Work Requirements for the Healthy Michigan Plan

Regional Forum

Michigan Department of Health and Human Services
Overview of the Presentation

- Overview of the Healthy Michigan Plan and Work Requirements
  - Healthy Michigan Plan (HMP)
  - Changes Coming in 2020
  - High-Level Description of Work Requirements
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  - Reporting Process
  - Beneficiary Notifications
  - Regaining Eligibility after Losing Coverage

- Scenarios for Reporting Work, Other Activities, and Exemptions

- Regional Planning Discussion

- Resources and Questions
Overview of the Healthy Michigan Plan and Work Requirements
Healthy Michigan Plan

- The Michigan legislature authorized the expansion of the Michigan Medicaid program (Public Act 107 of 2013).

- HMP provides monthly coverage to more than 648,320 (as of October 14, 2019).

- HMP eligibility:
  - Between the ages of 19 and 64
  - Not eligible for or receiving other Medicaid or Medicare benefits
  - Not pregnant at time of application
  - Have income at or below 133% of the Federal Poverty Level (FPL)
Medicaid Population

Healthy Michigan Plan Population
## Changes Coming in 2020

### Public Act 208 of 2018

<table>
<thead>
<tr>
<th>Event Date</th>
<th>Requirement Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>January 1, 2020</td>
<td>Mandates work requirements</td>
</tr>
<tr>
<td>October 1, 2020</td>
<td>Mandates new requirements after 48 months of cumulative enrollment in an HMP health plan</td>
</tr>
</tbody>
</table>
High-Level Overview of Work Requirements

Population
- All HMP beneficiaries who are between the ages of 19 and 62 who are not otherwise exempt (excused)

Changes
- Required to work or complete other activities, such as job search, for at least 80 hours per month
- Loss of eligibility for non-compliance

Date
- Implementation Date: January 1, 2020
Work or Other Activities

- Beneficiaries who are not exempt must report 80 hours of any combination of work or other activities each month. Beneficiaries will have until the end of the current month to report hours for the previous month. Beneficiaries who fail to report for three months in a calendar year may lose their health care coverage.

1) **Employment, self-employment, or having income consistent with being employed or self-employed**
   - If reporting “income”, the income must be equal to earning minimum wage for 80 hours per month (e.g. pension, retirement, rental income, etc.)
   - MDHHS may have income data to deem compliance

2) **Education directly related to employment**
   - This includes school, college, or working on GED
   - Study time also counts
   - MDHHS may have education data to deem compliance
3) Job training directly related to employment
   • This includes job skills training and workforce development programs

4) Vocational training directly related to employment
   • This includes training or apprenticeship for a job or trade

5) Unpaid workforce engagement such as an internship
   • This includes working for a company or organization to gain experience or skills for a future job

6) Tribal employment programs
   • If a member of a federally recognized Tribe, the beneficiary can report hours spent in a work or employment program that has been approved by the Tribe
7) Participating in substance use disorder (SUD) treatment
   • This includes counseling, recovery support programs, and court-ordered treatment

8) Volunteering or community service
   • Beneficiaries are limited to reporting volunteering and community service to 3 months in a calendar year
   • Beneficiaries must volunteer with a 501(c)(3) or 501(c)(4) organization

9) Job search directly related to job training
   • This includes preparing or submitting resumes or email applications to apply for job openings, job interviews, etc.
An exemption means that an HMP beneficiary may be excused from:

- HMP work requirements and/or
- Other HMP program requirements

Exemptions can last up to one year and can also be renewed.

Beneficiaries can tell MDHHS about an exemption (through self-attestation). MDHHS may also use administrative data to identify beneficiaries who should be excused from the requirements.

Once a beneficiary tells MDHHS about an exemption, MDHHS will send the beneficiary a letter with the date the exemption ends.
# Exemptions from Work (Reasons to Be Excused)

12 “Reportable” HMP Work Requirement Exemptions

<table>
<thead>
<tr>
<th>Number</th>
<th>Exemption</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Pregnant or was pregnant in the last 2 months</td>
</tr>
<tr>
<td>2.</td>
<td>Main caretaker for a family member under 6 (One parent per household)</td>
</tr>
<tr>
<td>3.</td>
<td>A full-time student</td>
</tr>
<tr>
<td>4.</td>
<td>Under age 21 and was in Michigan foster care</td>
</tr>
<tr>
<td>5.</td>
<td>In prison or jail in the last 6 months</td>
</tr>
<tr>
<td>6.</td>
<td>Receiving State of Michigan unemployment benefits</td>
</tr>
<tr>
<td>7.</td>
<td>Receiving temporary or permanent disability payments from a private insurer or the government</td>
</tr>
<tr>
<td>8.</td>
<td>Has a medical condition that limits work, approved by a doctor</td>
</tr>
<tr>
<td>9.</td>
<td>Caring for a dependent with a disability and doctor’s order for full-time care (One claim per household)</td>
</tr>
<tr>
<td>10.</td>
<td>Caring for a person who cannot make decisions for themselves</td>
</tr>
<tr>
<td>11.</td>
<td>Is medically frail (See slides 13 and 14)</td>
</tr>
<tr>
<td>12.</td>
<td>Has good cause (See slide 15)</td>
</tr>
</tbody>
</table>

