

COFA Islander Health Care

Office of Medicaid Eligibility and Policy Medicaid Eligibility and Community Support October 2018



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Background





Background

The Compact of Free Association (COFA) is an economic and military treaty between the United States and the Republic of the Marshall Islands, the Federated States of Micronesia and the Republic of Palau.

Individuals from these nations can come and go freely from the United States. These individuals have a non-qualified immigration status that limits their ability to get federally funded Washington Apple Health (Medicaid).

The exception to this are pregnant individuals and children age 19 and younger.



COFA Islander Health Care

Substitute Senate Bill 5683 was passed by the legislature this session to give COFA islanders who are also Washington residents health care under a qualified health plan.

This bill funded COFA Islander Health Care which enables HCA to pay the premiums and out-of-pocket costs for individuals who have household income under 133% of the federal poverty level (FPL) and enrolled in a silver level qualified health plan.

These individuals currently are not eligible for some Apple Health programs.



COFA Nations





COFA Islander Facts

The U.S. conducted 67 nuclear tests in the Marshall Islands between 1946 and 1958. High levels of radioactive fallout contaminated the region, which continues to produce measurable radiation levels above naturally occurring background levels according to a Columbia University study. ¹

Marshallese people suffer from high rates of cancer and diabetes. According to the 2009-2011 American Community Survey, 24 percent of Marshallese in the U.S. were uninsured. ¹

¹ Information courtesy of Washington State Commission on Asian Pacific American Affairs



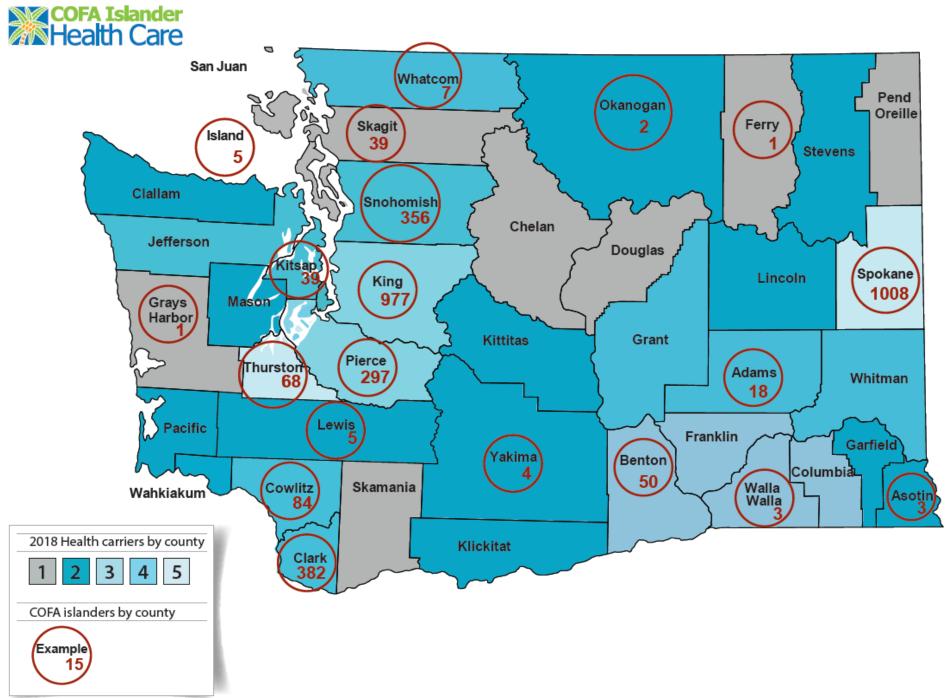
COFA Islander Facts

Washington State has the second-largest population of Kosraeans and the third-largest population of Palauans and Marshallese people in the U.S. according to the 2010 U.S. Census. COFA migrants reside in Auburn, Everett, Federal Way, Spokane, and Vancouver.¹

The six main languages are Chuukese, Marshallese, Pohnpeian, Yapese, Palauan, and Kosraean.

