

## Illinois Continuity of Care 1115 Waiver

### Quarterly Monitoring Report & Quarterly Budget Neutrality Report

December 16, 2021 – Updated February 27, 2023

The COVID-19 Public Health Emergency (PHE) prevents Illinois from accurately measuring the impact of the provisions in its Continuity of Care 1115 Waiver. This quarter's monitoring and budget neutrality report describes the implications of the PHE on each of the three waiver components. The report also proposes alternate metrics and estimates which the state can include in future quarterly monitoring reports during the PHE upon CMS approval.

#### Extending Postpartum Coverage to 12 Months:

- *12/16/21 Narrative:* The Benefits for Postpartum Women demonstration group will not have any enrollees until the PHE Maintenance of Effort (MOE) provision ends. This is because the COVID-19 PHE MOE is currently preventing otherwise eligible individuals for the demonstration group from losing coverage during the postpartum period. In its waiver application, HFS proposed to report on the number of women who retained coverage due to the demonstration as well as quality metrics, but HFS will be unable to report on these metrics until the demonstration group has enrollees.
- *12/16/21 Proposed PHE Metric:* To approximate the potential impact of the postpartum extension, the state will estimate the number of women who would have likely been moved into the demonstration group if not for the PHE MOE provisions. The estimated group will include women between 61 and 365 days postpartum whose income would put them over the threshold for Medicaid coverage without the 1115 postpartum extension waiver.
  - *DY1Q3 ends on 9/30/21. As of 9/30/21, the estimated number of enrollees who would have likely been moved into the demonstration group if not for the PHE continuous enrollment requirement is 646 enrollees.*
- *12/16/21 Budget Neutrality:* The Benefits for Postpartum Women demonstration group will not have any enrollees until the COVID-19 Public Health Emergency (PHE) Maintenance of Effort (MOE) provision ends. As a result, there is currently no budget impact due to the demonstration.

#### Managed Care Reinstatement when a Medicaid Beneficiary Submits Late Paperwork within 90 Days:

- *12/16/21 Narrative:* In its waiver application, HFS proposed to report on the number of reinstatements into MCOs as well as MCO enrollees meeting HEDIS 12-month continuous enrollment standard. However, the COVID-19 PHE MOE has impacted these metrics. HFS currently is not taking adverse actions on late redetermination paperwork due to the PHE MOE and Medicaid enrollees are generally staying enrolled continuously due to the PHE MOE. As a result, HFS believes reporting on these metrics would reflect the impact of the PHE MOE more than the impact of the 1115 demonstration change.
- *12/16/21 Proposed PHE Metric:* To estimate the potential impact of the 90-day reinstatement period into the same MCO, the state will calculate the average number of monthly

reinstatements that happened between 61 and 90 days after cancellation in months prior to the PHE.

- *The average number of monthly reinstatements that happened between 61 and 90 days after cancellation in months prior to the PHE was 1,149.*
- *12/16/21 Budget Neutrality: N/A*

**Waiver of Hospital Presumptive Eligibility (HPE):**

- *12/16/21 Narrative:* In its waiver application, HFS proposed to report on Medicaid approval and denial rates and application processing backlog and turnaround time. However, the COVID-19 PHE MOE has impacted application processing at HFS. For example, the reduced amount of time caseworkers are spending on processing redeterminations due to the PHE MOE has resulted in caseworkers having more time to process Medicaid eligibility applications. The number of pending applications is currently much lower than when the state submitted the 1115 waiver, but reporting on these metrics would reflect the impact of the PHE MOE more than the impact of the 1115 demonstration. Approval and denial rates could have changed as well; however, additional PHE-related application flexibilities such as accepting customer income attestation and removing asset tests would have far more impact on those rates than the state's HPE waiver.
- *12/16/21 Proposed PHE Metric:* To estimate the impact of waiving HPE requirements on application metrics, the state will add its estimated number of incoming monthly HPE applications to its current backlogs.
  - *DY1Q3 ends on 9/30/21. As of 9/30/21, adding the state's estimated number of incoming monthly HPE applications to its current backlog equals 10,611 applications.*
- *12/16/21 Budget Neutrality: N/A*