

# Health Safety Net (HSN)

Massachusetts Health Care Training Forum April 2021





- COVID-19 Vaccine
  - Billing for Health Safety Net (HSN) patients
  - Billing for MassHealth Limited patients



### **COVID Vaccine**

- Billing for Health Safety Net (HSN) Patients
  - Providers should continue to bill the Health Resources and Services
    Administration (HRSA) for the COVID-19 vaccine for Health Safety Net patients
    without other coverage
- Billing for MassHealth Limited Members
  - Providers should bill MassHealth for any MassHealth Limited Members who receive the vaccine for dates of service on or after March 11, 2021
- For more information, please visit <u>https://www.mass.gov/doc/all-provider-bulletin-312-additional-authorized-vaccine-product-and-antibody-treatment-and-0/download</u>



### **QUESTIONS?**

For more information, please contact (877) 910-2100 or <u>hsnhelpdesk@state.ma.us</u>



## MassHealth

#### Massachusetts Health Care Training Forum April 2021





- MassHealth's Response to COVID-19
- MassHealth Income Standards and Federal Poverty Guide 2021
- MassHealth Health Plans Updates
- Cost Sharing Policy Updates
- MassHealth Customer Service Update
- Estate Recovery
- Update: Public Charge Rule Change
- Resources



# MassHealth's Response to COVID-19

# Response to COVID-19 Health Emergency

The COVID-19 national public health emergency declaration was extended, effective April 15, 2021. This extension is for 90 days.

- MassHealth will maintain coverage for individuals who have:
  - MassHealth (Medicaid/CHIP) coverage, Children's Medical Security Plan (CMSP), or Health Safety Net (HSN) as of March 18, 2020
  - Newly approved during the COVID-19 public health national emergency, and through the end of the month in which such national emergency period ends
- Individuals will not lose coverage or have a decrease in benefits during the public health national emergency. Coverage will end only if an individual:
  - Request termination of eligibility
  - Is no longer a resident of Massachusetts
  - Is deceased
- MassHealth Eligibility Flexibilities for COVID-19

# MassHealth 2021 Income Standards



- On March 1, 2021, the Federal Poverty Level (FPL) standards increased
  - 100% FPL for one individual went from \$1,064 to \$1,074
  - The 2021 FPL chart:
    <u>https://www.mass.gov/doc/</u> 2021-masshealth-incomestandards-and-federalpovertyguidelines/download

Note: The FPL percentages in the online application at <u>MAhealthconnector.org</u> will be updated for MassHealth purposes

#### Federal Poverty Levels (Monthly)

	Household Size	100%	133%	150%	200%	250%	300%	400%
	1	\$1,074	\$1,428	\$1,610	\$2,147	\$2,684	\$3,220	\$4,294
	2	\$1,452	\$1,931	\$2,178	\$2,904	\$3,630	\$4,355	\$5,807
	3	\$1,830	\$2,434	\$2,745	\$3,660	\$4,575	\$5,490	\$7,320
	4	\$2,209	\$2,938	\$3,313	\$4,417	\$5,521	\$6,625	\$8,834
2	5	\$2,587	\$3,441	\$3,880	\$5,174	\$6,467	\$7,760	\$10,347
	6	\$2,965	\$3,944	\$4,448	\$5,930	\$7,413	\$8,895	\$11,860
	7	\$3,344	\$4,447	\$5,015	\$6,687	\$8,359	\$10,030	\$13,374
	8	\$3,722	\$4,950	\$5,583	\$7,444	\$9,305	\$11,165	\$14,887
	Additional Persons	\$379	\$504	\$568	\$757	\$946	\$1,135	\$1,514

