Ending Continuous Medicaid Coverage

July 2022
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The Families First Coronavirus Response Act (FFCRA) was passed by U.S. Congress in March 2020.

- Allowed states to qualify for a temporary 6.2 percentage point Federal Medical Assistance Percentage (FMAP) increase, provided states maintain Medicaid coverage for most people enrolled in Medicaid as of or after March 18, 2020, until the end of the month in which the federal public health emergency (PHE) ends.

- HHSC implemented the federal directive effective March 18, 2020.
Medicaid Full Benefit Caseload, September 2019 - May 2022

COVID-19 PHE impacts begin April 2020

Notes: December 2021 - May 2022 data is not yet final and subject to change. Source: PPS, HHSC Forecasting, July 2022.
Federal Guidance

• Guidance from Centers for Medicare and Medicaid Services (CMS) has evolved over time.

• Major parameters for unwinding include:
  • **States have up to 12 months** to complete pending eligibility actions, which can begin **up to 60 days** before the first disenrollments will begin.
  • Disenrollments cannot be effective before **the first of the month after the PHE ends**.
  • **States must conduct a full redetermination** (as outlined in 42 Code of Federal Regulations 435.916) and allow members a minimum of 30 days to respond to renewal packets or requests for information.
Current Landscape

HHSC is preparing for the large volume of work expected with unwinding continuous coverage. This plan is subject to change based on new guidance and the changing landscape.

Estimated PHE End Date

- The PHE is currently slated to end on **October 13, 2022**; it can be extended in increments up to 90 days.
- The federal government has committed to giving states at least 60 days notice before the end of the PHE.
- HHSC is working under the assumption that the PHE will end on **October 13, 2022**. The federal government should inform states of the end of the PHE by **August 14, 2022**, if the PHE will end as assumed.

Redetermination Population

- HHSC has extended Medicaid coverage for as many as **2.7 million members** due to the continuous Medicaid coverage requirement in the FFCRA.
- All these members will need to have their Medicaid eligibility redetermined when continuous coverage ends.
HHSC’s unwinding approach **stagger**s Medicaid redeterminations for continuous coverage over multiple months.

The continuous coverage population will be distributed into **three cohorts** to best accomplish the goals of:

- Maintaining coverage for eligible individuals; reducing churn
- Prioritizing redeterminations for those most likely to be ineligible or to be eligible for another program
- Reducing the risk of overwhelming the eligibility system or workforce during the unwinding period
- Establishing a sustainable renewal schedule for subsequent years
HHSC Plan to End Continuous Enrollment (2 of 2)

First Cohort
• Includes individuals most likely to be ineligible or transitioned to CHIP.
  • Pregnant women who may transition to Healthy Texas Women Program
  • Members who aged out of Medicaid
  • Adult recipients who no longer have an eligible dependent child in their household
Approximately 1.4M members (as of April 2022)

Second Cohort
• Includes individuals likely to transition to a different Medicaid eligibility group
  • Medicaid children, parent/caretaker and waiver groups pending information
  • Certain MAGI population groups (e.g., children, people under Transitional Medical Assistance).
Approximately 500K members (as of April 2022)

Third Cohort
• Includes everyone remaining from the previous groups, including those most likely to remain eligible (i.e., Children in Medicaid).
Approximately 640K members (as of April 2022)
Timeline for Ending Continuous Coverage

Outreach-related Activity

Milestone

Note: Timeline assumes PHE ends October 13, 2022. The current PHE declaration ends on October 13, 2022. The federal government has NOT indicated the PHE will be renewed beyond October 13.

