

Unwinding: Getting Ready for SNAP & Medicaid Changes



March 21, 2023



Agenda

- The End of Extra SNAP (Emergency Allotments)
- The End of Medicaid Continuous Coverage
 - COVID-19 & Medicaid Continuous Coverage
 - Unwinding Medicaid Continuous Coverage
 - Preparing for Renewals
 - Options if Ineligible for Medicaid

The End of Extra SNAP (Emergency Allotments)

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SNAP Background

- Income limit 200% FPIG
 - This is a change (was 160% for most until 10/1/22)
 - Almost all our clients should be getting SNAP!
- One in seven Pennsylvanians gets SNAP

	Feb. 2020	February 2023
Pennsylvanians on SNAP	1.74 million	1.97 million
Value of SNAP (100% federal \$)	\$205 million	\$518 million



SNAP Emergency Allotments

- During the pandemic, everyone who qualifies for SNAP got the maximum SNAP benefit.
 - Normal SNAP amount in the beginning of the month
 - Second payment (Emergency Allotment or “extra SNAP”) issued later in the month to bring to the maximum.
- Minimum SNAP EA was \$95 a month.



Maximum Benefit Levels

Household Size	Maximum Monthly Benefit effective 10/1/22
1	\$281
2	\$516
3	\$740
4	\$939
5	\$1,116



End of Extra SNAP

- Last SNAP emergency allotments were issued in February 2023.
 - Mid-late March is when folks are first missing the extra SNAP that has been coming in the 2nd half of the month.
- SNAP benefits do not expire or need to be spent by a set date. The balance stays on an EBT card so long as the card is used at least once every 9 months.



Maximizing SNAP Going Forward

- Folks will now get just their “normal” SNAP amount – may be only \$23 per month.
- Make sure folks are getting all they can!
- Normal SNAP benefit = maximum benefit minus 30% of net income after deductions
- Make sure the County Assistance Office gets your income right, and knows about all deductions that will lower your income and increase your SNAP.



Checking Allotment Accuracy

- Folks receiving the maximum SNAP can't get more.
- Use our public SNAP calculator:
<https://clsphila.org/services/snap-food-stamps/>
- If low, report correct income & deductions. Can also check notice or call Customer Service Center to see what exactly is off.



SNAP Income Deductions

- Deductions to reach net income:
 - High housing costs (including \$681 standard utility allowance for almost everyone)
 - Rent, mortgage, taxes, insurance
 - Child or adult care
 - Includes cost of transportation to care, ELRC co-pays, summer camp
 - Court-ordered child support paid
 - Medical expenses (see next slide)



Medical Expenses

- For folks 60+ or getting a disability benefit, deduct expenses over \$35/month:
 - Health insurance premiums (like Medicare Part B), co-pays, deductibles
 - Medical bills (including back bills)
 - Transportation to doctor or pharmacy
 - Glasses, dentures, hearing aids, medications, etc
 - Cost of home health aides
 - Cost of trained service animals



One Other Possibility: PA-CAP

- Single people getting only SSI income, or SSI + social security, might be getting one of these amounts of SNAP (as of 10/1/22):

Source of Income	Rent below \$196	Rent at or above \$196
SSI	\$116	\$156
SSI + soc sec	\$110	\$150

- These folks might have been auto-enrolled in a special program (PA-CAP).
- Most could get more SNAP by submitting a regular SNAP application.



Other Sources of Help

- WIC – for kids up to age 5, pregnant / postpartum folks:
PaWIC.com
- Senior boxes for those over age 60: cutt.ly/seniorbox
- Food resources: findhelp.org
- Gov's proposal to increase SNAP minimum benefit to \$35 for seniors or with disabilities
- Advocate for a Farm Bill that protects and strengthens SNAP



Questions?



