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GOVERNOR

DEPARTMENT OF
PUBLIC HEALTH &
HUMAN SERVICES

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RESPONSE TO INTERIM COMMITTEE REQUESTS

FOR: Children, Families, Health, and Human Services Interim Committee (CFHHS)

REQUESTED INFORMATION: Rep. Howell referred to the Centers for Medicare & Medicaid Services's (CMS) 23 strategies to minimize termination for procedural reasons and asked how many of the strategies the department is using.

RESPONSE: Of the 23 strategies, the department is using 10 strategies, 7 are not being used, and 6 are not applicable to Montana. See the attached table outlining the strategies.

ENCLOSURE: 23 CMS Strategies

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REVIEWED BY: Erica Johnston, Executive Director, Human Services
COORDINATION: N/A

State Strategies to Minimize Terminations for Procedural Reasons

Strategy #	Strategy Description	Federal or State Authority	Are we using this Strategy?	Was this option in place before PHE?	Notes
1	Renew Medicaid eligibility based on financial findings from the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or other means-tested benefit programs*	1902(e)(14)(A)	Yes	Yes	
2	Implement Express Lane Eligibility (ELE) for children	State Plan Amendment	No	No	Montana does not have an integrated eligibility system with programs that would provide the necessary information (WIC, NSLP, Head Start, etc).
3	Renew Medicaid eligibility for individuals with no income and no data returned on an ex parte basis ($0 income strategy)*	1902(e)(14)(A)	Yes	No	Waiver
4	Renew Medicaid eligibility for individuals with income at or below 100% FPL and no data returned on an ex parte basis (100% income strategy)* (UPDATED)	1902(e)(14)(A)	Yes	No	Waiver
5	Renew Medicaid for individuals for whom information from the Asset Verification System (AVS) is not returned or is not returned within a reasonable timeframe (AVS strategy)*	1902(e)(14)(A)	Yes	No	
6	Renew Medicaid eligibility for individuals with only Title II or other stable sources of income (e.g., pension income) without checking required data sources*	1902(e)(14)(A)	NA	No	SSI Medicaid recipients do not have renewal/recertification dates in Montana.
7	Renew Medicaid eligibility for individuals with stable sources of income or assets (e.g., many life insurance policies) when no useful data source is available	State Plan Amendment	No	No	Implementing this strategy would require system development changes. Due to the temporary nature of these flexibilities, our resources are focused on implementing required permanent changes for SNAP, TANF and Medicaid programs.
8	Renew Medicaid eligibility without regard to the asset test for non-MAGI beneficiaries who are subject to an asset test*	1902(e)(14)(A)	No	No	Implementing this strategy would require system development changes. Due to the temporary nature of these flexibilities, our resources are focused on implementing required permanent changes for SNAP, TANF and Medicaid programs.
9	Suspend the requirement to apply for other benefits under 42 CFR 435.608* (NEW)	1902(e)(14)(A)	Yes	No	Waiver
10	Suspend the requirement to cooperate with the agency in establishing the identity of a child's parents and in obtaining medical support* (NEW)	1902(e)(14)(A)	No	No	
11	Renew eligibility if able to do so based on available information, and establish a new eligibility period whenever contact is made with hard-to-reach populations (NEW)	None. Permissible under 42 CFR 435.916(d)(1)(ii)	Yes	Yes	
12	Permit managed care plans to provide assistance to enrollees to complete and submit Medicaid renewal forms* (NEW)	1902(e)(14)(A)	NA	No	Montana does not have Managed Care Plans

13	Permit the designation of an authorized representative for the purposes of signing an application or renewal form via the telephone without a signed designation from the applicant or beneficiary*	1902(e)(14)(A)	Yes	Yes	
14	Delay procedural terminations for beneficiaries for one month while the state conducts targeted renewal outreach (NEW)	CMS Concurrence with applicability of 42 CFR 435.912(e).	No	No	Implementing this strategy would require system development changes. Due to the temporary nature of these flexibilities, our resources are focused on implementing required permanent changes for SNAP, TANF and Medicaid programs.
15	Send lists to managed care plans and providers for individuals who are due for renewal and those who have not responded	State Plan Amendment	NA	No	Montana does not have Managed Care Plans
16	Inform all beneficiaries of their scheduled renewal date during unwinding	State Plan Amendment	Yes	No	
17	Use managed care plans and all available outreach modalities (phone call, email, text) to contact enrollees when renewal forms are mailed and when they should have received them by mail	State Plan Amendment	NA	No	Montana does not have Managed Care Plans
18	Designate the state agency as a qualified entity to make determinations of Presumptive Eligibility (PE) on a MAGI basis for individuals disenrolled from Medicaid or CHIP for a procedural reason in the prior 90 days (or longer period elected by the state)* (NEW)	1902(e)(14)(A)	No	No	This strategy will add additional steps to our redetermination process. If a redetermination form or application is received after a procedural disenrollment, the document is processed to make a full eligibility determination.
19	Designate pharmacies, community-based organizations, and/or other providers as qualified entities to make determinations of PE on a MAGI basis for individuals disenrolled from Medicaid or CHIP for a procedural reason in the prior 90 days (or longer period elected by the state)* (NEW)	1902(e)(14)(A)	Yes	Yes	
20	Reinstate eligibility effective on the individual's prior termination date for individuals who were disenrolled based on a procedural reason and are subsequently redetermined eligible for Medicaid During a 90-day Reconsideration Period* (NEW)	1902(e)(14)(A)	No	No	Montana does allow for retroactive coverage requests (up to 3 months or 90 days) at application for Medicaid coverage
21	Extend the 90-day reconsideration period for MAGI and/or add or extend a reconsideration period for non-MAGI populations during the unwinding period		Yes	No	Montana has extended this to ABD cases. It has been available for MAGI pre-pandemic and ongoing.
22	Extend automatic reenrollment into a Medicaid managed care plan to up to 120 days after a loss of Medicaid coverage ("Managed Care Plan Auto-Reenrollment Strategy")*	1902(e)(14)(A)	NA	No	Montana does not have Managed Care Plans
23	Extend the amount of time managed care plans have to conduct outreach to individuals recently terminated for procedural reasons		NA	No	Montana does not have Managed Care Plans