

## Medicaid Suspension under Washington Apple Health FAQ

Individuals in the custody of the criminal justice system need seamless access to community treatment networks and medical assistance upon release to prevent gaps in treatment and reduce barriers to accessing care. Beginning July, 2017 due to the passage of Substitute Senate Bill (SSB) 6430, the Health Care Authority (HCA) will suspend, rather than terminate, medical assistance benefits for individuals who are incarcerated or committed to a state hospital. The intent is to provide continuity of care for individuals upon re-entry into the community. For more information, visit [www.hca.wa.gov/medicaid-suspension](http://www.hca.wa.gov/medicaid-suspension)

### About Medicaid Suspension

#### What is suspension of Medicaid?

HCA promoted new system automation and policy in July 2017 regarding incarcerated individuals and their Washington Apple Health (Medicaid) coverage. ProviderOne (P1) interfaces daily with the city/county Jail Booking and Reporting System (JBRS) and incarcerated individuals will show in P1 with a new “SBP (suspended benefit package) Institutionalized Dates” RAC (recipient aid category) and a new “Suspended – Inpatient Hospital Services Only” service package. This means the individual’s coverage is in a suspended status and P1 will only pay inpatient claims. Apple Health eligibility is not changed but the scope of coverage is reduced to inpatient services only (an inpatient event is when an individual is formally admitted by doctor’s orders). When the individual is released, the interface end-dates the SBP Institutionalized RAC and full scope coverage is restored without any action required on the part of the individual. Please refer to the suspension process example provided in this document.

#### Who is a justice involved (JI) individual?

A justice involved (JI) individual is any individual who is incarcerated in a prison or jail setting or is under supervision or being monitored by a correctional entity including work release. This “status” could also extend to infrequent contacts by a community supervision or probation officer long after release from a formal jail setting. The JI individual is a new term and not universally used but is considered a favorable descriptive title.

#### Who is an institutionalized individual?

In relation to Apple Health Medicaid suspension, the term institutionalized refers to incarcerated individuals or those residing in Western or Eastern State Hospitals.

#### What is a correctional facility?

Correctional facility is a term used to refer to either a city/county jail or prison. Prisons are state facilities administered by the Department of Corrections (DOC). Jails and detention centers are administered by local municipalities. Individuals who receive sentences for longer than one year will serve their term in prison. Sentences for less than one year are served in a city/county jail.

#### What institutionalized populations will have Medicaid coverage suspended and when?

- On July 7, 2017 suspension went live for DOC (prisons) and city/county jails.
- A process for suspension of benefits for other populations, (Eastern/Western State Hospitals, juvenile rehabilitation facilities and tribal jails for example) will be established in the second phase of implementation (2017/2018).

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## **Under what circumstances can a JI individual be eligible for Apple Health?**

Justice involved individuals must meet the same Apple Health eligibility criteria as any other individuals: citizenship or satisfactory immigration status, social security number enumeration, and income are the major eligibility factors. Incarceration does not affect Apple Health eligibility, but it does impact the scope of coverage. While incarcerated, only inpatient hospitalizations lasting longer than 24 hours are a covered benefit. When there is a question regarding whether an individual's incarceration status or setting allows them to be eligible for full scope coverage, the Apple Health (Medicaid) manual "[Program Options for the Justice-Involved](#)" matrix provides clarity. For any other questions regarding a JI individual's eligibility, please contact the Medical Assistance Customer Service Center (MACSC) at 1-800-562-3022.

## **Are there exceptions to the rule regarding institutionalized individuals?**

Yes, the exception is inpatient hospitalizations that last longer than 24 hours. Medicaid can be billed for inpatient medical services for incarcerated individuals who were in jail or prison but required inpatient medical care. These rules differ for those under 22 years of age in an Institution for Mental Disease (IMD). In 2018 the State hospitals will be included in the scope of suspension and more details will be provided at that time.

## **Will Apple Health be billed for medical services provided while an individual is incarcerated?**

Per the Centers for Medicare and Medicaid Services (CMS) rules, only inpatient hospitalizations lasting longer than 24 hours are a covered benefit for Apple Health clients while incarcerated. All other medical care is the responsibility of the correctional facility.