COMMUNITY LEGAL SERVICES
OF PHILADELPHIA

The End of Medicaid Continuous Coverage



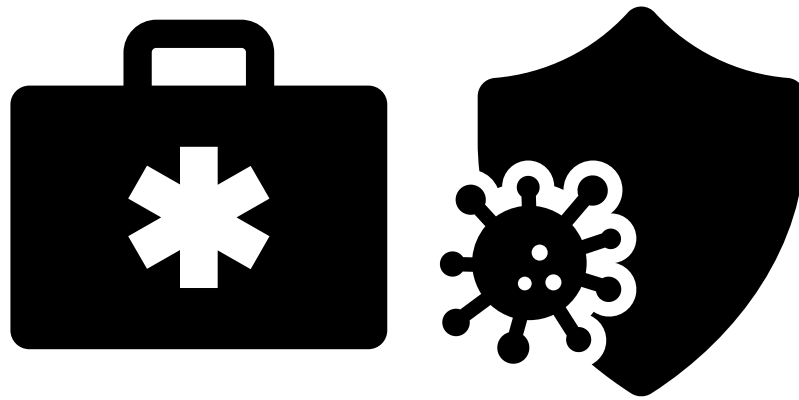
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About PHLP

- Statewide non-profit legal organization dedicated to ensuring access to public health coverage and services
- What we do:
 - Helpline for clients and advocates
 - FREE legal services
 - Community education/trainings
 - Monthly email newsletter
 - Policy Advocacy



COVID-19 & Medicaid Continuous Coverage



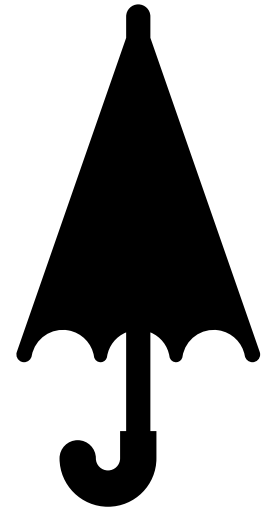
Medicaid Continuous Coverage

- January 2020 - Federal COVID-19 public health emergency (PHE) declared
- March 2020 - Families First Coronavirus Response Act (FFCRA)
 - 6.2% increase in federal Medicaid (MA) funding to states that maintain people on MA during PHE – “MA Continuous Coverage”
 - Covers people enrolled in MA 3/18/20 or later



Exceptions to MA Continuous Coverage

- Under FFCRA
 - Voluntary terminate MA
 - No longer PA resident
- November 2020 - CMS Interim Final Rule (IFR)
 - Immigrants in 5-year MA bar (who were in an exempt category)
 - “Not validly enrolled”
 - On waiver and refuse annual needs assessment
 - Asset transfer penalty period for nursing facility & waiver
 - ~~Duals ineligible for MA, but eligible for Medicare Part B Buy In only~~
- Immigrants Receiving MA funded solely by PA

