

New Work Requirements: Reporting of Work, Other Activities, and Exemptions

Phil Kurdunowicz Michigan Department of Health and Human Services September 25, 2019

Overview of the Presentation

- What is the Healthy Michigan Plan (HMP)?
 - 2020 Changes
- What are the new work requirements?
 - Activities to Meet HMP Work Requirements
 - Reasons to Be Excused (Exemptions)
 - Reporting Process
 - New Legislative Changes
- What is the implementation process for HMP work requirements?
 - Implementation Timeline for HMP Work Requirements
 - Beneficiary Notifications
 - Regaining Eligibility after Loss of Coverage
 - MDHHS Application Changes
- Questions



What is HMP?

- The Michigan legislature approved the expansion of the Michigan Medicaid program through Public Act 107 of 2013.
- The Michigan Department of Health and Human Services (MDHHS) established HMP in 2014.
- HMP provides monthly coverage to more than 655,000 individuals (as of September 23, 2019).
- HMP beneficiaries can access a wide range of health care services which includes, but is not limited to, primary care, emergency services, behavioral health services, and prescription drugs.
- The HMP program also includes unique requirements for costsharing and healthy behaviors.



What is HMP?

- Michigan residents can qualify for HMP coverage if they:
 - Are between the ages of 19 and 64
 - Are not receiving or eligible for Medicare benefits
 - Are not eligible for other Medicaid programs
 - Are not pregnant at the time of application
 - Have income at or below 133% of the Federal Poverty Level (FPL)
 - Note 5% disregard = 138%
 - Meet other federal requirements



What are the 2020 changes to HMP?

Public Act 208 of 2018

Mandates work requirements

Mandates new requirements after 48 months of cumulative enrollment in an HMP health plan



What are the HMP new work requirements?

- Activities to Meet New HMP Work Requirements
- Reasons to Be Excused (Exemption)
- Reporting Process
- New Legislative Changes



What are the new HMP work requirements?

Population

 All HMP beneficiaries that are between the ages 19 and 62 that 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



What are the new HMP work requirements?

- HMP beneficiaries are required to work or complete other activities for at least 80 hours per month.
- Beneficiaries must report work or other activities (through selfattestation) to MDHHS on a monthly basis.
- Beneficiaries may also receive an exemption (reason to be excused) from these requirements.
- If a beneficiary fails to meet work requirements for three months in a calendar year, the beneficiary will lose eligibility.
- Coverage may be reinstated after the beneficiary comes into compliance after serving a penalty month of non-coverage.



- The beneficiary has a job or income.
 - Beneficiaries are considered to be employed when they work for another individual or organization in exchange for money.
 - Self-employment includes:
 - Working in exchange for money.
 - Working in exchange for goods or services (in-kind). Work-In-Kind does not include the exchange of money.
 - Beneficiaries may also meet this requirement by making money equal to earning the state-mandated minimum wage for 80 hours per month. Examples include earnings from a pension or retirement plan, rental income, or other types of income.



- ▶ The beneficiary is a student (completing high school, GED or college).
 - This activity includes participating in an educational program directly related to employment. The beneficiary can participate in person or online. Study time also counts.
 - Examples of educational programs include:
 - Preparing for and taking a High School Equivalency test such as the General Equivalency Diploma (GED) exam
 - Attending a basic skills program (e.g. English as a Second Language, computer skills, reading and writing skills)
 - Taking classes with the goal of getting a degree or certificate
 - The beneficiary can take classes at a university, college, community college, or other post-secondary school.



- The beneficiary is looking for a job.
 - This activity is related to looking and applying for jobs.
 - Searching for a job includes:
 - Searching for a job through a workforce program
 - Completing a job skills assessment or job readiness workshop
 - Preparing or submitting resumes or e-mail applications to apply for job openings
 - Interviewing for jobs
 - Traveling to job interviews or job fairs



- The beneficiary is volunteering.
 - This activity includes volunteering or doing community service.
 The beneficiary must volunteer with a non-profit 501(c)(3) or 501(c)(4) organization.
 - Examples include, but are not limited to, volunteering with a church group, homeless shelter, soup kitchen, animal shelter, or food bank.
 - The beneficiary can only count this activity for three months per calendar year.
 - MDHHS will recognize participation in court-order community services as meeting the requirement.



