



## **Eligibility Operations Memo 24-02**

**DATE:** March 2024

**TO:** MassHealth Eligibility Operations Staff

**FROM:** Heather Rossi, Director of Eligibility Policy

**RE:** **Continuous Eligibility for Certain MassHealth Members**

### **Background**

In September 2022, the Centers for Medicare & Medicaid Services (CMS) approved a five-year extension of the [MassHealth Section 1115 Demonstration](#), which allowed for continuous eligibility for two demonstration populations: MassHealth members younger than 65 who have been released from jail or prison and MassHealth members younger than 65 experiencing homelessness. The 1115 Demonstration is effective October 1, 2022, through December 31, 2027.

Additionally, under the [Consolidated Appropriations Act, 2023, Section 5112](#), states are required to provide 12 months of continuous eligibility for children who are younger than the age of 19 and enrolled in Medicaid or the Children's Health Insurance Program (CHIP), effective January 1, 2024.

These authorities align with MassHealth's goals of supporting integrated, outcomes-based care for MassHealth members and bring a new focus on advancing health equity by closing disparities in quality and access.

### **Eligibility Criteria and Coverage Start Dates**

A period of continuous eligibility will be provided to specific MassHealth member populations based on the criteria listed below regardless of a change in circumstances that would otherwise make a member ineligible. These specific members will only lose coverage during a continuous eligibility period if they are no longer a resident of the state, request a voluntary termination, are deceased, attain age 19 (for continuous eligibility for children), or MassHealth determines that eligibility was erroneously granted at the most recent determination, redetermination, or renewal of eligibility because of agency error or fraud, abuse, or perjury attributed to the individual.

Additionally, enrollment in a continuous eligibility period requires a final eligibility determination. A provisional or presumptive MassHealth beneficiary will only be eligible for continuous coverage if they receive a final eligibility determination before the end of their provisional or presumptive period. Those receiving a provisional benefit may need to submit information or verifications to establish their eligibility. Those on a presumptive benefit, such as

hospital-determined presumptive eligibility, must submit a full application to receive a final eligibility determination.

### **Members released from jail or prison**

As of April 1, 2023, MassHealth has provided continuous eligibility for Medicaid-eligible members released from jail or prison younger than age 65 for up to 12 months following their release. The continuous eligibility period will start on the date of release and will end at the end of the 12th month following the release date. For example, a member who is released from a correctional facility on April 1, 2024, and was determined eligible for MassHealth prior to their release date, will have their continuous eligibility period start on April 1, 2024, and end on April 30, 2025.

If an eligibility determination is made after the date of release but before 12 months following the date of release, the individual is eligible for continuous eligibility from the date of the determination until the last day of the 12th month following the date of release.

### **Members experiencing homelessness**

As of December 15, 2023, MassHealth has provided 24 months of continuous eligibility to Medicaid-eligible members younger than the age of 65 who have a confirmed status of homelessness for at least six months from either:

- the Statewide Homeless Management Information System, or
- the Executive Office of Housing and Livable Communities, Emergency Assistance shelter system.

MassHealth applicants experiencing homelessness who are not tracked in the Statewide Homeless Management Information System or the Executive Office of Housing and Livable Communities, Emergency Assistance shelter system are not eligible for continuous eligibility until they have a confirmed status of homelessness in the above-mentioned systems for at least six months. The MassHealth eligibility systems will still flag members who are not in the system but self-report as homeless.

For new MassHealth applicants who meet the criteria, the continuous eligibility period will start on the date that MassHealth determines that they qualify for coverage. In the case of retroactive coverage, the continuous eligibility period is also based on the date MassHealth determines the individual is eligible for coverage. All members will be sent a renewal at the end of their continuous eligibility period.

For example, an applicant with a confirmed status of homelessness for at least six months submits a MassHealth application on March 1, 2024; MassHealth determines that the individual is eligible for coverage on April 10, 2024; the individual's health coverage may begin on or up to 10 days before the date of application (on or up to 10 days before March 1, 2024); the continuous eligibility period starts on April 10, 2024 and ends after the member completes a renewal that is triggered by the date of application of March 1, 2024.

## Children younger than age 19

As of January 1, 2024, MassHealth has provided 12 months of continuous eligibility for children younger than the age of 19 enrolled in Medicaid and CHIP programs. Even if a child or household experiences a change in circumstances that would otherwise make the child ineligible for benefits, their 12-month continuous eligibility period will not be affected, except as outlined in this EOM. Additionally, a child may not be downgraded or terminated for non-payment of premiums during their continuous eligibility period.

For new MassHealth applicants who meet the criteria, the continuous eligibility period will start on the date MassHealth determines they qualify for coverage. In the case of retroactive coverage, the continuous eligibility period is also based on the date MassHealth determines the individual is eligible for coverage. All members will be sent a renewal at the end of their continuous eligibility period.



For example, an applicant submits a MassHealth application on March 1, 2024; MassHealth determines that the individual is eligible for coverage on April 10, 2024; the individual's health coverage may begin on or up to 90 days before the date of application (on or up to 90 days before March 1, 2024); the continuous eligibility period starts on April 10, 2024, and ends after the member completes a renewal that is triggered based on the date of application of March 1, 2024. If the member continues to be eligible for MassHealth coverage after renewal and is younger than the age of 19, a new 12-month continuous eligibility period is triggered.

## Summary of Continuous Eligibility Provisions

Initiative	Description	Implementation Date
Continuous eligibility for Justice Involved (JI)	Provides 12 months continuous eligibility to Justice Involved younger than age 65 upon release from public institution for the first year they return to the community	April 1, 2023
Continuous eligibility for Homeless Adults	Provides 24 months continuous eligibility to homeless younger than age 65	December 15, 2023
Continuous eligibility for Children	Provides 12 months continuous eligibility to children younger than age 19	January 1, 2024

## Questions

If you have questions about this memo, please have your MEC designee contact the Policy Hotline.

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