

DHB ADMINISTRATIVE LETTER NO: 01-24, CONTINUOUS COVERAGE UNWINDING (CCU) PERIOD AFTER COVID-19 PUBLIC HEALTH EMERGENCY (PHE): MEDICAID PROCEDURES FOR THE e-14/100% INCOME STRATEGY WAIVER

DATE: January 11, 2024

SUBJECT: Continuous Coverage Unwinding (CCU) Period After
COVID-19 Public Health Emergency (PHE):
Medicaid Procedures for the e-14/100% Income
Strategy Waiver

DISTRIBUTION: County Departments of Social Services
Medicaid Supervisors
Medicaid Eligibility Staff

I. BACKGROUND

On March 13, 2020, the President issued a proclamation declaring a federal public health emergency (PHE) concerning the Coronavirus Disease outbreak (COVID-19). Beginning in March 2020, the Centers for Medicare and Medicaid Services (CMS) issued guidance to be followed during the COVID- 19 PHE, including the requirement for continuous enrollment/coverage for Medicaid beneficiaries who were eligible on March 13, 2020, or who were determined eligible on or after March 13, 2020.

The Consolidated Appropriations Act (CAA), 2023 was enacted on December 29, 2022. The CAA de- linked the continuous coverage requirement from the PHE and provided March 31, 2023, as the last day of the continuous coverage requirement for Medicaid beneficiaries.

The purpose of this administrative letter is to advise counties of an additional waiver that is being implemented during the Continuous Coverage Unwinding (CCU) period. This letter provides guidance for implementation of the e-14/100% Income Strategy Waiver for MAGI programs.

II. POLICY AND PROCEDURES

It is important to note that the policies and procedures found below are effective for MAF-C recertifications with certification periods ending March 31, 2024, or after. **Recertifications for MAF-C cases with certification periods ending January 31, and February 29, 2024 should be processed following existing MAGI Recertification policy found in [MA-3421](#).**

The Centers for Medicare and Medicaid Services (CMS) has approved NC Medicaid's request for a temporary waiver during the continuous coverage unwinding (CCU) period. The waiver is approved through December 31, 2024. Medicaid caseworkers should be aware of the following policy and procedures concerning the approved e-14 100% Income Strategy Waiver (100% Waiver).

A. Purpose

1. NC FAST has implemented an automated process to apply e-14 100% Income Waiver criteria during the straight-through process (STP) for recertifications.
2. The purpose of the 100% Waiver is to allow ex-parte recertification for individuals receiving Medicaid as a parent/caretaker (MAF-C) without requesting further income verification if the requirements listed in II.B., below are met.
3. The waiver allows NC to complete the recertification for MAF-C cases without requesting additional information, when the most recent active income verification was verified no earlier than March 1, 2019, and **NO** income verification is returned in the current electronic data source.
4. Additionally, all non-financial components of eligibility must be reverified. NC only re-verifies immigration status at recertification in addition to income.
5. NC FAST has implemented an automated process to complete these redeterminations as part of the straight-through recertification batch process, without caseworker intervention when possible.
6. Section II.C., below provides procedures for caseworkers when the MAF-C recertification is not completed in the straight-through recertification batch process.

B. Requirements

The individual must meet **all three** of the following requirements to apply the 100% e-14 waiver rules:

1. The most recent **active** income verification included in the evidence on the dashboard is at or below 100% of the Federal Poverty Level (FPL).

Note: all individuals eligible for MAF-C meet this requirement.

2. The most recent **active** income verification included in the evidence on the dashboard at either application or recertification was verified no earlier than March 1, 2019 (12 months prior to the beginning of the COVID-19 PHE).
3. Electronic sources (OVS, TWN) returned **no** income hits.

Note: This means zero income was returned via electronic sources.

C. Procedures

1. Refer to the following NC FAST Job Aids for information related to the STP recertification process:
 - a. MAGI Recertification Straight-Through Processing
 - b. MAGI Recertification Straight-Through Processing Automated Recert Selection and Exclusion Criteria
2. **Cases are evaluated for STP each month beginning on the first calendar day and completing no later than the 15th calendar day of the month.**
3. NC FAST will attempt to complete MAF-C recertifications utilizing e-14 100% waiver rules and STP criteria.
4. Caseworkers should monitor the NC FAST MAGI Pending Recertification Details report daily to identify all cases that are still being processed in the straight-through recertification batch process, in particular MAF-C recertifications.

