



Georgetown University
Health Policy Institute
CENTER FOR CHILDREN
AND FAMILIES

Medicaid Learning Lab



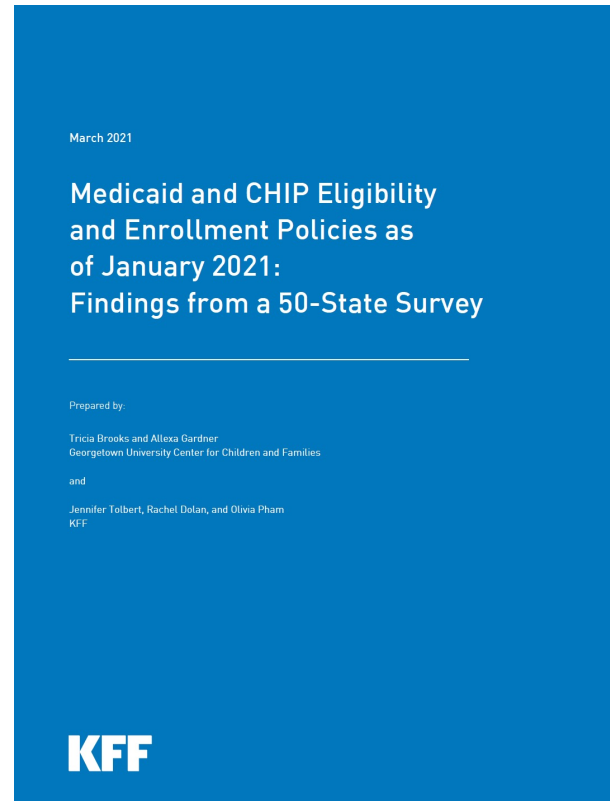
Session 3: Eligibility and Enrollment

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April 15, 2021*

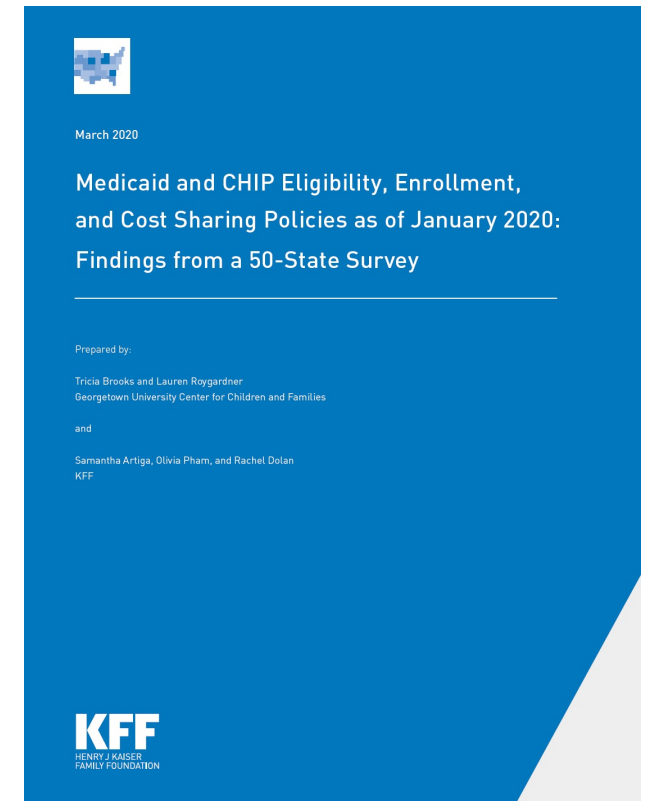
Eligibility and Enrollment

Today's Session

- Eligible populations and current eligibility
- Eligibility verification
- How the processes work



[2021 – More Limited PHE Version](#)



[2020 More State Level Data](#)



CHILDREN'S HEALTH CARE **REPORT CARD**



HOW DOES YOUR STATE STACK UP?

[Check out: CCF's state data hub](#)



ELIGIBLE POPULATIONS AND CURRENT ELIGIBILITY

Eligibility Milestones

<p>1965 Social Security Act</p>	<ul style="list-style-type: none"> • Medicaid inked to federal financial assistance: SSI for aged, blind, and disabled; and AFDC for families with dependent children
<p>1984 - 1990</p>	<ul style="list-style-type: none"> • Expansions for pregnant women and children based on FPL • Additional options for low-income seniors (>65) and disabled
<p>1996 Welfare Reform Act</p>	<ul style="list-style-type: none"> • Severed link with cash assistance, now TANF
<p>1997 Children’s Health Insurance Program</p>	<ul style="list-style-type: none"> • Children in moderate income families with greater flexibility in program design and option to cover the unborn child
<p>2009 CHIP Reauthorization Act</p>	<ul style="list-style-type: none"> • Lawfully-residing pregnant women and children; CHIP option for pregnant women
<p>2010 Affordable Care Act</p>	<ul style="list-style-type: none"> • Intended to align Medicaid eligibility at 133% FPL for non-elderly, non-disabled; requires data-driven eligibility verification; introduced MAGI and annual renewals for MAGI groups

Broad Eligibility Criteria; Varies by Population

Population

Mandatory

- Poverty-related infants, children, and pregnant women
- Low-income parents / caretakers (1931 parents)
- Families receiving transitional medical assistance (TMA)
- Children in and aging out of foster care
- Elderly and disabled individuals receiving SSI
- Certain working individuals with disabilities (Ticket to Work)

Optional

- Children, pregnant women, parents, and elderly and disabled individuals with incomes above federal minimum standards
- Medically needy
- Adults without dependent children
- Home and Community Based Services (HCBS) and Section 1115 waiver enrollees
- Enrollees covered only for specific diseases or services