## **Will HCA be able to recoup any managed care premiums?**

If determined an individual was incarcerated for a full calendar month (not 30 day period) and the managed care premium was paid for that period, the premium will be recouped.

## **What system is used to suspend coverage?**

In ProviderOne, claims suspend when the JBRS/DOC interface makes a direct match to an individual. Once coded as suspended, ProviderOne will only pay inpatient claims. For additional information, please refer to the section entitled "The Suspension Process".

## **Is federal approval needed to suspend Apple Health eligibility vs terminating it?**

No, we do not need CMS approval. Suspension is a policy encouraged by CMS.

## **What is care coordination?**

Care coordination for the justice involved includes a deliberate organization of patient care and may include activities such as scheduling medical appointments, conducting assessments and arranging transportation. The intent is to facilitate a successful reentry into the community with the goal of reducing recidivism (the incidence of reoffending).

## **Are correctional facilities required to collaborate with Behavioral Health Organizations (BHOs) and Managed Care Organizations (MCOs)?**

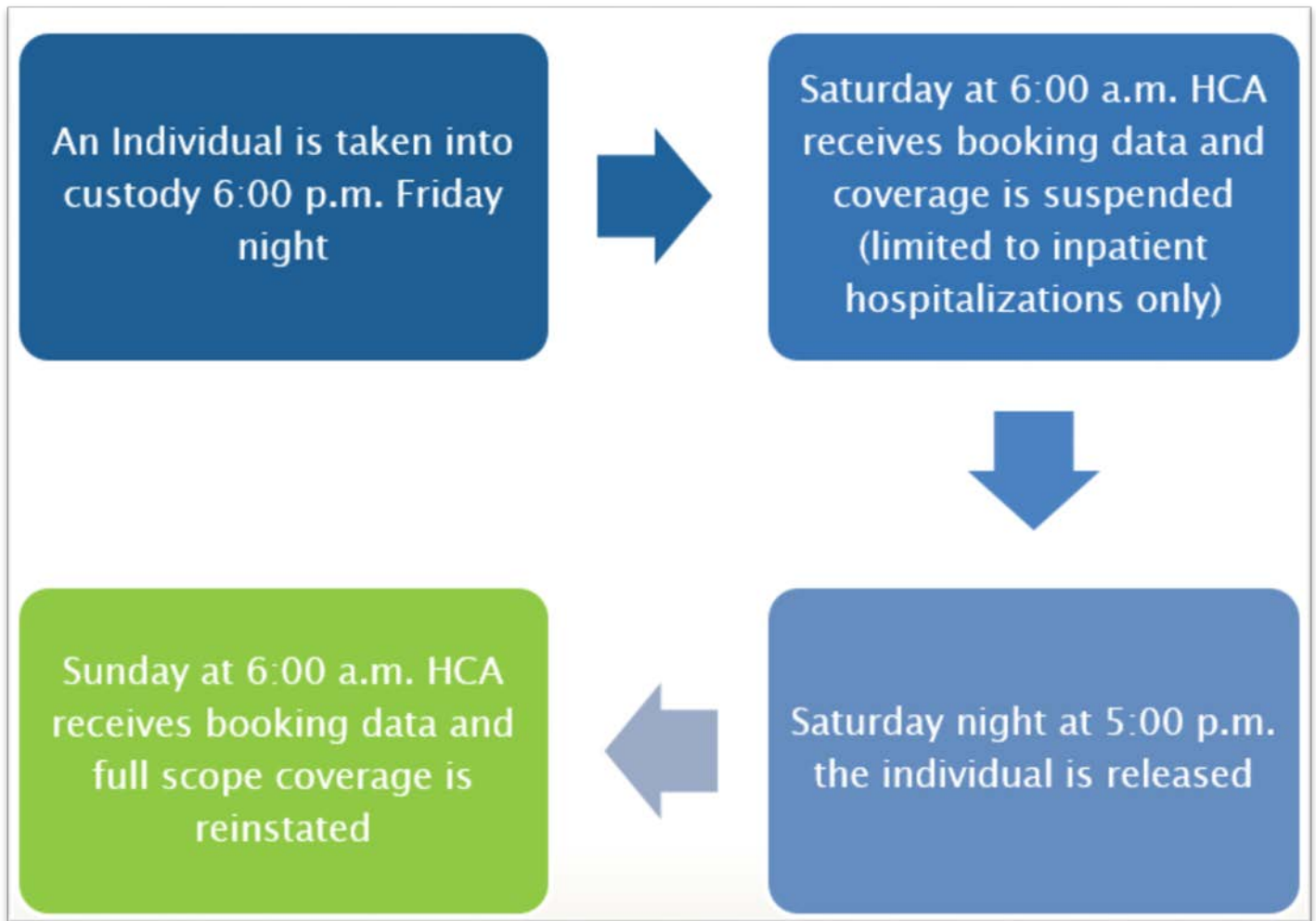
Correctional facilities are encouraged to collaborate and most facilities believe care coordination will result in a benefit to the individual, the community and lead to reduced recidivism.