Currently, individuals can select Trukese and Marshallese in Washington Healthplanfinder. Trukese is the outdated name for Chuukese.

¹ Information courtesy of Washington State Commission on Asian Pacific American Affairs



Program Eligibility





COFA Islander Health Care

To qualify for COFA Islander Health Care, an individual must:

- Be a COFA islander and a Washington resident
- Have countable income under 133% FPL
- Not be eligible for other minimum essential coverage such as employer sponsored insurance, Apple Health or Medicare
- File federal taxes even if they do not meet the tax filing requirements
- Qualify and take the maximum Advanced Premium Tax Credit (APTC)
- Enroll in a silver level Qualified Health Plan (QHP)



The effective date of COFA Islander Health Care follows QHP rules, which are different from Apple Health.

In general, QHP effective dates follow a cutoff of 15th of the month for changes to be effective the next month.

This means changes made between the 1st and the 15th will take effect the next month and changes made after the 15th will take effect in the month after next.

Let's look at a couple of scenarios for a better understanding.

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Scenario 1: before the 15th of the month.

Mary has been enrolled in COFA Islander Health Care since January 1. On June 7th, she reports her income is 145% FPL and she is now over income for the program.

COFA Islander Health Care will end June 30th since she reported this change before the 15th of the month, however she remains eligible for QHP.



Scenario 2: after the 15th of the month.

Steve has been enrolled in COFA Islander Health Care since January 1. On June 17th, he reports his income is 172% FPL and he is now over income for the program.

COFA Islander Health Care will end July 31st since he reported this change after the 15th of the month, however he remains eligible for QHP.



Scenario 3 before the 15th of the month.

James applied during Open Enrollment for COFA Islander Health Care, but due to his income of 182% FPL he is not eligible for the program but he enrolled in a silver level QHP.

On June 10th, he reports his income is now 121% FPL and he is now eligible for the program.

COFA Islander Health Care will begin July 1st since he reported this change before the 15th of the month.

Applications





Washington Healthplanfinder Accounts

A Washington Healthplanfinder account is required for individuals applying for COFA Islander Health Care.

Washington Healthplanfinder accounts are required for all individuals enrolling in QHP on the exchange but are optional for those applying for Apple Health.

This may mean individuals with existing applications must create an account if they would like to apply for COFA Islander Health Care.

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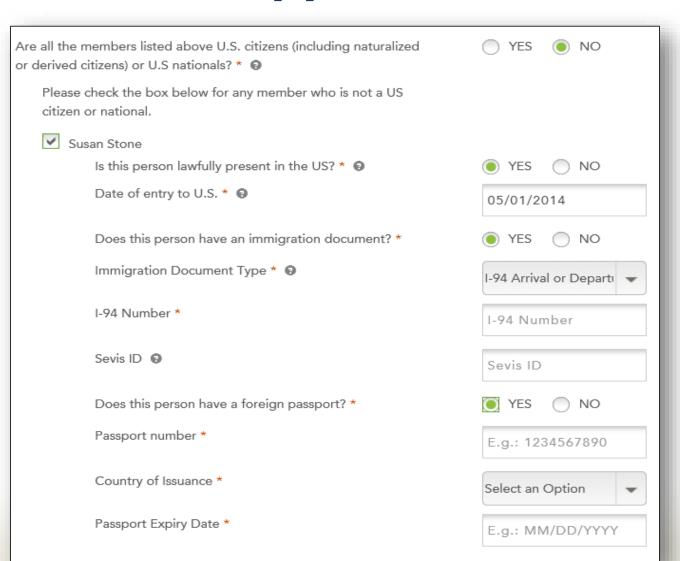
An individual can submit an application for coverage during open enrollment via:

- Online: <u>www.wahealthplanfinder.org</u>
- Mobile application: WAPlanfinder
- Phone: 1-855-923-4633
- Paper Application

An individual may qualify for a special enrollment period for certain life changes. Find a list online at www.wahbexchange.org/sep

For the benefit year 2019 open enrollment is November 1st through December 15th. COFA Islander Health Care begins January 1, 2019.