Income

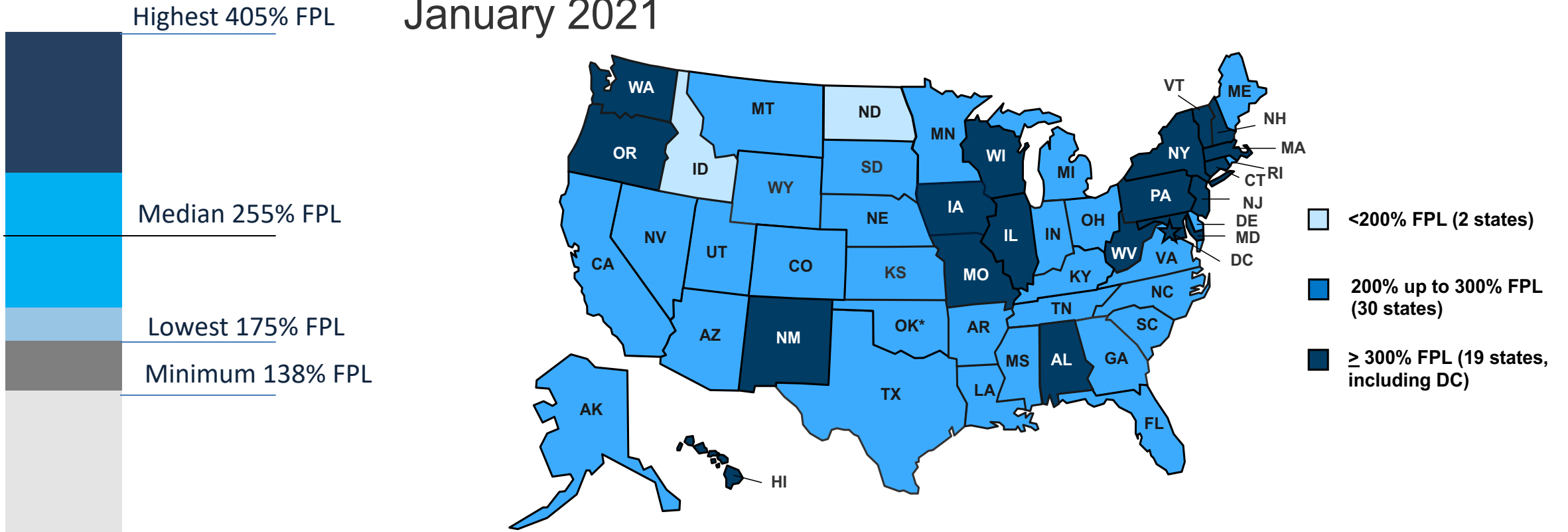
Immigration Status

Residency

Resources

Figure 4

Income Eligibility Levels for Children in Medicaid/CHIP, January 2021

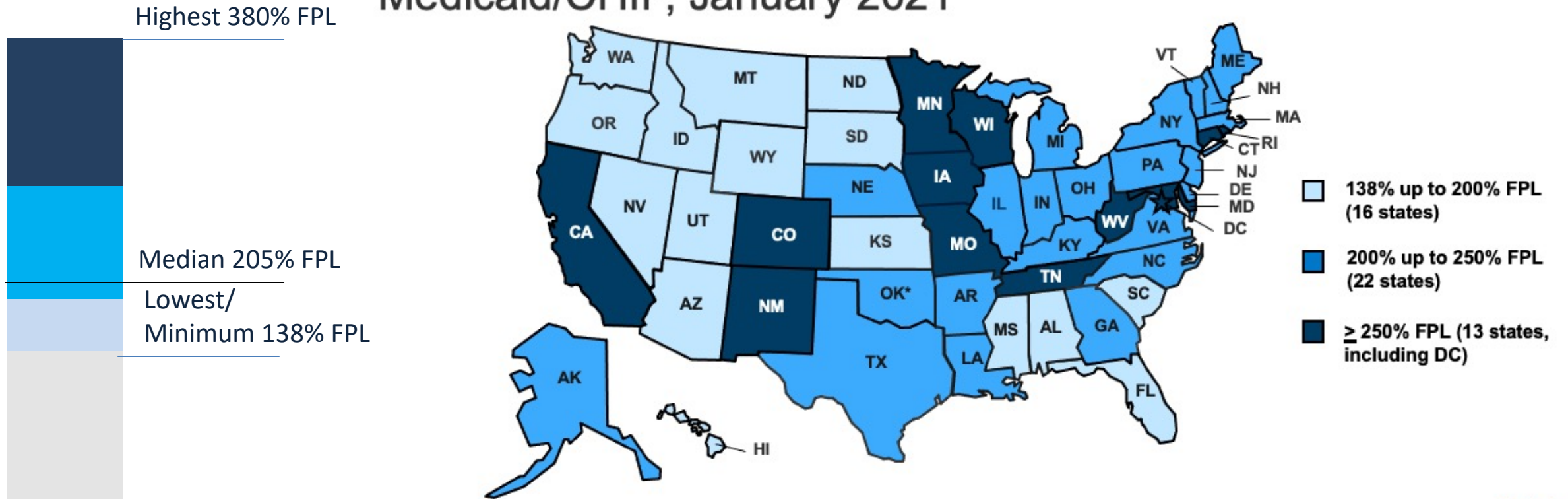


NOTES: Eligibility levels are based on 2021 federal poverty levels (FPLs) for a family of three. In 2021, the FPL was \$21,960 for a family of three. Thresholds include the standard five percentage point of the FPL disregard.
SOURCE: Based on results from a national survey conducted by KFF and the Georgetown University Center for Children and Families, 2021.