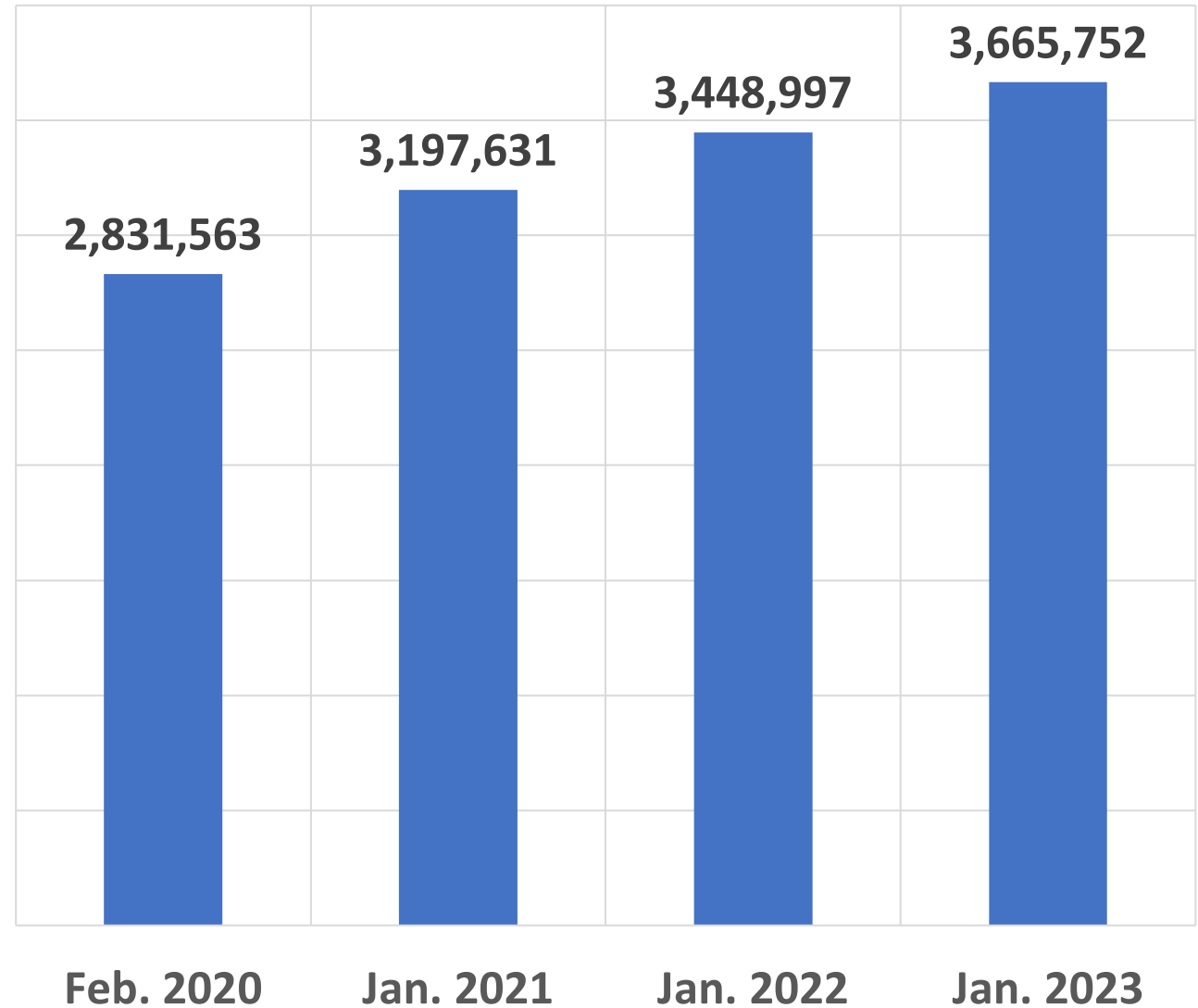


Carr v. Becerra Order (1/31/23)

- Class: People who were or will be reduced from:
 - Full MA to Part B Buy-In Only, or
 - Qualified Medicare Beneficiary (QMB) to other Part B Buy-In categories
- Injunction
 - Cease reductions during MA continuous coverage
 - Retroactively reinstate



Medicaid Enrollment Growth During PHE



Medicaid Enrollment Growth During PHE

- 834,189 (29%) increase
- 28% Pennsylvanians on Medicaid
- 1.1 million + MA maintained due to COVID continuous coverage (“**COVID Maintained**”)
 - \approx 593,000 “COVID Flag” (information indicating no longer eligible)
 - \approx 577,000 Overdue Renewals

Unwinding Medicaid Continuous Coverage

When Does MA Continuous Coverage End?