[Healthy Michigan Plan Logo]
Exemptions from Work (Reasons to Be Excused)

- **Medically Frail** – The beneficiary is medically frail due to one or more of the following:
  - Physical, mental, or emotional condition that limits a daily activity, like bathing
  - Physical, intellectual, or developmental disability that makes it hard to do daily living activity
  - Physical, mental, or emotional condition that needs to be checked often
  - Disability based on Social Security criteria (SSDI)
  - Chronic substance use disorder (SUD)
  - Serious and complex medical condition, or special medical needs
  - The beneficiary is in a nursing home, hospice, or is receiving home help services
  - The beneficiary is homeless
  - The beneficiary is a survivor of domestic violence
Exemptions from Work (Reasons to Be Excused)

- Medically Frail
  - MDHHS will use data to assign this exemption based upon a retrospective data analysis:
    - ICD–10 diagnosis codes (over 350 codes), which include serious and complex medical conditions, physical, intellectual, or developmental disability, etc.
    - Data that identifies that a beneficiary is in a nursing home, hospice, or is receiving home help services
  - Beneficiaries may also report this exemption through:
    - Completing the Medicaid Application
    - Reporting the exemption in a similar way to other exemptions (through self–attestation)
Exemptions from Work (Reasons to Be Excused)

Good Cause

- The beneficiary has good cause because the beneficiary or a close family member:
  - Has a serious illness;
  - Is hospitalized; or
  - Has a disability that meets the government definition.
Individuals who are enrolled in the Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF) program are also exempt from the need to report work requirements for the Healthy Michigan Plan.

MDHHS will use data to assign this exemption to beneficiaries. Beneficiaries cannot report this exemption.
Reporting Process for Work or Other Activities

- **Work** requirement begins **January 1, 2020**

- **Reporting** requirement begins **February 1, 2020**

- **How to Report Work to MDHHS:**
  - **Online**: MI Bridges Portal (Head of Household Only)
  - **Phone**: HMP Work Requirement and Exemption Reporting Line
  - **In-Person**: Kiosks in MDHHS County Offices (Head of Household Only)

- **Notes:**
  - Beneficiaries have until the end of the current month to report hours for the previous month.
  - There is an opportunity to “cure” previous months of non-compliance for up to 60 days after the end of the failed month.
  - Beneficiaries will receive a notice every time that they fail to report for a given month.
# Reporting Process for Exemptions

**Before January 31, 2020**

1. Submit the Exemption Form to the MDHHS Special Processing Office by mail or fax

**After February 1, 2020**

1. Online: MI Bridges (Head of Household Only)
2. By Phone: HMP Work Requirement and Exemption Reporting Line
3. In-Person: Kiosks in MDHHS County Offices (Head of Household Only)
Reporting Process

Exemption Form

Reasons to be excused continued (check all that apply)

- I am the main caretaker for a family member under 6 (one parent per household)
- I am a full-time student
- I am under age 21 and was in Michigan foster care
- I was imprisoned or jailed in the last 6 months
- I get State of Michigan unemployment benefits
- I get temporary or permanent disability payments from a private insurer or the government
- I have a medical condition that limits work, approved by a doctor
- I am caring for a dependent with a disability and doctor’s order for full-time care
  (one family per household)
- I am caring for a person who cannot make decisions for themselves
- I have good cause because I or a close family member:
  - Has a serious illness, or
  - Is hospitalized, or
  - Has a disability that meets the government definition

3. Sign below

You or your authorized representative or legal guardian must sign below. The signature means the information on this form is true.

HMP member signature

Or signature of authorized representative (AR) or legal guardian

Printed name of AR or legal guardian

Telephone number

Relationship to beneficiary

Signature of AR or legal guardian

Date

4. Return completed form by January 31, 2020

Mail to: MDHHS Special Processing Office
Suite 1465
PO Box 30090
Lansing, MI 48909
Or fax to: 1-517-432-6379

Special Making HMF Exemption
Valid through 1/31/2020

- CAN ONLY BE USED UNTIL JANUARY 31, 2020 -
Beneficiary Notifications

Important changes inside!

