

# Pandemic-Related Medicaid Continuous Coverage Requirement is Ending: *Challenges and Opportunities in Miami Dade County*

Miriam Harmatz,  
Advocacy Director,  
Florida Health Justice Project

March 7, 2023



# Florida Health Justice Project

<https://www.floridahealthjustice.org/>

- **Mission:** Expand health care access and promote health equity for vulnerable Floridians.
- **How we work:** Use every tool in the “advocate's tool kit”
  - Advocacy and education
    - Enforcement actions, including [litigation](#) to secure health care rights
    - [Policy briefs](#), talking points, public comments
    - Consumer: [Know Your Rights](#) handouts and [videos](#)
  - Secure health care rights through systemic [litigation](#).
  - Increase the capacity of the advocacy community
    - Publish [advocate guides](#)
    - [Trainings](#) & technical assistance
  - [Elevate voices](#) of individual Floridians facing healthcare access barriers
- **Collaboration with partners on major health access issues, e.g., end of the continuous Medicaid coverage requirement**

# Presentation Overview

- **Background of Medicaid Continuous Coverage Requirement**
- **DCF Unwind plan & timeline**
- **Issues**
- **Impact in MDC: Over 200,000 likely to lose Medicaid**
- **Challenges and opportunities**
- **How navigators can help ensure coverage and improve Medicaid**

# Background of Medicaid Continuous Coverage Requirement

- **Families First Coronavirus Response Act, March 2020**
  - States receive 6.2% increase in federal Medicaid matching funds
  - No disenrollment during public health emergency (PHE)
- **Federal Consolidated Appropriations Act, January 2023**
  - Delinked continuous coverage from PHE and gave date end date: 3-31-23
  - To continue receiving the enhanced Medicaid matching rate, states must:
    - Follow federal Medicaid eligibility requirements
    - Attempt to ensure updated beneficiary contact information
    - Make a good faith effort to contact current enrollees by using more than one modality (e.g., hard copy letter and text message)

# DCF Plan

## Florida's **MEDICAID** REDETERMINATION PLAN

### BACKGROUND

Medicaid is health coverage option for low-income individuals and families. Due to the federal **Public Health Emergency**, the **Department of Children and Families** (Department), as required by the federal government, implemented processes to maintain Medicaid coverage for individuals, regardless of their financial eligibility. This resulted in the number of Medicaid recipients growing from 3.8 million to 5.5 million. In Florida, the Department determines **eligibility** for Medicaid, while the **Agency for Health Care Administration** administers the **Medicaid program**.

*Once the continuous coverage requirement ends, the Department will return to the standard Medicaid review process, which ensures eligible recipients will continue to remain enrolled.*

### PLAN OBJECTIVES



**Ensure** continuity of Medicaid coverage for eligible individuals while promoting the availability of alternative health insurance providers.



