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Covering the Care: Medicaid, Work, and Community Engagement

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Recommended Citation

Porter, Jo and Hodder, Lucy, "Covering the Care: Medicaid, Work, and Community Engagement" (2018). *Institute for Health Policy and Practice (IHPP)*. 34.

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Covering the Care: Medicaid, Work, and Community Engagement

Over the next twelve months, New Hampshire will transition to a new coverage model for the Medicaid expansion program (the “Granite Advantage Program”), and will implement a demonstration waiver including a work and community engagement requirement, approved for New Hampshire on May 7, 2018.¹ This brief focuses on the population covered by the New Hampshire Medicaid program, with an emphasis on work status and income (for a description of Medicaid expansion in New Hampshire, see *Covering the Care: A Focus on the NH Marketplace*).²

WHO HAS MEDICAID COVERAGE?

Overall, approximately 185,000 people have coverage through New Hampshire Medicaid. Of these, 132,000 have “standard” Medicaid coverage, which is the long-standing program for low income people and those with certain medical or other eligibility criteria.³ Pursuant to the Affordable Care Act, New Hampshire expanded Medicaid coverage to a new adult group of 19-64 year olds with incomes between 0-138% of the Federal Poverty Level (FPL) through the New Hampshire Health Protection Program (NHHPP) beginning in the summer of 2014. (See timeline at right)

Over 50,000 people are covered by NHHPP on a monthly basis. Table 1 includes a summary of the enrollment in New Hampshire Medicaid, by category and eligibility. Figure 1 shows, as of January 2018, the two largest Medicaid eligible categories in NH are low-income children (48%), including the Children’s Health Insurance Program (CHIP) and NHHPP enrollees (29%).

NH’S WORK AND COMMUNITY ENGAGEMENT MANDATE TIMELINE

March 2014: SB413 is signed into law expanding Medicaid through the NH Health Protection Program (NHHPP).

August 2014: New adult expansion group ages 19-64 with incomes between 0-138% Federal Poverty Limit begin enrolling in Medicaid managed care “bridge” Alternative Benefit Plans.

March 2015: The Centers for Medicare and Medicaid Services (CMS) approves NH’s Premium Assistance Program (PAP), requiring the new adult expansion group to enroll in Qualified Health Plans through New Hampshire’s Marketplace Exchange (approval granted through December 31, 2018).

January 2016: New adult expansion group transitions to the NH Health Protection Program Premium Assistance plans (unless medically frail).

April 2016: NH legislature reauthorizes the NHHPP through December 2018 with a work requirement included.

July 2017: HB517 becomes effective requiring DHHS to apply for and receive approval from CMS for a work requirement by April 30, 2018.

May 2018: CMS approves an amendment to PAP program to add a work and community engagement requirement, with implementation no sooner than January 1, 2019.

May 2018: NH DHHS issues a notice to amend its PAP waiver in order to discontinue the NHHPP and implement the Granite Advantage Program, providing Medicaid coverage to the new adult group through managed care with a work and community engagement requirement.

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1. <https://www.dhhs.nh.gov/pap-1115-waiver/index.htm>

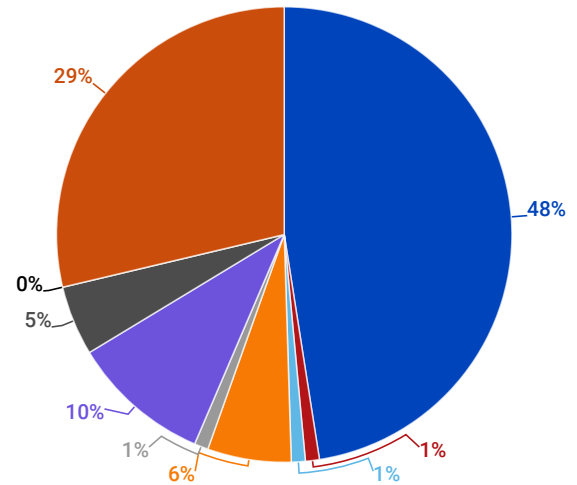
2. https://chhs.unh.edu/sites/chhs.unh.edu/files/departments/institute_for_health_policy_and_practice/informing_the_conversation_covering_care_a_focus_on_the_nh_marketplace.pdf