- The beneficiary is in job training.
 - This activity includes doing training for a job.
 - Job training can also include:
 - Job skills training
 - Job training through a workforce program
 - Training to become self-employed
 - Job-training program at a community college.
- The beneficiary is in a tribal employment program.
 - If the beneficiary is 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 beneficiary's Tribe.



- The beneficiary is in rehab (substance use).
 - This activity includes substance use disorder treatment that is ordered by a court or prescribed by a licensed medical professional.
 - Examples of related activities include participating in:
 - Counseling
 - Support group meetings or other recovery support programs
 - Residential or inpatient treatment programs
 - Intensive outpatient programs
 - Medication assisted treatment programs.



- The beneficiary is participating in vocational training.
 - This activity includes training for a job or trade. Examples include, but are not limited to:
 - Apprenticeship programs
 - Vocational training shorter than six months
 - · Clinicals or similar program.
 - Vocational training can also include time spent in a classroom, laboratory, studying, or other related activity.
- The beneficiary is completing an internship.
 - This activity includes working for a company or organization who
 is not the beneficiary's employer and developing experience or
 skills for a future job.

- 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. Some exemptions can be renewed.
- Beneficiaries can tell MDHHS about an exemption (through self-attestation). MDHHS may also use internal 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.



"Reportable" HMP Work Requirement Exemptions

- 1. The beneficiary is pregnant or was pregnant in the last 2 months.
- 2. The beneficiary is the main caretaker for a family member under 6 (One parent per household).
- 3. The beneficiary is a full-time student.
- 4. The beneficiary is under age 21 and was in Michigan foster care.
- 5. The beneficiary was in prison or jail in the last 6 months.
- 6. The beneficiary gets State of Michigan unemployment benefits.
- 7. The beneficiary gets temporary or permanent disability payments from a private insurer or the government.

- 8. The beneficiary has a medical condition that limits work, approved by a doctor.
- 9. The beneficiary is caring for a dependent with a disability and doctor's order for full-time care (One claim per household).
- 10. The beneficiary is caring for a person who cannot make decisions for themselves.
- 11. The beneficiary is medically frail (See Slides 19 and 20).
- 12. The beneficiary has good cause (See Slide 21).



- 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 get home help services
 - The beneficiary is homeless
 - The beneficiary is a survivor of domestic violence



- Medically Frail (CONTINUED)
 - MDHHS will use data to assign this exemption based upon a retrospective data analysis:
 - ICD-10 diagnosis codes (over 350 codes), which includes 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)



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 work requirements.
- MDHHS will use data to assign this exemption to beneficiaries. Beneficiaries cannot report this exemption.



Reporting Process

- How will beneficiaries be able to report work and other activities after February 1, 2020?
 - In-Person (Kiosks in MDHHS Field Offices Head of Household Only)
 - Online (via the MI Bridges Portal Head of Household Only)
 - By Phone (via the Healthy Michigan Plan Work Requirement and Exemption Reporting Line)
 - Through the Application and Redetermination Process (Renew My Benefits)