**Prioritize** exceptional customer service through strong communication and community collaboration.



**Leverage** technology and operational efficiencies while being compliant with federal guidance.

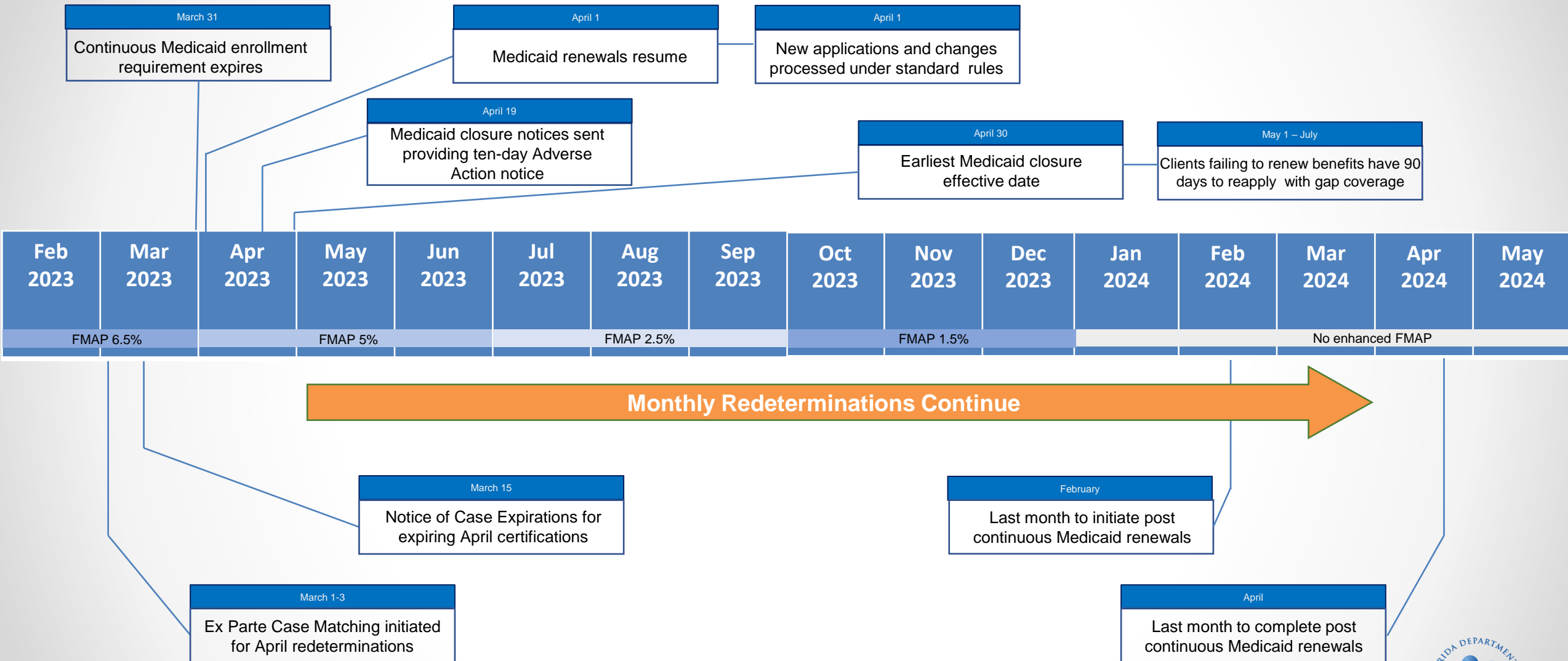
### FLORIDA'S PLAN SUMMARY

- **Increase efficiency** by **aligning public benefit cases** over a 12-month period.
- **Enhance customer service** by **reducing paperwork**.
- **Meet federal regulatory requirements** while **prioritizing Florida's families**.
- **Maximize technology** and **automation** to **enhance processes** and communication to recipients.
- **Automatic review** for recipients to determine Medicaid eligibility. If Medicaid cannot be automatically renewed, **recipients will receive a notice 45 days prior to their renewal date** with instructions on how to complete the renewal process.

### FLORIDA WINS

- Technology enhancements and **automation implemented** to help process cases faster.
- **Utilization of technology** to communicate to recipients via email, text messaging and mail.
- More than **92% of our recipients enroll online**.
- Automatic partner referrals to organizations like **Florida Healthy Kids** and other **subsidized programs**.
- **Clear and robust communication** to recipients, partners and stakeholders.

# Florida's Medicaid Redetermination Operations



# Notice of Eligibility Review

State of Florida

Department of Children and  
Families

- Notice of Eligibility Review



# Notice of Eligibility Review

ACCESS CENTRAL MAIL CENTER  
P.O. BOX 1770  
OCALA FL 34478

Notice of Eligibility Review  
State of Florida  
Department of Children and Families



December 16, 2019

Case: 5003425023

Phone: (866) 762-2237

RAP MOM  
1940 N MONROE  
TALLAHASSEE FL 32399

Dear Rap Mom,

The following is information about your eligibility.

It is time to review your case to find out if your household is still eligible for Medicaid and/or Medically Needy.

You or your authorized representative must reapply to keep getting Medicaid and/or stay enrolled in Medically Needy without a break. If you have completed a review or returned an interim contact form within the last 30 days, you do not need to reapply now.



# Issues with Termination Notice

- Current issues:
  - Reason(s) for termination for individual family member not clear
    - E.g., unclear reason for termination is failure to renew or ineligible and what to do
    - Information on contact to legal aid incorrect
- New draft
  - FHJP comments (<https://www.floridahealthjustice.org/publications--media/florida-health-justice-projects-comments-regarding-dcf-draft-termination-notice>)
- Current DCF Notices:
  - For more information on termination notice and other notices see, Memo on DCF notices [Department of Children and Families \(DCF\) Notices](#)

# Enrollment Impact due to Continuous Coverage (Miami Dade County)

- **Total Enrollment increase from March 2020 to January 2023**

343,835 increase (52% increase)

- **Parent /Caregiver increase:**

209,896 (303% increase)