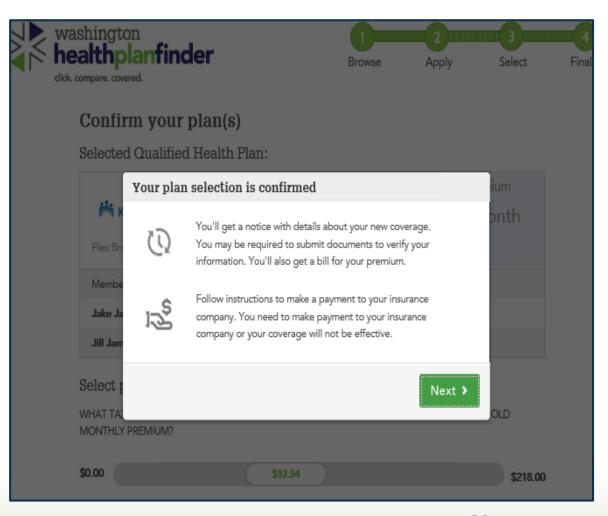




The application does not include a place to attest to being a COFA Islander.

Individuals will enter their I-94 card information and/or their foreign passport information into the application.





To enroll in COFA Islander Health Care, individuals must enroll in a silver level QHP.

Those who are unable to select a QHP for a client should contact their lead org for assistance.

This screenshot shows that a plan selection has been confirmed.



To enroll in COFA Islander Health Care during the benefit year, an individual must qualify for a Special Enrollment Period (SEP).

Qualifying events include:

- Changes in household size
- Reconciliation of federal taxes
- Loss of minimum essential coverage

For a complete list, please visit:

https://www.wahbexchange.org/new-customers/who-can-sign-up/special-enrollment-period/special-enrollment-qualifying-events/



Application and Sponsorship

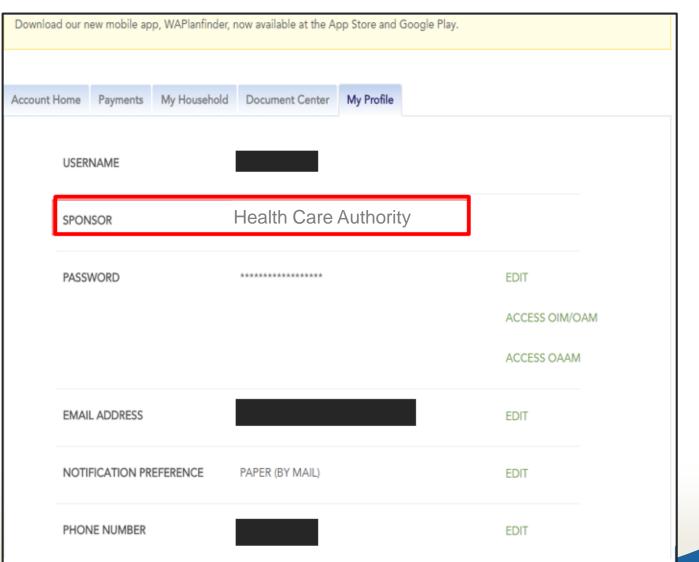
Individuals enrolled in COFA Islander Health Care will be sponsored by HCA in Washington Healthplanfinder and will receive a letter confirming this after they apply.

As a sponsor, HCA will pay an individual's monthly insurance premiums directly to the carriers.

If an individual enrolled in COFA Islander Health Care receives a bill from the insurance company in the first month they should not pay this bill since they are sponsored by HCA.



Application and Sponsorship



Confirmation of sponsorship can be found on the My Profile tab in Washington Healthplanfinder.