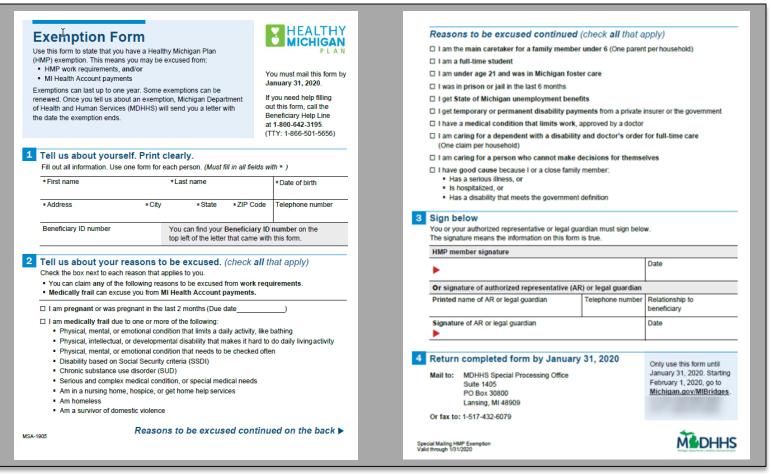


Reporting Process

- How will beneficiaries be able to report exemptions prior to February 1, 2020?
 - MDHHS has created a form to allow beneficiaries to report exemptions, which can be submitted to the Special Processing Office by mail or fax.
- How will beneficiaries be able to report exemptions after February 1, 2020?
 - In-Person (Kiosks in MDHHS Field Offices Head of Household Only)
 - Online (via the MI Bridges Portal Head of Household Only)
 - By Phone (via the Healthy Michigan Plan Work Requirement and Exemption Reporting Line)
 - Through the Application and Redetermination Process (Renew My Benefits)



Reporting Process





New Legislative Changes

- Governor Whitmer recently signed Senate Bill 362 of 2019 (now Public Act 50 of 2019), which does the following:
 - Allow the department to use administrative data to determine that beneficiaries are completing work or other activities;
 - Allow beneficiaries to report work or other activities up until the end of the month; and
 - Allow beneficiaries to report work or other activities for months where the beneficiary previously failed to meet work requirements.



What is the implementation process?

- Implementation Timeline for HMP Work Requirements
- Beneficiary Notifications
- Regaining Eligibility after Losing Coverage
- MDHHS Application Changes



Implementation Timeline for HMP Work Requirements

Start of Webinars and Continued Outreach to Stakeholders Distribution of Notices

Start of Exemption Reporting

Posting of Draft Policy Bulletin for Public Comment

Creation of Special Processing Office

Continued
Distribution of
Notices

Continuation of Public Comment

Continuation of Exemption Reporting Release of Revised Applications

Launch of New Technology Systems

Distribution of Critical Beneficiary Communications

Publication of Final Policy Bulletin

July & Aug.

Sept.

Oct. & Nov.

Dec. & Jan.

- MDHHS distributed high-level information about the new requirements to beneficiaries in February 2019.
- MDHHS will be issuing notices in September and October 2019 to beneficiaries to indicate whether (a) they are subject to the new requirements or (b) they have a known exemption.
- MDHHS's goal is to make these requirements and processes easy to understand and follow. To reach that goal, MDHHS will focus initial messaging around work requirements only. MDHHS will notify partners and stakeholders when MDHHS plans to begin sharing information related to healthy behavior and premium requirements.



Letter	Purpose	Who Gets The Letter	Send Date
B 19–36 (Not Exempt)	Notify the beneficiary about work requirements and that the requirements will apply to them unless they report an exemption.	Beneficiaries who are in HMP as of 9/1/2019 and who do not currently meet an exemption based on MDHHS records. This includes beneficiaries in fee for service and health plans.	Between 9/3/2019 - 9/30/2019
B 19–37 (Exempt)	Notify the beneficiary about work requirements but that the requirements do not currently apply to them due to an exemption. The beneficiary needs to be aware of the requirements in case they ever lose their exemption and are subject to requirements.	Beneficiaries who are in HMP as of 9/1/2019 and who meet an exemption based on MDHHS records.	Between 10/1/2019 - 10/24/2019
B 19–43 (Over 62 Exempt)	Notify the beneficiary about work requirements, but that the work requirements will not ever apply to them since they are 62 or over.	Beneficiaries who are in HMP as of 9/1/2019 and who are age 62 or over.	Between 10/1/2019 - 10/24/2019