- **Children 0-18:**

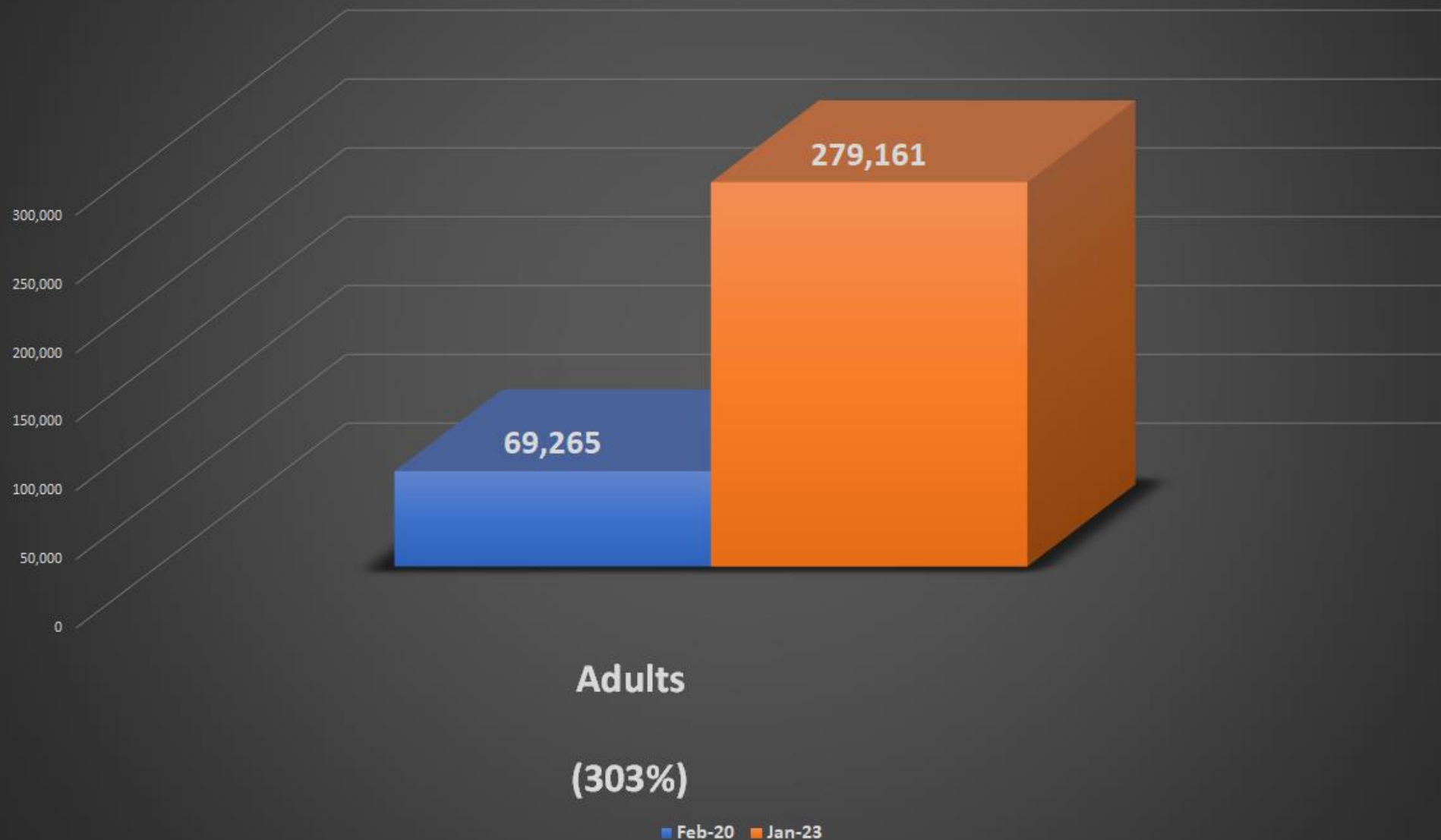
64,916 (22.0% increase)

- **Youth 19-20:**

25,624 (290% increase)