Figure 5

Income Eligibility Levels for Pregnant Women in Medicaid/CHIP, January 2021



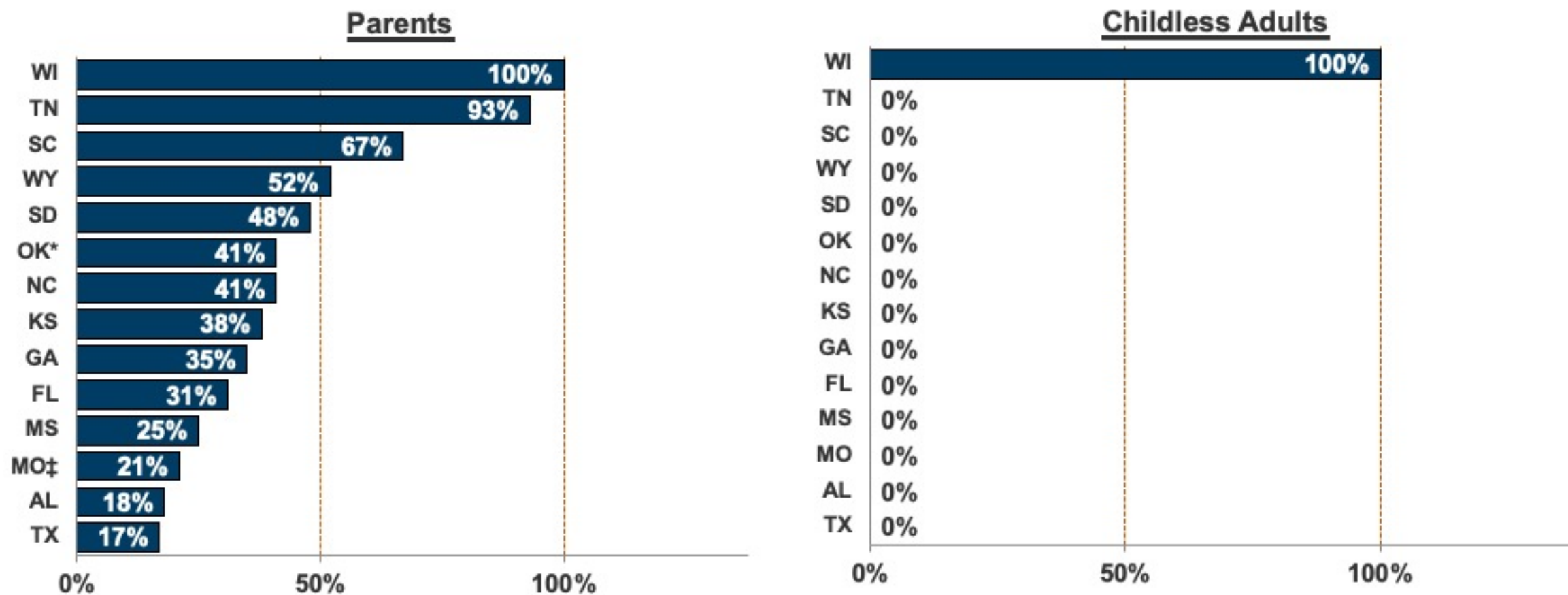
NOTES: Eligibility levels are based on 2021 federal poverty levels (FPLs) for a family of three. In 2021, the FPL was \$21,960 for a family of three. Thresholds include the standard five percentage point of the FPL disregard.

SOURCE: Based on results from a national survey conducted by KFF and the Georgetown University Center for Children and Families, 2021.

KFF

Figure 3

Medicaid Income Eligibility Limits for Adults in States that Have Not Implemented the Medicaid Expansion, January 2021

