

# Unwinding from Medicaid Continuous Coverage

March 2023

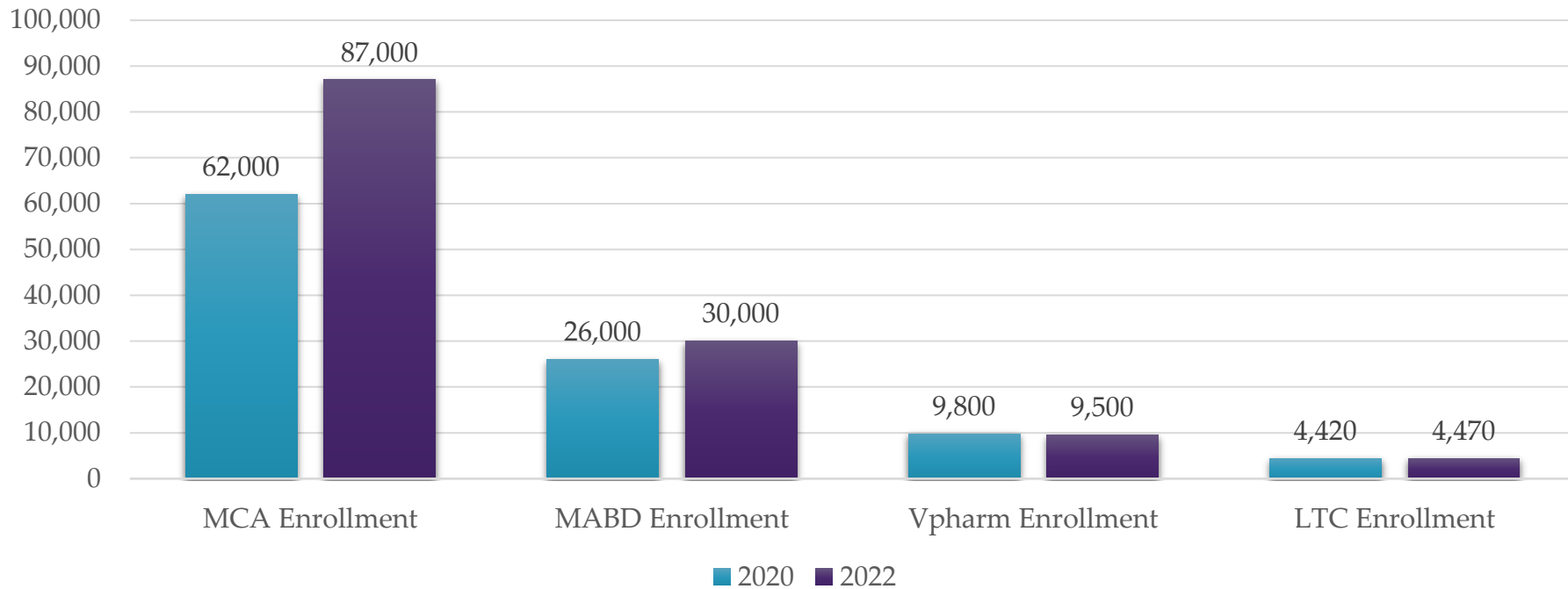
- Medicaid Continuous Coverage Overview
- General Unwind Requirements from CMS
- State of Vermont's Goals
- Vermont Renewal Schedule
- Areas of focus:
  - System Readiness (Process & Policy)
  - Compliance
  - Communications
- References

- CMS: Centers for Medicare and Medicaid Services
- FPL: Federal Poverty Level
- MCA: Medicaid for Children and Adults (MAGI)
- MABD: Medicaid for the Aged, Blind and Disabled (non-MAGI)
- LTC: Long Term Care Medicaid
- PHE: Public Health Emergency
- QHP: Qualified Health Plan
- SOV: State of Vermont
- VHC: Vermont Health Connect

- Became law March 18, 2020
- FFCRA required continuous Medicaid enrollment, with certain exceptions, through the end of the month in which the federally declared Public Health Emergency (PHE) ends
- This is a condition of receiving enhanced 6.2% Federal Medical Assistance Percentage (FMAP) during the PHE
- Congress put this measure in place in 2020 to support states with increased caseload during the pandemic