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



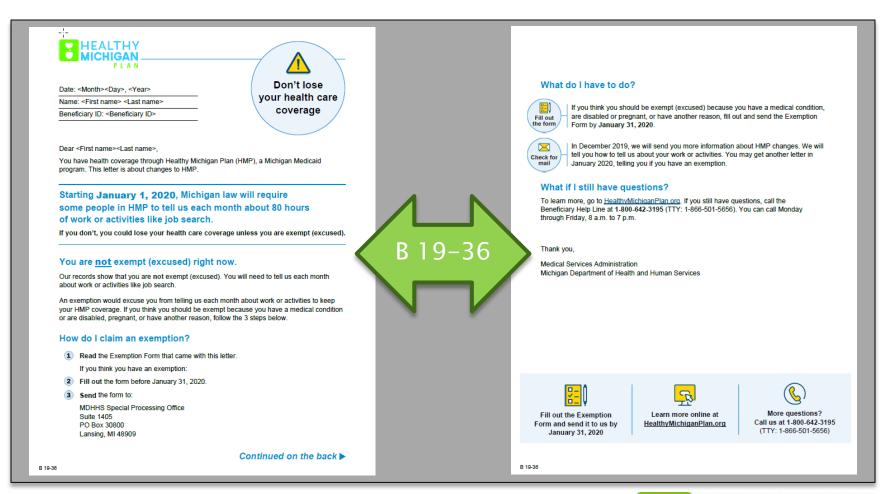
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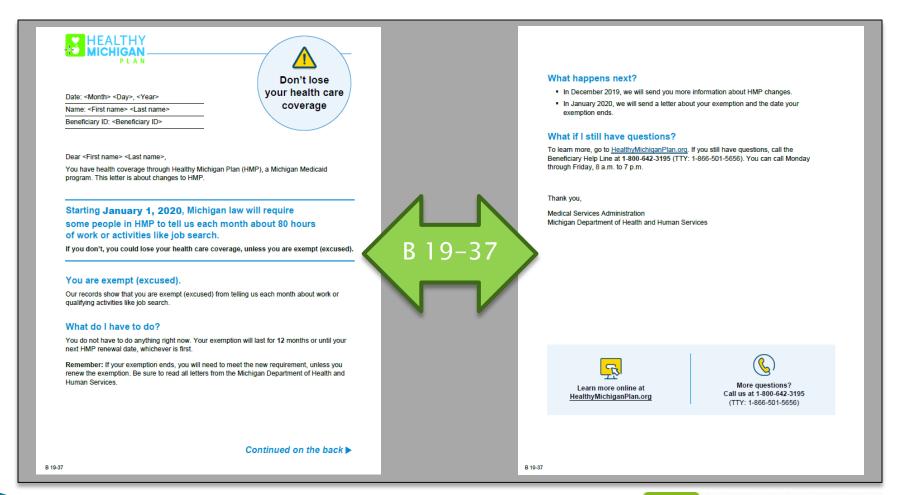
Starting **January 1, 2020**, Michigan law will require some people in Healthy Michigan Plan (HMP) to tell us each month about 80 hours of work or activities like job search.

Read the enclosed letter to learn how to keep your health care coverage.

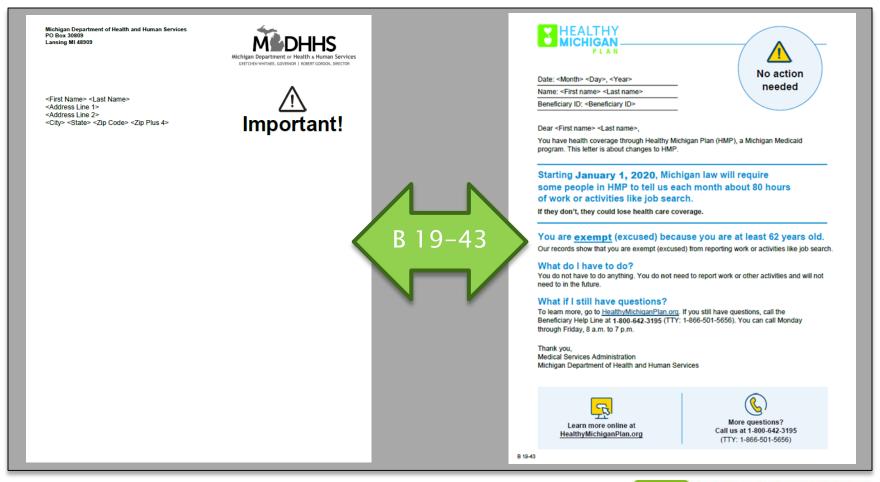












- Beneficiaries without an exemption will be notified by mail in December 2019 that they must complete work or other activities.
- HMP beneficiaries with an active exemption will be notified after January 24, 2020.
- New enrollees will be notified that they are potentially subject to work requirements as part of the enrollment process.