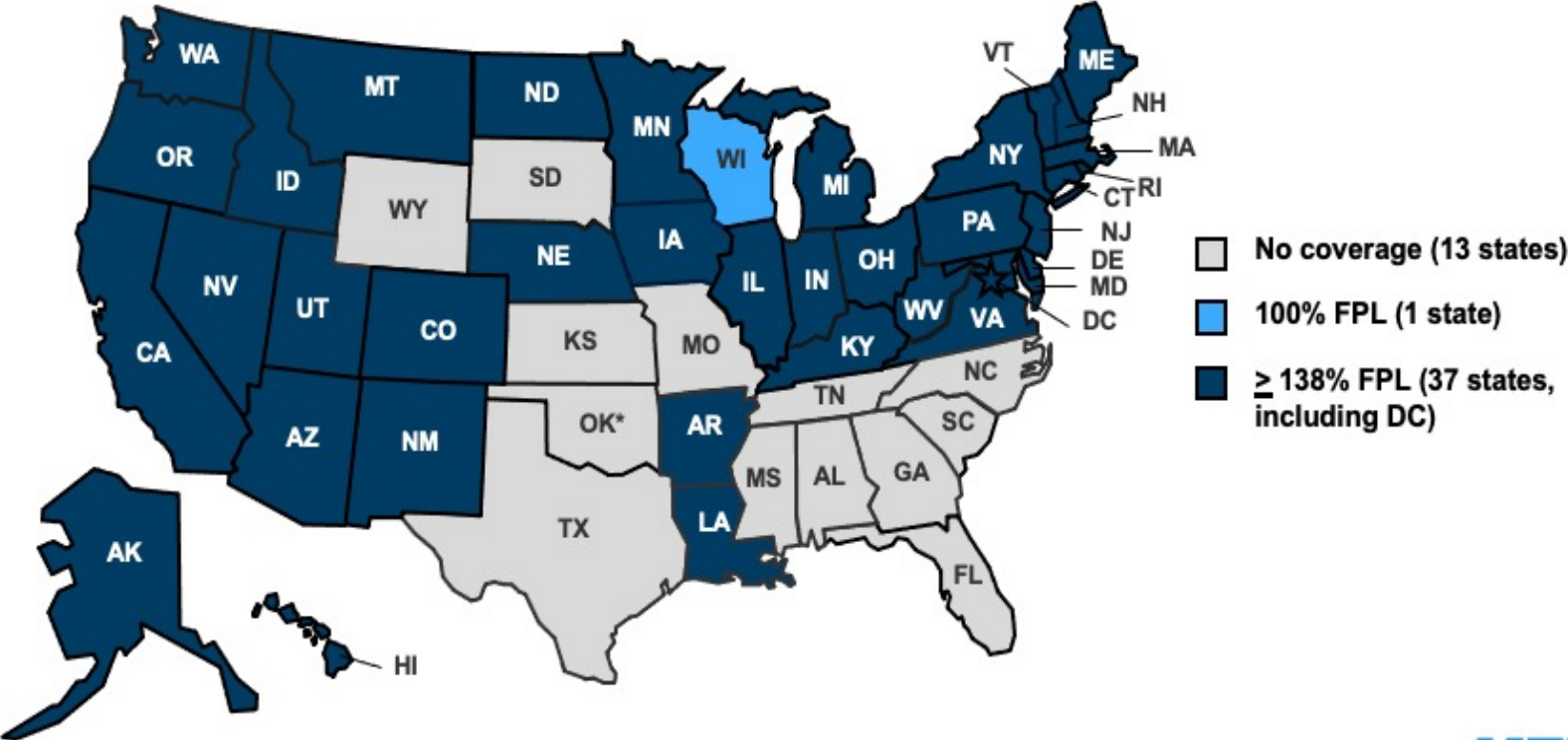


NOTES: Oklahoma voters approved a Medicaid ballot expansion measures in June 2020 and an expansion state plan amendment was approved in December 2020. Medicaid expansion implementation for both states is set to begin in 2021. ‡ Missouri voters approved a Medicaid ballot expansion measure in August 2020 and an expansion state plan amendment has been submitted.

SOURCE: Based on results of a national survey conducted by KFF and the Georgetown Center for Children and Families, 2021.

Figure 1

Medicaid Income Eligibility Levels for Other Adults, January 2021

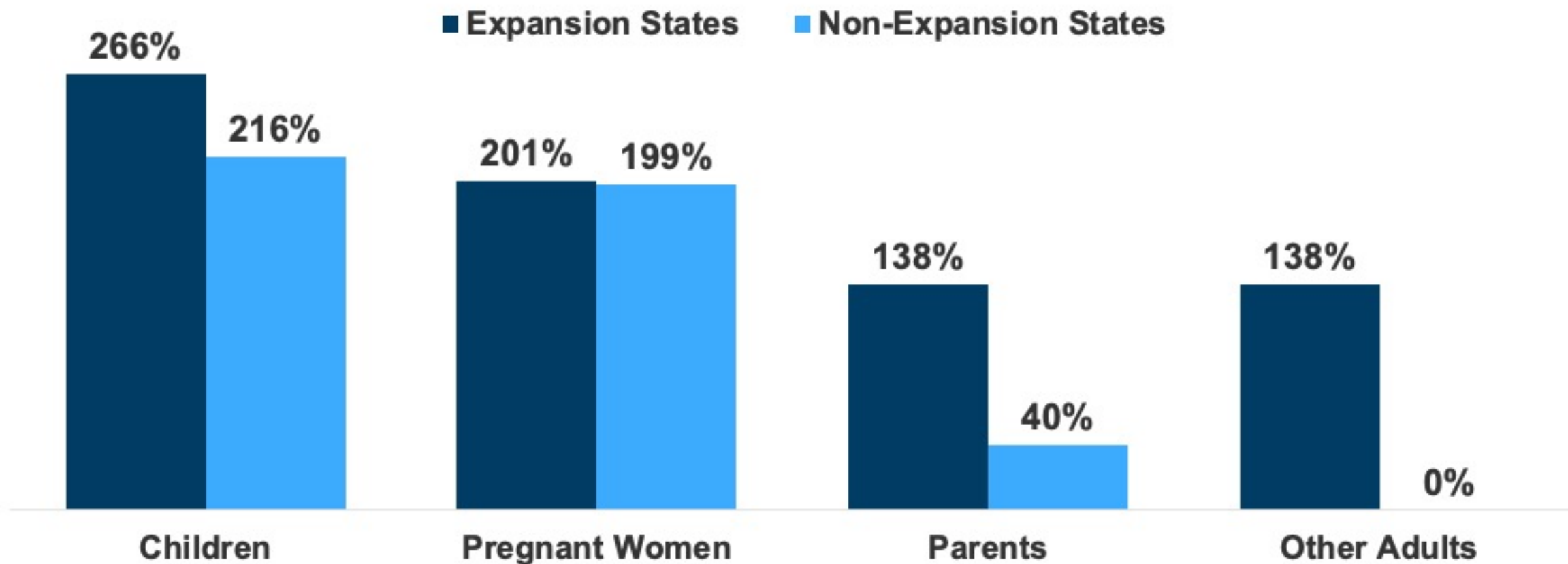


NOTES: Eligibility levels are based on 2021 federal poverty levels (FPLs) for a family of three. In 2021, the FPL was \$21,960 for a family of three. Thresholds include the standard five percentage point of the FPL disregard. *OK provides more limited coverage to some childless adults under Section 1115 waiver authority.
SOURCE: Based on results from a national survey conducted by KFF and the Georgetown University Center for Children and Families, 2021.