Conditional Eligibility Verification

Federal Regulations require all state-based exchanges and the federal marketplace to verify eligibility for individuals.

Conditional Eligibility is a status a QHP or Qualified Dental Plan individual may receive if they have submitted an application and the federal hub was unable to verify information entered in their application.

There is a 95 day time frame to provide documents and resolve inconsistencies. Individuals may receive tax credits and cost-sharing reductions during this time.



Conditional Eligibility Verification

An individual can be in the conditional eligibility verification for the following:

- Social Security Number (SSN)
- Citizenship or lawful presence (if indicated as a lawfully present immigrant/non-immigrant)
- Incarceration
- Eligibility or enrollment in non-employer sponsored insurance (Medicare, Tricare*, Veteran's Health*, and Peace Corp*)
- Income*
- Tribal membership



Conditional Eligibility Verification



Funding





Sponsorship

State and federal laws allow organizations and government agencies to pay monthly premiums on behalf of individuals who are enrolled in a QHP through Washington Healthplanfinder.

The Health Care Authority is listed as the sponsor for individuals enrolled in COFA Islander Health Care; this means that the agency will pay the QHP premiums directly to the insurance carrier.



Out-of-Pocket Costs

Out-of-Pocket Costs are expenses for medical care that are not reimbursed by the insurance, this includes:

- Copayments, coinsurance and deductibles
- Cost-sharing requirements imposed under a qualified health plan for services, pharmaceuticals, devices, and other health benefits covered by the plan and rendered as in-network.

Out-of-pocket costs excludes premiums, balance billing amounts for out-of-network providers, and spending for non-covered services.



Cost-Sharing Funds

The funds provided by the agency for out-of-pocket costs are called cost-sharing funds. These funds cover out-of-pocket costs for services rendered as in-network.

Cost-sharing funds cannot be use for services that are not covered by the plan. Even when in-network, it is always the client's responsibility to check what services are covered with their plan.

Qualified Dental Plan (QDP) is not included in COFA Islander Health Care; individuals who select a dental plan are responsible for their QDP premium.



Cost-Sharing Funds

A cost-sharing funds card will be mailed to each individual enrolled in COFA Islander Health Care.

The funds on this card are for out-of-pocket costs only. This means copays, co-insurance, deductibles, prescriptions and other costs for in-network services.

The card cannot be used for services that are not covered by the QHP, are rendered as out-of-network or are balance billing amounts.

For example: If a plan only authorized 15 physical therapy visits during the year, the card cannot be used to pay for any additional visits.



Cost-Sharing Funds

Each card will have a \$300 monthly limit. At the beginning of the next month, the card will be refilled up to the limit.

If additional funds are needed to, for example, cover prescriptions or pay a bill, HCA must be contacted for an authorization of additional funds.

It may take 48 business hours to load more funds after an authorization has been approved. If more funds are needed and an individual calls on Friday, the funds will not be available until Tuesday.

Outreach





COFA Islander Health Care

HCA anticipates that there is about 1200-2500 individuals eligible for the program in Washington.

Analysis shows that most populous counties include:

Spokane

- Clark

- Cowlitz

- King

- Snohomish

- Pierce

- Thurston



Outreach

HCA is hosting a COFA Advisory Committee made up of community members, carriers, advocates, lead organizations, navigators, and state partners. This group is helping advise HCA on making decisions about the implementation of the program.

HCA launched a culturally and linguistically accessible outreach campaign. This includes outreach materials, videos, social media campaign, and website.

You can check out the website now at: www.hca.wa.gov/cofa



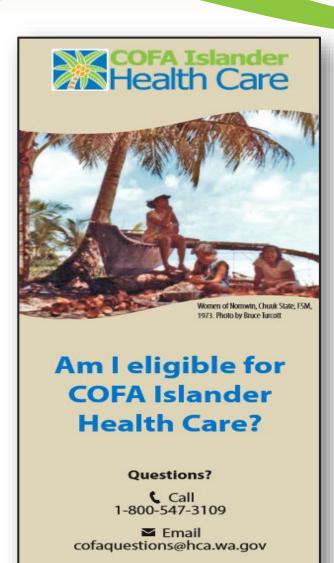
Community Workers - Outreach

HCA hired six part-time and temporary Community Workers to help individuals apply during open enrollment.

