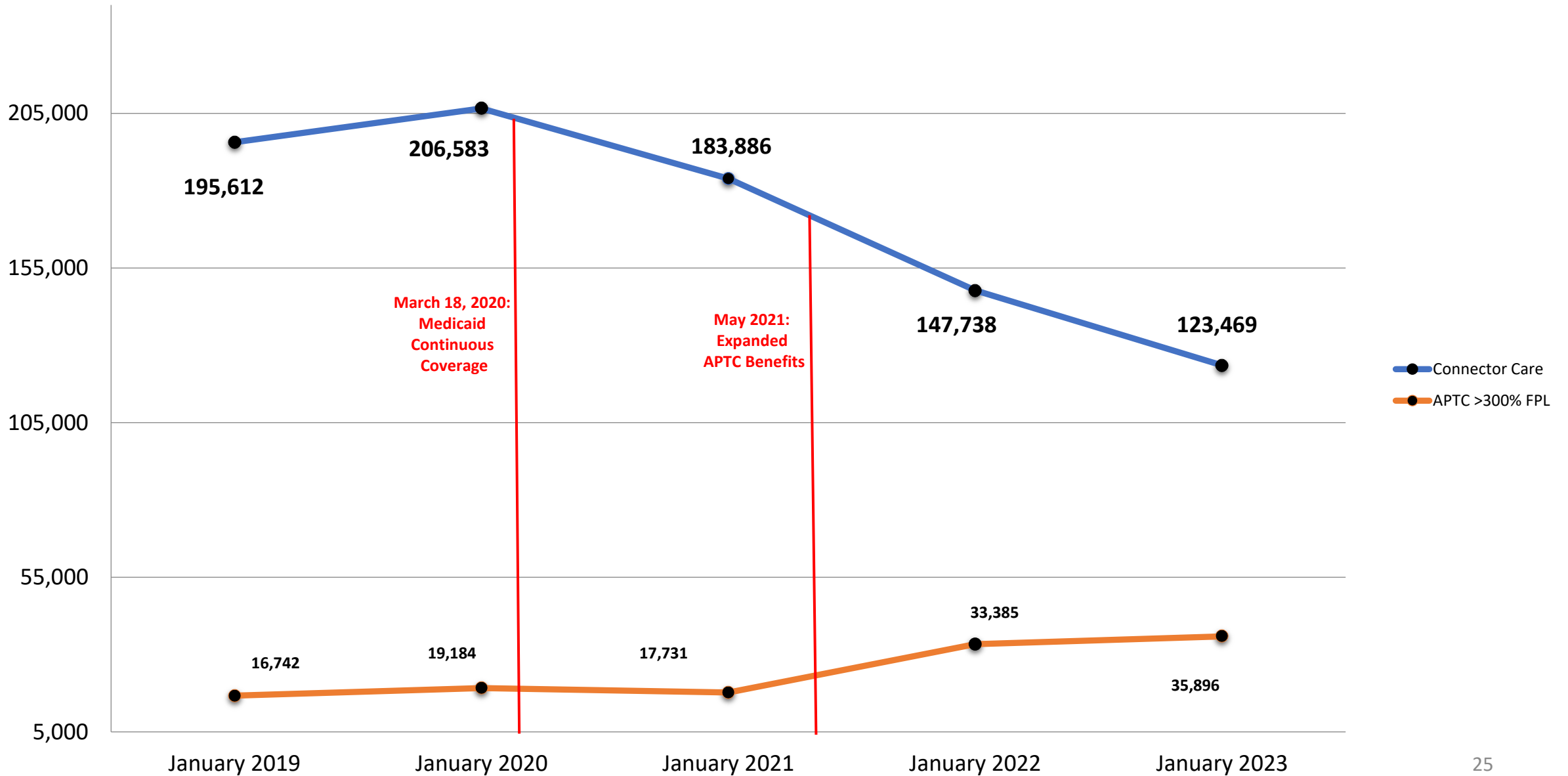
What went wrong?