Figure 2

Median Medicaid Income Eligibility Limits based on Implementation of Medicaid Expansion as of January 2021



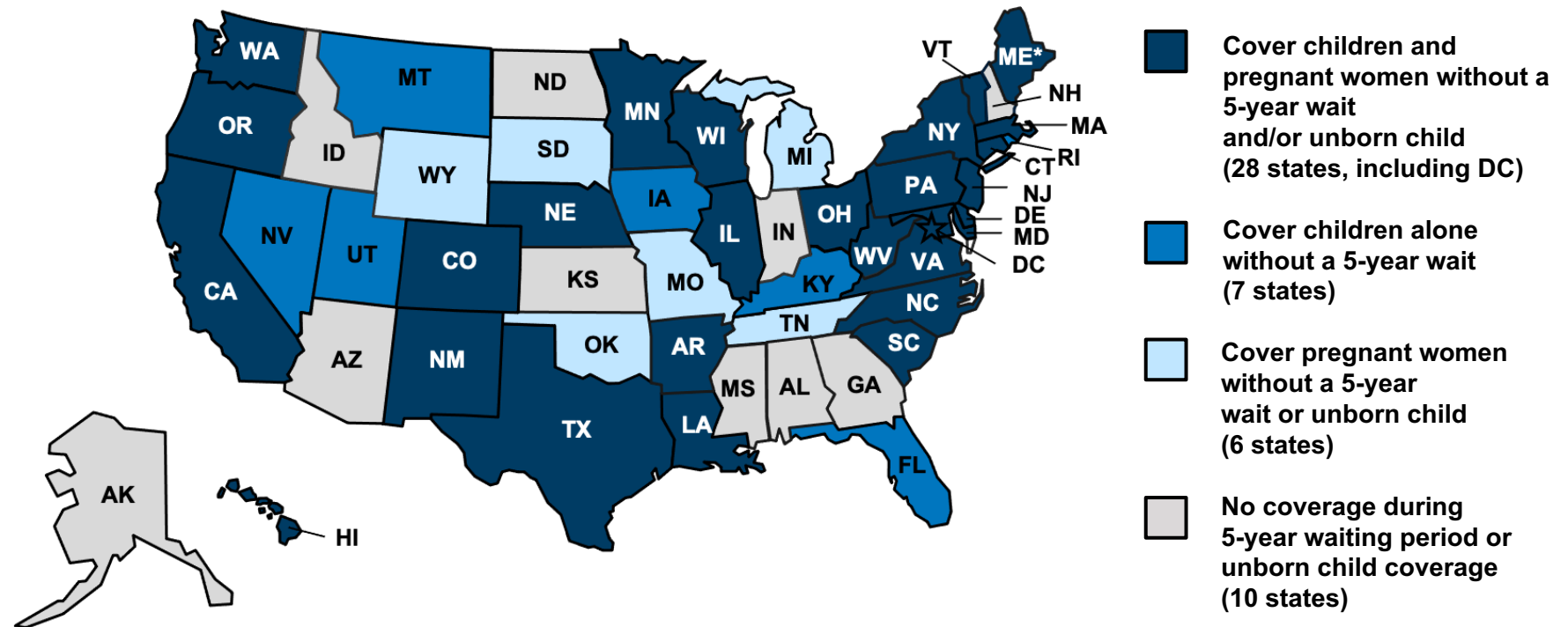
NOTES: Eligibility levels are based on a family of three for parents and an individual for childless adults. In 2021, the FPL was \$21,960 for a family of three and \$12,880 for an individual. Thresholds include the standard five percentage point of FPL disregard. UT provided more limited coverage to some childless adults under Section 1115 waiver authority prior to adopting expansion. OK provides more limited coverage to some childless adults under Section 1115 waiver authority.

SOURCE: Based on results from a national survey conducted by KFF and the Georgetown University Center for Children and Families, 2021.

Citizenship and Immigration Status

- Citizen
- Qualified immigration status for 5 years
- State option for lawfully-residing children and pregnant woman
- CHIP unborn child allows pregnancy coverage without regard to immigration status

Medicaid/CHIP Coverage for Lawfully Residing Immigrant Children or Pregnant Women and/or Unborn Child, January 2021





ELIGIBILITY VERIFICATION

General Eligibility Verification Rules

- Requirements vary by criteria
- Must attempt to verify electronically first
- If unable to verify electronically, state may accept reasonable explanation or require documentation
- States may request documentation if application information or electronic data conflict with information on file
- May accept Marketplace determination or conduct its own eligibility review (determination vs. assessment state)
- State verification plan provides details of state choices

Eligibility Criteria and Verification Requirements

	Required/Optional?	Data Sources
Citizenship and satisfactory immigration status	Required but can accept self-attestation and provide reasonable opportunity to provide documentation	Federal Hub Dept of Homeland Security Social Security Administration
Income	Required but may be verified post-enrollment	IRS State databases (wages, unemployment)
Household Size	State option to accept self-attestation	Personal tax returns
State Residency	State option to accept self-attestation	State databases (motor vehicles registration, drivers licenses) PARIS
Not Incarcerated	State option to accept self-attestation	State prison and jail records

State Verification Plans

For each eligibility criteria

- Self-attested, verified before enrollment, verified post-enrollment?
- Electronic data source used
- Reasonable compatibility standard
- If not reasonable compatible, accept a reasonable explanation or require paper documentation?

For specific electronic data sources

- Is it determined to be useful?
- Considerations (Y/N) (accurate, timely, comprehensive?)
- Used at application? Renewal?
- Used for periodic reviews? If so, at what frequency?

Verification plans also include eligibility factors specific to CHIP such as being uninsured, waiting periods, and more.

Two Primary Groups based on Financial Eligibility

MAGI	Non-MAGI
<ul style="list-style-type: none">• Children• Parent/caretakers• Pregnant women• ACA expansion adults• Family planning• Breast and cervical cancer early detection program	<ul style="list-style-type: none">• Individuals with disabilities• Elderly dually-eligible for Medicare and Medicaid• Individuals receiving long-term services and supports (LTSS)

Differences in Financial Eligibility

	MAGI	Non-MAGI
Income	Mostly taxable income with a few exceptions	Traditional Medicaid rules, may include non-taxable income like veterans benefits or child support
Household Size	<ul style="list-style-type: none"> • Tax filers – tax filing unit • Non-filers – related household members • Fetus counts toward pregnant person (optional for other family members) • Exceptions 	Immediate family in the home
Asset / Resources	Not allowed	State option
Income Disregards or Deductions	Standard 5 percentage point disregard	State option

MAGI Household Size

Tax Filers

- Tax filer and spouse
- All tax dependents
 - Dependent children
 - Dependent relatives

Some exceptions apply!

