

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Health Care Finance



Office of the Senior Deputy Director-Medicaid Director

Transmittal # 20-34

TO: District of Columbia Providers and Medicaid Beneficiaries

FROM: Melisa Byrd
Senior Deputy Director and State Medicaid Director

DATE: September 30, 2020

SUBJECT: **Managed Care Enrollment and Beneficiary Disenrollment**

Purpose

This transmittal provides additional guidance to all Medicaid stakeholders regarding special circumstances when the Department of Health Care Finance (DHCF) will permit certain populations to be exempt from mandatory enrollment in the District's Medicaid Managed Care program, DC Healthy Families, and instead receive services via the District of Columbia Medicaid Program fee-for-service (FFS) delivery system.

Background

On August 14, 2020, DHCF adopted an amendment to Chapter 55 (Enrollment and Disenrollment Requirements and Procedures for Medicaid Beneficiaries in the Medicaid Managed Care Program) of Title 29 (Public Welfare) of the District of Columbia Municipal Regulations. The rulemaking corresponds to changes to the District of Columbia Medicaid State Plan approved by the Centers for Medicare and Medicaid Services on August 10, 2020.

The rulemaking clarifies which eligibility groups will be: 1) mandatorily enrolled in managed care; 2) will be able to voluntarily enroll in managed care; or 3) will be excluded from enrollment in managed care. Alongside regulatory and SPA changes, DHCF made changes to the managed care contracts governing DC Healthy Families to limit the ability of mandatory adult groups to opt out of enrollment into a managed care plan.

In sum, effective October 1, 2020, the rulemaking, State Plan amendment (SPA), and programmatic changes will transition an approximately 17,000 individuals from FFS to mandatory managed care.

Individuals transitioning on October 1, 2020 that are dissatisfied with their assigned health plan or would like to change their MCO for any reason they have until December 31, 2020 to choose from the following:

- AmeriHealth Caritas District of Columbia
- CareFirst BlueCross BlueShield Community Health Plan of District of Columbia
- MedStar Family Choice District of Columbia

Beneficiaries may contact DC Healthy Families to get help in choosing a different MCO plan by phone at (202) 639-4030 or 1 (800) 620-7802. For the hearing impaired, call the TDD/TTY line at (202) 639-4041.

In reviewing the District's proposed transition plan, DHCF identified three populations where additional clarification was needed to avoid unintended and unnecessary disruption of coverage. Pursuant to this transmittal, there are limited circumstances for three populations where DHCF will permit individuals who will be or are enrolled in DC Healthy Families on a mandatory basis to voluntarily disenroll or remain in the FFS Program: (1) Children with Special Health Care Needs; (2) Individuals Transitioning to Medicare Eligibility within 90 Days of Assignment to a Mandatory Managed Care Eligibility Group; and (3) Individuals with a Pending Application to Receive Long Term Care or Home and Community-Based Waiver Services.

Children with Special Health Care Needs

The District intends to continue to allow certain children with special health care needs under the age of 21 to opt out of mandatory managed care enrollment. Children with special health care needs who are under the age of 21 and who have either 1) opted out of enrollment in DC Healthy Families prior to October 1, 2020; or 2) wish to opt out of managed care after October 1, 2020 due to special health care needs may elect to receive Medicaid services via the FFS program.

For questions regarding the process for children with Special Health Care Needs to opt out of managed care, please contact Colleen Sonosky, Associate Director, Division of Children's Health Services, Health Care Delivery Management Administration, DHCF at colleen.sonosky@dc.gov or (202) -557-1625.

Adults Who Will Become Eligible for Medicare Within 90 Days of Assignment to a Mandatory Managed Care Eligibility Group

Adults who are dually eligible for Medicaid and Medicare are excluded from enrollment in managed care. Individuals scheduled to become eligible for Medicare within 90 days of assignment to an eligibility group that must enroll in managed care¹ could face multiple transitions of coverage during a short time frame, which could disrupt their access to care. To address this challenge and limit the number of program transitions for individuals approaching Medicare eligibility, DHCF will allow adults who will become Medicare eligible within the first 90 days of assignment to a mandatory managed care eligibility group to disenroll from managed care or remain in FFS at their request, effective October 1, 2020.

Individuals with a Pending Application to Receive Long Term Care or Home and Community-Based Waiver Services

Individuals receiving Home and Community Based services through one of the District's 1915(c) waivers are excluded from managed care. Individuals who are near a final determination of LTSS or HCBS coverage are at risk of needing to undergo multiple program transitions in a short timeframe. To limit the number of program transitions for these individuals, DHCF will allow

¹ Eligibility groups enrolled in managed care on a mandatory basis are defined in rulemaking at 29 DCMR 5501.2.

individuals with a pending LTSS application to request to remain in or transition to the FFS program.

Contact

If you think you qualify for an exemption from being part of managed care, as outlined above, please contact DC Healthy Families at (202) 639-4030 or 1 (800) 620-7802.

For questions regarding this transmittal, please contact Linda Walker, Program Analyst, Division of Managed Care, at linda.walker@dc.gov or (202) 442-5853.

For more information on the District's Healthy Families Program, please visit the DHCF website at <https://dhcf.dc.gov/service/dc-healthy-families>.

cc: Medical Society of the District of Columbia
DC Hospital Association
DC Primary Care Association
DC Health Care Association
DC Home Care Association
DC Behavioral Health Association
DC Coalition of Disability Service Providers
DC Chapter American Academy of Pediatrics