3. May 31, 2017, “Summary NH Medicaid Program,” UNH HLP/HP. https://chhs.unh.edu/sites/chhs.unh.edu/files/departments/institute_for_health_policy_and_practice/new_hampshire_medicaid_overview_05252017_final.pdf

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TABLE 1 AND FIGURE 1 MEDICAID ENROLLMENT, BY ELIGIBILITY CATEGORY, 2018⁴

Eligibility Category	# Of People Enrolled in Medicaid
Low-Income Children (Age 0-18); including CHIP	88,330
Children With Severe Disabilities (Age 0-18)	1,443
Foster Care & Adoption Subsidy (Age 0-25)	2,378
Low-Income Non-Disabled Adults (Age 19-64)	10,962
Low-Income Pregnant Women (Age 19+)	2,078
Adults With Disabilities (Age 19-64)	18,052
Elderly & Elderly With Disabilities (Age 65+)	8,957
Breast and Cervical Cancer Program (Age 19-64)	149
NH Medicaid Expansion Population (NHHPP)	53,197
TOTAL	185,546



FOCUS ON THE NEWLY ELIGIBLE ADULT NHHPP POPULATION

As of April 2018, the NHHPP provided coverage to 52,910 (86%) individuals, 41,354 (14%) of whom were enrolled in Qualified Health Plans offered by commercial health insurance carriers offering coverage on NH's Health Insurance Marketplace. An additional 7,863 NHHPP beneficiaries were enrolled in managed care plans with NH Healthy Families or Wellsense Health Plan, most as medically frail. Also, 3,693 NHHPP beneficiaries were in the process of selecting a plan.⁵

NHHPP AND FEDERAL POVERTY LEVEL

Adults with incomes between 0-138% FPL are currently eligible for NHHPP coverage, and will be eligible for the Granite Advantage Program. Alternatively, adults with incomes between 100%-400% FPL are eligible for premium tax credits to help purchase health insurance through New Hampshire's Health Insurance Marketplace. Table 2 shows annual income measured in terms of the 2018 Federal Poverty Level (FPL).⁶ Table 3 shows the income levels of those enrolled in commercial plans through the NHHPP PAP and those NHHPP enrollees who are medically frail.⁷ Over half of the NHHPP PAP enrollees had incomes less than 50% FPL. For medically frail enrollees, over 65% had incomes below 50% FPL.

TABLE 2 FEDERAL POVERTY LEVELS, 2018

Annual Income	Federal Poverty Level (FPL)			
	50%	100%	138%	400%
Individual	\$6,070	\$12,140	\$16,753	\$48,560
Family of 4	\$12,500	\$25,100	\$34,638	\$100,400

TABLE 3 INCOME LEVELS FOR THE NHHPP PAP AND MEDICALLY FRAIL, 2017

Income Level	% Enrollees	
	Premium Assistance Program	Medically Frail
<50% FPL	53%	65%
50-100%	24%	19%
>100% FPL	23%	16%

4. <https://www.dhhs.nh.gov/ombp/medicaid/documents/medicaid-enrollment-01302018.pdf>

5. <https://www.dhhs.nh.gov/ombp/medicaid/documents/ga-waiver-app-05082018.pdf>

6. <https://aspe.hhs.gov/poverty-guidelines> (Add \$4,320 for each family member up to 8 members)

7. <https://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Waivers/1115/downloads/nh/health-protection-program/nh-health-protection-program-premium-assistance-qtrly-rpt-jan-mar-2017.pdf>