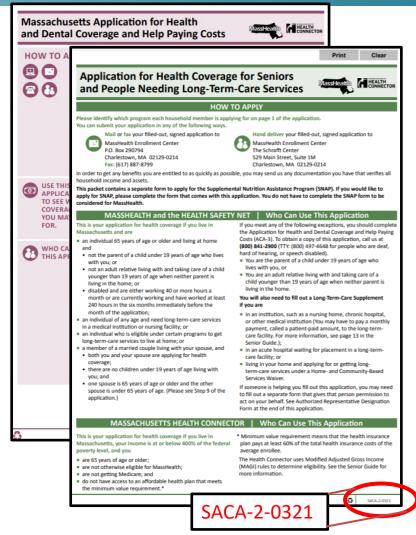


### ACA-3 and SACA-2

- The <u>ACA-3</u> & <u>SACA-2</u> applications have been updated
  - Updates reflect the 2021 Federal Poverty Level guidelines
- After <u>April 30, 2021</u>, MassHealth will not accept the January 2021 versions of these applications

#### **Ordering Materials:**

- Call: 1-800-841-2900
- Fax a request: 617-988-8973
- Email a request: <u>publications@mahealth.net</u>





### ACA-3 and SACA-2

#### When ordering be sure to include:

- Name of the form being ordered (e.g., ACA-3, SACA-2)
- Quantity requested
- Name of the person, organization, and shipping address the materials will be delivered to, and
- A direct phone number in case there is a question about the order





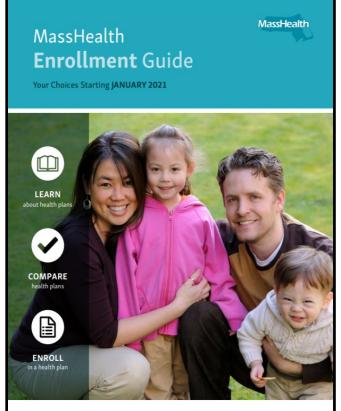
## **MassHealth Health Plans**

### **MassHealth Health Plans**



Beginning July 1, 2021, MassHealth members whose Primary Care Provider (PCP) will be joining an Accountable Care Organization (ACO) plan, or whose PCP will be changing from one ACO to another will receive an *"Important News about Your MassHealth Health Plan"* letter.

- MassHealth intends to keep members with their existing Primary Care Provider (PCP) when possible
  - As a result, members will be following their PCP into the same health plan their PCP has joined unless they take action

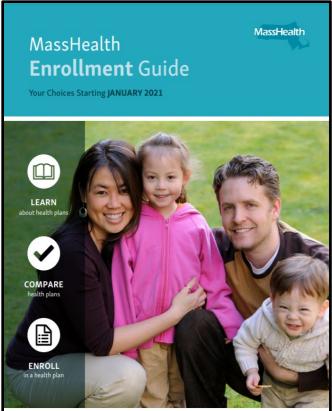


### **MassHealth Health Plans**



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- Member action
  - Members that would like to change health plans can do so during their Plan
     Selection Period of July 1, 2021 –
     September 30, 2021
- How to change health plan
  - Online: <u>MassHealthChoices.com</u>
  - Call: MassHealth Customer Service at (800) 841-2900; TTY: (800) 497-4648
  - Mail or fax: Complete the <u>MassHealth</u> <u>Health Plan Enrollment or Change Form</u>
  - <u>Certified Assisters</u> (CACs and Navigators)
    Call to set up an appointment





# **Cost Sharing Policy**



### **Key Terms**

#### Copays (Copayment)

The dollar amount charged by a provider to a member for use of a covered service or item

#### <u>Premium</u>

A charge for payment to the MassHealth agency that may be assessed to members of MassHealth Standard, MassHealth CommonHealth, MassHealth Family Assistance, or the Children's Medical Security Plan (CMSP)



MassHealth updated cost sharing rules. (See SSA §§ 1916 & 1916A; 42 C.F.R. Parts 447 and 457)

#### **Cost Sharing**

- Dollar amounts eligible members are charged for Medicaid coverage and benefits. For MassHealth, cost sharing includes Medicaid premiums and copays
  - <u>Copays</u> Current copayments include certain drugs dispensed at pharmacies
    - Pharmacy Copays:
      - \$1 for certain covered generic drugs and over-the-counter drugs mainly used for diabetes, high blood pressure, and high cholesterol. These drugs are called antihyperglycemics (such as metformin), antihypertensives (such as lisinopril), and antihyperlipidemics (such as simvastatin)
      - \$3.65 for each prescription and refill for all other generic, brandname, and over-the-counter drugs covered by MassHealth

*Note:* Members receiving a 90-day supply of a MassHealth covered prescription drug, the total copay amount for that 90-day supply will either be \$1 or \$3.65 depending on the type of drug.