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### How will HCA know someone has been incarcerated?

Each night HCA receives jail data from the statewide JBRS and from DOC regarding incarcerated individuals. State law requires prison and jail roster information be accessible to the public.



### Do I need to report incarceration?

For Apple Health, HCA does not need this change reported due to receiving DOC and city/county jail booking data. For any questions or updates, please contact the HCA Medical Assistance Customer Service Center (MACSC) at 1-800-562-3022. Incarceration may need reporting, if receiving other state benefits, such as cash or food assistance. Please report changes to DSHS at 1-877-501-2233.

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### **Who can I contact if I have a question regarding an individual's circumstances?**

For any questions regarding an individual's suspension status, please contact the Medical Assistance Customer Service Center (MACSC) at 1-800-562-3022.

### **What if I think the suspension status in ProviderOne is incorrect?**

When there is a question regarding an individual's incarceration status, please contact the Medical Assistance Customer Service Center (MACSC) at 1-800-562-3022.

### **How do you renew eligibility coverage for a suspended case?**

Coverage for Apple Health for adults, pregnant women, children, and parents/caretakers is called Modified Adjusted Gross Income (MAGI) Medicaid. MAGI households found reasonably compatible (income verified below the Medicaid standard via an automated data-match) will auto-renew. Households found not reasonably compatible (income reported under the Medicaid standard, but data match verifies income over the Medicaid standard) and do not get renewed by a household member, will close as they would today if no action was taken.

Apple Health coverage for individuals who are aged, blind, or disabled or in need of long-term care (LTC) services and supports is called "Classic" Medicaid. Classic households will receive a renewal form sent via mail to the last known address. If no response is received, coverage will terminate.

Apple Health coverage managed by DSHS' Home & Community Services (HCS) are not automatically suspended. If notification of incarceration is received for an LTC case, ProviderOne will generate a Barcode tickler to DSHS. Future action taken by DSHS HCS staff is dependent upon HCS' internal policy and results of monitoring the case.

The grace period for completing a renewal continues to exist for cases that suspend, as referenced in the [Apple Health \(Medicaid\) eligibility manual](#).

### **What if a client is enrolled in a managed care plan and becomes incarcerated?**

An incarcerated individual remains enrolled in managed care even if they are incarcerated for all but one day of the month. ProviderOne is programmed to dis-enroll from managed care plans when an individual is incarcerated for the entirety of a month (not a 30 day period but a full calendar month such as August 1st through August 31st).

### **Will the individual need to visit a DSHS Community Services Office (CSO)?**

No, not in relation to suspension. Individuals may need to go to the CSO to apply for other services such as cash and food assistance.

### **What will happen to the benefits of other family members in the same household?**

In most cases the family coverage will remain the same. Occasionally, households will need to be reconfigured when the future living arrangement will change significantly.

### **When an individual's coverage is suspended, are they still being counted towards the Medical Assistance Unit (MAU) of other household members?**

Yes, only the incarcerated individual's coverage is changed.

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## Suspension Changes in ProviderOne

### How can incarcerated individuals be identified in ProviderOne?

In ProviderOne incarcerated individuals will have a SBP (suspended benefit package) Institutionalized Dates Recipient Aid Category (RAC) of 8500 if residing in a city/county facility or an OHP (Offender Health Plan) RAC of 8000 if residing in a DOC facility. The SBP and OHP RAC are not the true indicators of suspension. Suspension dates can only be identified by the “Suspended – Inpatient Hospital Services Only” service package. For further detail, please refer to the screen images that follow.