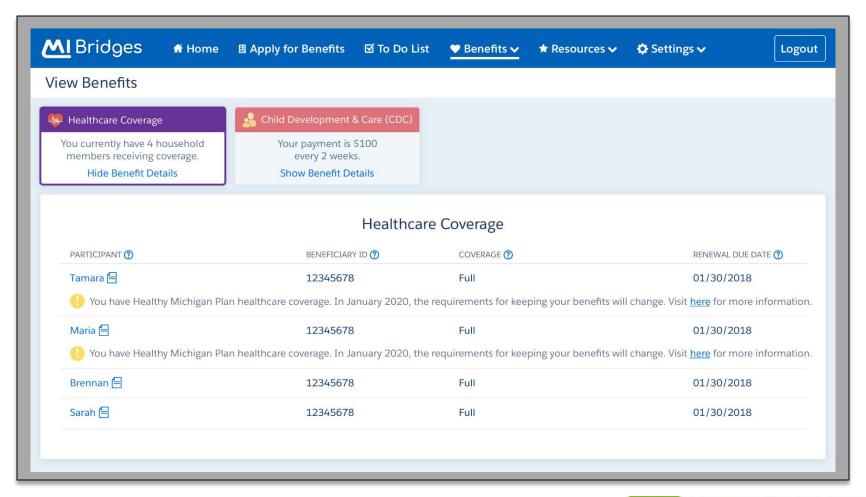
- Beneficiaries will receive a variety of communications related to whether they have an active exemption.
 - Beneficiaries who are the Head of Household will be able to view whether they have an exemption to the requirements in the MI Bridges system. Beneficiaries who are the Head of Household can also view whether other household members have exemptions.
 - All beneficiaries have the option of calling the "Healthy Michigan Plan Work Requirement and Exemption Reporting Line" after January 27, 2020 to check their current exemption status.
- Beneficiaries will also receive a letter when they have failed to meet the requirements for a given month. Beneficiaries can call the "Healthy Michigan Plan Work Requirement and Exemption Reporting Line" for more information on this issue.

- Beneficiaries will also receive notices when they have failed to meet requirements for three months. MDHHS will send the beneficiary a Health Care Coverage Determination Notice (1606) by mail, which will indicate that a beneficiary's case is closing due to failure to meet work requirements.
- Beneficiaries who are Head of Household will be able to view correspondence about case closure from MDHHS through the MI Bridges system.
- Beneficiaries can also call the Beneficiary Helpline to learn whether they have active HMP or other health care coverage.











Regaining Eligibility after Losing Coverage

- Beneficiaries who are non-compliant with work requirements will serve a penalty month unless they can report an exemption.
- Beneficiaries can re-enroll once they complete and report the completion of work or other activities.

Online www.michigan.gov/mibridges

MDHHS Application Changes

- MDHHS is adding a new appendix to two applications:
 - MDHHS-1171 (Multi-Program Coverage Application)
 - DCH-1426 (Medicaid Health Coverage)
- The appendix will allow beneficiaries to:
 - (1) Tell MDHHS about an exemption; and
 - (2) Tell MDHHS that they completed work or other activities after they have lost coverage for non-compliance.
- MDHHS will use data from other parts of the applications to identify beneficiaries who may be excused from the work requirements.
- During the redetermination process, MDHHS staff can renew a current exemption or end an existing exemption based on new data.



Resources

- Participate in upcoming webinars and other outreach events
 - www.Michigan.gov/Medicaidproviders
 >> click on Training
- Watch for updates on the MDHHS website
 - Beneficiary page: www.healthymichiganplan.org
 - Provider page: https://www.michigan.gov/healthymichiganplan
- Download and review beneficiary-specific communications
 - https://www.michigan.gov/healthymichiganplan >> click on Changes Coming January 2020
- Review and provide comments on the draft policy bulletins for new requirements
 - www.Michigan.gov/Medicaidproviders >> click on Policy, Letters
 & Forms

Resources

- Beneficiary Resources:
 - Beneficiary Support Information:

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https://www.michigan.gov/mdhhs/0,5885,7-339-71547_4860_78446_78447_78453---,00.html
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- MI Bridges: <u>www.michigan.gov/mibridges</u>
- Email questions to: healthymichiganplan@michigan.gov



Questions?