See [Getting MAGI Right Primer](#).

Non-Tax Filers

- Related family members in the home
- Adults
 - Adult
 - Spouse
 - Children (under age 19 or including 20 and 21 year-olds at state option)
- Children
 - Parents
 - Siblings
 - Child's children
 - Child's spouse

MAGI Income Counting

COUNTED		NOT COUNTED
Wages and Tips (taxable)	Pre-tax deductions should NOT be included	Supplemental Social Security Income (SSI)
Unemployment (base only)	\$300 per week COVID-emergency unemployment does NOT count	Temporary Aid to Needy Families (TANF) and other government cash assistance
Most retirement benefits	If taxable	Tax refunds and refundable tax credits (Earned Income Tax Credit (EITC); child tax credit)
Business income	(Profit after deducting expenses, line 31 of schedule C; line 34 of schedule F – farm income)	Worker’s compensation payments
Dividends and interest	Taxable and tax-exempt	Veterans benefits
Social Security benefits (Disability, survivor benefits, and retirement benefits)	Taxable and non-taxable for adults (Children’s Social Security benefits are NOT counted unless child is not required to file taxes (\$12,400 in earned income/\$1,100 in unearned income in 2020))	Certain payments to American Indian/Alaska Natives (tribal land payments; Alaska personal dividends)
Rents and royalty income (after costs)	Profit after subtracting costs	Child support received
Capital gains	Profit after subtracting capital losses	Workers compensation
Foreign income	Not common	Life insurance proceeds, inheritances, gifts, or loans

Differences in Reported Income and Data Source

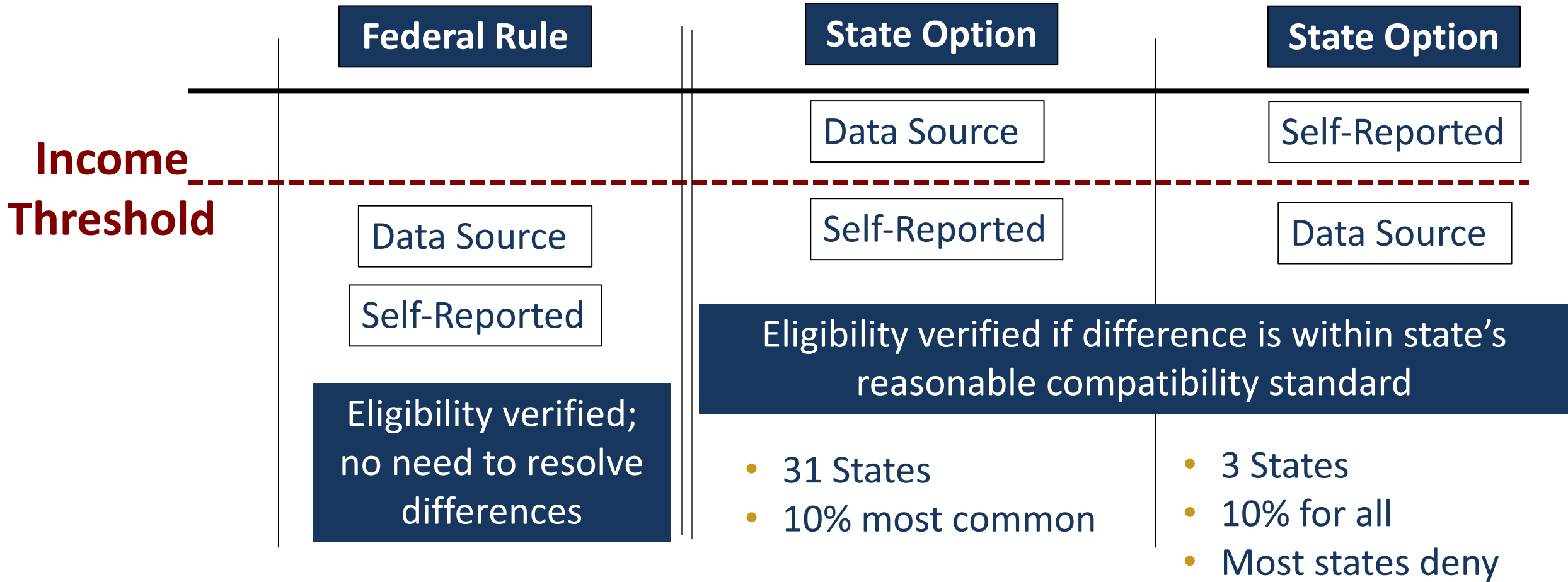
Reasonable Compatibility Rule

- “Income information obtained through an electronic data match shall be considered reasonably compatible with income information provided by or on behalf of an individual if both are either above or at or below the applicable income standard or other relevant income threshold.” 42 CFR §435.952(c)(1).

Translation

- If both the self-reported income or attestation and the data source are at or below the eligibility threshold, the individual is eligible.
- The difference doesn't matter because the individual would be eligible using either the electronic data or the attestation.
- States should not request documentation to account for the difference.

Optional Reasonable Compatibility



Reasonable Compatibility Examples

Medicaid threshold for adult (family of 3)	\$2,498	\$2,498	\$2,498
Reported income	\$2,550	\$2,550	\$2,550
Data source	\$2,350	\$2,350	\$2,350
Reasonable compatibility standard (% or dollar)	None	10% (\$249)	\$50
Eligibility verified?	No	Yes	No

Eligibility Determination

Step 1

Identify members of individual's family who are considered part of their household to determine family size.

Step 2

Add income of relevant members of the household.

*Income of tax dependents only counts if they are required to file taxes.
(\$12,600 in wages/earned income; \$1,100 in unearned income – 2020)*

Step 3

Apply reasonable compatibility standard (if applicable) and compare to FPL eligibility levels.