- Became law December 29, 2022
- Decouples Medicaid continuous coverage from Public Health Emergency
- Continuous coverage requirement ends as of April 2023, *even if* the federal government continues to extend the COVID-19 Public Health Emergency
- Creates a phase-down of the FFCRA enhanced FMAP
- Codifies other federal requirements for the end of Medicaid continuous coverage

### Enrollment Numbers (Households)



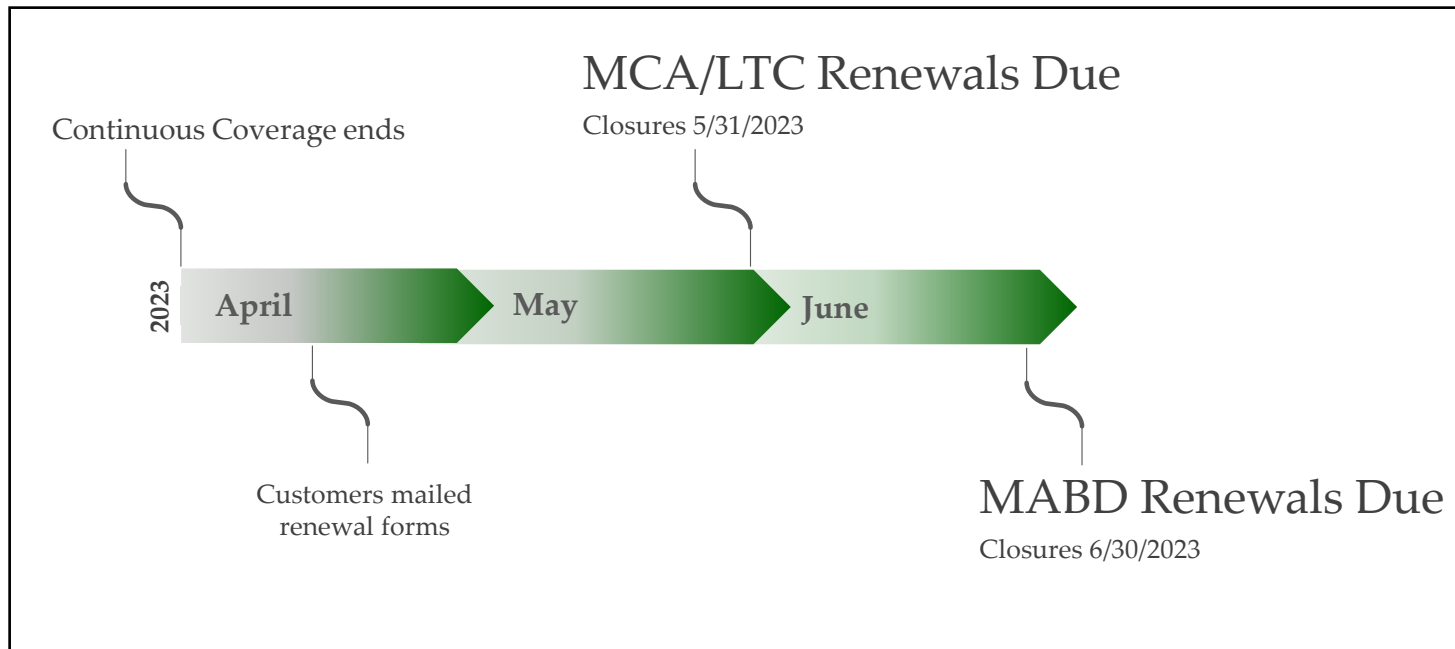
# **General Requirements from CMS**

- CMS has issued guidance about “unwinding” from Medicaid continuous coverage
- The unwind period begins when a state initiates renewals that could result in termination
  - States have 12 months to initiate renewals of total caseload
  - States have 14 months to complete required renewals
- Guidance limits monthly renewal processing to 1/9 of the population and encourages even distribution throughout the unwind period
- CMS will monitor states’ progress through regular reporting



## ❖ Renewals

- All renewals need to be initiated by the 12<sup>th</sup> month of the unwind
  - Initiated = automatic (ex parte) renewal process has begun
- Last renewal batch is completed by the 14<sup>th</sup> month of the unwind



Population to be spread out over 12 months to establish manageable monthly renewal volume for subsequent years.

## ❖ Pending Applications

- Applications must be processed in a timely manner following the end of continuous coverage and during the unwind period.
- Pending applications received during the PHE\* will be addressed in conjunction with the end of the continuous coverage requirement.
  - Includes verification processes with documentation requirements.
  - Note that this could result in closure in April (prior to commencement of renewal-based closures).

