

Practice Alert



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Issued by: Lori Masek & Vickie Stoneberger

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Medicaid Continuous Coverage Mandate in Response to COVID-19

The Families First Coronavirus Response Act (FFCRA), signed into law on 3/18/20, provides additional resources to states to help mitigate the impact of the COVID-19 pandemic. Specific to Medicaid, the FFCRA provides coverage protections for individuals who were enrolled in a Medicaid program on 3/18/20, and those who enroll during the public health emergency period declared by the Secretary of Health and Human Services. Until the emergency period is lifted, Medicaid enrollment shall continue and may end only if the individual is deceased, requests coverage be terminated, or is no longer a resident of the state.

What this means for children and youth receiving Medicaid coverage through the Children's Division, including subsidy cases and former foster care youth:

- For case functions closed during the month of March and ongoing during the period of emergency, a FACES programming fix has been implemented to keep the Medicaid eligibility open despite case closures. Although the case will be closed in FACES, the Title XIX Medicaid section will remain open.
- All AC, AD and LG case functions should continue to be closed in FACES when warranted, thus ending any alternative care services and services included in the subsidy agreement.
- FACES will continue to automatically close case functions if still open upon age 21. The Medicaid will remain open for these cases as well during the period of emergency.
- For Healthcare for Former Foster Care Youth, Medicaid eligibility will be extended for three months past the individual's 26th birthday. If after three months the period of emergency is still in effect, the eligibility will be extended further.
- Once the period of emergency is lifted, a FACES programming fix will be implemented to add the current date as the Medicaid end date for all cases closed during the emergency period.
- All participants will continue to have the same level of Medicaid coverage.
- Managed Care enrollment will not be affected; care management services offered through the managed care plan will continue.

Program Development Specialist Contacts:

Lori Masek
Lori.Masek@dss.mo.gov

Vickie Stoneberger
Vickie.Stoneberger@dss.mo.gov