MassHealth updated cost sharing rules. (See SSA §§ 1916 & 1916A; 42 C.F.R. Parts 447 and 457)

 Premiums Payments - Premium schedule is not expected to change at this time. MassHealth premiums will not exceed 3% of household income, as applicable

#### Monthly or Quarterly Caps

- States elect to track cost sharing on a monthly or quarterly basis
- Individual's cost sharing cannot exceed 5% of their family income applied on a monthly or quarterly basis
- Cap is based on copays and premiums incurred, not copays paid (i.e., a member does not have to actually have paid the copay to reach the cap)

#### Household Composition

 Household composition for purposes of determining eligibility is the same as the household composition for purposes of calculating the 5% aggregate cost sharing limit (notwithstanding whether household is Modified Adjusted Gross Income (MAGI) or non-MAGI)



MassHealth updated cost sharing rules. (See SSA §§ 1916 & 1916A; 42 C.F.R. Parts 447 and 457)

Phase 1 (7/01/20)

**Annual** copay caps on drugs dispensed by the pharmacy and monthly premium amounts

#### Copays



\$250 per calendar year on drugs dispensed by pharmacies. New member exclusions will apply

*Note*, acute inpatient hospital copays have been eliminated as of 3/18/20.



#### Phase 2 (7/01/21)

Members' total cost sharing obligation for copays and premiums combined will not exceed 5% of member's monthly household income



#### Copays

Members will be assigned a **monthly** copay cap not to exceed 2% of member's monthly household income for drugs dispensed by the pharmacy

- Members will be subject to this new copay policy starting July 1, 2021. However, for the duration of the COVID-19 Public Health Emergency, members will not be charged more than \$250 in total copays annually
- The updated copay policy will apply to members in MassHealth Standard, CarePlus, Family Assistance, and CommonHealth
- The updated copay policy will not apply to Children's Medical Security Plan (CMSP) members and any drugs that are charged through Health Safety Net (HSN) will continue to be subject to the \$250 annual pharmacy copay cap 20



#### Phase 2 (7/01/21)

Members' total cost sharing obligation for copays and premiums combined will not exceed 5% of member's monthly household income

#### Premiums

Members' premiums will <u>not exceed 3% of the member's monthly household</u> <u>income</u>, if applicable

- This limit does not apply to CommonHealth members
- Members experiencing undue financial hardship can request a waiver or reduction of their premium



### Who is Not Subject to Cost Sharing

Populations excluded from Cost Sharing (copays) (see 130 CMR 450.130)

#### **MEMBERS**

- Members with incomes at or below 50% FPL
- Members categorically eligible for MassHealth because they are receiving other public assistance such as Supplemental Security Income (SSI), Transitional Aid to Families with Dependent Children (TAFDC), or services through the Emergency Aid to the Elderly, Disabled and Children (EAEDC) Program
- Members under the age of 21 years old
- Pregnant women and those who are in their postpartum period
  - MassHealth defines the postpartum period as the time through the last day of the second calendar month after the end of the member's pregnancy. (For example, if the member gave birth on May 15th, the postpartum period ends July 31st)
- MassHealth Limited members



### Who is Not Subject to Cost Sharing

Populations excluded from Cost Sharing (copays) (see 130 CMR 450.130)

#### **MEMBERS**

- MassHealth Senior Buy-In members or MassHealth Standard members for drugs covered under Medicare Parts A and B only, when provided by a Medicare-certified provider
- Members in a long-term care facility such as nursing facilities, chronic-disease or rehabilitation hospitals, or intermediate-care facilities for individuals with intellectual disabilities or who are admitted to a hospital from such a facility or hospital
- Members who are receiving hospice services
- Members who are former foster care individuals eligible for MassHealth Standard, until the age of 21 or 26 as specified by 130 CMR 505.002(H)
- Members who are American Indians or Alaska Natives currently receiving or have ever received services at the Indian Health Service, an Indian tribe, a tribal organization, or an urban Indian organization
- Members who have reached a cost sharing cap