Population that will go through the Medicaid Renewal (MR) Process

Population that will go through MAGI Alert, Special, or non-MR process

Pre PHE end outreach by state and non-state government stakeholders

1809 Notice informing members of possible eligibility change

Post PHE end outreach by state and non-state government stakeholders

Post PHE end outreach to special populations (e.g. waiver populations)

Identify Population and staggered groups

Run ELDS for additional information on MR Groups

Send Application Packets to MR Groups (and H1020 if applicable)

Perform determinations on returned packets; terminate cases w/unreturned packets, send TF0001 Notice

Run ELDS for additional information

Send, Application, H1020, or Alert

Automatic Denials

Prospective Terminations to Occur as Early as 11/1/2022

Website, System Messaging, Social Media

Turn off continuous Medicaid

Application and H1020 have been received by all MR members

TF0001 Notice have been received by all members of MAGI/Special Group

TF0001 Notice have been received by all members of MAGI/Special Groups

TF0001 Notice with termination received by all non-MR members

PHE end Terms Begin

PHE Unwind Complete

TEXAS Health and Human Services
To address potential strain on the eligibility system during the unwinding period, HHSC has identified multiple strategies aimed at increasing workforce capacity and/or reducing workload on eligibility workers. These include:

- Augmenting the eligibility operations team with other staff to process certain case actions.
- Conducting job fairs in high retention areas and doing on-demand hiring to boost recruitment.
- Base salary increases for eligibility operations staff.
- Increasing staff efficiency and performance, while improving the client experience, by:
  - Allowing clerical staff to perform data entry tasks and assist with interview scheduling.
  - Prioritizing specific system changes that will result in faster processing times, including the automated scheduling of SNAP appointments and automation of certain manual eligibility staff alerts (i.e. MAGI).
Constraints

• The unwinding of continuous coverage is comparable in magnitude to the launch of the Affordable Care Act (ACA).
• The end date of the PHE is still uncertain.
• Additional guidance from CMS may require the need to revisit strategy, IT coding, and other preparations currently underway.
• Workforce challenges exist across the system that continue to impact planning efforts and preparation.
  • This includes hiring and retention of staff for contract partners, including call centers.
Next Steps

• Continue working with CMS to keep aligned with the latest federal guidance and requirements.

• Continue activities to increase workforce capacity and ensure the eligibility system is prepared for ending continuous coverage.

• Continue engaging with contract partners and external stakeholders to build awareness for HHSC plans to end continuous coverage and expectations for members when action is needed.
Additional Questions?

Contact Molly Lester at molly.lester@hhs.texas.gov
Ambassador Toolkit
Overview
HHSC Communications Plan for End of Continuous Enrollment

- HHSC’s unwinding approach includes a proactive multi-pronged communications campaign to help members, providers, health plans, and advocates prepare for the end of continuous enrollment.
- There is a lot of confusion on what actions members need to take now and in the future.
  - Members have not had to take action for two years to maintain Medicaid coverage.
  - High rate of returned mail.

First Phase – Pre-Continuous Coverage Ending

Second Phase – Continuous Coverage End Confirmed

Third Phase – Post-Continuous Coverage End
Ambassador Program

HHSC created the Ambassador Program for stakeholders, partners, providers, health plans, and advocates to support members and prepare for the end of continuous Medicaid coverage.
Ambassador Program
Key Messages

Key Messages – Actions Members Can Take Now

• Sign up for the YourTexasBenefits account and mobile app.
• Report any changes in contact information to ensure members receive important notices when needed.
• Return renewal packets or requests for information as soon as possible after they are received by the member.

These key messages aim to reduce member confusion, increase likelihood of eligible members maintaining coverage and minimize call center volume.
Ambassador Program Toolkit

The following items are included in the toolkit, and all items are in English and Spanish.

- FAQs
- Talking Points
- Flyers
- Social Media Graphics/Messages
Ambassador Program Toolkit (cont.)

Actions Ambassadors Can Take Now

• Download Ambassador Toolkit from https://www.hhs.texas.gov/services/health/coronavirus-covid-19/end-continuous-medicaid-coverage-ambassador-toolkit

• Share toolkit items with members in offices or electronically.

• Share toolkit items with other stakeholders to ensure consistent messaging.
DON’T WAIT — Respond and Update!

Update your information today.
Visit YourTexasBenefits.com or call 2-1-1 and select option 2.

Attention Medicaid recipients:
Have you moved, had a baby or changed jobs recently?
Make sure you update your contact information soon.
Visit YourTexasBenefits.com or call 2-1-1, option 2, to update your information.
Additional Questions?

Contact Rachel Shumaker at Rachel.Shumaker@hhs.texas.gov

THANK YOU!