\*For the remainder of this presentation, PHE refers to the COVID-19 Public Health Emergency period prior to the unwind from Medicaid continuous coverage.

# **State of Vermont's Goals for Unwind Planning**

- Maintain Vermont's high insured rate
- Keep eligible individuals enrolled in Medicaid and reduce churn
- Help Vermonters stay covered by facilitating marketplace transitions
- Achieve a sustainable renewal schedule
- Maintain stable operations
- Meet federal expectations

Although the guiding principle is to maintain coverage for Vermonters, DVHA does anticipate coverage losses associated with unwinding from the Medicaid continuous coverage requirement.

- Automatic (ex parte) renewal rate is expected to be around 40%
- 60% of Medicaid enrollees will have to submit information as part of their renewal
- Out of date contact information could disrupt this outreach
- Normal churn with other programs
- Terminations will take place throughout the unwinding period.
- Terminated customers can reapply for Medicaid or QHP/marketplace coverage.

# **Vermont Renewal Schedule**

- All beneficiaries will have eligibility redetermined over the 12 month unwinding period.
- Population spread over 12 months to establish a manageable workload for subsequent renewal years.
- Certain subpopulations prioritized for renewal outreach based on eligibility factors.
- Long Term Care Medicaid enrollees will generally have the same renewal month they had prior to the Medicaid continuous coverage requirement.

Total population ~200,000 members

## Planned Renewal Volume per month (households)

	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
MCA*	7500	7500	7500	7500	7500	7500	7500	7500	7500	7500	7500	7500
MABD*	2600	2600	2600	2600	2600	2600	2600	2600	2600	2600	2600	2600
LTC*	375	375	375	375	375	375	375	375	375	375	375	375
VPharm**	800	800	800	800	800	800	800	800	800	800	800	800

\* Monthly volume displayed is in households or "cases", total enrolled population is higher (individuals)

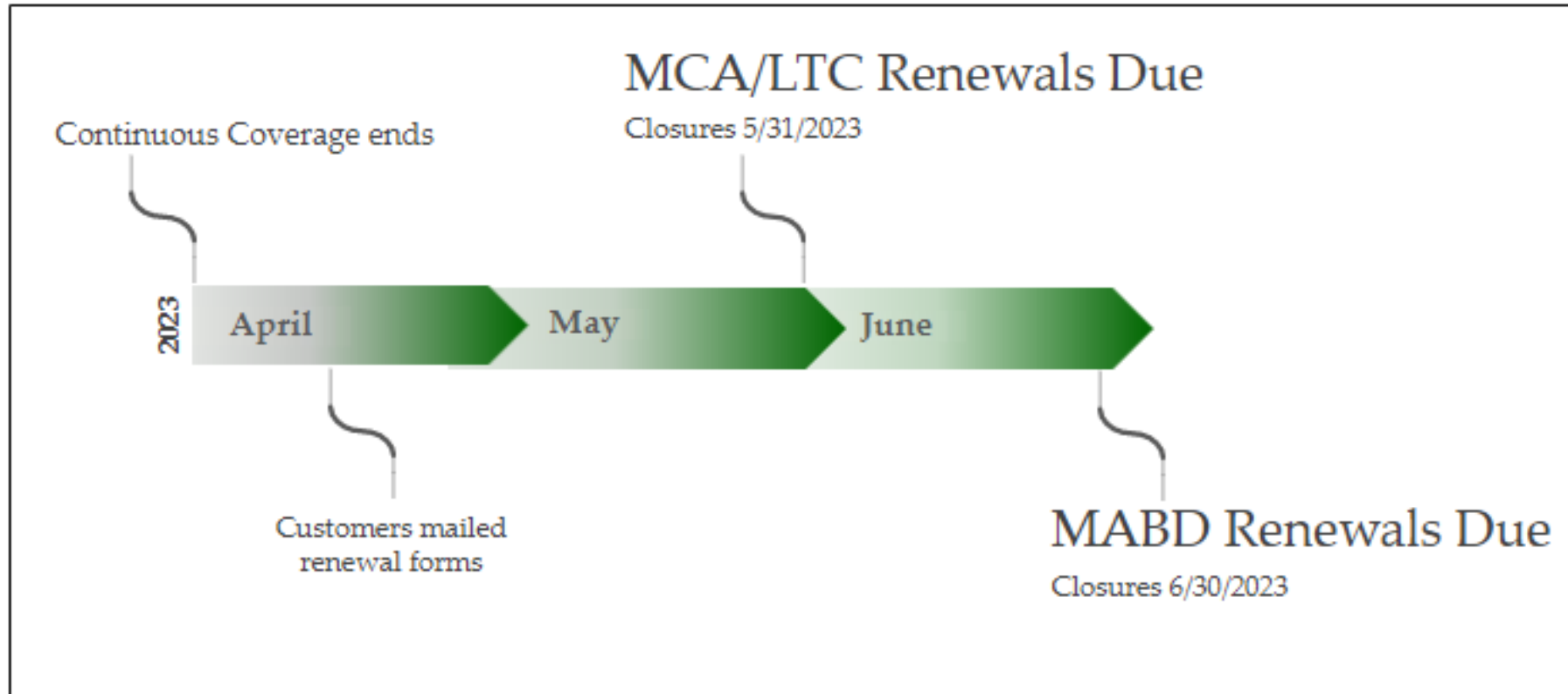
\*\* VPharm monthly renewal volume is not included in total population members