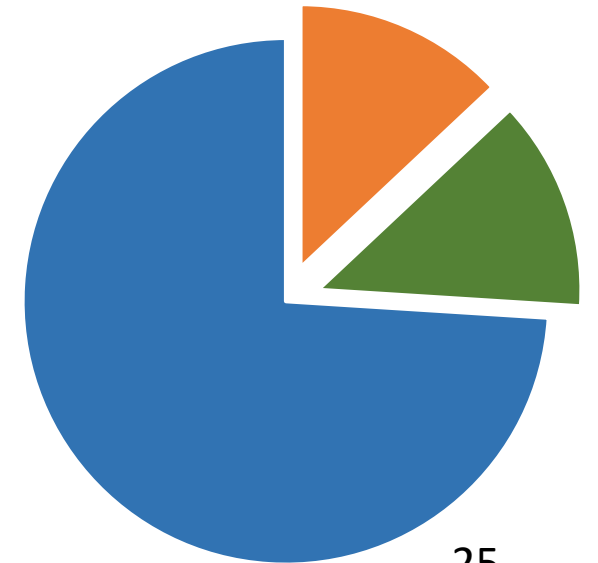
- Consolidated Appropriations Act (CAA) (December 2022)
 - MA Continuous Coverage **ends April 1, 2023** – decouples MA continuous coverage from PHE
 - Beginning April 1, DHS may terminate MA if certain conditions met



April 1, 2023

Unwinding in Pennsylvania

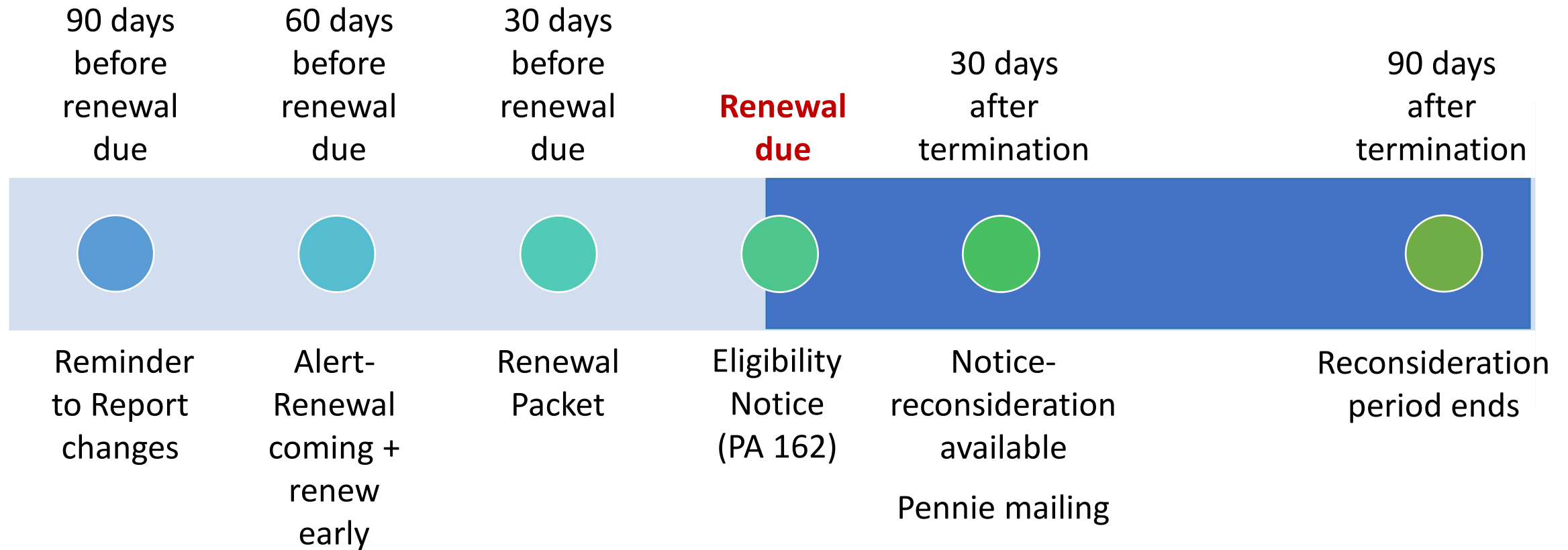
- 12 months to review eligibility for **everyone** on MA ($\approx 305,000$ / month)
- **COVID Maintained** MUST have full renewal before termination for being ineligible (even if change in circumstances)
- Hundreds of Thousands Will Be Terminated from Medicaid
 - **Terminated for Substantive Ineligibility**
 - PA DHS estimate = 466,000
 - **Terminated but Eligible (Churn)**
 - US DHHS estimates 7.9% nationwide
 - PA data from one month in 2019 suggests **MUCH higher churn rate**



When Will Renewals Occur?