- Son was wrongly terminated during continuous coverage for reason other than moving out of state, or asking that his benefits end.
- Termination notice was not sent to Son at his new address
- Son was terminated without first having an opportunity to renew.
- When son reapplied, he wasn't sure how to answer. Online renewal is programmed to treat an answer of "I'm not sure" as an answer of NO, I don't want to apply for MassHealth or help paying for health care.
- Solution: Update application to YES.* Refer to legal services to address, wrongful termination, & bad notice

Transition to the Health Connector

- Health Connector anticipating new enrollment of over 100,000 from MassHealth redeterminations
- Preparing for outreach and enrollment campaign in Phase II after April 1, 2023 redeterminations begin
- If no longer eligible for MassHealth, but eligible for ConnectorCare/APTC –
 - MassHealth will end on last day of current or following month to allow time to select a plan by 23d of month for coverage to begin 1st of next mo
- Individuals eligible for ConnectorCare/APTC but “protected” in MassHealth who don’t want to wait, can voluntarily waive protection and enroll in ConnectorCare/APTC now

Enrollment in Subsidized Health Connector Coverage 2019-2023



Expanded MassHealth eligibility: CommonHealth

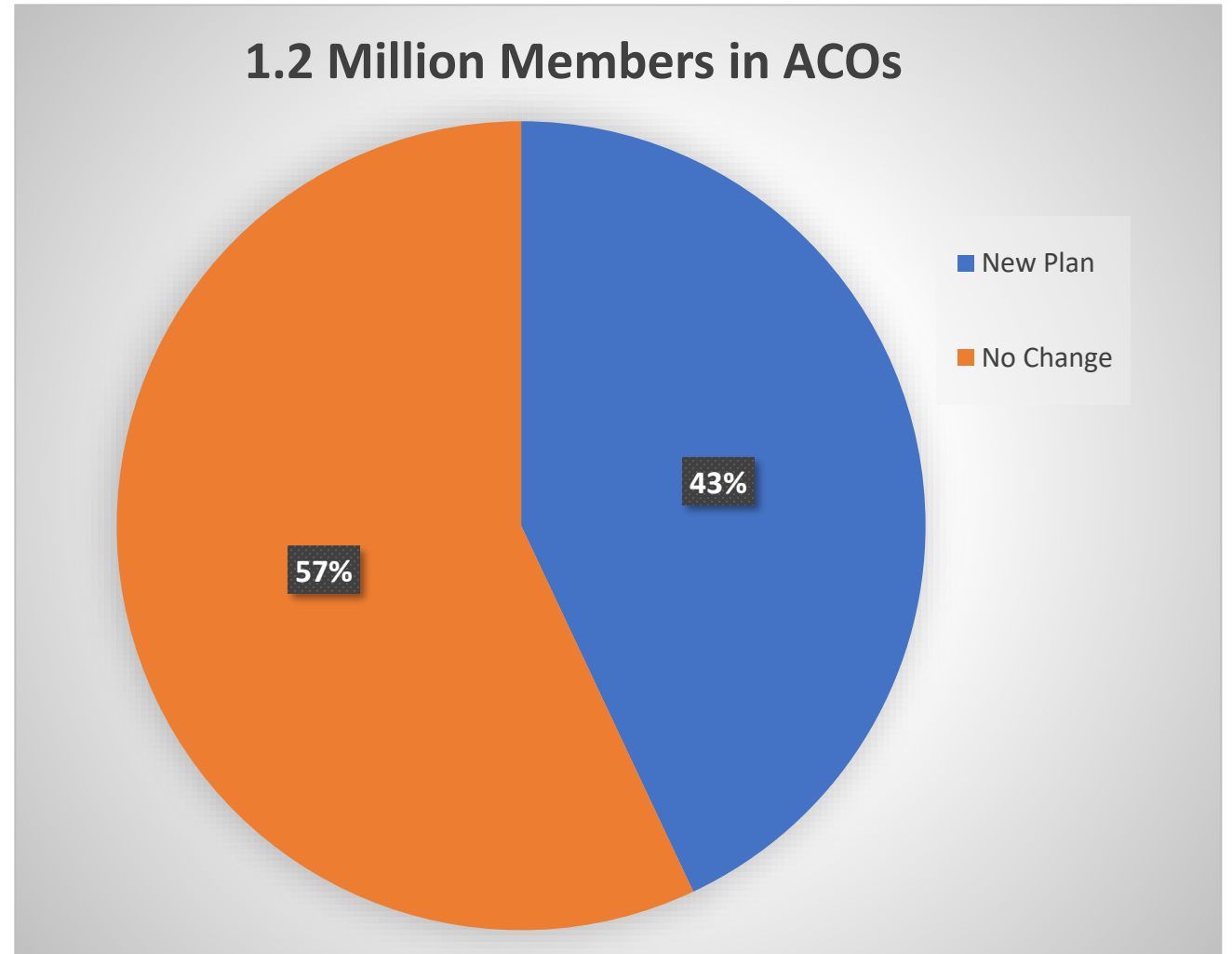
- Dec. 2022 expansion of CommonHealth for disabled individuals 21-64 with income too high for MassHealth Standard-
 - No longer need to meet a one time deductible or be working to qualify
 - Sliding scale premium begins at 150% FPL
 - For most people 1-step eligibility & one notice
 - For some people still a 2-step “workaround” but current benefits will continue until 2d notice
- Only CommonHealth members with income of 135% or less will have Medicare Part B premium paid by MassHealth