Numbers are approximate to illustrate scale; not all cases require a renewal



- First month of unwind:
  - Renewal notices sent in April
  - Reminder notices sent in May
  - If no response, termination effective May 31, 2023

Process will continue on a monthly basis.



## Prioritization in first quarter

- Those who reported changes during the PHE\* making them ineligible for Medicaid
- Those who became ineligible during the PHE due to critical events (ie turning 19, 65)
- Certain medically needy enrollees with spenddowns
- Additional eligibility processes

Every month will also include an ex parte renewal population to establish even renewal volume for subsequent years.

\*PHE refers to the COVID-19 Public Health Emergency period prior to the unwind from Medicaid continuous coverage.

## Special handling during unwind period

- New applicants during the last year of the PHE: scheduled for renewal at 12 months
- Critical events: time renewal with critical event that changes eligibility (ie turning 19)
- Pregnancy: no renewal until after 12 months post-partum

## Maintain coverage until later in the unwind period

- Children in custody
- Medicaid for working people with disabilities

Every month will also include an ex parte renewal population to establish even renewal volume for subsequent years.

- Transitions
  - Population that could transition to another program will be screened for that program through a streamlined process. Example: MCA (MAGI) --> MABD (non-MAGI)
- Verifications
  - To be processed in conjunction with application or renewal

Note: Some verifications have been processed during the PHE; applications pending post-enrollment verification could result in closure in April, prior to commencement of renewal-based closures.

- Changes of circumstance
  - Pending changes reported during the PHE will be processed during the unwind period in conjunction with renewal.
  - Changes reported during unwind will be processed if member has had a renewal/eligibility determination in past 12 months.
- Returned mail
  - Members who have no known address will not be closed until they have been outreached multiple times. This could result in closure in April, prior to commencement of renewal-based closures.

# Areas of Focus for Unwind Planning

**System Readiness (Process & Policy)**

**Compliance**

**Communications**

# **System Readiness (Process & Policy)**



- **Renewals:**

- Use of federal data services hub to anticipate eligibility status and spread renewal populations
- Use of additional data sources to minimize required documentation
- Expand threshold for income inconsistencies
- Updated MABD renewal processes
- Use of VT 3Squares data

- **Coverage Transitions:**

- Special enrollment period
- Online MABD application

- **Transition to QHP/Marketplace Coverage:**
  - Vermont has an integrated exchange (Vermont Health Connect), processes Medicaid and QHP eligibility in one system
  - Loss of Medicaid is a qualifying event to come into marketplace coverage
  - During the unwind, this is interpreted broadly so that any type of Medicaid loss triggers an enrollment opportunity
  - DVHA has implemented a new continuous enrollment opportunity for individuals up to 200% FPL
  - Marketplace coverage affordability improved by expanded federal subsidies through 2025

- Income-based marketplace enrollment opportunity (launched July 2022)
- Medicaid post-partum coverage period extension to 12 months (Medicaid State Plan amendment for March 2023)
- Dr. Dynasaur (Medicaid for children) premium suspension through the unwind period (suspended since spring 2020)

