

## Fact Sheet: MassHealth's Requested 1115 Demonstration Amendment Supports Health Equity and Universal Coverage

August 2023

On August 2, 2023, the Healey-Driscoll Administration posted for public comment a proposal to amend Massachusetts' Section 1115 Demonstration ("1115 Demonstration"). The amendment proposes additional innovative flexibilities under the 1115 Demonstration that was approved on September 28, 2022.

The Massachusetts 1115 Demonstration, currently approved through December 31, 2027, has long supported the Commonwealth's commitment to universal health care coverage and has provided federal authority to test innovations in payment and care delivery. The posted amendment aims to advance health equity by expanding coverage and further addressing members' health-related social needs.

MassHealth intends to request authority through this amendment to implement the following changes:

### 1. Provide Pre-Release MassHealth Services to Individuals in Certain Public Institutions

- To address health inequities experienced by justice-involved populations, MassHealth is proposing to provide certain MassHealth-covered services to otherwise eligible individuals for up to 90 days prior to release, including justice-involved youth in Department of Youth Services (DYS) facilities. Covered services would include physical and behavioral health clinical consultation services, medications and medication administration, as well as pre-release case management, post-release treatment plan, and discharge planning.

### 2. Provide 12 Months Continuous Eligibility for Adults and 24 Months' Continuous Eligibility for Members Experiencing Homelessness Who Are 65 and Over

- Continuous eligibility means that members will retain coverage for the appointed period even if they experience changes in their circumstances that would otherwise affect eligibility.
- MassHealth is proposing to extend 12 months of continuous eligibility to all adults age 19 and over. Continuous eligibility for children under age 19 is already slated to begin in January of 2024, so this amendment would extend 12 months of continuous eligibility to all MassHealth members.
- The amendment would also extend the 24 months of continuous eligibility for members under age 65 experiencing homelessness to those age 65 and over.

### 3. Implement Three Months Retroactive Eligibility

- MassHealth is seeking to implement three months of retroactive coverage from the day of application for all members, if any medical services were received during that time period. This means that if a member joins MassHealth in July, MassHealth will be able to cover eligible services received for the prior three-month period (April-June).

### 4. Expand Marketplace (Health Connector) Subsidies to Additional Individuals

- The Commonwealth is requesting an expansion of its existing 1115 Demonstration expenditure authority for marketplace subsidies for ConnectorCare premiums to include eligible individuals up to 500% of the Federal Poverty Level (FPL), consistent with potential changes to state law. Currently, marketplace subsidies are only available to individuals with incomes up to 300% FPL.

### 5. Include Short-Term Post Hospitalization Housing (STPHH) and Support Services as an Allowable Health Related Social Needs Service

- The proposed amendment would permit MassHealth to cover up to six months of Short-Term Post-Hospitalization Housing (also known as medical respite) as a Health Related Social Needs service. STPHH will include certain medical services such as monitoring of vital signs, assessments, wound care, medication monitoring, and 24-hour on-call medical support, as well as housing navigation and support services, for MassHealth members enrolled in a MassHealth Accountable Care Organization who meet certain risk-based and clinical criteria.
- Through this amendment, MassHealth seeks to ensure that MassHealth members experiencing homelessness are discharged from hospitals to a safe space and, by doing so, avert further intensive medical interventions and reduce the total cost of care.

**6. Increase the Expenditure Authority for the Health-Related Social Needs Integration Fund**

- MassHealth's current 1115 Demonstration includes authority for \$8M of infrastructure investments for organizations providing Health-Related Social Needs supports to MassHealth members. Upon approval, this expanded authority will allow MassHealth to allocate additional funding up to \$25M for infrastructure investment.

**7. Increase the Income Limit for Medicare Savings Program (MSP) Benefits for Members on MassHealth Standard to the State Statutory Limit**

- The amendment further seeks to extend the Medicare Savings Program by tying federal eligibility to the income limit in state law. This would mean that more low-income individuals would qualify for assistance in paying for their Medicare premiums.

**8. Preserve CommonHealth Members' Ability to Enroll in One Care Plans**

- MassHealth is seeking to clarify demonstration authority to continue to allow, post 1/1/26, CommonHealth members to be enrolled in One Care as their delivery system for Medicaid coverage.

**Public Comment Period:**

EOHHS will accept comments on the proposed amendment through 5:00 PM on September 9, 2023. Written comments may be delivered by email or mail. By email, please send comments to [1115WaiverComments@mass.gov](mailto:1115WaiverComments@mass.gov) and write "1115 Amendment Comments" in the subject line. By mail, please send comments to: 1115 Amendment Comments, EOHHS Office of Medicaid, One Ashburton Place, 3<sup>rd</sup> Floor, Boston, MA 02108. Comments must be received by September 9, 2023 in order to be considered.

The amendment documents may be obtained on the MassHealth website: <https://www.mass.gov/service-details/1115-masshealth-demonstration-waiver>. Additional updates and final submissions to CMS will also be posted on this website.

EOHHS will hold a virtual public meeting to hear comments from the public on the proposed amendment:

**Date: Thursday, August 17, 2023**

**Time: 2:00 to 3:00 PM**

**Meeting Link:** Join from PC, Mac, Linux, iOS or Android:

<https://umassmed.zoom.us/j/94557067013?pwd=enp6UFBldWRBNdNDbnBIU3Q3bXhJUT09>

Password: 828333

Or iPhone one-tap (US Toll): +13052241968,94557067013# or +13092053325,94557067013#

Or Telephone:

Dial:

+1 305 224 1968 (US Toll)  
+1 309 205 3325 (US Toll)  
+1 312 626 6799 (US Toll)  
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+1 669 444 9171 (US Toll)

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Meeting ID: 945 5706 7013

Password: 828333

International numbers available: <https://umassmed.zoom.us/j/adZdMvQp4y>

Reasonable Accommodation: If you require an ADA accommodation, please contact  
[1115WaiverComments@mass.gov](mailto:1115WaiverComments@mass.gov)