MassHealth Updates

Massachusetts Health Care Training Forum
October 2018
Agenda

- Proposed rule change to Federal Public Charge policies
- Citizenship and Immigration
- MassHealth Application and Member Booklet Update
- Assister Updates – October 2018
Proposed rule change to Federal Public Charge Policies

MassHealth has received inquiries regarding the recent release of the Department of Homeland Security's proposed rule that would make changes to "public charge" policies.

It is important to note this rule is **not** in effect at this time and **does not** impact eligibility for benefits.

For more information visit: https://www.mass.gov/service-details/us-department-of-homeland-securitys-proposed-rule-regarding-public-charge
The Baker-Polito Administration has released the following statement:

"The Baker-Polito Administration values the immigrant community's role in making Massachusetts a vibrant and competitive commonwealth and the Administration believes this proposed rule change would result in individuals not accessing basic needs like food assistance or medical care for them or their family. The Administration will formally oppose this proposal as the process moves forward."

"We're going to do everything possible to make sure the voice of our state is heard on how negative and detrimental this proposed rule would be on Massachusetts residents and our state economy," Secretary of Health and Human Services Marylou Sudders said in an interview. "I think of public benefits as a step up for immigrants who are on their path to economic security."

Citizenship and Immigration
Eligibility Requirement

- **MassHealth** and the Health Connector require verification of the following eligibility factors to make an eligibility determination:
  - Income
  - Social Security Number
  - Residency
  - Citizenship
  - **Immigration Status**
  - Incarceration
  - Non-custodial Parent Info (MassHealth only)
  - American Indian/Alaska Native (Health Connector only)
Citizens and Noncitizens

Citizen:
- An individual who is:
  - Born in the U.S. or its territories (Puerto Rico, the Virgin Islands, Commonwealth of the Northern Mariana Islands, and Guam)
  - Born to a parent who is a U.S. Citizen
  - A Naturalized Citizen
  - A US National

Noncitizens: Lawfully Present Immigrant
- A Lawfully Present Immigrant is an individual who fits into 1 of 3 categories:
  - Qualified Noncitizens – (QLP), includes Protected Noncitizens
  - Qualified Noncitizens Barred - (QAB)
  - Nonqualified Individuals Lawfully Present – (ILP)
Noncitizens that are not described on the previous slide as Immigrants Lawfully Present (ILP) may be described as:

- **Nonqualified Persons Residing Under Color of Law (PRUCOL):**
  - Individuals with an immigration status not described as Lawfully Present, but have applied for an adjustment of status through the United States Citizenship and Immigration Services (USCIS).
  - PRUCOL status may also be relevant for individuals who have not applied for an adjustment of status (e.g. people with an indefinite stay of deportation or an indefinite voluntary departure).

- **Other Noncitizen:**
  - Individuals with an immigration status that is not described as Lawfully Present or Nonqualified PRUCOL.
Who may qualify for MassHealth?

- U.S. Citizen or U.S. National
- Lawfully Present Immigrants - three categories
  - Qualified Noncitizen (including Protected Noncitizens) - QLP
  - Certain Qualified Noncitizen Barred - QAB
  - Certain Nonqualified Individuals Lawfully Present - ILP
- Certain Nonqualified Persons Residing Under Color of Law (PRUCOL)
- Certain Other Noncitizens

- As a condition of eligibility, an applicant or member must be a resident of the Commonwealth of Massachusetts and meet other universal eligibility requirements.

- Any applicant confined even if not convicted is not eligible for MassHealth.
Who may qualify for the Health Connector?

- A U.S. Citizen or a Lawfully Present Immigrant.
- As a condition of eligibility, an applicant or member must be a resident of the Commonwealth of Massachusetts.
- Cannot be incarcerated.
- Any applicant confined but not convicted may be eligible for the Health Connector.
Immigration Question

- Are you a U.S. national?
  - If Yes, are you a naturalized citizen (not born in the U.S.)?