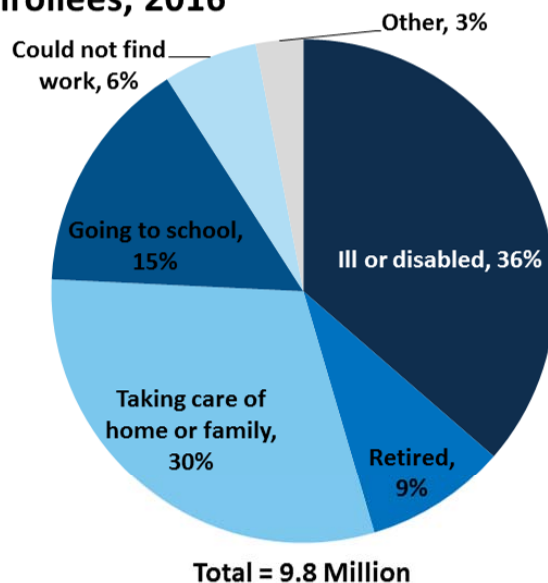
FOCUS ON WORK AND COMMUNITY ENGAGEMENT FOR NEW ADULT GROUP

New Hampshire is one of four states, including Indiana, Arkansas, and Kentucky, requiring work or community engagement obligations to be met for Medicaid coverage. New Hampshire's plan to require the new adult expansion group to participate in work or community engagement activities was approved by the Centers for Medicare and Medicaid (CMS) on May 7, 2018. In brief, NH intends to transition NHHPP new adult expansion group members to the Granite Advantage Program on January 1, 2019 (pursuant to NH SB313)⁸ and require those who are not medically frail or otherwise exempt to engage in certain work, public service, or educational activities for 100 hours a month after 75 days or more of enrollment in a Granite Advantage Program Medicaid managed care plan.

It's unclear what type of impact the community and work engagement requirement will have on people who will have coverage through the Granite Advantage Program. Based on data from NH DHHS, 47% of PAP members were employed or self-employed. There is no NH-specific data regarding the reasons why others were not employed. According to research from the Kaiser Family Foundation,⁹ nationally, about a third of Medicaid enrollees who were not working cited being ill or disabled, and about a third cited not working due to taking care of home or family, as the reason (Figure 2).

FIGURE 2 REASONS FOR NOT WORKING, NATIONALLY, 2016

Main reasons for not working among non-SSI, adult Medicaid enrollees, 2016



NOTE: Includes nonelderly adults who do not receive Supplemental Security Income (SSI).
SOURCE: Kaiser Family Foundation analysis of March 2017 Current Population Survey.



FOCUS ON HEALTH POLICY

CMS 2018 GUIDANCE ON "WORK AND COMMUNITY ENGAGEMENT" EFFORTS

CMS recently explained its expectations around state activity seeking to "improve Medicaid enrollee health and well-being through incentivizing work and community engagement..."
See Letter to State Medicaid Directors from Brian Neale, CMS Director, January 11, 2018.
CMS offered the following guidance:

- States can incentivize work and community engagement only among non-elderly, non-pregnant, adult beneficiaries who are eligible on a basis other than disability.
- States can test incentives designed to promote better mental, physical, and emotional health in furtherance of the Medicaid program objectives.

8. legiscan.com/NH/bill/SB313/2018

9. kff.org, "Understanding the Intersection of Medicaid and Work", January 2018

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UNEMPLOYMENT IN NEW HAMPSHIRE

The rates of unemployment and income levels in New Hampshire will impact the population of people enrolled in the Granite Advantage Program as they attempt to fulfill the work requirement.

New Hampshire's overall unemployment rate is approximately 3%, one of the lowest in the country.¹⁰ The unemployment rate by county ranges from 2.2% in Grafton County to 4.1% in Coos County. Coos County also has highest percentage of its population enrolled in NHHPP (6.5%), as shown in Table 4.¹¹ Very low unemployment rates may actually make finding work more difficult.