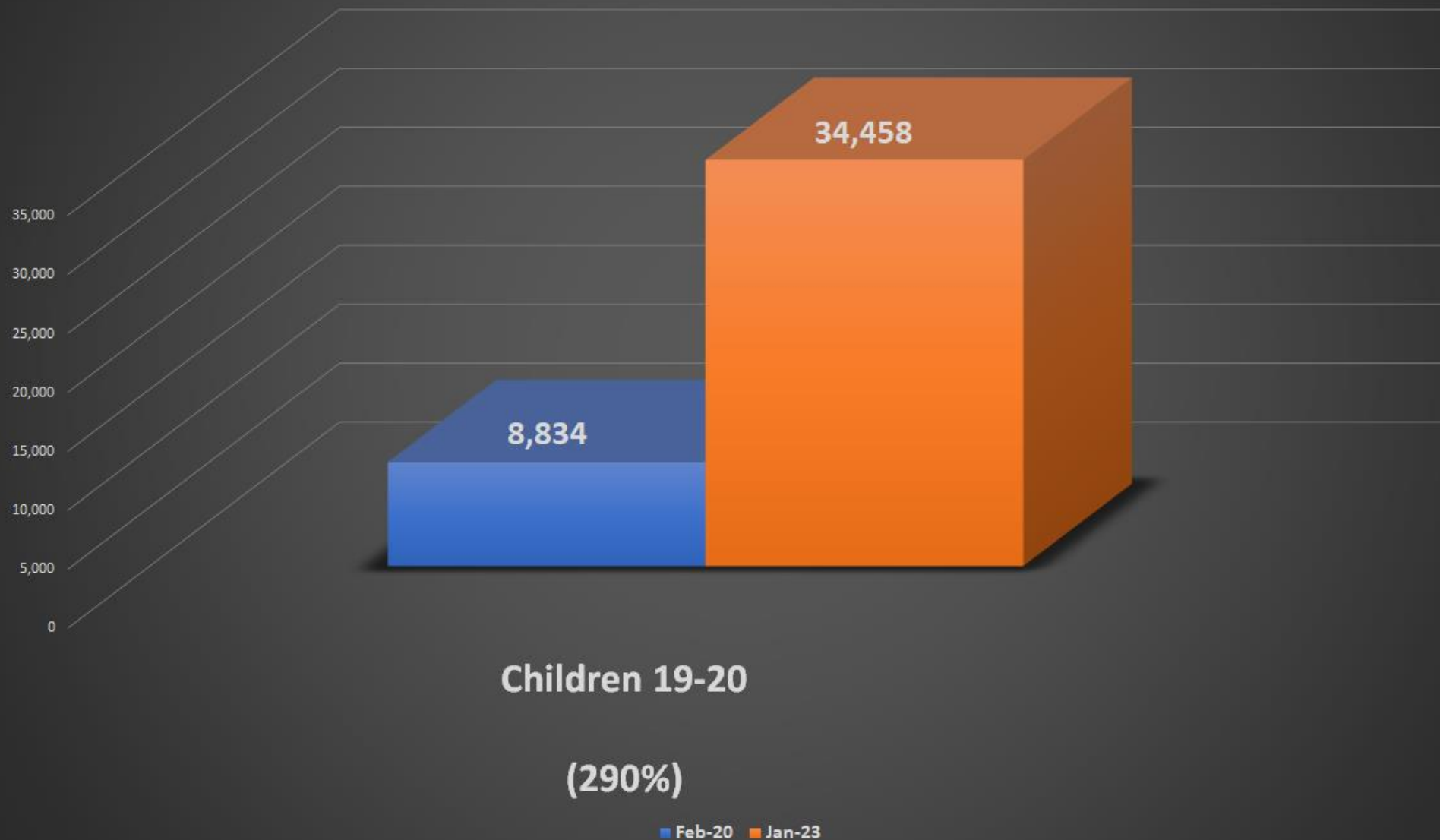
# Medicaid Enrollment Increase in Miami-Dade