Federal Poverty Level and Income Eligibility

- Income eligibility can be based on a dollar threshold or percent of the HHS Federal Poverty Level (FPL)
- The poverty level is updated annually and is adjusted upward to account for inflation
- The FPL equivalent rate for dollar-based thresholds will erode over time

2021 Federal Poverty Level		
Poverty Level	Single Individual	Family of Three
100%	\$12,880	\$21,960
138%	\$17,609	\$29,974
200%	\$25,250	\$43,440

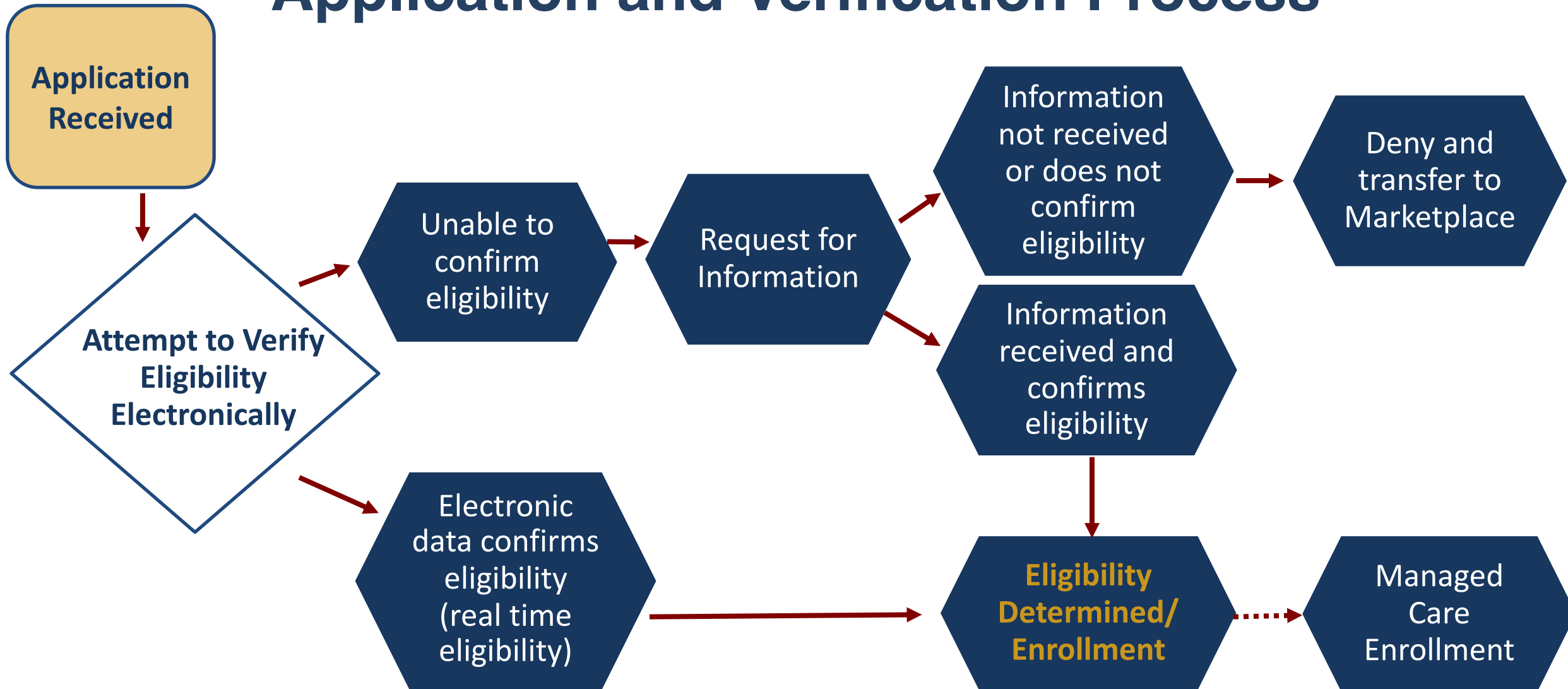


TYING IT ALTOGETHER: HOW THE PROCESSES WORK

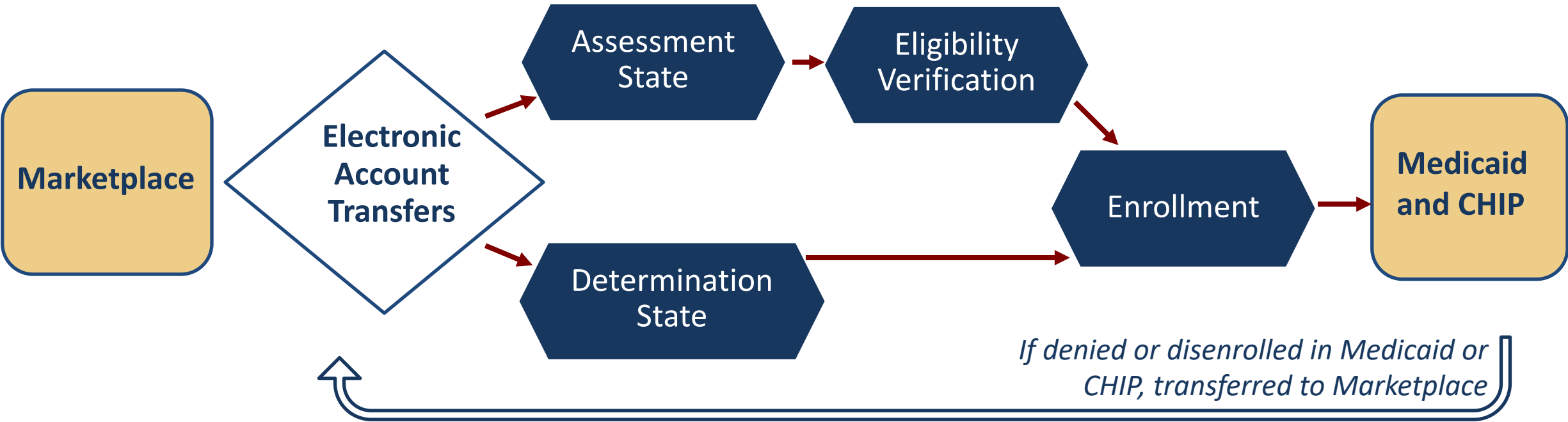
Application Pathways and Rules

- Single streamlined application for MAGI groups
 - May include screener questions for non-MAGI
 - 4 submission modes: online, telephone, in-person, mail
 - Requires a signature
 - Timeliness standards
 - 45 days for MAGI
 - 90 days for non-MAGI
- Account transfers from Marketplace
- Effective date of coverage
 - Medicaid: date of application or at state option, the first day of the application month
 - Medicaid retroactive coverage of unpaid medical bills up to 3 months if applicant was eligible in each of those months
 - CHIP
 - Enrollment may be prospective at beginning at next month
 - May require prepayment of premiums or prior to enrollment

Application and Verification Process



How Account Transfers are Designed to Work



Managed Care Enrollment Rules

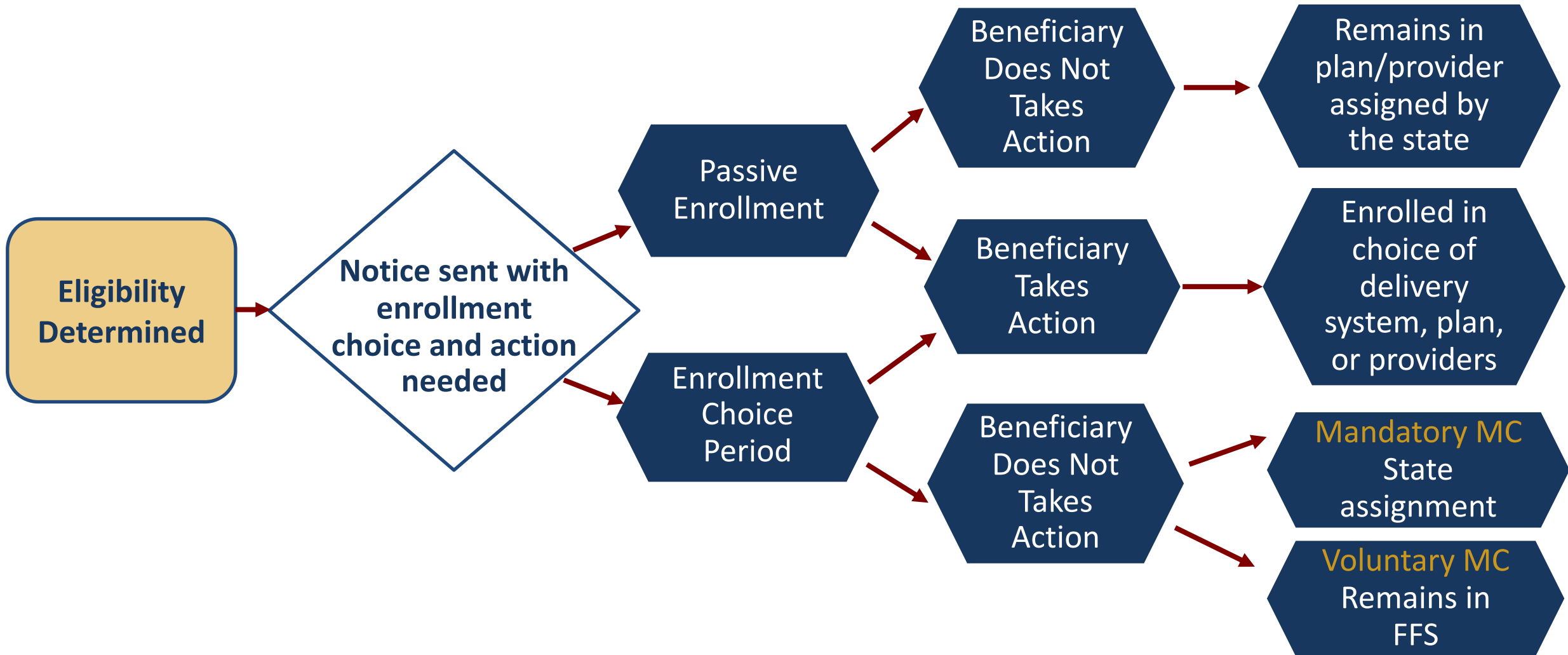
Voluntary vs Mandatory