- If you are a noncitizen, do you have an eligible immigration status?
  - See page (ACA- p.22; SACA- p.20), “Immigration Statuses and Document Types” for help. If No or no response, you may get only one or more of the following: MassHealth Standard (if pregnant), MassHealth Limited, the Children’s Medical Security Plan (CMSP), or the Health Safety Net (HSN). Go to Question 10.
    - a. If Yes, do you have an immigration document?
      - It may help us to process this application faster if you include a copy of your immigration document with the application. We will try to verify your immigration status through an electronic data match. Please list all the immigration statuses or conditions that have applied to you since you entered the U.S. If you need more space, attach another sheet of paper.
        - Status award date.
        - Immigration Status.
    - b. Did you use the same name on this application that you did to get your immigration status?
    - Did you arrive in the U.S. after August 22, 1996?
Information Necessary for Program Determination

- A person who applies for MassHealth or the Health Connector coverage is asked to provide their citizenship and/or immigration status in order to help determine the benefit they may be eligible for.

- If an individual does not indicate their citizenship or immigration status, they may still be eligible for MassHealth Limited, the Children’s Medical Security Plan or the Health Safety Net.

- MassHealth will attempt to determine the benefits an individual may qualify for based on the information provided. If additional information is needed MassHealth will notify the individual.
Immigration Status: Request for Information Notice (RFI)

- If attested immigration status cannot be confirmed with the information available from the available data sources:
  - A Request for Information (RFI) notice will be sent to the applicant listing all requested verifications required.
  - The deadline for submission of the requested verifications will be provided on the notice.

- The individual has 90 days from receipt of the RFI notice for immigration documents to provide all requested verifications.
  - If an individual is having difficulty providing the requested documentation, they may request a 90 day reasonable opportunity extension.
    • Must be requested before the original RFI period expires.

- Key resources to refer to:
  - MassHealth Member Booklet for acceptable proofs of Citizenship and or National Status.
  - Refer to [https://www.mahealthconnector.org/verification-documents](https://www.mahealthconnector.org/verification-documents)
Scenario #1

- Michael is applying for health insurance coverage. Michael was born in the U.S. Virgin Islands.
  - Applicant should gather all necessary documents:
    - Michael provides his Social Security number and indicates that he was born in the U.S. Virgin Islands.
  - **Michael is a** U.S. citizen because he was born in a U.S. territory.

**NOTE:** Applicants/members can review MassHealth.

Citizenship/Immigration information:
  - In the MassHealth Member Booklet, under the section U.S. citizenship and immigration rules,
  - Or by checking the MAhealthconnector.org help menu.
Scenario #2

- Jimmy is a student and has provided a VISA. Jimmy says he is planning on continuing his education in Massachusetts.
  - Applicant gathers all documents:
    - Jimmy provides an unexpired student F-1 VISA.
  - Jimmy’s status is: Nonqualified Individual Lawfully Present.

NOTE: Applicants/members can review MassHealth Citizenship/Immigration information:

- In the MassHealth Member Booklet, under the section U.S. citizenship and immigration rules,
- Or by checking the MAhealthconnector.org help menu.
Scenario #3

Carla is present in the U.S. under (DACA) Deferred Action for Childhood Arrivals.

- Step 1: Applicant gathers all documents:
  - Carla provides a I-797 Notice of Action with DACA approval language. She also provided her alien registration number.

- Carla’s status is: Non-qualified PRUCOL (NQP), as a result of her I-797 with Deferred Action for Childhood Arrivals (DACA) language.

**NOTE:** Applicants can review MassHealth Citizenship/Immigration information:

- In the MassHealth Member Booklet, under the section U.S. citizenship and immigration rules,
- Or by checking the MAhealthconnector.org help menu.
Scenario #4

- Steve is a naturalized citizen and he received an RFI for immigration after completing his application.

  - Applicant gathers all documents:
    - Steve needs to submit his naturalization certificate or Certificate of Citizenship (Form N-560 or N-561), but Steve lost his naturalization certificate. He completed and submitted a request to USCIS or the U.S. Immigration and Naturalization Service for the replacement.
    - As he submits his request for a replacement, he realizes the 90 day deadline for his MassHealth RFI for citizenship/immigration is fast approaching. Steve calls MassHealth customer service before his RFI expires and requests a Reasonable Opportunity extension to submit his citizenship/immigration verifications.
    - Because Steve’s request was prior to the expiration of his original 90 day RFI period, he has an additional 90-days to submit his citizenship/immigration verification.
Resources

SECTION 10
U.S. Citizenship and Immigration Rules

When deciding if you are eligible for benefits, we look at all the requirements described under each coverage type and program. We will try to prove your U.S. citizenship, national status and immigration status using federal and state data services to decide if you may get a certain coverage type.