## March 2020 - January 2023



# Medicaid Enrollment Increase in Miami-Dade

## March 2020 - January 2023



---

# PREPARING FOR THE PUBLIC HEALTH EMERGENCY'S “UNWIND” OF CONTINUOUS MEDICAID COVERAGE

---

The Impact on Florida Parents and Caregivers

July 2022



FLORIDA HEALTH  
JUSTICE PROJECT

Family Related Medicaid Income Limits												
Family	100%	Adults		Pregnant Women		Infants		Children			MNIL	MAGI Disregard (5% of 100% FPL)
Size	FPL			Including PEPW		< 1		1 through 5		6 through 18 *See Note Below		
		Parents, Caretakers, Children 19 & 20	Standard Disregard	185% FPL	Standard Disregard	200% FPL	Standard Disregard	133% FPL	Standard Disregard	133% FPL	** See Note Below	*** See Note Below
1	1,133	180	109	2,096	68	2,265	68	1,507	79	1,507	289	57
2	1,526	241	146	2,823	92	3,052	92	2,030	107	2,030	387	78
3	1,920	303	183	3,551	115	3,839	115	2,553	134	2,553	486	96
4	2,313	364	221	4,279	139	4,625	139	3,076	162	3,076	585	116
5	2,706	426	258	5,006	162	5,412	162	3,599	189	3,599	684	135
6	3,100	487	296	5,734	186	6,199	186	4,122	217	4,122	783	155
7	3,493	549	333	6,462	210	6,985	210	4,646	245	4,646	882	175
8	3,886	610	371	7,189	233	7,772	233	5,169	272	5,169	981	194
9	4,280	671	408	7,917	257	8,559	257	5,692	300	5,692	1079	214
10	4,673	733	446	8,645	280	9,345	280	6,215	327	6,215	1179	234
11	5,066	795	484	9,372	304	10,132	304	6,738	355	6,738	1279	253
12	5,460	857	522	10,100	328	10,919	328	7,261	382	7,261	1379	273
13	5,853	919	560	10,828	351	11,705	351	7,784	410	7,784	1479	293
14	6,246	981	598	11,555	375	12,492	375	8,307	437	8,307	1579	312
15	6,640	1,043	636	12,283	398	13,279	398	8,831	465	8,831	1,679	332
16	7,033	1,105	674	13,011	422	14,065	422	9,354	492	9,354	1,779	352
17	7,426	1,167	712	13,738	446	14,852	446	9,877	520	9,877	1,879	371
18	7,820	1,229	750	14,466	469	15,639	469	10,400	547	10,400	1,979	391
19	8,213	1,291	788	15,194	493	16,425	493	10,923	575	10,923	2,079	411
20	8,606	1,353	826	15,921	516	17,212	516	11,446	602	11,446	2,179	430
21	9,000	1,415	864	16,649	540	17,999	540	11,969	630	11,969	2,279	450
22	9,393	1,477	902	17,377	564	18,785	564	12,493	658	12,493	2,379	470
23	9,786	1,539	940	18,104	587	19,572	587	13,016	685	13,016	2,479	489
24	10,180	1,601	978	18,832	611	20,359	611	13,539	713	13,539	2,579	509
Additional Person	+ 394	+ 62		+ 728		+ 787		+ 524		+ 524	+ 100	
Effective Date	April 2022	April 1992		April 2022	April 2022	April 2022	April 2022	April 2022	April 2022	April 2022	January 2014	April 2022



\$303

+183

+96

---

= \$582

- Base Amount
- Plus Standard Disregard
- Plus MAGI Disregard

Zoe will **no longer** be eligible for Medicaid once the continuous coverage requirement ends.