Michigan Department of Health and Human Services
PO Box 30809
Lansing MI 48909

\(<First Name> \& Last Name>\)
\(<Address Line 1>\)
\(<Address Line 2>\)
\(<City> \& <State> \& <Zip Code> \& <Zip Plus 4>\)
<table>
<thead>
<tr>
<th>Date</th>
<th>Notification Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>February 2019</td>
<td>• Sent letters about the upcoming work requirements for 2020</td>
</tr>
<tr>
<td>September 2019 to October 2019</td>
<td>• Sent letters indicating whether beneficiaries must meet requirements OR they have an exemption</td>
</tr>
<tr>
<td>December 2019</td>
<td>• Notify beneficiaries who are not exempt that they are required to work in January 2020</td>
</tr>
<tr>
<td>January 2020</td>
<td>• Notify beneficiaries who are exempt that they are not required to report</td>
</tr>
<tr>
<td>New Enrollees</td>
<td>• Notify new enrollees that they may be subject to new requirements during the enrollment process</td>
</tr>
</tbody>
</table>
Regaining Eligibility after Losing Coverage

- Beneficiaries who are not compliant with work requirements will lose eligibility for health care coverage. Beneficiaries must serve a penalty month unless they report an exemption.

- Beneficiaries can reapply for health care coverage. Upon reapplication, beneficiaries must self-attest to (a) having completed the work requirements in the last 12 months or (b) having an exemption.

- Beneficiaries may report work, other activities, or exemptions online through the Application and Redetermination Process (Renew My Benefits).

Online
www.michigan.gov/mibridges
Scenarios for Reporting Work, Other Activities, and Exemptions
### Scenarios for Reporting Work, Other Activities, and Exemptions

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Compliant?</th>
<th>Reporting Category</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Employment: 120 hours at $10 per hour</td>
<td>Yes</td>
<td>“I have a job or income”</td>
</tr>
<tr>
<td>• Income: $1000 pension per month</td>
<td>Yes</td>
<td>“I have a job or income”</td>
</tr>
<tr>
<td>• Employment: 40 hours at $10 per hour</td>
<td>Yes</td>
<td>“I have a job or income”</td>
</tr>
<tr>
<td>• Self-Employment: 10 hours at $10 per hour</td>
<td>Yes</td>
<td>“I have a job or income”</td>
</tr>
<tr>
<td>• Self-Employment: 50 hours for $200</td>
<td>Yes</td>
<td>“I have a job or income”</td>
</tr>
<tr>
<td>• Employment: 40 hours at $15 per hour</td>
<td>Yes</td>
<td>“I have a job or income”, “I am volunteering”, and “I am a student”</td>
</tr>
<tr>
<td>• Volunteer: 20 hours</td>
<td>Yes</td>
<td>“I have a job or income”, “I am volunteering”, and “I am a student”</td>
</tr>
<tr>
<td>• Student: 25 hours</td>
<td>Yes</td>
<td>“I have a job or income”, “I am volunteering”, and “I am a student”</td>
</tr>
</tbody>
</table>
## Scenarios for Reporting Work, Other Activities, and Exemptions

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Excused?</th>
<th>Reason to Be Excused</th>
</tr>
</thead>
<tbody>
<tr>
<td>Individual with breast cancer</td>
<td>Yes</td>
<td>“I am medically frail”</td>
</tr>
<tr>
<td>Individual with muscular dystrophy</td>
<td>Yes</td>
<td>“I am medically frail”</td>
</tr>
<tr>
<td>Individual with a diagnosed chronic substance use disorder</td>
<td>Yes</td>
<td>“I am medically frail”</td>
</tr>
<tr>
<td>Individual with an undiagnosed substance use disorder</td>
<td>Yes</td>
<td>“I am medically frail”</td>
</tr>
<tr>
<td>Individual in a nursing facility</td>
<td>Yes</td>
<td>“I am medically frail”</td>
</tr>
<tr>
<td>Individual who is homeless</td>
<td>Yes</td>
<td>“I am medically frail”</td>
</tr>
<tr>
<td>Individual who is living in a shelter</td>
<td>Yes</td>
<td>“I am medically frail”</td>
</tr>
<tr>
<td>Individual with a hangnail</td>
<td>No</td>
<td>Not Applicable</td>
</tr>
</tbody>
</table>
### Scenarios for Reporting Work, Other Activities, and Exemptions

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<th>Scenario</th>
<th>Excused?</th>
<th>Reason to Be Excused</th>
</tr>
</thead>
<tbody>
<tr>
<td>Individual receiving state disability assistance</td>
<td>Yes</td>
<td>“I get temporary or permanent disability payments…”</td>
</tr>
<tr>
<td>Individual receiving social security disability insurance</td>
<td>Yes</td>
<td>“I get temporary or permanent disability payments…”</td>
</tr>
<tr>
<td>Individual with a broken leg and a doctor’s note that indicates he or she cannot work</td>
<td>Yes</td>
<td>“I have a medical condition that limits work, approved by a doctor”</td>
</tr>
<tr>
<td>Individual who is in the hospital</td>
<td>Yes</td>
<td>“I have good cause”</td>
</tr>
<tr>
<td>Individual who is blind</td>
<td>Yes</td>
<td>“I am medically frail” or “I have good cause”</td>
</tr>
</tbody>
</table>
Regional Planning Discussion
Regional Planning Discussion