U.S. Citizens/Nationals
US citizens/nationals may be eligible for MassHealth Standard, CommonHealth, CarePlan, Family Assistance, or the Children's Medical Security Plan (CMSP). They may have Plans and Advance Premium Tax Credits, and the Health Safety Net. Proof of eligibility for all US citizens/nationals is:

- in the United States (for example, Puerto Rico, the Virgin Islands, Hawaii, and the Northern Mariana Islands), a person who is a "citizen" of the United States who meets the requirements of section 3101 of the Immigration Act of 1990, or who is a "national" of the United States who meets the requirements of section 4003 of the Immigration Act of 1990.

SECTION 9
U.S. Citizenship and Immigration Rules

When deciding if you are eligible for benefits, we look at all the requirements described under each coverage type and program. We will try to prove your U.S. citizenship, national status and immigration status using federal and state data services to decide if you may get a certain coverage type.

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US citizens/nationals may be eligible for MassHealth Standard, CommonHealth, CarePlan, Family Assistance, or the Children's Medical Security Plan (CMSP). They may have Plans and Advance Premium Tax Credits, and the Health Safety Net. Proof of eligibility for all US citizens/nationals is:

- in the United States (for example, Puerto Rico, the Virgin Islands, Hawaii, and the Northern Mariana Islands), a person who is a "citizen" of the United States who meets the requirements of section 3101 of the Immigration Act of 1990, or who is a "national" of the United States who meets the requirements of section 4003 of the Immigration Act of 1990.

Senior Guide to Health Care Coverage

This guide is for seniors and for persons of any age needing long-term care services.
Resources

- MAhealthconnector.org
  - Getting Started Guide: https://mahealthconnector.org/start
  - Verification Documents: https://www.mahealthconnector.org/verification-documents
  - Immigration Document Types: https://www.mahealthconnector.org/immigration-document-types
MassHealth Application and Member Booklet Update
The Massachusetts Application for Health and Dental Coverage and Help Paying Costs (ACA-3) was revised October 2018.

- To align with changes in Release 16 of the online system, the section, Deductions (Q-30) was revised. If you pay for certain things that can be deducted on a federal income tax return, telling us about them could make the cost of health coverage a little lower. What deductions do you report on your income tax return? Check all that apply. Your deductions should be what you report on your federal income tax return in the section “Adjusted Gross Income.” For each deduction you select, give the yearly amount. You can enter up to the maximum deduction amount allowed by the IRS.

  • Applicants will no longer be able to report anything in this question except for the specific deductions that are applicable.
    
    – Other – as an option have been taken out.

  – SACA-2: Deduction question: revised to align with changes made in the ACA-3.
Ordering Paper Applications

- Applications are available for download on the MassHealth website [www.mass.gov/masshealth](http://www.mass.gov/masshealth) under MassHealth Member Applications:
  [https://www.mass.gov/lists/masshealth-member-applications](https://www.mass.gov/lists/masshealth-member-applications)

- To order paper applications
  - Call: 1-800-841-2900
  - Fax a request: 617-988-8973
  - Email a request: [publications@mahealth.net](mailto:publications@mahealth.net)
Medicare Part D Update
Medicare Part D: Major Changes this Year

- **Beginning January 1, 2019** dual eligible members (both full and partial) will no longer be able to change Medicare Part D plans at any time. Instead they will have certain Special Election Periods (SEPs) available to them during the year.

  - Duals may request enrollment in a different plan one time during each of the first three quarters in a calendar year (January to March, April to June, July to September).
  
  - During the Annual Enrollment Period between October 15 and December 7, duals (like all Medicare beneficiaries) can choose a new plan that will be effective January 1 of the next year.
  
  - There is a time-limited SEP for duals who are auto-enrolled into a plan, either by CMS or by a state.
Medicare Part D: Major Changes this Year (cont.)

- There are other SEPs for particular circumstances, including individuals who lose or gain dual or LIS status or individuals who move out of their original plan's service area.

- Dual members who are designated by their Part D plan as “at-risk” or “potential at-risk” for “misuse or abuse of a frequently abused drug” will have extra limits on when they may change plans.

- Detailed CMS guidance on these changes can be found at the link below (see pages 28-29 for the SEPs for dual eligible members)
Medicare Part D: Part D Low Income Subsidy (LIS)

- Part D Low Income Subsidy (LIS) – Automatically “deemed” eligible (full and partial duals).
  - All individuals with Medicare who are active in MassHealth (either full dual or partial dual/Medicare Savings Programs) for at least one month starting July 2018 will automatically get the LIS for the rest of 2018 and also for all of 2019.
  - Anyone who was found automatically eligible for the 2018 LIS but was not an active MassHealth full or partial dual member in July 2018 will receive a GREY letter in the next few weeks from CMS and SSA notifying them that they will not be automatically eligible for the LIS for 2019 due to the loss of Medicaid or Medicare Savings Program membership.