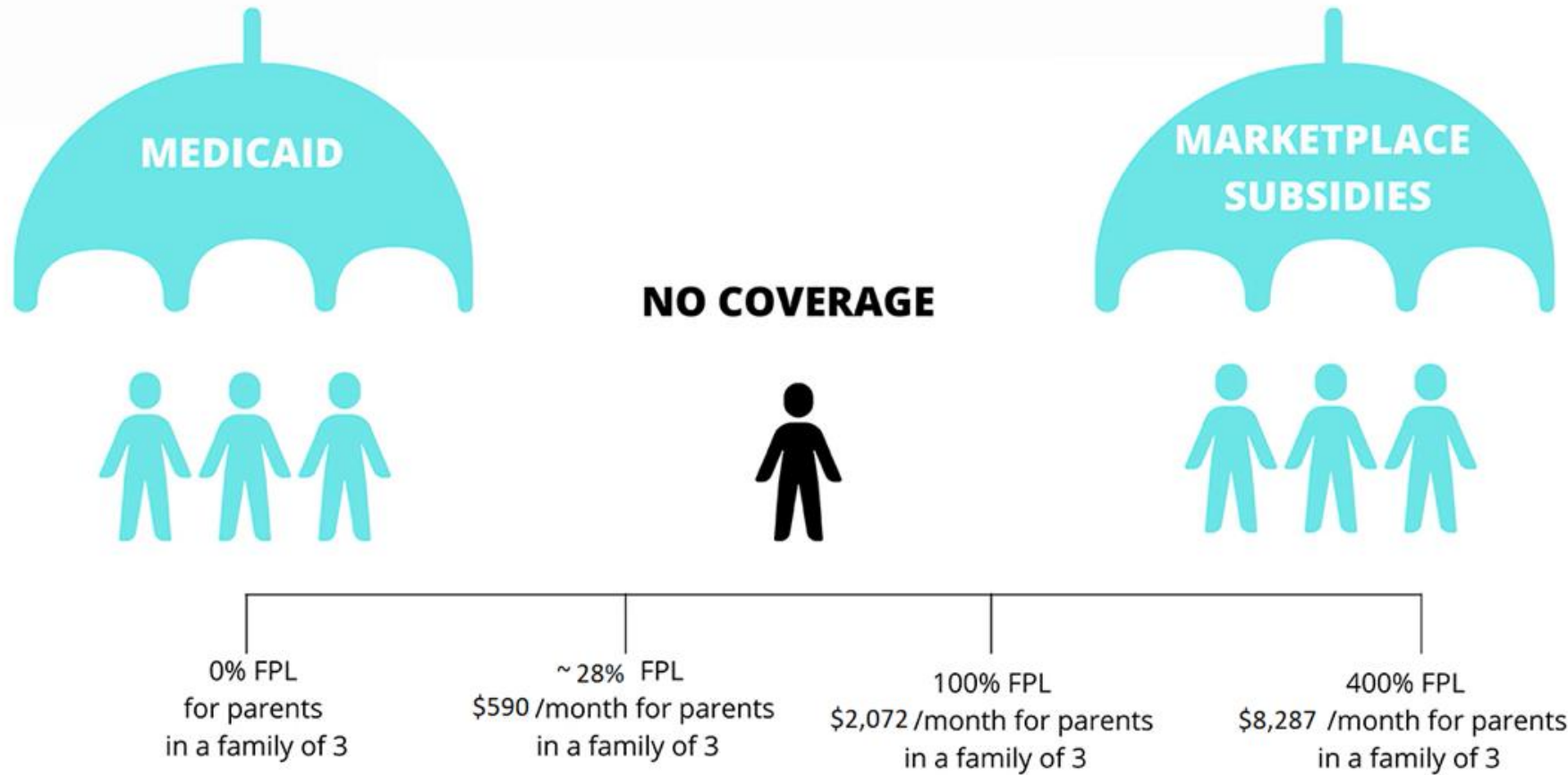
2023		ESTIMATED Florida Family Related-Medicaid Income Limit *				
Household Size	100% FPL (Monthly)	Adults**	Pregnant Women	Infants <1	Children 1-5	Children 6-18
			196%	211%	145%	138%
1	\$1,215	\$350	\$2,381	\$2,564	\$1,762	\$1,677
2	\$1,643	\$469	\$3,221	\$3,467	\$2,383	\$2,268
3	\$2,072	\$590	\$4,060	\$4,371	\$3,004	\$2,859
4	\$2,500	\$710	\$4,900	\$5,275	\$3,625	\$3,450
5	\$2,928	\$830	\$5,740	\$6,179	\$4,246	\$4,041
6	\$3,357	\$951	\$6,579	\$7,083	\$4,867	\$4,632
7	\$3,785	\$1,071	\$7,419	\$7,986	\$5,488	\$5,223
8	\$4,213	\$1,192	\$8,258	\$8,890	\$6,109	\$5,814
		* As of 3-6-23 DCF has not yet published 2023 Family related income limits.				
		** Includes parents, caregivers, and 19-20 year-olds				



# Low-Income Family Example

- John has 2 children, age 7 and 8.
  - He lost his job early in the pandemic, April 2020
  - He enrolled in Medicaid with children
  - He went back to work June 2020 part-time; earns \$ 1000/month
- What will happen?
  - Kids stay eligible (income limit for kids in HH 3 age 6-18 is \$2,859)
  - John is over-income; limit for parent is \$590
  - Refer to FHJP for help getting Jackson care

# Coverage Gap for Florida Adults Due to not Expanding Medicaid



---

# PREPARING FOR THE PUBLIC HEALTH EMERGENCY'S “UNWIND” OF CONTINUOUS MEDICAID COVERAGE

---

Special Considerations for 19 & 20 Year Olds

December 2022



FLORIDA HEALTH  
JUSTICE PROJECT

# Family with 19–20-Year-Old Example

- Zoe has 2 kids, daughter aged 15 and son, Oscar, is now 19.
  - Zoe earns \$ 1000 month and Oscar earns \$ 300/mo
- Zoe and Oscar will be found ineligible for Medicaid, income limit \$ 590/month & both be in coverage gap because income under 100% FPL. \$ 2072
- Daughter will stay eligible for Medicaid
- Oscar has the option to apply as a HH of one, income limit is \$ 350
- Video and Q/ and A goes through the different scenarios that apply, e.g., who is filing taxes; living at home, student; full time or part time .
- This is a critical group for outreach because we could help a lot of youth maintain coverage

# Kidcare Issues

- Wrong income limit on website - should be 215% of FPL (\$4,454/monthly for family of 3) but [website](#) says 200% FPL (\$4,143/monthly)
- No standalone application; have to complete full Medicaid application through ACCESS
- Need to pay premium before actually enrolled
- Risk of delays and interruptions in coverage
- Can be enrolled in both Medically Needy and KidCare
- Notices are confusing!