### How can dates of suspension be identified in ProviderOne?

In the ProviderOne Benefit Inquiry screen, suspended cases will have a “Suspension – Inpatient Hospital Services Only” service package listed. The dates provided are the dates of suspension.

Example of *open Suspended Benefit Package (SBP) – Institutionalized Dates (8500 jail RAC)* with *open suspension service package* limiting coverage to inpatient hospitalizations only ([see Appendix A](#)).

From the Benefit Inquiry View

Insurance Type Code	Recipient Aid Category (RAC)	Benefit Service Package	Eligibility Start Date	Eligibility En	CES Coverage Group	ACES Case Nu
MC: Medicaid	8500	SBP - Institutionalized Dates	01/10/2017	12/31/2999		
MC: Medicaid	1201	Suspended - Inpatient Hospital Services Only	01/11/2017	12/31/2999		
MC: Medicaid	1201	ABP	05/01/2014	01/10/2017	N05	

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Message(s): Suspended Medical, Inpatient H

Information Source Data

Identification Code Qualifier: PI: Payor Identification  
 Primary Identifier: 77045  
 Contact Name: WA State DSHS Provider Relat  
 Communications Number: (800) 562-3022

Information Receiver Data

Organization:  
 Provider Name:

The 8500 or 8000 SBP RAC indicates the dates of incarceration or institutionalization. This may or may not match up with true incarceration dates. This field is often used for system corrections and the **true suspension dates cannot be determine from this RAC**. In many instances it can be disregarded.

The “Suspended – Inpatient Hospital Services Only” service package is the true indicator of suspension and the dates of suspension. In this example suspension is ongoing.

Remember while in a suspended status, the client’s scope of coverage is limited to inpatient hospitalizations only.

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This case is an example of a closed RAC 8000 Offender Health Plan (OHP) eligibility segment. The OHP RAC 8000 segment is utilized for DOC prison inmates. This example also shows a closed 8500 jail segment. In this scenario the suspended service package limiting coverage to inpatient hospital services only is closed and the client has active full scope Medicaid coverage. (see Appendix A)

From the Benefit Inquiry View

The OHP RAC 8000 or RAC 8500 indicates the dates of incarceration. For DOC (OHP) clients these dates generally match up with the true incarceration dates.

Insurance Type Code	Recipient Aid Category (RAC)	Benefit Service Package	Eligibility Start Date	Eligibility End Date	ACES Coverage Group
MC: Medicaid	1201	ABP	08/03/2017	12/31/2999	N05
MC: Medicaid	8000	OHP	07/26/2017	08/03/2017	
MC: Medicaid	1201	Suspended - Inpatient Hospital Services Only	07/12/2017	08/02/2017	
MC: Medicaid	8500	SBP - Institutionalized Dates	07/11/2017	07/26/2017	
MC: Medicaid	1201	ABP	12/01/2015	07/11/2017	N05

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Message(s): Suspended Medical, Inpatient Hospital Service Only

The "Suspended - Inpatient Hospital Services Only" package is the true indicator of suspension and the dates of suspension. In this example suspension lasted from 7/12-8/2. If a client or provider indicates these dates are incorrect please contact HCA.

Remember while in a suspended status, the client's scope of coverage is limited to inpatient hospitalizations only.

In this case the individual was first incarcerated in a city/county jail then moved to a DOC facility this is why there is a difference between suspension dates and the OHP dates.

### Will HCA grant ProviderOne access to correctional facilities?

This subject is under review. Certified providers currently have access to look up clients in ProviderOne. For those who do not have access to ProviderOne, HCA is researching other avenues for correctional facilities to access client coverage information.

## Suspension and Special Populations

### Does being convicted or charged with a misdemeanor or felony affect Apple Health suspension?

No, eligibility for Apple Health (and suspension) is not related to any crimes an individual may be convicted of or charged with.

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## **What happens to coverage in a suspended status for the aged, blind, or disabled (non-MAGI) programs?**

There is no difference under Apple Health suspension between “Classic”/non-MAGI and MAGI Medicaid. Suspension will be applied to both “Classic”/non-MAGI and MAGI Medicaid with the same policies and procedures. Renewals for MAGI will be based upon reasonable compatibility. Renewals for “Classic” will follow the current policy and procedures for this population.

