

# NE Children's Health Care Summit

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Coordinating Coverage for Children Across  
Medicaid, CHIP, the Basic Health Plan and the  
Exchange in 2014 and Beyond

New England Alliance for Children's Health  
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# Let's Start with Good News

- Single, streamlined application
  - Medicaid, CHIP, Basic Health Plan, subsidies in Exchange
- No wrong door
  - screened and enrolled in appropriate program regardless of how/where you apply
- Multiple methods of application
  - Online, mail, telephone, in person, with assistance



# Technology-Enabled, Data-Driven Eligibility Process

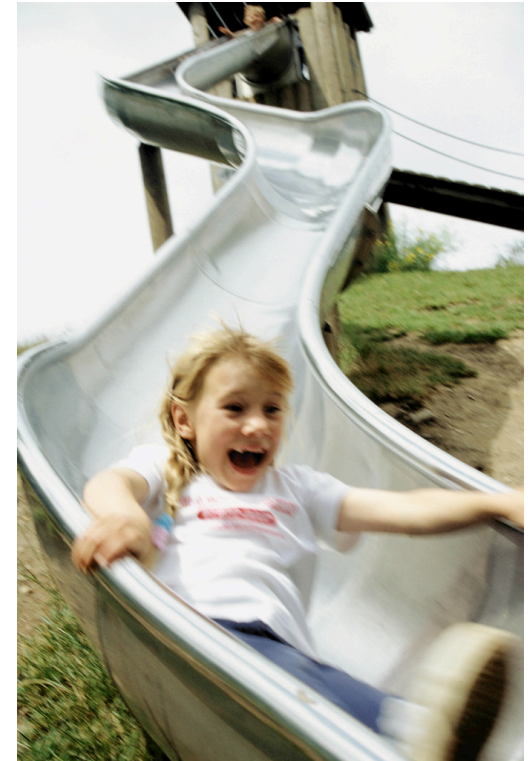
- Can't ask for information not needed for eligibility
- Paperless process
  - Verification through electronic sources including new federal data hub
  - Establishes “reasonable compatibility” concept for differences in reported vs. electronic data
  - Self-attestation options for states
- Real or near-real time determination

# Verification/Self-Attestation of Eligibility

Criteria	Medicaid/CHIP	Exchange
Citizenship/Immigration	SSA/DHS Matching (Hub)	SSA/DHS Matching (Hub)
Income	Current monthly income May accept self-attestation	Projected annual income May accept self-attestation
Residency	May accept self-attestation	Must accept self-attestation
Pregnancy	Must accept self-attestation	Must accept self-attestation
Household composition	Must accept self-attestation	Must accept self-attestation
Age and date of birth	May accept self-attestation	May accept self-attestation
Incarceration	N/A	Must verify electronically
Availability of minimum essential coverage	NA (CHIP continues to follow existing crowd-out rules)	Must verify electronically (source to be determined)

# Fastracked Eligibility Options

- Presumptive eligibility
- Provisions for express lane eligibility decisions
  - Assumes ELE does not sunset in 2013 as expected under CHIPRA
  - Legislation will be required
- Pre-enrollment of parents/ other programs



## KEY POLICIES & PROCEDURES (2011)



Immigrant Coverage	Y	Y	Y	N	Y	N
Electronic App with E-Sign	N	N	*	N	N	Y
No Income Paperwork	Y	N	N	N	N	Y
SSA Cit-Doc Match	Y	Y	Y	Y	N	N
Presumptive	Med only	N	Y	Med only	N	N
Express Lane	N	N	N	N	N	N
Administrative Renewal	Y	Y	N	N	N	Y
Online Renewal	N	N	N	N	N	Y
Telephone Renewal	N	N	Y	N	N	N
Community App Assistance	Y	Y	Y	Y	Y	Y

# The Role of the Exchange

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- Authorized to make Medicaid decisions
  - Will transfer enrollment data to agency for Medicaid/CHIP
- Must have robust website with electronic application using electronic signature
  - Regulations stop short of requiring:
    - “My account” functionality
    - Third party access (navigators, application assistants)

# MAGI-based Rules

- No asset test
- No face-to-face interview
- New rules related to income and family size (generally) consistent with premium tax credits in the Exchange
  - Parents must file joint tax return to get subsidies but not for Medicaid
- No income disregards or deductions
  - Flat 5 percentage points above 133% FPL

# What is MAGI?

- Not a number on your tax return
- Formula or methodology rooted in tax law with adjustments
- Differs from current Medicaid rules for counting income and family size



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# What about those more complicated family situations?