### **Services Excluded from Cost Sharing**

Services excluded from Cost Sharing (copays) (see 130 CMR 450.130)

#### SERVICES

- Copays for FDA-approved medications for detoxification and maintenance treatment of substance use disorders (SUD)
- Preventive services rated Grade A & B by the US Preventive Services Task Force (USPSTF) or broader exclusion specified by MassHealth, and vaccines and their administration recommended by the Advisory Committee on Immunization Practices (ACIP)
- Acute inpatient hospital stays
- Emergency services
- Family Planning services and supplies
- Smoking cessation products and drugs
- Provider-preventable services



### Key Takeaway

- MassHealth will fully implement cost sharing changes on July 1, 2021
- Members' total cost sharing will not exceed 5% of the member's monthly household income
  - The \$250 annual cap on pharmacy copays will be eliminated. Copay caps will be tracked monthly and members will be assigned to copay cap bands based on cap amount not to exceed 2% of the member's monthly household income
    - Members will be subject to this new copay policy starting July 1, 2021.
      However, for the duration of the COVID-19 Public Health Emergency, members will not be charged more than \$250 in total copays annually
  - Members' premiums will <u>not exceed 3%</u> of the member's monthly household income
    - New waiver or premium reduction requests
- Populations and services excluded from copays as of 7/01/20 remain excluded

# MassHealth Customer Service Update

### MassHealth Customer Service Center Menu Changes



#### **What**

- MassHealth is changing the member call menu options for 1-800-841-2900
- Callers will be asked to enter their MassHealth ID or last 4 numbers of their SSN and Date of Birth (DOB)
- Customized and streamlined menu options will be offered based on caller verification
- Option 3 (to report changes such as income, family size, assets, or employment) <u>and</u> Option 5 (questions about nursing homes and Long-Term Care) from the member menu will route callers directly to the MECs
- Expand self-service options, such as requests for MassHealth card replacements, address and phone number verification
- Provide Voice Recognition technology allows for a more member-friendly interaction

#### <u>Why</u>

- Create a more member-focused menu and improved customer service
- Streamline menu options and improve ease of use

### Sample Member Customer Service Center Menu



# The following demonstrates how a caller would access the new member menus:

- 1. Call 1-800-841-2900
- 2. Enter 1 for Member
- 3. Enter 1 for English or 2 for Spanish
- 4. Complete caller verification by entering MassHealth ID or Last 4 number of members SSN and Date of Birth
- 5. Customized call menu presented to caller based on call verification

#### Sample Menu

Option 1	Option 2	Option 3	Option 4	Option 5	Option 6
Self-service to confirm MassHealth status/health plan, phone #, address	Renew/update MassHealth and for self-service MassHealth card replacements	Report changes to case (income, family size, assets, or employment change)	Self-service for changing health plan/PCP and for covered services	Nursing Homes and Long-Term Care	Premium Billing, Transportation self-service, and Dental

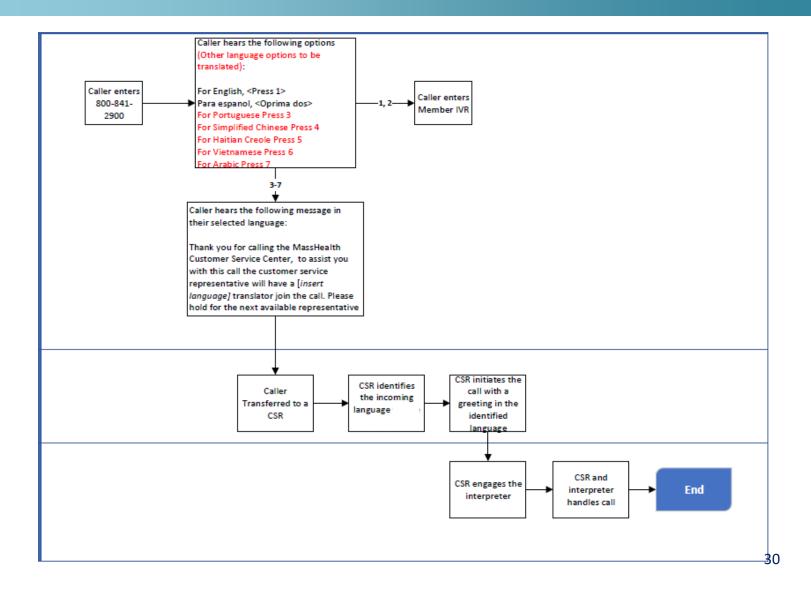
### Member Customer Service: Language Access