The pending recertification report indicates the STP status of cases with the following terms:

- a. **Not Selected:** The case was not selected to attempt STP.
 - **Caseworkers should proceed to complete recertification.**
- b. **Selected:** The case was selected to attempt STP and STP is ongoing. These cases will remain in “selected” status. If a selected case falls out of STP, the status will change to “incomplete.”
 - **When NC FAST completes a selected case, it will fall off the Pending Recertification Details report.**

- **Caseworkers should let STP process complete, before attempting the recertification.**
- c. **Incomplete:** The case was selected to attempt STP, but STP is unable to be completed and the case has fallen out of the STP batch.
- **Caseworkers should proceed to complete the recertification.**
5. Caseworkers should complete the MAF-C recertification in the following circumstances:
- a. The case is marked “not selected.”
- (1) The caseworker **must** request all electronic sources (OVS, TWN).
 - (2) If electronic sources return **NO** new/additional income, the case **is** eligible to be evaluated using the 100% e-14 waiver rules, even if there is current active income on the case dashboard, refer to II.D., below.
 - (3) If electronic sources return **new/additional** income, a complete recertification is required. The case is **not** eligible to be evaluated under the 100% e-14 waiver rules. Refer to [MA-3421, MAGI Recertification](#), and follow ALL recertification procedures.
- b. The case is marked “incomplete.”
- (1) Determine the “fallout” reason that stopped the STP process.

Refer to NC FAST Job Aid: MAGI Recertification Straight-Through Processing.
 - (2) If STP ended because of reasons unrelated to income (i.e., person mismatch, immigration status change, etc., this is not an exhaustive list), **AND** there are **no** income results in either OVS or TWN, the case is eligible to be evaluated under the 100% e-14 waiver rules:
 - (a) The caseworker should review and resolve the non-financial and/or system issue that caused STP to end.
 - (b) Once the non-financial and/or system issue has been resolved if the individual continues to meet all non-financial requirements, extend the case for 12 months by utilizing medical continued evidence. Refer to II.D., below.

- (c) If the individual does **not** continue to meet **all** non-financial eligibility requirements, follow the policy for the applicable non-financial requirement.
 - (d) If the individual is no longer eligible due to the non-financial reason (i.e., the individual no longer resides in North Carolina), refer to [MA-3430, Notice and Hearings Process](#), to determine if timely or adequate notice is required.
- (3) If STP ends for **any reason** and **new/additional income is reported** in electronic sources (OVS, TWN), the case is **not** eligible to be evaluated using the 100% e-14 waiver rules.
- (a) The caseworker **must** follow regular recertification procedures to complete the recertification process, including income verification when the electronic source causes the individual to be eligible for a lesser Medicaid program, or results in ineligibility.
 - (b) Refer to [MA-3421, MAGI Recertification](#).
- c. If the case is in “selected” status, the caseworker should continue to monitor the STP status daily via the pending recertification report to determine if the case can be completed by the worker at that time.
- (1) The caseworker should let the STP process complete.
 - (2) Caseworkers may focus on working MPW, FPP and other non-MAGI recertifications along with processing applications and working the change in circumstance (CIC) report, while continuing to monitor the STP process.

Note: As with all cases selected for STP, at any point during the STP, if there is a recertification record (created manually by the caseworker) in progress, evidence is marked “in-edit”, or action is taken to make changes to the case, STP may end, or result in the case being excluded from the STP batch.

- d. As a reminder the STP Recertification batch process may run up until the 15th calendar day of each month. The pending recertification report is updated daily with the most recent STP status.

D. Caseworker Action Required

- 1. When all requirements in II.B., above have been met, and there are no other outstanding issues, the caseworker must:

- a. Enter medical continued evidence for 12 months.
 - b. Document the reason for the continuation as: “100% Income e14 Waiver”. This documentation **must be included in the narrative in NC FAST. Failure to include this documentation will result in an audit finding.**
2. When all requirements in II.B., above have been met, but another issue is outstanding (i.e., person mismatch, etc.), the caseworker **must** resolve the outstanding issue. This may require additional verifications for non-financial criteria. **Do not request income.**
 3. If all requirements in II.B., above have **not** been met, and electronic sources **does** return new/additional income, refer to [MA-3421, MAGI Recertification](#) and follow regular recertification procedures.
 4. **In all cases**, when electronic sources return income information, a full recertification must be completed. The case is **not** eligible to be evaluated using the 100% e-14 waiver rules.
 5. If NC FAST or the caseworker discover that the case cannot be recertified using ex-parte, refer to [MA-3421, MAGI Recertification](#) and follow regular recertification procedures.

E. Untimely Recertification/Medicaid Extension

When the recertification is not completed timely by the caseworker and/or NC FAST extends the certification period for three months in the COVID extension batch, the three-month extension cases will go through the STP recert batch process again until the case is completed.

Example: The certification period ended January 31, 2024; however, the caseworker was unable to complete the recertification timely, NC FAST extends the case through April 30, 2024, and begins STP on April 1, 2024.

III. IMPLEMENTATION

The policies and procedures found in this administrative letter are effective for MAF-C recertifications with certification periods ending March 31, 2024, or after.

Recertifications for MAF-C cases with certification periods ending January 31, and February 29, 2024 should be processed following existing MAGI Recertification policy found in [MA-3421](#).

If you have any questions regarding this information, please contact your [Medicaid Operational Support Team representative](#).

DocuSigned by:



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Jay Ludlam

Deputy Secretary, NC Medicaid