

Title page for the Commonwealth's Continuous Eligibility Implementation Plan

State	Massachusetts
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Section 1. Background and Approved Policies

Since 1997, the MassHealth 1115 demonstration has been a critical tool in enabling Massachusetts to achieve and maintain near-universal coverage, sustain the Commonwealth's safety net, expand critical behavioral health services, and implement reforms in the way that care is delivered. The recently approved 1115 demonstration will continue utilizing this tool by working toward the following goals:

- 1) Continue the path of restructuring and re-affirm accountable, value-based care – increasing expectations for how ACOs improve care and trend management, and refining the model
- 2) Reform and invest in primary care, behavioral health, and pediatric care that expands access and moves the delivery system away from fee-for-service health care
- 3) Advance health equity, addressing health-related social needs and specific disparities
- 4) Sustainably support the Commonwealth's safety net, including increased funding for safety net providers, with a continued linkage to accountable care
- 5) Maintain near-universal coverage, including updates to eligibility policies to support coverage and equity

While the approved continuous eligibility provisions in the 1115 demonstration aim to support each of these goals, they most directly address the priorities that are embedded within goal 5 by providing continuity and improving access for members who are being released from a correctional setting and members who are experiencing homelessness.

For justice involved individuals, MassHealth will provide continuous eligibility for Medicaid-eligible members under age 65 for up to 12 months following release from a correctional institution, including individuals who apply up to 12 months after being released. These individuals will receive coverage through the last day of the 12th month following release. Implementing this policy will reduce administrative eligibility churn, decrease disruption in coverage, improve health outcomes during the reentry period, and decrease the risk of recidivism. Additionally, this will ensure individuals can access coordinated physical and behavioral health care to meet their unique needs. This policy is complementary to other MassHealth initiatives including the Community Support Program for Justice Involved members (CSP-JI) which provides enhanced behavioral health supports and care coordination services for members post-release.

For individuals experiencing homelessness, MassHealth will provide continuous eligibility for 24 months to Medicaid-eligible members under the age of 65 who are experiencing homelessness and who meet the following criteria: individuals must have a confirmed status of homelessness for 6 months from the Statewide Homeless Management Information System, and/or are part of the Department of Housing and Community Development, Emergency Assistance Program for homeless families. Implementing this policy will reduce loss of coverage

for administrative reasons such as incomplete or missing paperwork, and will ensure uninterrupted access to physical and behavioral health care and supports that promote self-sufficiency and community stabilization. This policy is complementary to other MassHealth initiatives, including CSP for Homeless Individuals (assistance from specialized professionals who provide support specific to this population's housing and health needs), ACO Flexible Services, and Community Partners.

Section 2. Identifying Continuous Eligibility Demonstration Populations

A. Justice-involved Members

Individuals eligible for 12 months continuous eligibility are released from a correctional institution, defined as County Correctional Facilities (CCFs), state Department of Corrections (DOC) Facilities, and Department of Youth Services (DYS) juvenile justice facilities.

MassHealth has existing procedures and direct communication with correctional facilities who notify MassHealth when a member is in custody, or a member or new applicant is being released. While MassHealth also utilizes electronic data matching to identify this population, these established relationships allow for more timely notification. Once a member or applicant has been identified as justice-involved, either through communication with correctional partners or by information provided on an application, the system will place a flag on their record ensuring their identification as a recipient of 12 months of continuous eligibility.

The 12-month continuous eligibility period begins at the date of the individual's release and will extend through the end of the 12th month following release. Eligible individuals for whom an eligibility determination is made after their release date but before 12 months after their release date shall be eligible for continuous eligibility through the last day of the 12th month following release. This may result in continuous eligibility periods of less than 12 months for some individuals.

B. Members Experiencing Homelessness

Individuals eligible for 24 months continuous eligibility are those who have a confirmed status of homelessness for at least 6 months from the Statewide Homeless Management Information System Data Warehouse or from the Department of Housing and Community Development, Emergency Assistance Program. Once a member or applicant has been identified as homeless, the system will place a flag on their record ensuring their identification as a recipient of the appropriate number of months of continuous eligibility.