TABLE 4 UNEMPLOYMENT AND NHHPP ENROLLMENT BY COUNTY, 2018

County	Number Unemployed	Unemployment Rate	NHHPP Enrollees in County	% NHHPP Enrolled
Belknap	870	2.9%	3,247	5.3%
Carroll	660	3.0%	2,523	5.2%
Cheshire	1,080	2.6%	3,527	4.6%
Coos	580	4.1%	2,046	6.5%
Grafton	1,080	2.2%	3,579	4.0%
Hillsborough	6,640	2.8%	16,831	4.1%
Merrimack	1,880	2.3%	6,028	4.0%
Rockingham	5,370	2.9%	8,417	2.7%
Strafford	1,710	2.3%	5,051	3.9%
Sullivan	530	2.3%	2,094	4.9%
NH Total	23,600	2.7%	53,343	4.0%

WAGES IN NEW HAMPSHIRE

Since income level is an critical eligibility criteria for Medicaid, it is important to understand how wages generated through a work requirement could change eligibility status. The following demonstrates examples of annual income for individuals in a single person household working 100 hours a month. This number of hours (100) is used as an example, because the current work and community engagement requirement approved by CMS includes the stipulation that Granite Advantage Program non-exempt enrollees meet 100 hours a month of a work or community engagement "qualifying activity" to maintain Medicaid eligibility. The Granite Advantage Program enrollee must also remain under 138% FPL to remain eligible for Medicaid coverage in the program.

TABLE 5 INCOME LEVELS FOR HOURLY WAGES BY FPL, 2018

FPL Eligibility	Hourly Rate	Monthly Income working 100 hours a month	Annual Income working 1200 hours a year
Minimum wage	\$7.25	\$725	\$8,700
To make 100% FPL	\$10.12	\$1,012	\$12,144
To make 138% FPL	\$13.96	\$1,396	\$16,752

10. <https://www.nhes.nh.gov/elmi/statistics/document/laus-current.pdf>

11. <https://www.dhhs.nh.gov/ombp/pap/documents/nhhpp-enroll-demo-020118.pdf>, based on 2017 US Census population estimates

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As shown in Table 5, in general, an individual would need to earn an hourly wage of less than \$14/hour for 100 hours a month in order to stay under 138% FPL. Said another way, if an eligible new adult expansion beneficiary works 100 hours a month for \$14/hour, she may no longer be eligible for the Granite Advantage Program health plan benefits due to having income above 138% FPL (unless she meets a different eligibility category).

The New Hampshire Department of Employment Security publishes wage information by occupation.¹² Table 6 summarizes those occupations for which there were over 2,000 people in the occupation and for which the median wage was less than \$14/hour. This shows the most common types of occupations that are likely to have workers earning below 138% of the FPL, working part-time.

TABLE 6 SELECTED OCCUPATIONS, MEDIAN WAGE LESS THAN \$14/HR, 2017

Occupations	Estimated Employment	Median Wage
Substitute Teachers	2,240	\$11.28
Cooks, Restaurant	5,580	\$13.67
Cooks, Short Order	3,230	\$9.75
Food Preparation Workers	3,160	\$10.94
Bartenders	3,520	\$9.40
Combined Food Preparation and Serving Workers, Including Fast Food	12,800	\$9.69
Waiters and Waitresses	12,220	\$9.69
Dishwashers	2,480	\$9.39
Hosts and Hostesses, Restaurant, Lounge, and Coffee Shop	2,020	\$9.71
Janitors and Cleaners, Except Maids and Housekeeping Cleaners	9,800	\$13.05
Maids and Housekeeping Cleaners	4,520	\$10.91
Childcare Workers	2,760	\$10.85
Personal Care Aides	7,410	\$12.09
Cashiers	22,340	\$9.55
Retail Salespersons	25,920	\$11.38
Stock Clerks and Order Fillers	13,710	\$12.37
Driver/Sales Worker	2,280	\$12.15
Light Truck or Delivery Services Drivers	4,520	\$13.35
Taxi Drivers and Chauffeurs	1,190	\$11.51
Laborers and Freight, Stock, and Material Movers, Hand	6,710	\$13.02
Packers and Packagers, Hand	2,060	\$11.02

WHAT'S NEXT?

The new Granite Advantage work and community engagement requirement for NHHPP beneficiaries and other new adult expansion members cannot be implemented until after January 1, 2019. Beneficiaries will be provided notice and several months to meet the work and community engagement requirement.

12. <https://www.nhes.nh.gov/elmi/products/documents/wages-state.pdf>

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Funding is provided by:

