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)
Florida’s MEDICAID REDETERMINATION PLAN

BACKGROUND
Medicaid is a 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**

<table>
<thead>
<tr>
<th>Month</th>
<th>Event</th>
</tr>
</thead>
<tbody>
<tr>
<td>Feb 2023</td>
<td>Continuous Medicaid enrollment requirement expires</td>
</tr>
<tr>
<td>Mar 2023</td>
<td>FMAP 6.5%</td>
</tr>
<tr>
<td>Apr 2023</td>
<td>Medicaid closure notices sent providing ten-day Adverse Action notice</td>
</tr>
<tr>
<td>May 2023</td>
<td>Medicaid renewals resume</td>
</tr>
<tr>
<td>Jun 2023</td>
<td>FMAP 5%</td>
</tr>
<tr>
<td>Jul 2023</td>
<td>FMAP 2.5%</td>
</tr>
<tr>
<td>Aug 2023</td>
<td>FMAP 1.5%</td>
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<tr>
<td>Sep 2023</td>
<td>Medicaid renewals resume</td>
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<tr>
<td>Oct 2023</td>
<td>FMAP 1.5%</td>
</tr>
<tr>
<td>Nov 2023</td>
<td>Medicaid renewals resume</td>
</tr>
<tr>
<td>Dec 2023</td>
<td>FMAP 2.5%</td>
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<tr>
<td>Jan 2024</td>
<td>Clients failing to renew benefits have 90 days to reapply with gap coverage</td>
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<tr>
<td>Feb 2024</td>
<td>FMAP 5%</td>
</tr>
<tr>
<td>Mar 2024</td>
<td>No enhanced FMAP</td>
</tr>
<tr>
<td>Apr 2024</td>
<td>Last month to initiate post continuous Medicaid renewals</td>
</tr>
<tr>
<td>May 2024</td>
<td>Last month to complete post continuous Medicaid renewals</td>
</tr>
</tbody>
</table>

**Notes:**
- FMAP: Federal Medical Assistance Percentage
- Ex Parte Case Matching initiated for April redeterminations
- Notice of Case Expirations for expiring April certifications
- Last month to initiate post continuous Medicaid renewals
- Last month to complete post continuous Medicaid renewals
- Medicaid renewal notices sent providing ten-day Adverse Action notice
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

December 16, 2019
Case: 5003425023

State of Florida
Department of Children and Families

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:
  o 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

• Current DCF Notices:
  o For more information on termination notice and other notices see, Memo on DCF notices Department of Children and Families (DCF) Notices
• 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

Adults
(303%)
Medicaid Enrollment Increase in Miami-Dade
March 2020 - January 2023

Children 19-20

(290%)
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

<table>
<thead>
<tr>
<th>Family</th>
<th>100% FPL</th>
<th>Pregnant Women</th>
<th>Infants</th>
<th>Children</th>
<th>MNIL</th>
<th>MAGI Disregard (5% of 100% FPL)</th>
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<td></td>
<td>Parents, Caretakers, Children 19 &amp; 20</td>
<td>Including PEPW</td>
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<td>1 through 5</td>
<td>6 through 18</td>
<td>** See Note Below</td>
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<td>Standard Disregard</td>
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<td>Additional Person</td>
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$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.
<table>
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<tr>
<th>Household Size</th>
<th>100% FPL (Monthly)</th>
<th>Adults**</th>
<th>Pregnant Women</th>
<th>Infants &lt;1</th>
<th>Children 1-5</th>
<th>Children 6-18</th>
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<td>$1,215</td>
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<td>$5,814</td>
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</table>

* 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 in $590
  - Refer to FHJP for help getting Jackson care
Coverage Gap for Florida Adults Due to not Expanding Medicaid

**MEDICAID**
- 0% FPL for parents in a family of 3
- ~28% FPL $590/month for parents in a family of 3
- 100% FPL $2,072/month for parents in a family of 3

**MARKETPLACE SUBSIDIES**
- 400% FPL $8,287/month for parents in a family of 3

NO COVERAGE
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
Zoe has 2 kids, daughter aged 15 and son, Oscar, is now 19.
- Zoe earns $1000/month and Oscar earns $300/month.

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/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

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
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.
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**

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**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

If questions/suggestions, please contact:
  Miriam Harmatz, harmatz@floridahealthjustice.org

THANK YOU!