- MDHHS Actions To Date
- Ways for Beneficiaries to Prepare for January 1, 2020
- Opportunities for Providers
- Role of Health Plans
- Role of Community Partners
- Collaboration with Michigan Works!
- Local Resources
- Future Opportunities
Regional Planning Discussion

- MDHHS Actions to Date
  - Establishing a Special Processing Office
  - Creating a new phone line for beneficiaries to report
  - Updating IT systems (e.g. Bridges, CHAMPS, MI Bridges, etc.) and eligibility applications
  - Improving our beneficiary communications and launching a mass media campaign
  - Conducting ongoing stakeholder meetings and webinars and strengthening partnerships with community partners, health care providers, health plans, and Michigan Works!
  - Developing policy for work requirements
What should beneficiaries do to prepare for January 1, 2020?

- Sign up for MI Bridges ([www.michigan.gov/mibridges](http://www.michigan.gov/mibridges))
- Learn what type of coverage they have by logging into MI Bridges or calling their health plan
- Keep an eye out for mail from MDHHS in December and January
- Report an exemption through the Exemption Form (until January 31, 2020)
- Seek assistance from local Michigan Works! offices and local community partners
- Hold onto documentation
Regional Planning Discussion

What can providers do to assist beneficiaries?

◦ Check to see what type of coverage beneficiaries have through the CHAMPS Online Eligibility inquiry

◦ Ask beneficiaries whether they have an exemption

◦ Assist beneficiaries with reporting exemptions through the Exemptions Form (until January 31, 2020)

◦ Refer beneficiaries to local community partners (www.michigan.gov/mibridgespartners)

◦ Visit the Medicaid provider webpage (www.michigan.gov/medicaidproviders)
What can health plans do to assist beneficiaries and providers?

◦ Connect members to community resources that will help members be able to work or participate in other activities. Examples may include (but are not limited to):
  • Transportation
  • Child Care
  • Employment Assistance

◦ Assist members in understanding work requirements and exemptions

◦ Provide hands-on assistance to members through Community Health Workers
What can community partners do to assist beneficiaries?

- Sign up to be a MI Bridges Community Partner (www.michigan.gov/mibridgespartners)
- Provide computers, tablets, or mobile devices for beneficiaries to register and use MI Bridges
- Provide informational materials to beneficiaries
- Assist with reporting of work, other activities, and exemptions
  - Assist with completion and submission of Exemption Form
  - MI Bridges Community Partners – Assist beneficiaries with navigating the system (with consent)
New Partnership with Michigan Works!

- Michigan Works! has service centers across Michigan with free resources and helpful staff. Beneficiaries can search for jobs, attend workshops, or explore careers and training.

- To find a service center, call 1–800–285–WORKS (9675) or go to MichiganWorks.org.
Regional Planning Discussion

- What local resources are available within this region to assist beneficiaries with meeting the new requirements?

- What are other ways that MDHHS can assist beneficiaries with preparing to meet the new requirements?
Resources and Questions
Resources

- Participate in upcoming webinars and other outreach events
  - [www.michigan.gov/medicaidproviders](http://www.michigan.gov/medicaidproviders) >> click on Training

- Watch for updates on the MDHHS website
  - Beneficiary page: [www.healthymichiganplan.org](http://www.healthymichiganplan.org)
  - Provider page: [https://www.michigan.gov/healthymichiganplan](https://www.michigan.gov/healthymichiganplan)

- Download and review beneficiary-specific communications
  - [https://www.michigan.gov/healthymichiganplan](http://www.michigan.gov/healthymichiganplan) >> click on Changes Coming January 2020

- Review and provide comments on the draft policy bulletin for new requirements
  - [www.michigan.gov/medicaidproviders](http://www.michigan.gov/medicaidproviders) >> click on Policy, Letters & Forms
Resources

- Beneficiary Resources:
  - Beneficiary Support Information: [https://www.michigan.gov/mdhhs/0,5885,7-339-71547_4860_78446_78447_78453---,00.html](https://www.michigan.gov/mdhhs/0,5885,7-339-71547_4860_78446_78447_78453---,00.html)
  - Beneficiary Help Line: 1–800–642–3195
  - MI Bridges: [www.michigan.gov/mibridges](http://www.michigan.gov/mibridges)
  - Michigan Works: [www.michiganworks.org](http://www.michiganworks.org)
- Email questions to: [healthymichiganplan@michigan.gov](mailto:healthymichiganplan@michigan.gov)
Questions?

More people are getting healthy with the Healthy Michigan Plan.