Many of the Community Workers are members of the COFA Islands so they can locally connect and assist members of their community with the enrollment process.

Community Workers are available to help in other communities where smaller populations reside.







Health care coverage available for COFA islanders

Starting January 1, 2019, the Health Care Authority will be paying the monthly premiums and out-of-pocket expenses for silver level Qualified Health Plans for Compact of Free Association (COFA) islanders. COFA islanders include people from the Republic of the Marshall Islands, the Federated States of Micronesia, and the Republic of Palau.

Am I eligible?

You are eligible if you are a COFA islander with income less than 133% of the federal poverty level (see chart below) and you must:

- Live in Washington
- · Enroll into a silver level Qualified Health Plan
- Agree to file federal taxes (even if you do not meet tax-filing requirements)
- · Not get other federal or state medical coverage

	COFA
Website:	www.hca.wa.gov/cofa
Email: cot	faquestions@hca.wa.gov
Phone: 1-	800-547-3109
	ne about enrolling in a Qualified Health DFA Islander Health Care.
COFA client name	

Fact sheet

Contact Card

HCA 19-0029 (9/18)

Operational Impacts





Operational Impacts

Many COFA islanders enrolled in the program may have households that include children receiving Apple Health coverage.

Households may have:

- A Post-Eligibility Review (PER).
- Children aging out of Apple Health and transitioning to COFA Islander Health Care.
- Pregnant women transitioning to COFA Islander Health Care after pregnancy coverage ends.
- Individuals who are transitioning from a reasonable opportunity period if they had an unverified immigration status.



Individuals cannot receive COFA Islander Health Care and other Minimum Essential Coverage (MEC); this may include DSHS programs like Medical Care Services (MCS).

As Alien Emergency Medical (AEM) is not considered MEC, individuals enrolled in COFA Islander Health Care can apply for AEM.

Family Planning is another program where an individual can be enrolled concurrently with COFA Islander Health Care since Family Planning is not considered MEC.



What is a Reasonable Opportunity Period (ROP)?

It is a 90 day timeframe given to an individual to verify citizenship and lawful presence when federal and state electronic system are unable to verify the information.

Individuals applying for COFA Islander Health Care could be approved for Washington Apple Health due to the reasonable opportunity period; the Health Care Authority will review these cases.



Individuals receiving COFA Islander Health Care and become pregnant have the option of continuing with COFA Islander Health Care or Washington Apple Health Pregnancy Medical.

If an individual reports their pregnancy in Washington Healthplanfinder but decides to continue on COFA Islander Health Care instead of Washington Apple Health Pregnancy Medical, the due date will have to be removed from the application.



Scenario 1

Bob has been enrolled in COFA Islander Health Care since January 1st, his children are enrolled in Apple Health for Kids with a review end date of March 2019.

Bob must manually renew his children's coverage. He updates his application through the Washington HPF and reports an income of 210% FPL.

His children remain on Apple Health for kids.

Bob is still eligible for QHP but no longer qualifies for COFA Islander Health Care.



Scenario 2

Jane has been enrolled in COFA Islander Health Care and her children are enrolled in Apple Health for Kids.

A post-eligibility review (PER) was completed on September 17th. An income of 153% FPL was verified using wage stubs.

The application was updated and as a result of the PER Jane remains eligible for QHP; but no longer qualifies for COFA Islander Health Care.