## PUBLIC HEALTH EMERGENCY & EXTENDED MEDICAID



### PUBLIC HEALTH EMERGENCY & EXTENDED MEDICAID

In the face of COVID-19, the federal government has disallowed all states, from terminating the Medicaid coverage of virtually all beneficiaries. As a result, since March 2020, hundreds of thousands of Floridians who are no longer eligible for Medicaid have maintained their health coverage. This moratorium on terminations will last until the end of the federally declared COVID-19 Public Health Emergency.

Once the Public Health Emergency (also called the "PHE") ends, individuals who are no longer eligible will lose their current Medicaid coverage. In order to

<https://www.floridahealthjustice.org/public-health-emergency.html>





**Ending the COVID-19 Related Continuous Medicaid Coverage Requirement:  
Impact on parents & caregivers whose income is above the eligibility limit**

**Background:** In the face of the COVID-19 pandemic, 2020 legislation provided states with significant federal funding to ensure continuous Medicaid coverage of individuals enrolled in the program, **even those who are no longer technically eligible**. States were required to maintain this moratorium on terminations until the end of the Public Health Emergency (also referred to as the PHE). In late December 2022, the law was changed to “de-link” the requirement of continuous Medicaid from the end of the PHE. Although the PHE is still in effect, the continuous Medicaid coverage requirement **ends March 31, 2023**.

Under [Florida’s plan](#), the Department of Children and Families (DCF) will begin reviewing the eligibility of approximately 4.9 million Floridians currently on the Medicaid program in March 2023. The reviews will be spread throughout a 12 month period. For those individuals scheduled for redetermination each month, DCF will first review its available data to determine if the individual is still eligible for Medicaid. If there is not enough data, DCF will send a notice requesting that the individual complete a redetermination. Terminations for those who are sent case redetermination (also called “renewal”) notices in March and who are found to be ineligible or who fail to complete the renewal process will be effective April 30, 2023.

**Many low-income parents/caregivers whose income increased will lose eligibility:** Florida’s income limit for parents with minor children is very low: only about 30% of the federal poverty level (FPL). This means that a single parent with 2 minor children will lose coverage if her/his taxable income is above \$582/month.<sup>1</sup>

**For example:** *Zoe, a single parent with 2 minor children, lost her job during the COVID shutdown in April 2020, and enrolled the entire family in Medicaid. Even though Zoe got another job in June 2020 with a monthly income of \$1000, everyone in the family remained on Medicaid due to the PHE’s continuous coverage rule. However, Zoe is now over Florida’s income limit for parents, and her coverage will be terminated.*

**How many Florida parents/caregivers are likely to lose coverage:** Enrollment for the adult coverage group grew by [855,066](#) between March 2020 and December 31, 2022. Thus, if the state returns to pre pandemic enrollment levels, approximately 850,000 adults will be terminated. (Note: this number also includes parents/caregivers who lose Medicaid eligibility because they

<sup>1</sup> This example is based on 2022 federal poverty guidelines.

# Advocate Q & A | Florida Medicaid Recipients at Risk

Updated 01/24/2023

This Q&A explains why so many Florida parents and caregivers are likely to lose Medicaid eligibility when the continuous coverage requirement ends; what are their coverage options; and how they can prepare. [Read Q&A](#)

**Read more about other groups who will likely lose coverage when the extended Medicaid coverage requirement ends:**



- [Parents & Caregivers who no longer have any child\(ren\) under age 18](#)



- [Youth who turned 19-20](#)
- [Aged and disabled individuals now on Medicare](#)
- [Former foster children who turned 26](#)
- [Medically Needy Recipients](#)

# Good news/bad news

- Good news 👍
  - Opportunity to enroll huge number of MDC adults to enroll in FFM
  - Opportunity to help ensure Medicaid recipients are enrolled in the Medicaid programs for which they are eligible, e.g., medically needy, family planning
- Bad news 📢
  - Huge undertaking to renew over 5.5 million Medicaid enrollees in next 12 months
  - Notices are very confusing
  - Some people will be in coverage gap because FL has not expanded Medicaid
  - Kidcare confusion
- Good news 👍
  - Opportunity to improve DCF notices
  - Opportunity to help people in coverage gap
  - Opportunity to improve KidCare



:

## Cases to Refer to FHJP?

- Now (March 7-April 15, 2023):
  - 19–20-year-old
  - If want to understand Medicaid eligibility for each family member and might consider sharing story.
- After April 15, 2023, and going forward:
  - **If person does not understand Medicaid renewal or termination notice.**
  - If terminated due to income but not enrolled in Medically Needy.
  - If mother losing Medicaid was not enrolled in family planning waiver.
  - **If person is in coverage gap (terminated due to income but below 100% FPL).**
  - If issues with KidCare enrollment.