- First renewals sent in March 2023 with **April due dates**
- Most renewals occur when normally scheduled
- Exceptions for 2 COVID-maintained groups
 1. Align MA renewals with SNAP renewals
 2. Emergency Medical Assistance renewals
 - Push out people who will be eligible for federal MA within Unwinding Period
 - Distribute rest evenly over 12 months
 - Recertification of emergency medical condition simultaneous with financial renewal

MA Renewal Communications



When Can DHS Act on Changes in Circumstances?

- Timing of change reporting
 - Most on MA - 10th day of the month after the change
 - People In nursing facility, on waiver or in LIFE → Within 10 calendar days
- During PHE -- duty to report changes in circumstances did not change— but no termination if change resulted in ineligibility.
- During Unwinding -- CAO Response to Change in Circumstances
 - If person COVID-maintained – no action until scheduled full renewal
 - If not COVID-maintained
 - CAO redetermines eligibility
 - If ineligible for any MA category → termination notice with appeal rights

Change in Circumstances

COVID Maintained

- Rory is on Medicare and has been on MA since December 2019.
- During the PHE, Rory remembers seeing some renewal forms from DHS, but never returned any of them.
- In July 2023, Rory receives an \$11,000 inheritance that is reported to the CAO. The CAO does not act on the change in circumstances because Rory is Covid Maintained.
- Rory's MA eligibility is reviewed at their regularly scheduled renewal in December 2023. If Rory's resources make them ineligible for any MA category, they will be terminated.



Change in Circumstances Not COVID Maintained

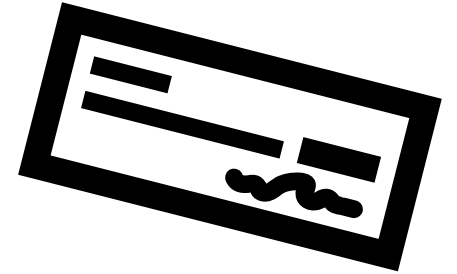
- Marta has been on MA since September 2018.
- Every September, she fills out and returns her renewal paperwork.
- She last renewed in September 2022 when her income from a part-time job was below the MA level for adults.
- In June 2023, Marta starts working full-time. She reports her new income to DHS. DHS reviews her income and determines she is not eligible for any MA category.
- Marta receives a notice terminating her MA in July 2023.



Overpayments

- What is an MA overpayment?
 - MA overpayments occur when someone receives MA when not eligible
 - No MA overpayments for CAO administrative error
- Overpayments and Unwinding (what we know so far)
 - **No overpayments for MA** received during MA continuous coverage period: **March 18, 2020 – March 31, 2023**
 - DHS **should not** impose overpayments on COVID Maintained population for MA received from April 1, 2023 to their renewal

MAWD Premiums



- Premiums for Medical Assistance for Workers with Disabilities (MAWD) were still collected during PHE
- Consequences of not paying some or all MAWD premiums during PHE:
 - Not terminated
 - Unpaid premiums accrued during PHE will be forgiven – will get notification
 - Considered COVID-maintained → should not be terminated until full MA renewal
- MAWD premiums will be due again beginning April 2023

Preparing for Renewals

How Can MA Recipients Prepare?

- Report **address changes**
 - Customer Service Center at 877-395-8930 or 215-560-7226 (Philadelphia)
 - [COMPASS](#) or MyCOMPASS PA mobile app
 - In person at CAO
- Report **language needs**
 - Customer Service Center at 877-395-8930 or 215-560-7226 (Philadelphia)
 - Write language needs on all documents submitted to CAO
 - Ask for interpreters when calling or going to CAO

How Can MA Recipients Prepare?