- Starting May 6<sup>th</sup>, the Member Customer Service Line will be modified to improve the experience of members for which English is not their primary language
- Expand the IVR to provide greetings in:
  - Portuguese, Simplified Chinese, Haitian Creole, Vietnamese and Arabic
- Offer a simplified call flow
  - If on hold, callers will hear on hold music
  - Provide translated greeting and confirmation
  - Route call directly to a "Universal" customer service representative (CSR)
- Ensure CSRs are trained to effectively support the use of an interpreter



### **Prevalent Language Call Flow**







Federal law requires MassHealth to have an estate recovery program. This program requires MassHealth to recover money from the assets from the estate(s) of certain MassHealth members after their death, unless exceptions apply.

- Estate Recovery applies to members who are:
  - 55 years old or older
  - Any age and living in a long-term care or other medical facility

*Note*: Estate recovery may apply to MassHealth members whether or not they enrolled in a health plan, such as a Managed Care Organization, Accountable Care Organization, Senior Care Options (SCO), PACE, or One Care.

- MassHealth will amend the regulations at 130 CMR 501.000 and 515.000 to reduce the number of estates subject to estate recovery and expand the definition of undue hardship for when a member's estate may qualify for estate recovery to be waived by MassHealth. These regulations will take effect **5/14/2021**.
  - These changes will significantly reduce the number of estates and expenses subject to estate recovery, and promote intergenerational transfers of wealth to help reduce reliance on public assistance



Federal law requires MassHealth to have an estate recovery program. This program requires MassHealth to recover money from the assets from the estate(s) of certain MassHealth members after their death, unless exceptions apply.

- The regulation changes will include:
  - Expansion of the existing criteria for undue hardship
  - The addition of two new hardship waivers. The new hardship waiver applications will be available at <u>www.mass.gov/estaterecovery</u>
  - A new form for American Indian and Alaska Natives (AI/AN) that <u>must be</u> <u>completed</u> in order to inform MassHealth's Estate Recovery Unit (ERU) when the AI/AN estate recovery exemption should apply
  - In addition, during the Public Health Emergency, MassHealth stopped filing estate recovery claims on probated estates with assets valued at \$25,000 or less. This change will become permanent with the regulation updates



#### When does estate recovery happen?

- Estate recovery only occurs after a MassHealth member's death
- The process begins once a probate estate is opened by the member's personal representative, the court-appointed executor or administrator of the estate (often a lawyer), with the appropriate probate court

# What's the difference between a MassHealth recorded lien and estate recovery?

 A lien is a legal claim on assets that allows MassHealth to recover the cost of care paid on the member's behalf. MassHealth liens are recorded during a member's lifetime after a determination has been made that they are not reasonably likely to return home from institutional care. The liens are recorded in the Registry of Deeds against any legal interests that a MassHealth member has in real estate. If MassHealth places a lien against a property that is later sold, transferred, or refinanced, money from the sale of that property must be used to repay MassHealth for medical services provided.





