



MARYLAND Department of Health

Larry Hogan, Governor · Boyd K. Rutherford, Lt. Governor · Robert R. Neall, Secretary

August 14, 2018

Mr. Tim Hill

Acting Deputy Administrator and Director
Center for Medicaid and CHIP Services
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244-1850

Dear Mr. Hill,

The Secretary of Health is requesting a modification to the amendment to Maryland's § 1115 HealthChoice demonstration submitted on July 2, 2018. The Department now seeks to modify its § 1115 Amendment to permit Maryland to continue to operate a portion of its Family Planning Program under its § 1115 waiver, rather than removing it entirely. Specifically, the Department would like to continue to cover Family Planning Program services for post-partum women who are no longer eligible for full Medicaid benefits under the § 1115 waiver.

The Maryland Medicaid Program currently covers adults up to 138% of the federal poverty level (FPL) and pregnant women up to 250% FPL. Participants who qualify for benefits on the basis of their modified adjusted gross income (MAGI) must apply for benefits using Maryland's State-Based Marketplace, Maryland Health Connection (MHC), which is administered by the Maryland Health Benefit Exchange (MHBE). Pregnant women continue to be eligible for full Medicaid benefits for two months post-partum. Those who no longer qualify for benefits after the end of the post-partum period because their income is over scale are automatically enrolled in the Family Planning Program for one year (12 months). After 12 months, these women must re-apply for benefits to continue their enrollment in the Family Planning Program.

Under the State Plan Family Planning program, Maryland has selected to count only the applicant in determining household size and income. This decision was made due to system limitations. If the Department considered other household members in the eligibility standards, the applicant would need to list those household members. Our eligibility system requires those household names to be entered into the system. Because the other household members are entered into the system, our current eligibility system will prevent them from being able to submit their own application. This would mean a dependent or a husband would be unable to receive benefits.

In order to ensure that the Department can still automatically enroll in the Family Planning Program all women who are not eligible for full benefits after the post-partum period, the Department requests to modify its Amendment to permit it to continue to cover Family Planning

Program services for post-partum women for their initial 12-month eligibility period under the § 1115 waiver. All other Family Planning Program enrollees would be covered under the State Plan Amendment Maryland is submitting with an effective date of July 1, 2018.

The Department anticipates that this waiver could end during state FY 2021. The Department anticipates integrating the Family Planning Program into Maryland Health Connection by October 1, 2020. Once it is integrated into MHC, the Department will begin using MAGI rules in the eligibility process and it will allow all household members to apply for coverage. When these system changes are finalized, the Department intends to submit a new SPA to cover both post-partum women and new applicants.

The Department looks forward to working with CMS regarding this proposed modification. Thank you for considering our proposal. If you have any questions, please contact Tricia Roddy, Director of the Planning Administration, at 410.767.5809 or tricia.rodny@maryland.gov.

Sincerely,



Dennis R. Schrader
Chief Operating Officer & Medicaid Director
Maryland Department of Health