Advancing Systems of Services Network Café Notes

Unwinding the COVID-19 Public Health Emergency (PHE) Medicaid Maintenance of Effort (MOE) Requirements

April 8, 2022

Key Discussion Questions
1. What activities could you consider to help ensure continuity of Medicaid coverage for CYSHCN in your state?
2. What partners might you work with to address the unwinding of the PHE in your state?
3. How can the Network and/or fellow CYSHCN program colleagues support you in these efforts?

Catalyst Center Presentation on Unwinding the COVID-19 Public Health Emergency (PHE) Medicaid MOE Requirements
- Speaker: Rebecca Bilodeau, Program Manager at the Catalyst Center
- Presentation slides can be found at the end of this document.
- Under the Families First Coronavirus Response Act, state Medicaid programs are eligible to receive an additional 6.2% federal match provided they meet specific maintenance of effort (MOE) requirements: Medicaid eligibility standards/methods/procedures can be no more restrictive than those in effect in 1/1/2020; states cannot increase premiums; states must provide continuous eligibility through the end of the month when PHE ends. COVID-19 Public Health Emergency has been extended to July 15, 2022.
- When the PHE ends, states will need to redetermine eligibility for over 80 million enrollees, including 37.3 million children.
- What State Title V programs can do:
  - Serve as trusted messengers for families
  - Leverage relationships with Medicaid to elevate the needs of CYSHCN
  - Collaborate with priority partners (e.g., departments of health, behavioral health, education, social services, child welfare, housing, and SNAP/WIC)

State Experiences and Discussion
- States are required by CMS to develop and submit a plan for the unwinding/redetermination process (see the Guidance on Unwinding and Returning to Regular Operations after COVID-19 linked in the Resources Shared box below).
- CMS created a Communications Toolkit (see the Resources Shared box below) that can be used to help inform CYSHCN about steps to take to renew their Medicaid coverage.
- States could encourage Medicaid to deprioritize high risk populations like CYSHCN for the redetermination process, although one state shared that when they made this...
suggestion, they were told that prioritizing or deprioritizing any population would be viewed as an unequitable approach.

- States can also highlight the cost burden if CYSHCN populations lose Medicaid and have to rely on state-only Title V funding.
- Care coordinators and care managers can play a huge role in helping families with the redetermination process.
- Other partners to think about include children's hospitals, which have a strong incentive to make sure children/families remain enrolled; state AAP chapters; Title XXI agencies; family/disability organizations; parent navigators; marketplace navigators; and state protection and advocacy agencies.
- Important to convey to families about the importance of gathering needed documentation requirements for Medicaid renewals.

### Resources Shared


- CMS:


WELCOME
Zoom – Thank You for Using Your WebCam and Muting Your Line
Unwinding the COVID-19 Public Health Emergency (PHE) Medicaid MOE Requirements

- Under the Families First Coronavirus Response act, state Medicaid programs are eligible to receive an additional 6.2 federal funding match provided they meet specific requirements.

- Maintenance of effort requirements include:
  - Medicaid eligibility standards, methodologies, and procedures are no more restrictive than those in effect on January 1, 2020
  - States cannot increase premiums above those in place on January 1, 2020
  - State Medicaid programs must provide continuous eligibility through the end of the month in which the PHE ends for those enrolled as of March 18, 2020, or at any time thereafter during the PHE period
Unwinding the COVID-19 Public Health Emergency (PHE) Medicaid MOE Timeline

- PHE in effect through at least April 16, 2022
  - Last renewed January 14, 2022
  - Effective for 90 days each time it is renewed

- Federal Administration has previously indicated that it would give a 60-day notice to states before the end of the PHE
  - 60-days prior to April 16 would have been February 15; since the administration did not give notice in February, we assume the PHE will be extended in April 2022

- If extended, the PHE would next expire on July 15, 2022
## Pending Key Dates

<table>
<thead>
<tr>
<th>Medicaid and CHIP 1135 Emergency Waivers</th>
<th>End of PHE</th>
<th>July 15, 2022</th>
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<tbody>
<tr>
<td>Medicaid Disaster SPAs</td>
<td>End of PHE or earlier date selected by the state</td>
<td>July 15, 2022</td>
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<tr>
<td>CHIP Disaster SPAs</td>
<td>End of PHE or date selected by the state (can be later if state has later state declared emergency)</td>
<td>July 15, 2022</td>
</tr>
<tr>
<td>PHE-related Section 1115 Demonstrations</td>
<td>No later than 60 days after the end of the PHE</td>
<td>September 13, 2022</td>
</tr>
<tr>
<td>MAGI Verification Plan Addendum</td>
<td>Date selected by the state</td>
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</tr>
<tr>
<td>MOE Continuous Eligibility Provision</td>
<td>End of the month in which the PHE ends</td>
<td>July 31, 2022</td>
</tr>
<tr>
<td>FMAP Bump</td>
<td>End of quarter in which the PHE ends</td>
<td>September 30, 2022</td>
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</tbody>
</table>
Implications of the Unwinding for CYSHCN

• When the PHE ends, state Medicaid agencies will need to redetermine eligibility for over 80 million enrollees, including 37.3 million children.

• Some will no longer be eligible due to income

• Concern that children and families may lose coverage inappropriately due to administrative reasons
Current CMS Guidance – Selected Guidance

- States must develop an unwinding operational plan

- 12-month unwinding period
  - In compliance if all renewals have been initiated by the end of the last month of the unwinding period, AND
  - They have completed all necessary action by the end of the 14th month after the end of the PHE

- Risk-based approach for prioritizing pending renewals, changes in circumstances, and post-enrollment verifications

- Initiate no more than 1/9th of the state’s total caseload in a given month
12 Month Unwinding Timeline – CMS Guidance
Issued March 3, 2022

Option A: State begins 12-month unwinding period two months prior to the end of the PHE

Month 1: Begin initiating unwinding-related renewals

Month 12: Last month to initiate unwinding-related renewals

Month 14: Last month to complete all unwinding-related E&E actions

Option B: State begins 12-month unwinding period one month prior to the end of the PHE

Month 1: Begin initiating unwinding-related renewals

Month 12: Last month to initiate unwinding-related renewals

Month 14: Last month to complete all unwinding-related E&E actions

Option C: State begins 12-month unwinding period the month after the PHE ends

Month 1: Begin initiating unwinding-related renewals

Month 12: Last month to initiate unwinding-related renewals

Month 14: Last month to complete all unwinding-related E&E actions
What state Title V programs can do:

- Serve as trusted messengers for families
- Leverage relationships with Medicaid to elevate the needs of CYSHCN
- Partner with external stakeholders
- What other roles are there for Title V?
CMS Communications Toolkit

**Renewals are coming back!**
Check that your state Medicaid office has your current mailing address.

**Don’t miss this letter.**
Check that your state Medicaid office has your current mailing address.

**Have Medicaid coverage?**
Your renewal letter is coming.
Check that your state Medicaid office has your current mailing address.
Discussion Questions

▪ What activities could you consider to help ensure continuity of Medicaid coverage for CYSHCN in your state?

▪ What partners might you work with to address the unwinding of the PHE in your state?

▪ How can the Network and/or fellow CYSHCN program colleagues support you in these efforts?
CYSHCN Café Evaluation Survey

- Use the link in the chat or scan the QR code on the screen with your phone’s camera.

- Notes from the CYSHCN Cafés are available at https://medicalhomeinfo.aap.org/national-state-initiatives/Pages/Network-Information.aspx

- Questions/TA requests?
  Email us: cyshcnetwork@aap.org
  We are here to help.

Next Café
June 10, 2022