Implementation & Timeline





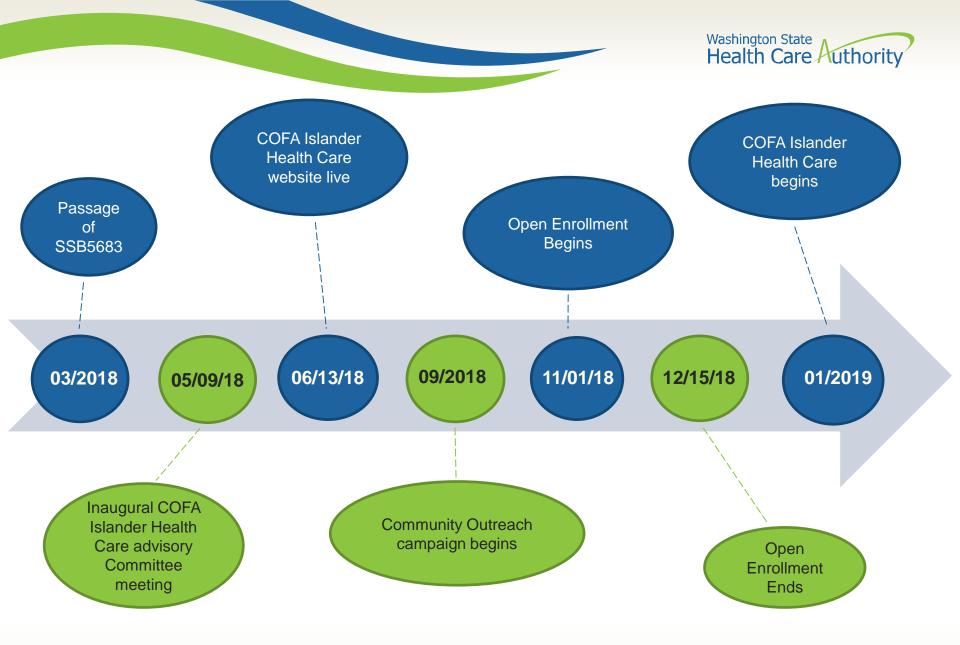
Implementation

First year impacts

- Manual processing and daily reports
- Sponsorship program to pay for premiums
- Paying for out-of-pocket costs using cost-sharing funds
- Letters sent through Washington Healthplanfinder using mass correspondence

Second year outlook

System support in Washington Healthplanfinder







Advance Premium Tax Credit (APTC): tax credit you can take in advance to lower your monthly health insurance payment (or premium).

Benefit year: A year of benefits coverage under an individual health insurance plan. The benefit year begins January 1 of each year and ends December 31 of the same year.

COFA islander: A person who is a citizen of the Federated States of Micronesia, the Republic of the Marshall Islands, or the Republic of Palau.

Co-insurance: a type of insurance plan where you pay a share of the payment.



Co-payment: a payment you make in addition to the payment made by the insurance plan.

Cost-Sharing Funds: the funds provided by the agency for outof-pocket costs.

Cost-Sharing Reductions (CSR): Cost-sharing reductions are discounts that lowers the amount an individual pays for deductibles, co-insurance, and co-payments and other out-of-pocket expenses.

Deductible: a specified amount of money that you must pay for medical services before an insurance company will pay a claim.



Household: all the individuals who reside together and file taxes together.

Out-of-pocket costs: costs that you have to pay and your insurance plan will not cover including deductibles, co-insurance, co-payments, and prescriptions.

Preventative services: services offered by an insurance plan including screenings, vaccinations, counseling, etc.

Tax credits: an amount of money that can be offset against your federal tax liability

Resources





Resources

COFA Islander Website:

www.hca.wa.gov/cofa

Questions? Email:

COFAQuestions@hca.wa.gov

Phone number:

1-800-547-3109

COFA Islander Program Manager:

Vesna Agina at Vesna Agina at Vesna@hca.wa.gov

Lead Organizations:

https://www.wahbexchange.org/partners/navigators/

COFA Outreach Toolkit:

https://www.hca.wa.gov/health-care-services-and-supports/apple-health-medicaid-coverage/cofa-outreach-toolkit