EXCEPTION: Coverage for individuals receiving aged, blind, or disabled coverage and receiving services from DSHS HCS will not suspend and a tickler is sent to DSHS to manually review.

## **What about children who become incarcerated?**

The Center for Medicare and Medicaid Services (CMS) rule which prohibits the use of federal dollars to pay for care while an individual is institutionalized or incarcerated is applicable to adults and children. The juvenile population is not included in Phase One of the suspension project and will be addressed in late 2017 and 2018.

## **How will suspension affect a Supplemental Security Income (SSI) recipient?**

An SSI recipient’s cash benefits will close if Social Security Administration (SSA) determines their stay is more than temporary. This is an SSA process and will not change due to suspension. SSI-related medical benefits will be suspended and reinstated upon release.

## **Does the coordination of care for individuals in Eastern or Western state hospital apply only to MCOs in the fully integrated managed care regions?**

All MCOs are required to provide care coordination for individuals being discharged from WSH or ESH, regardless of the area they are discharged to. State hospitals are considered covered institutions under SSB 6430.

## **What if the individual needing care is undocumented?**

The process remains the same for undocumented individuals or individuals here less than 5 years; the Alien Emergency Medical (AEM) program addresses inpatient hospitalization needs.

## **What if an individual is on an “immigration hold”?**

An immigration hold or order implies they do not have a satisfactory immigration status that qualifies them for Apple Health. This population is not included in the scope of suspension however they may be eligible for AEM coverage.

## **If a client has met the five year bar during incarceration and is eligible for another program, will the system transition them to the correct program?**


Yes, the next time the system determines eligibility, the program will be switched to the correct one.

## **Are immigration detention centers included?**

No, immigration detention centers are not considered institutions under SSB 6430.

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## What about a Washington state resident justice involved individual held in another state?

Occasionally correctional entities rent space in other jails including other states. These individuals are still the responsibility of the WA city/county facility or Department Of Corrections. If they have an inpatient hospitalization in that other state, it is up to the WA facility to pay those costs or apply for Medicaid to cover the costs. The address used should be in Washington. This does not include individuals who are arrested in another state. In that situation Apple Health should be closed and the arresting entity is responsible for any medical costs. ProviderOne only receives incarceration data for Washington jails.

## Are individuals in federal correctional facilities eligible for Apple Health?

No, individuals in federal correctional facilities are not considered WA residents; therefore, they are not eligible. While in a federal facility an individual's care is the responsibility of the federal government. Additionally, federal facilities are not included in the scope of Medicaid suspension.

## What will happen to American Indian/Alaska Native (AI/AN) coverage if suspended?

For AI/AN individuals whose coverage was suspended, they will be enrolled back into the program they were suspended from following the same process as all other incarcerated individuals. For example, an individual enrolled in managed care will automatically be re-enrolled back into managed care, an individual enrolled in fee for service (FFS), will go back onto FFS.

## Why are work release participants in certain facilities eligible for Apple Health (Medicaid) and others are not?

Some work release facilities allow "freedom of movement" which means participants can sign out to go to the library, religious services, access medical care, etc. Other work release facilities do not allow this "freedom of movement". Primarily only DOC work release facilities allow this freedom of movement however there are a few city/county jail facilities which qualify as well. The following is a list of specific work release facilities where participants qualify for full scope (unsuspended) Apple Health coverage (if all other eligibility factors are met).

- Ahtanum View – Yakima County
- Bellingham – Whatcom County
- Bishop House – King County
- Brownstone – Spokane County
- Clark County – Clark County
- Eleanor Chase House – Spokane County
- Helen B Ratcliff – King County
- Longview – Cowlitz County
- Olympia – Thurston County
- Peninsula – Kitsap County
- Progress House – Pierce County
- Reynolds – King County
- Tri-Cities – Benton County

**Note:** The only DOC Facilities that are unapproved are: Lincoln and Rap Houses in Pierce County.

Additionally, Thurston and Seattle/King County operate work release programs that allow "freedom of movement" and thus participants can be eligible for unsuspended Apple Health the same as DOC work release participants.