Other expanded coverage

- Individuals who were on MassHealth while pregnant are eligible for 12 months continuous coverage after end of pregnancy (eff. 4/1/22)
- Expanded eligibility for low income parents/caretakers with earnings
 - 12 months Transitional Medical Assistance (TMA) for parents/caretakers with children under 19 and earnings when any change puts MAGI income over 138% FPL
 - Previously required an increase in earnings to trigger TMA
- Expanded eligibility for ConnectorCare/APTCs continues in 2023
- Medicare Savings Program income limits increased on Jan 1, 2023
 - QMB from 130% to 190% FPL
 - Other MSP from 165% FPL to 225% FPL

Also coming April 1, 2023: New Plan Assignments

- MassHealth is sending advance notice of plan assignments before April 1
- Time to change initial enrollment before April 1
- 90 day plan selection period to change plans after April 1
- 90 day continuity of care period in new plan
- Overlap with Redeterminations likely to cause confusion



After April 1, 2023:

Important deadlines if MassHealth is terminated

- **Appealing terminations:** Members may appeal their termination from MassHealth by requesting an appeal (i.e. fair hearing) within **60 days*** of receiving MassHealth's notice of termination
- **Aid pending appeal:** If a member appeals, they can keep their MassHealth benefits while they wait for their appeal hearing date if they submit their appeal before the date their benefits will end or within **10 days** of receiving* the MassHealth notice.
- **90 day reinstatement rule:** If a person fails to submit a renewal form on time & is terminated, they can reinstate their coverage if they submit the renewal form within **90 days** of that termination and are still eligible.

Referral Resources

- Free assistance applying, renewing, signing up for a plan from the HCFA Helpline, the Mayor’s Health Line and other certified application counselors & Navigators (“enrollment assisters”) my.mahealthconnector.org/enrollment-assisters
- SHINE counselors help with transition to Medicare mass.gov/health-insurance-counseling
- Free legal services from GBLS, HLA and more masslrf.org/en/home
- MassHealth Enrollment Centers: appointment scheduler mass.gov/info-details/schedule-an-appointment-with-a-masshealth-representative
- MassHealth Customer Service 800-841-2900
- MassHealth Plans: mass.gov/info-details/contact-masshealth-information-for-members#health-plan-contacts

CMS Guidance on End of Continuous Coverage “Unwinding”

- Guidance and Key Information
 - [March 2022 guidance](#)
 - [Summary of Key Unwinding Requirements](#)
 - [Unwinding FAQs](#)
 - [Updated timelines based on CAA](#)
 - CMS plans to issue additional guidance including details on updated reporting requirements
 - Additional Resources on CMS [Unwinding Page](#)