**DVHA has obtained the following 1902(e)(14)(A) waivers from CMS to facilitate the unwind process:**

- Medicaid renewal for individuals based upon Supplemental Nutrition Assistance Program (SNAP/3Squares) eligibility
- Use of SNAP/3Squares eligibility data for application processing
- Ex parte renewal for individuals verified to have no income and no additional income data returned from electronic data sources
- Facilitating renewal for individuals with no asset verification system data returned within a reasonable timeframe
- Use of the United States Postal Service returned mail and change of address database to update beneficiary contact information
- Flexibility on pursuit of unearned income

# Compliance

- CMS requires monthly submissions of application and renewal data showing unwind progress.
- Congress expanded reporting requirements to include data about call center performance and marketplace enrollment.
- CMS will not consider eligibility and enrollment actions that are delayed due to the PHE as untimely for purposes of the Payment Error Rate Measurement (PERM) or Medicaid Eligibility Quality Control (MEQC) Programs audit programs if actions are consistent with CMS unwinding guidance.

## Snapshot of Unwinding Data Report

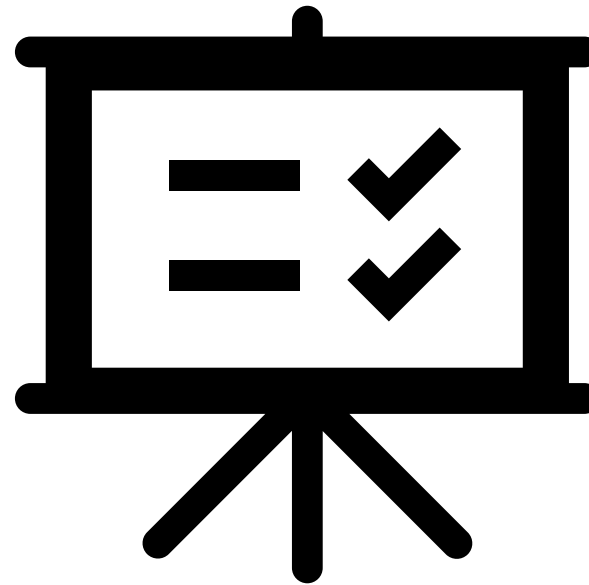
RENEWALS INITIATED	NUMBER	STATE NOTES/ADDITIONAL INFORMATION ABOUT THE DATA
<b>4. Total beneficiaries for whom a renewal was initiated in the reporting period</b>		
RENEWALS AND OUTCOMES	NUMBER	STATE NOTES/ADDITIONAL INFORMATION ABOUT THE DATA
<b>5. Total beneficiaries due for renewal in the reporting period (5a+5b+5c+5d)</b>		
5a. Of the beneficiaries included in Metric 5, the number renewed and retained in Medicaid or CHIP (those who remained enrolled) [5a(1) + 5a(2)]		
5a(1) Number of beneficiaries renewed on an <i>ex parte</i> basis		
5a(2) Number of beneficiaries renewed using a pre-populated renewal form		
5b. Of the beneficiaries included in Metric 5, the number determined ineligible for Medicaid or CHIP (and transferred to Marketplace)		
5c. Of the beneficiaries included in Metric 5, the number terminated for procedural reasons (i.e. failure to respond)		
5d. Of the beneficiaries included in Metric 5, the number whose renewal was not completed		
<b>6. Month in which renewals due in the reporting month were initiated</b>		
<b>7. Number of beneficiaries due for a renewal since the beginning of the state's unwinding period whose renewal has not yet been completed</b>		

- Beneficiaries have the right to request a Medicaid fair hearing on an eligibility determination and the right to continue to receive benefits pending the fair hearing decision.
- In anticipation of a large volume of fair hearing requests during the unwind period, DVHA:
  - Is working with the Human Services Board on the expected volume of cases.
  - Has an internal process to review requests for faster, informal resolution.



# Communications

- Update contact info
- Open mail
- Encourage customer contact
- Knowledge of options
- Understand timing



Having updated contact information is fundamental to the unwind process. Vermont's procedures for making sure our contact information is up-to-date include:

- Direct outreach
  - Text message campaign to all enrollees asking for updates to contact information
  - Phone outreach to enrollees following USPS returned mail with no forwarding address
- General outreach
  - Website
  - VHC social media
  - Stakeholders and community partners
- Reliable external sources
  - USPS
  - Economic benefits (ie SNAP) records
  - Assister network (includes certified provider staff, community organizations)
  - Authorized representatives

Contact information campaign to continue throughout unwind period

- Reminders to update contact information will be included in most notices.
- Quarterly post cards mailed to upcoming renewal populations alerting them of upcoming mail expectations and asking for correct addresses, phone numbers and emails.
- Multiple modalities to address returned mail prior to closure.