  - The letter will tell them that they need to apply for the LIS and will include an LIS application. The 2019 version of this notice is not yet available, but the 2018 notice is available at https://www.cms.gov/Medicare/Prescription-Drug-Coverage/LimitedIncomeandResources/Downloads/11198.pdf.
Individuals receiving this letter should go ahead and apply for the 2019 LIS even though they may end up getting it automatically if they regain their MassHealth or Medicare Savings Program eligibility.

- If they regain their MassHealth or Medicare Savings Program eligibility, CMS will send them a **PURPLE** notice informing them that they now automatically qualify for the LIS. The 2019 version of this notice is not yet available, but the 2018 notice is available at [https://www.cms.gov/Medicare/Prescription-Drug-Coverage/LimitedIncomeandResources/downloads/11166.pdf](https://www.cms.gov/Medicare/Prescription-Drug-Coverage/LimitedIncomeandResources/downloads/11166.pdf).

CMS is also sending an **ORANGE** notice in early October to those who will continue to be deemed eligible for the LIS but whose Part D copayment level is changing due to a change in income, institutional, or home and community based waiver status. The 2019 version of this notice is not yet available, but the 2018 notice is available at [https://www.cms.gov/Medicare/Prescription-Drug-Coverage/LimitedIncomeandResources/downloads/11199.pdf](https://www.cms.gov/Medicare/Prescription-Drug-Coverage/LimitedIncomeandResources/downloads/11199.pdf).
Medicare Part D: Major Changes this Year (cont.)

- For detailed CMS guidance on these changes, it can be found at the link below (see pages 28-29 for the SEPs for dual eligible members).

Assister Updates
October 2018
Agenda

• Mandatory Training Requirements
• Certified Application Counselor 2019 Recertification
• Friendly Reminder: Be Sure to Read Your Emails
• What’s Happening Fall/Winter 2018-19
• Questions
Mandatory Training Requirements
Mandatory Training Requirements

• Reminder: What are “Mandatory Training Events”?  
  • Training identified clearly as “mandatory” that occurs throughout the year—online, calls, webinars, meetings  
  • Content: Clearly identified as “mandatory.” Policy or procedure updates, certain system enhancements, training refreshers, updates to online courses

• Time period to finish mandatory training events – typically 3 weeks

• Completing “mandatory” training is a requirement to maintain CAC certification

• CAC responsibilities, along with sample copies of the CAC Designated Organization Agreement, can be found in the LMS (click Resources, select Legal Forms)
Mandatory Training Requirements

- By not completing mandatory trainings, you risk losing your CAC certification
- What happens if you lose your CAC certification?
  - Your CAC certification will no longer be valid, and you will no longer be authorized to act as a CAC for your CAC Designated Organization (assist applicants/patients/clients with their health insurance needs) until you complete the mandatory training and request to be reactivated
  - Your access to the LMS will be deactivated
  - For those with access, you will lose access to the Assister Portal/Assister Lines
Mandatory Training Requirements

- If your CAC certification expires:
  - You will need to see your Lead CAC who will need to submit a CAC Training Request form requesting we reactivate you in the LMS and in the Assister Portal.
  - You will then receive an email from MAhealthconnectorTraining reminding you of your LMS Username and Password.
  - When you receive this email, you can log back into the LMS and complete the training.
  - When you successfully complete the training, you will need to email the training team and your Lead CAC to let them know so we can reactivate your access to the Assister Portal and the Assister Lines for those who already had access. Your Assister Portal access will then be available in 1-3 business days.
CAC 2019 Recertification
CAC 2019 Recertification

- Annual Recertification is federally mandated
- 2019 CAC Recertification period:

**November 15, 2018 to December 31, 2018**
• Current CAC Certification: Valid until December 31, 2018
CAC 2019 Recertification

- CAC Recertification this Fall – like last year:
  - Current CACs must take and pass the CAC Recertification assessment between 11/15/18 and 12/31/18
    - Assessment content includes both Eligibility Policy and Applications — online and ACA-3
    - Assessment will not be available until all mandatory trainings are complete
  - Lead CACs – May want to decide when new staff should certify (if prior to 11/15, they will need to recertify)
• To be able to take the assessment:

✓ Must be a current “active” CAC

✓ Completion of all **mandatory training events** that have already happened. For example:
  
  • Year End Tax Filing Process (Course 05A, January 2018)
  • Provisional Eligibility (Course 6MHP, July 2018)
  • Health Connector Preliminary Eligibility, Renewal, and Open Enrollment 2019 (Course 06B, September 2018)
  • Watch your email for upcoming mandatory training courses

✓ Completion of mandatory refresher or update training that will be assigned when recertification opens (e.g., Course 9: Certified Application Counselors, Course 4: Citizens and Non-Citizens, etc.)
CAC 2019 Recertification

- Recertification Process
  - Eliminates need to retake all the curriculum each year in a short time period
  - Not much different than what you’ve been doing all along - we give you credit toward your annual recertification for attending/taking mandatory trainings throughout the year
  - Keep up with mandatory training events, complete any newly assigned or outstanding mandatory training, take and pass assessment to recertify
CAC 2019 Recertification

• Next steps:
  • Watch for email in November announcing opening of 2019 CAC Recertification
  • Watch for and Complete all mandatory training – including any newly-assigned refresher courses that occur annually
  • Take and pass the 2019 Recertification assessment
  • Print your 2019 CAC Certificate:
    • Your 2018 certificate will no longer be valid
    • Your 2019 certificate is valid on the date you successfully complete the Assessment
    • Your CAC # remains the same from year to year
  • 2019 CAC Certification will be valid from date of completion of assessment through 12/31/2019
CAC 2019 Recertification

• What else….
  • Reminder: **Current** Certification valid until December 31, 2018
  • CACs that are not recertified as of 1/1/2019 will lose their CAC certification and cannot act as a CAC
  • Reminder: What happens if you lose your CAC certification?
    • Your CAC certification will no longer be valid, and you will no longer be authorized to act as a CAC for your CAC Designated Organization (assist applicants/patients/clients with their health insurance needs) until you complete the mandatory training and request to be reactivated
    • Your access to the LMS will be deactivated
    • For those with access, you will lose access to the Assister Portal/Assister Lines
CAC 2019 Recertification

• CACs that are not recertified as of 1/1/2019 will lose their CAC certification and cannot act as a CAC.

• Certified CACs continue to receive important information via Assister emails, conference calls, and meetings. If you don’t recertify by December 31, 2018, you will lose your certification and no longer receive email updates.

• When any training is mandatory, we will let you know. And there will always be a set time limit for completion of mandatory trainings.
Assisters:
Please Read Your Emails....
Assister Emails

• Assister Update Emails:
  - Part of certified Assisters’ **ongoing education**
  - **In addition to** online training, conference calls, and in-person meetings like MTFs
  - **Keeps you up to date** on latest policy, systems or process changes, key dates, member communications and outreach coming up
  - We know you want and need to **keep updated as you help individuals** on a daily basis
  - Please be sure to read Assister emails **as soon as you receive them**
• A Few Words About Assister Conference Calls:
  – Important information about current activities
  – Opportunity to ask questions about the topic of the call
  – Most offered by our staff as support for you
  – Some may be offered as part of mandatory training, but we will always let you know when that is the case
## What's Happening Fall/Winter 2018-19
(as of October 8, 2018)

<table>
<thead>
<tr>
<th>Date</th>
<th>Event Type</th>
<th>Topic</th>
</tr>
</thead>
<tbody>
<tr>
<td>October through</td>
<td>All-Assister Conference Calls</td>
<td>Health Connector Open Enrollment</td>
</tr>
<tr>
<td>January</td>
<td></td>
<td></td>
</tr>
<tr>
<td>October through</td>
<td>All-Assister Emails, Conference</td>
<td>MassHealth Health Updates for 2019</td>
</tr>
<tr>
<td>January</td>
<td>Calls</td>
<td></td>
</tr>
<tr>
<td>11/15/18 through</td>
<td>CAC Recertification</td>
<td>Annual CAC Recertification</td>
</tr>
<tr>
<td>12/31/18</td>
<td></td>
<td></td>
</tr>
<tr>
<td>January 2019</td>
<td>Joint MassHealth and Health</td>
<td>Year End Tax Filing Process</td>
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<tr>
<td></td>
<td>Connector All-Assister Conference Call</td>
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Questions?