Consistent with federal regulations, the 24-month continuous eligibility period for individuals experiencing homelessness will begin no later than the third month before the month of application or on the effective date of the most recent renewal of eligibility. Additionally, 12 months into the 24-month continuous eligibility period, MassHealth will make a reasonable effort to confirm that the individual is still a resident of the Commonwealth and is not deceased before resuming the remainder of the 24-month eligibility period. One attempt will be made at the 12-month mark for each member receiving more than 12 months of continuous eligibility. MassHealth will utilize available data sources and standard member outreach procedures in an

attempt to verify the member still meets continuous eligibility criteria. The termination of continuous eligibility would only result in the event of a response affirming out of state residency, death or voluntary withdrawal.

Section 3. System Protections for Demonstration Populations

A beneficiary identified as justice involved or homeless will be determined eligible for continuous eligibility for 12 or 24 months, respectively, with varying operational requirements. Continuous eligibility for eligible recipients will ensure there are no downgrades to benefits for the duration of the continuous eligibility period, with the only exceptions being a self-attested voluntary withdrawal from the MassHealth program, death, verification that a member has moved out of state, or agency error or fraud, abuse or perjury attributed to the individual.

The implementation of continuous eligibility will not replace or interfere with standard operational procedures related to the maintenance of member records. The customary process to perform verifications on beneficiary residency will continue to allow reported changes from a third party, a member self-attestation, or related record updates to be applied without interfering with benefit continuity. Changes to a member's record, including contact information, can be made at any time throughout the continuous eligibility period and are required annually at the time of eligibility renewal. The operating system will attempt to confirm if the reported changes can be verified via available data sources and will generate noticing to the member if manual verification is required. Notices of renewal, requests for verifications, or any other correspondence requiring member action will be sent to the member in advance of any upcoming program determinations. Member materials inform beneficiaries that changes in circumstance require timely reporting and further explain necessary member duties and responsibilities, specified timeframes for submission, and modes by which the member may respond to satisfy requests. In the case where members are homeless or considered otherwise transient, mail may be returned undeliverable indicating the most recent and updated information may no longer be valid; such an event will not result in a termination of benefits or an interruption in the continuous eligibility period unless there is sufficient evidence indicating this is a result of the previously mentioned termination exception. Staff are instructed to process all received changes in accordance with the current operational procedures which will preserve case accuracy, member communication and operational reliability but will not downgrade member benefits.

Section 4. Ending the Continuous Eligibility Period

Prior to the conclusion of the continuous eligibility period, MassHealth will attempt an ex parte renewal by accessing available federal and state data sources. In the case we are unable to complete an ex parte renewal, a request for renewal will be sent to the applicable members with additional member materials detailing the required actions. Beneficiaries are required to complete an eligibility renewal in its entirety and submit it timely to ensure continuity of benefits that will be determined based on established regulatory eligibility criteria. Should a member not submit a completed eligibility renewal following the end of the continuous eligibility period, benefits will be determined based on available data sources during a systematic program determination.

Section 5. Operational Implementation

Existing operational processes around MassHealth enrollment of individuals released from correctional facilities requires manual processing by a designated team of MassHealth staff that is initiated by direct communication from correctional facilities. MassHealth expects to finish automating systematic enrollment processing of justice-involved individuals by July 2024. Ahead of this scheduled system update, MassHealth will implement a manual process for the justice-involved population so that continuous eligibility can take effect as of April 2023.

Continuous eligibility for members experiencing homelessness will take effect for individuals as of December 2023. In order to fulfill the requirements of the STCs for continuous eligibility, verification of homelessness through the Statewide Homeless Management Information System is required. In order to automate the existing process as well as the communication between MassHealth systems and the statewide system, comprehensive system upgrades and testing of systems will be required. These processes to systematically apply continuous eligibility will be completed by December 2023. Ahead of this scheduled system update, the federal public health emergency Maintenance of Effort requirement will continue coverage until a renewal is completed during unwind.

Figure 1: Overview of Implementation Timeline