- Voluntary - states offer a choice of fee-for-service (FFS) or enrollment in managed care (MC)
- Mandatory
 - Allowed for children, pregnant women, parents, and other adults
 - Waiver is needed to mandate MC for other groups
- Choice must include more than 1 MCO, with exceptions (i.e., rural areas with only 1 plan but provider choice)

Enrollment

- Managed care enrollment is another step in the process
- State options in both voluntary and mandatory enrollment
 - Offer beneficiary a choice period
 - Assign beneficiary automatically with time-limited opt out
- Opt out opportunities
 - Within 90 days without cause
 - At any time with cause
 - Annual enrollment period to switch

Managed Care Enrollment



Monitoring Enrollment Data

Improvement Opportunities

- Ready access to consumer assistance
 - Call center stats
 - In-person assistance (culturally competent, community-based)
- Reducing procedural denials
 - Ineligible vs. procedural
- Multiple follow-ups for missing information
- Easy-to-understand notices

Enrollment Data

- Direct correlation between enrollment and uninsurance rates among low-income
- Monthly data submitted to CMS (reporting lag)
- Many states post more timely and detailed data directly
- Trending enrollment data is an early warning system

Resources

- [CCF State Data Hub](#)
- [Getting MAGI Right Primer](#)
- [Kaiser Family Foundation](#)
- [Medicaid.gov](#)
- [Medicaid and CHIP Payment and Access Commission \(MACPAC\)](#)
- [CBPP Beyond the Basics](#)