## What's the difference between a MassHealth recorded lien and estate recovery? (cont.)

 MassHealth estate recovery involves Notices of Claim that are filed in the probate court. The Notice of Claim only occurs after a member's death. The Notice of Claim provides notice to the estate's personal representative about MassHealth's claim to recover services paid by MassHealth from the assets of the probate estate



#### Exceptions

- If MassHealth's estate recovery claim would cause an undue hardship for the member's heir(s) who inherit an interest in the estate, MassHealth may waive all or part of the recovery amount in certain circumstances
  - Residence and Financial Hardship Waiver: The entire recovery of assets is waived for heirs with income under 133% of the federal poverty limit who live in the home and meet other specific criteria
  - Income-Based Hardship Waiver: Heirs with income under 400% of the federal poverty limit will have up to \$50,000 excluded from estate recovery
  - Care Provided Hardship Waiver: Heirs that lived in the member's home and provided a certain level of care for two years before the member became institutionalized or before the member's death and that meet other specific criteria will be exempt from estate recovery



#### Exceptions (cont.)

- Estate recovery will be deferred by law, if the member leaves behind a surviving spouse, a child who is blind, a child who is permanently and totally disabled, or a child younger than 21 years of age. MassHealth will not collect the debt until those conditions cease to exist
- MassHealth will not seek recovery from member's probate estate if the total gross assets are worth \$25,000 or less
- Certain income and resources of American Indians and Alaska Natives are exempt from estate recovery
- If the member had certain long-term-care insurance that meets the requirements of 130 CMR 515.014 and the Division of Insurance regulations at 211 CMR 65.09(1)(e)(2), the estate may not have to repay MassHealth for nursing facility and other long-term-care services



#### Exceptions (cont.)

- If the MassHealth member was eligible for both MassHealth and Medicare, MassHealth will not recover Medicare cost-sharing benefits paid on or after January 1, 2010, for members who got these benefits while they were age 55 or older. This exception applies primarily to MassHealth paid Medicare Part A and Part B premium payments
- If the MassHealth member was enrolled in a MassHealth plan that included member premiums paid to MassHealth on their behalf when the member was 55 or older, MassHealth will not recover on the amount that the member paid in premiums during that time period





#### How to apply for a Hardship Waiver

- Only the court-appointed personal representative or a public administrator of the estate can apply on behalf of the estate for each individual heir of the estate that meets the qualifications for a hardship waiver
- The Hardship Waiver Application Form will be available on the MassHealth website at <u>mass.gov/estaterecovery</u>
- The application form identifies all of the information and documentation required to qualify for each waiver

#### Resources

- Learn more and review the MassHealth Estate Recovery FAQ that will be available in early May <u>www.mass.gov/estaterecovery</u>
- MassHealth members with general questions about Estate Recovery can call MassHealth at 1-800-841-2900 (TTY: (800) 497-4648)



# Update: Public Charge Rule Change

### **Public Charge Rule Change**



On March 9, 2021 the Federal Government announced it is going back to the longstanding Public Charge Guidance in effect from the 1990s through 2019.

The Federal announcement and the Guidance: <u>https://www.uscis.gov/green-card/green-card-processes-and-procedures/public-charge</u>

#### What does this mean?

• The following programs **do not count** as part of the Public Charge determination:

Medicaid (MassHealth)	Public Housing
• SNAP	Unemployment benefits
WIC benefits	Pandemic EBT

- Health Connector subsidies (Advance Premium Tax Credits/ConnectorCare)
- The Guidance lists examples of many other benefits that are not subject to public charge, and the many types of immigrants who are not subject to the public charge test

### **Public Charge Rule Change**



On March 9, 2021 the Federal Government announced it is going back to the longstanding Public Charge Guidance in effect from the 1990s through 2019.

 The only benefits considered in public charge are programs (including Medicaid) that pay for long-term care in a medical institution such as a nursing home and needs-based cash assistance benefits such as SSI, TAFDC, and EAEDC

#### **Resource: Immigration Services**

 For questions and to learn more, speak with an immigration expert. For a list of immigration services in the community, visit <u>https://hcfama.org/immigrant-health-toolkit/</u>