- **Completed/Planned:**

- Updating contact information
  - Enhanced returned mail review process
  - Call center verifying and updating contact information
- Member noticing
  - Post card/flyer to members before processing renewals during unwind
  - Special envelope
- Stakeholder engagement planning
  - Social media
  - Stakeholder newsletters
  - Townhalls
- Texting platform
  - Use of texting to remind members to update their contact information and to respond to renewal notices

# Communication Methods and Timeline

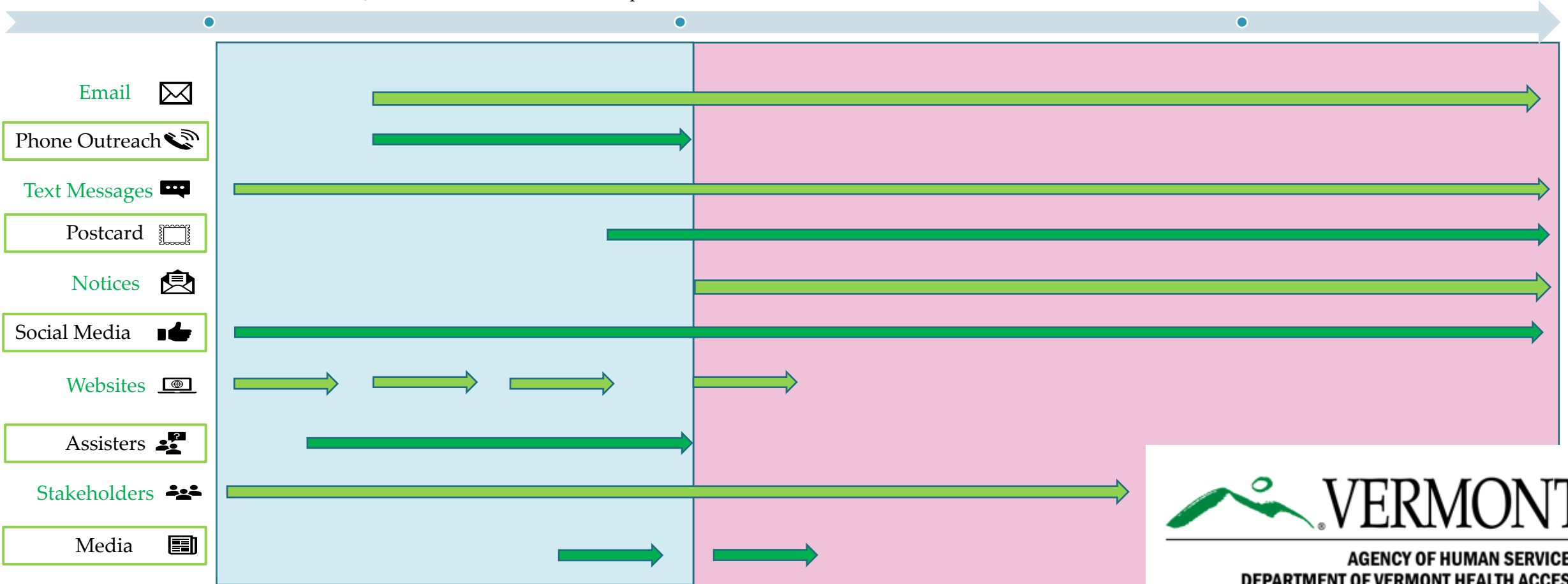
A) Prepare: update contact info, change happening soon, open mail


B) Action (identify options)

January 2023

April 2023 First Renewal Notices

2024




**VERMONT HEALTH CONNECT**  
DVHAVHC1  
Vermont Health Connect  
280 State Drive  
Waterbury, VT 05671-8100

**Important Renewal Notice**

PRESORTED  
FIRST CLASS MAIL  
U.S. POSTAGE PAID  
MONTPELIER, VT  
PERMIT #212

**Action Needed**  
Health Care Information Enclosed

**GreenMountainCare**  
A HEALTHIER STATE OF LIVING

**Important Review Notice**

DCFP11  
Department of Vermont Health Access  
Application and Document Processing Center  
280 State Drive  
Waterbury, VT 05671-1500

