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COVID-19 Public Health Emergency (PHE) Continuous Medicaid Mandate Ends 3/31/23

This Practice Alert addresses:

- COVID Public Health Emergency (PHE) mandate specific to continuous Medicaid coverage ends 3/31/23
- FACES changes implemented to comply with the PHE mandate will be removed – return to prior functionality
- Youth exiting AC and qualifying for health care for former foster care youth Medicaid coverage to age 26 – FACES updates required

PHE Mandate for Continuous Medicaid Coverage - Background

- The U.S. Department of Health and Human Services' Public Health Emergency (PHE) declaration for COVID-19 in March 2020 included many mandates and allowances.
- One provision mandated continuous Medicaid coverage for any individual enrolled in Medicaid in March 2020 or anytime during the PHE, meaning states could not terminate one's Medicaid coverage even if they were no longer eligible.
- Practice Alert [PA20-CM-05](#) introduced the impact the March 2020 COVID PHE declaration would have on Medicaid coverage for children and youth exiting foster care, aging out of a subsidy agreement, or turning 26 years old - for the former foster care youth eligible for the extended coverage: their Medicaid coverage through Children's Division would remain active despite case closure in FACES until the PHE ended.

PHE Termination - Impact to Closed Cases with Active Medicaid

- Effective 3/31/23, the Title XIX Medicaid will be end-dated for all children and youth with a closed AC function, closed AC and AD function for subsidy cases, and former foster care youth age 26 or older - IF they have active coverage with the Family Support Division (FSD).
- For those individuals who do not have active coverage through FSD, Medicaid coverage through CD will remain active through June 30, 2023 while FSD conducts a diligent efforts process to determine eligibility or notify these individuals of pending closure and the process for applying for health care coverage through FSD.
 - Regardless of the outcome of FSD's process, Medicaid coverage for remaining individuals still receiving through CD *only* due to the PHE will be closed by 6/30/23.
- Because address information on closed cases cannot be verified as current and accurate, formal notification of the PHE termination will not be made by mail by CD.
 - CD, FSD, the MO HealthNet Division, and the Department Communications office are working on targeted communication to reach CD participants.
 - AC and Subsidy case managers are encouraged to share this information with any family or former foster care youth with a verified address, phone number, or email address.

Starting 4/1/23 – FACES Functionality and Medicaid Eligibility Returning to Pre-PHE:

- With the termination of the PHE provision mandating continuous Medicaid coverage, the FACES programming edit implemented at the onset of the PHE to prevent Medicaid closure upon case closure will be removed.
- Starting 4/1/23, FACES - as it did prior to the March 2020 PHE - will end Medicaid coverage once an AC or AD case is closed, as well as when a former foster care youth eligible for coverage to age 26 turns 26 years old.

- When a child is placed on a trial home visit, staff should encourage parents to apply for Medicaid with FSD, if needed, to allow sufficient time for FSD to process and approve eligibility to prevent a gap in coverage between the two programs once the AC case is closed.

Health Care for Former Foster Care Youth – coverage to age 26 – FACES Action Required:

- Youth exiting alternative care anytime within 30 days of their 18th birthday or after qualify for extended Medicaid coverage to age 26.
- Prior to the PHE, youth qualifying for the extended coverage automatically opened in the Health Care for Former Foster Care Youth (HCFFCY) screen under General Functions when the AC function closed. FACES changes implemented to prevent Medicaid closure during the PHE kept Medicaid coverage active in their closed AC cases; it also kept these youth from migrating over to the HCFFCY screen when their AC case closed.
- Effective with any AC case closure starting 4/1/23, FACES will resume calculating the youth's eligibility for HCFFCY coverage to age 26. If eligible, the youth's Medicaid eligibility information will open in the HCFFCY the day after function closure.
- ****Please see Practice Alert PA23-CM-05 for important information regarding required action steps on these cases starting 4/1/23.**

Please direct any Medicaid-related questions to our CDMHNQuestions@dss.mo.gov address.

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