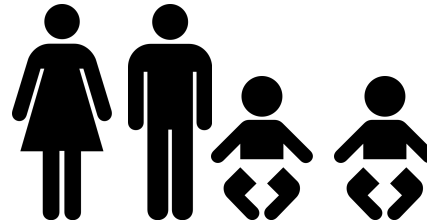
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# Children in Families with Access to *“Affordable?”* Employer Coverage



# Affordability Test

Families with offer of employer coverage



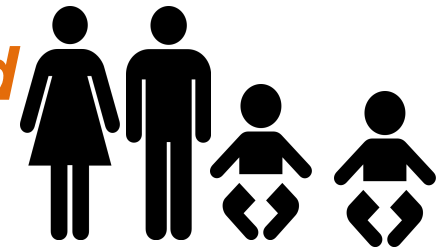
Can only access premium tax credits in Exchange *IF*:

Premium cost for:  
*Self-only*



> 9.5%

Income of:  
*Household*



# Family Affordability Test

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- Hoping for a better definition in final rule
- No penalty but where will they get affordable coverage?
- Many children eligible for Medicaid or CHIP
  - Adds weight to maintaining CHIP program
  - Eliminate CHIP waiting periods
  - Count CHIP premiums toward family contribution

# Kids Claimed as Tax Dependents on Non-Custodial Parent's Tax Return



# Exception to the MAGI rules for Medicaid/CHIP

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- Child will qualify for Medicaid or CHIP if custodial parent income is within income guidelines
  - Need to address child medical support rules to eliminate conflicting policy

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# Kids Living with Caretaker Relatives



# Exception to MAGI Rules for Medicaid/CHIP

- Children will be eligible for Medicaid based on their income only
- Caretaker's income will not count if child is not biological, adopted or step-child
- But if child has income above Medicaid/CHIP, how will tax credits work?
  - Depends on who claims child as tax dependent
  - Child-only plans in Exchange needed

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# Children in Medicaid/CHIP Parents in the Exchange



# Who are these families?

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- Citizen children with citizen parents with income >138% FPL
- Citizen children with legal resident parents (in country less than 5 years) regardless of income
- Legally-residing children in states covering in Medicaid and CHIP
  - CT, MA, ME, RI

# Systems should appropriately determine eligibility.

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- Although in different plans, Medicaid and CHIP may be better choice for children
  - Better benefits
  - Lower cost-sharing
- Will the systems be ready?
- Will parents get a double hit on premiums?
- Basic Health Plan might be good solution

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# Children Living in Families with Mixed Immigration Status



# Trickiest Scenario of All

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- Citizen parent may qualify for Medicaid while legally residing parent qualifies for tax subsidies
  - Set triggers for review at 5 year mark
- Undocumented parents are not eligible to purchase Exchange coverage with or without subsidies
  - Non-applicants not required to provide info

# Biggest Concerns for Immigrant Families

- Privacy and confidentiality
- Potential exportation and separation
- A number of immigrant families are covered through employers
  - Concern about SHOP re-assessing immigration status that is already verified
- Need trusted assistors within a strong navigator program

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# Making the System Work Well



# IT Systems that Really Work!

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- Timeline and complexity are challenging
- Who writes the business rules regarding eligibility? Do they account for all the various scenarios?
- Reliable sources for current income for Medicaid/CHIP
- Ensuring successful handoffs/transitions between programs

# Child-Only Plans



- Exchange participating insurers must offer child-only plans
- Essential benefits should meet the needs of children
- Network adequacy standards should have
- Child-only plans should be rated (priced) based on child utilization to assure affordability

# Culturally Competent Navigators

- Particularly important to:
  - Immigrants and individuals with low-English proficiency
  - Individuals with diverse ethnic, cultural backgrounds
  - Low-income individuals unfamiliar with insurance
- Tug-of-war between brokers and CBO's



# Keeping People Covered: New and Improved Renewals!



- Every 12 months
- Automatic renewals required if data is available
  - Cannot require signature
  - Report changes online, phone, mail, in person
- Otherwise use pre-populated renewal forms
  - Respond online, phone, mail, in person
  - Electronic signature must be available

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