### Resources

- 2021 FPL Chart
- COVID-19 Resources
- Food Assistance

### MassHealth Income Standards and Federal Poverty Guide



Family Size	MassHealth Income Standards		100% Federal Poverty Level		130% Federal Poverty Level		133% Federal Poverty Level		150% Federal Poverty Level	
	Monthly	Yearly	Monthly	Yearly	Monthly	Yearly	Monthly	Yearly	Monthly	Yearly
1	\$522	\$6,264	\$1,074	\$12,888	\$1,396	\$16,752	\$1,428	\$17,136	\$1,610	\$19,320
2	\$650	\$7,800	\$1,452	\$17,424	\$1,888	\$22,656	\$1,931	\$23,172	\$2,178	\$26,136
3	\$775	\$9,300	\$1,830	\$21,960			\$2,434	\$29,208	\$2,745	\$32,940
4	\$891	\$10,692	\$2,209	\$26,508	1		\$2,938	\$35,256	\$3,313	\$39,756
5	\$1,016	\$12,192	\$2,587	\$31,044	1		\$3,441	\$41,292	\$3,880	\$46,560
6	\$1,141	\$13,692	\$2,965	\$35,580	1		\$3,944	\$47,328	\$4,448	\$53,376
7	\$1,266	\$15,192	\$3,344	\$40,128	1		\$4,447	\$53,364	\$5,015	\$60,180
8	\$1,383	\$16,596	\$3,722	\$44,664	1		\$4,950	\$59,400	\$5,583	\$66,996
For each additional person add	\$133	\$1,596	\$379	\$4,548			\$504	\$6,048	\$568	\$6,816

#### 2021 MassHealth Income Standards and Federal Poverty Guidelines

These figures are rounded and may not reflect the figures used in program determination. Institutional Income Standard is \$72.80.

Family Size	165%		200%			0%		0%	400%	
	Federal Poverty Level		Federal Poverty Level		Federal Poverty Level		Federal Po	verty Level	Federal Poverty Level	
	Monthly	Yearly	Monthly	Yearly	Monthly	Yearly	Monthly	Yearly	Monthly	Yearly
1	\$1,771	\$21,252	\$2,147	\$25,764	\$2,684	\$32,208	\$3,220	\$38,640	\$4,294	\$51,528
2	\$2,396	\$28,752	\$2,904	\$34,848	\$3,630	\$43,560	\$4,355	\$52,260	\$5,807	\$69,684
3			\$3,660	\$43,920	\$4,575	\$54,900	\$5,490	\$65,880	\$7,320	\$87,840
4			\$4,417	\$53,004	\$5,521	\$66,252	\$6,625	\$79,500	\$8,834	\$106,008
5			\$5,174	\$62,088	\$6,467	\$77,604	\$7,760	\$93,120	\$10,347	\$124,164
6			\$5,930	\$71,160	\$7,413	\$88,956	\$8,895	\$106,740	\$11,860	\$142,320
7			\$6,687	\$80,244	\$8,359	\$100,308	\$10,030	\$120,360	\$13,374	\$160,488
8			\$7,444	\$89,328	\$9,305	\$111,660	\$11,165	\$133,980	\$14,887	\$178,644
For each additional person add			\$757	\$9,084	\$946	\$11,352	\$1,135	\$13,620	\$1,514	\$18,168

These figures are rounded and may not reflect the figures used in program determination. Institutional Income Standard is \$72.80.)

### **COVID-19 Resources**



#### **Information about COVID-19**

- All individuals who qualify for MassHealth, Children's Medical Security Plan, or Health Safety Net have access to the following services for free (none of these services are considered in the public charge test):
  - COVID-19 testing and treatment (find COVID-19 testing sites near you at <u>mass.gov/gettested</u>)
  - COVID-19 vaccines. Learn about when you're eligible to get a vaccine and how to schedule an appointment at <u>mass.gov/covidvaccine</u>
  - Help with transportation to the location where you have scheduled a vaccine appointment. Learn more at <a href="https://www.mass.gov/doc/transportation-to-covid-19-vaccine-appointments-for-masshealth-members-and-health-safety-net-0/download">https://www.mass.gov/doc/transportation-to-covid-19-vaccine-appointments-for-masshealth-members-and-health-safety-net-0/download</a>

### **COVID-19 Resources**



#### Help with food

- As a result of COVID-19, 1 in 3 people in Massachusetts needs help getting food, many for the first time
- Visit <u>mass.gov/findfoodhelp</u> for information about immediate access to food, as well as ongoing monthly financial support to buy food
  - Project Bread FoodSource Hotline: 800-645-8333