# Lived Experiences Project



FLORIDA HEALTH  
JUSTICE PROJECT

**STORIES**

Health Justice Issues ▾

Share Your Story

Get Involved ▾

About ▾

Contact

Florida Health Justice Project



Donate

## Medicaid | *The Lived Experience:* *Unwinding the Continuous* *Coverage Requirement*

In response to the COVID-19 pandemic, states were provided with significant federal funding in order to continue the Medicaid coverage of individuals in the program. As a result, since March 2020, approximately a million Floridians who are no longer technically eligible for Medicaid have stayed covered. This continuous Medicaid coverage requirement will end on March 31, 2023.

Starting April 30th, and over the next 12 months, those who are no longer Medicaid eligible will be terminated. Additionally, others who are still eligible could lose coverage due to administrative issues, like DCF not having the enrollee's updated address.



# Example: Medically Needy



Cassidy

Clay County, FL

**A COVID "silver lining" for Florida's most medically fragile children will soon be ending.**

For 13 year old Cassidy and her family, life is incomprehensibly challenging. Cassidy was born with an extremely rare neurological condition that causes autonomic bodily functions such as breathing to stop as soon as she is not fully awake; she has a cardiac condition and a pacemaker; she is ventilator-dependent. She must be on a ventilator when she sleeps, and also at other times such as when she is sick or tired. Cassidy has been prescribed 24 hours at home nursing care, and her parents take care of her at home.

A nurse is needed to ensure that her ventilator is connected while she sleeps and otherwise everytime she stops breathing or needs the ventilator, provide resuscitation immediately if the ventilator becomes disconnected or malfunctions, ensure her airway is clear, and provide other critical care. Without someone trained to provide these services, Cassidy could die. Miraculously, even with these challenges, Cassidy is otherwise a happy and thriving 13 year old, home schooled and taking college level classes, with the goal of attending college. With her tracheotomy tube sealed, she is even able to be on a local swim team.

---

**"We have searched for solutions and advocated for Medicaid coverage, with no success. We have been told to "just quit" our jobs so we can get Medicaid, or "move out of state," advice that does not work for our family."**



# Example: Youth 19-20



Iris

Orlando, FL

**Hard working students and youth could face the loss of needed health coverage.**

**Once the Public Health Emergency ends, Florida residents like Iris, a college student with asthma, could lose access to affordable healthcare needed for life-saving medications.**

Iris\* is grateful she is able to pursue her dream of a college education.

Today, the 20-year-old Florida resident balances full-time classes at a state university with substitute teaching. She pays her rent and meets living expenses. She's able to stay healthy in spite of her asthma and other health challenges because she has healthcare through the Florida Medicaid program. Medicaid pays for her check-ups and pricey medications like asthma inhalers.

The continuous coverage requirement that is part of the COVID-19 Public Health Emergency (PHE), makes Medicaid available in Florida to Iris and others who have been enrolled in the program since it began in March 2020 — though they may no longer be technically eligible. Iris lives in fear of her Medicaid running out.

---

**"Medicaid has been great for me because I've been able to find doctors that would take it and I could take care of my health needs," she says. "I've also been able to access emergency care at a hospital when I was suffering severe chest pains and thought I was having a heart attack.."**

# Example: Parent with no minor child(ren) /19-20 Youth



S.T.

Hollywood, FL

*S.T. and her family are living on the edge, hanging on to their family's Medicaid health insurance amid the COVID-19 pandemic, living in fear of losing the healthcare that keeps them alive.*

S.T. has lupus, an autoimmune disease recognized for its distinctive butterfly-shaped facial rash that also attacks internal organs. Her husband and son live with Marfan syndrome, a connective tissue disorder that causes cardiovascular problems. Each of them needs medical monitoring, diagnostic tests and medications.

# Preparation

- Make sure address is correct
- Other updates, e.g., additional members; pregnant; disabled
- Open [Access Account](#)
- Share materials, questions, stories!

## Q & A: Information/Referrals

For more information/updates, please check our web page  
<https://www.floridahealthjustice.org/public-health-emergency.html>

For client referrals, please contact:

Bryan Ortiz, [ortiz@floridahealthjustice.org](mailto:ortiz@floridahealthjustice.org)

If questions/suggestions, please contact:

Miriam Harmatz, [harmatz@floridahealthjustice.org](mailto:harmatz@floridahealthjustice.org)

THANK YOU!