PRESORTED  
FIRST CLASS MAIL  
U.S. POSTAGE PAID  
MONTPELIER, VT  
PERMIT #212

**Action Needed**  
Health Care Information Enclosed

**Vermont Health Care Information**  
**Open Right Away**



**Act to keep your health coverage**

**Watch your mail!**

Do you have health coverage from Vermont Health Connect or Green Mountain Care? Look for the envelope with the **red stripe**. It has important information that affects your health coverage! Read it carefully and answer.

Did you get this envelope? If not, find out more on our website.

**VERMONT**  
AGENCY OF HUMAN SERVICES  
DEPARTMENT OF VERMONT HEALTH ACCESS

**VERMONT**  
State of Vermont  
Department of Health Access  
280 State Drive  
Waterbury, VT 05671

**What to do NOW:** See if we have your correct address, phone number and email. Is it wrong? Log into your Vermont Health Connect account. Or call us at 1-855-899-9600.

**What to do LATER:** Carefully read the notice we send you! It will tell you what is changing with your health insurance. It will tell you what you need to do next. Questions? Call us or ask for in-person help from an Assister.

For more information:  
[dvha.vermont.gov/unwinding](http://dvha.vermont.gov/unwinding)  
or call 1-855-899-9600

- **Audience:** All Medicaid households
- **Timing:** Prior to renewal notice



- Design modeled using CMS suggestions and striped envelope
- SOV color palette
- Consistent language



Medicaid Renewals to restart in 2023! Act to keep your health coverage

## Don't miss this letter!

Check to make sure we have your current address. We want to make sure you get important information about how your health insurance may be affected.



#StayInsuredVT

Medicaid Renewals to restart in 2023! Act to keep your health coverage.

## DON'T MISS THIS LETTER

Read the notice carefully! Instructions include what changes you can expect to your health coverage and any actions you need to take.



#StayInsuredVT



- Vermont Communications Toolkit for Medicaid Renewal Process  
<https://dvha.vermont.gov/unwinding/communications-toolkit>
- Toolkit consists of:
  - A Medicaid Renewal Overview and Sample Articles
  - Medicaid Renewal Posters and Flyers
  - Sample social media posts
  - Virtual Town Hall presentation
  - More about Health Insurance

# References

## CMS:

- [Unwinding and Returning to Regular Operations after COVID-19 | Medicaid](#)
- [State Health Official Letter # 22-001](#)
- [COVID-19 PHE Unwinding Section 1902\(e\)\(14\)\(A\) Waiver Approvals | Medicaid](#)

## DVHA:

- [Health Insurance Maps | Department of Vermont Health Access](#)
- [Medicaid Renewals to restart in 2023 | Department of Vermont Health Access](#)

# **Addendum**

## **Fall 2023**

**DVHA obtained the following additional 1902(e)(14)(A) waivers from CMS to facilitate the unwind process:**

- Ex parte renewal for individuals with income at or below 100% of FPL and no additional income data returned from electronic data sources
- Waiving the recording of the telephonic signature from the beneficiary for those receiving long-term care in an institution as well as those receiving home- and community-based services (HCBS) – effective 8/1/2023
- Renew eligibility for individuals with stable income - Title II Social Security income and pension or retirement income – effective 10/1/2023
- Renew and maintain eligibility without regard to the asset test for non-MAGI beneficiaries subject to an asset test – effective 10/1/2023
  - Asset test waiver does not include beneficiaries subject to a spenddown and those receiving long-term services and supports.

- Federal compliance areas of focus during unwind period:
  - Modalities for renewal submission
    - Future project to build online renewal for MABD
  - Procedural termination rates
    - See Vermont's numerous waivers and enhancements to automatic (ex parte) renewal process
  - Ex parte renewal on an individual basis
    - System enhancement so members eligible for automatic (ex parte) renewal do not lose coverage based on their household's renewal response
- Due to compliance efforts and state-specific circumstances including Vermont's flooding, discussions are taking place about extending the duration of the unwind period beyond the 12-14 month framework

- Monthly data submissions and dashboards posted here: [Renewal Dashboards | Department of Vermont Health Access](#)