- Sign up for **COMPASS**
 - Create [COMPASS](#) account
 - Download MyCOMPASS PA app
 - Sign up for [texting](#) through COMPASS
- Address potential **eligibility issues now**
- Pay attention to **DHS communications**
 - Renew timely
 - Respond to CAO information requests



What if MA Terminated?

- **Appeal**
 - 30 days to appeal
 - Appeal within **15 days** of termination notice to **continue benefits**
- Request **Reconsideration** (but also appeal) within 90 days
- Explore **other health insurance options** and **health programs**

CAO Must Review for All MA Categories

MAGI

**Healthy
Horizons**

PH 95

**MA for
Workers with
Disabilities**

**Workers with
Job Success**

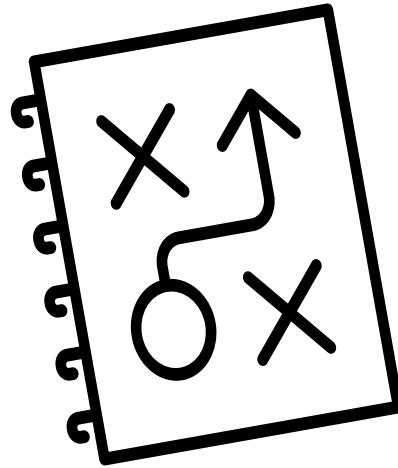
GA-Related

Waiver

... and more

[PHLP's 2023 Monthly Income and Resource Limits For Medicaid & Other Health Programs](#)

Options if Ineligible for Medicaid





- [Pennsylvania's health insurance marketplace](#) for ACA coverage
- Income-based subsidized premiums. Reduced cost sharing for some
- Most people substantively ineligible for MA sent to Pennie automatically (Not people on Medicare)
- Open to lawfully present immigrants ineligible for MA too
- **Special Enrollment Periods**
 - Enroll within 120 days of losing MA (60 days for retro coverage)
 - Only applies during Unwinding
 - MA coverage loss date = date MA managed care plan coverage ends
 - Households with income \leq 150% FPL can apply to Pennie at any time (for now)

PA MEDI



- “Pennsylvania Medicare Education and Decision Insight”
- Free Medicare counseling through local Area Agencies on Aging
- If fully on Medicare refer for:
 - Counseling on Medicare plans and program options
 - Assistance switching Medicare Rx and Medicare Advantage (health) plans
- If not on Medicare (or only partially) refer for:
 - Assistance with new 6-month Special Enrollment Period after loss of MA to enroll in Medicare Part A and B without a late enrollment penalty



- “Children’s Health Insurance Program”
- For children under 19
 - Free or subsidized coverage if 138-319% FPL
 - Full-cost CHIP for children over 319% FPL
- CAO should be reviewing for CHIP eligibility

If No Longer MA Waiver Eligible

- Pooled Income Spenddown Trust

- What: MA planning tool to put excess income into a trust to retain/obtain MA waiver
- Who: Clinically eligible but over income for MA waiver

- Act 150

- What: DHS program. Provides personal assistance services
- Who: Under Age 60 with physical disability and can self direct care

- Options Program

- What: Access through County Area Agency on Aging. Provides limited in-home assistance
- Who: Age 60+

Upcoming webinars in this series

- Medicaid Eligibility 101
March 28, 10:00 AM - [Register here](#)
- Medicaid Appeals, Reconsideration, and Troubleshooting Coverage Denials
April 11, 2023, 10:00 AM – [Register here](#)
- Revisiting MAWD & Introducing Workers with Job Success
April 20, 2023, 11:00 AM – [Register here](#)
- Dual Eligibles & Medicare Savings Programs
May 17, 2023, 11:00 AM – [Register here](#)

Questions?

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