

**NUMBER**

#24-21-05

**DATE**

May 6, 2024

**OF INTEREST TO**

County Directors

Social Services Supervisors and  
Staff

Financial Assistance Supervisors  
and Workers

Tribal Chairpersons and Tribal  
Health Directors

Navigators, Certified  
Application Counselors and  
Brokers

**ACTION/DUE DATE**

Please read and implement

**EXPIRATION DATE**

May 6, 2026

## DHS Announces Minnesota Health Care Programs Post-Unwinding Eligibility Policies

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### TOPIC

Minnesota Health Care Programs (MHCP) eligibility policies after the end of the unwinding period.

### PURPOSE

To provide information about MHCP eligibility policies after the end of the unwinding period.

### CONTACT

County and tribal agencies should submit policy questions via HealthQuest. All others should direct questions to:

Health Care Eligibility and Access Division  
PO Box 64989  
540 Cedar Street  
St. Paul, MN 55164-0989

### SIGNED



JULIE MARQUARDT  
Interim State Medicaid Director  
Health Care Administration

### TERMINOLOGY NOTICE

The terminology used to describe people we serve has changed over time. The Minnesota Department of Human Services (DHS) supports the use of "People First" language.

## I. Background

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On April 29, 2020, the Department of Human Services (hereafter referred to as “DHS” or “we”) published [Bulletin #20-21-02](#) to announce temporary eligibility policy changes to Minnesota Health Care Programs (MHCP) to ensure enrollees maintained coverage during the COVID-19 public health emergency (PHE). Subsequently, we issued [Bulletin #20-21-10](#), [Bulletin #20-21-13](#), [Bulletin #21-21-04](#) and [Bulletin #21-21-07](#), announcing additional policy changes in effect during the COVID-19 PHE. These temporary changes are frequently referred to as the COVID-19 continuous coverage policies.

On April 7, 2023, we issued [Bulletin #23-21-08](#), announcing the end of the COVID-19 continuous coverage policies effective March 31, 2023, and the beginning of Minnesota’s unwinding period, which runs from April 1, 2023, to May 31, 2024. The unwinding period is the time span during which a state gradually returns to standard eligibility and enrollment policies and operations, by resuming eligibility renewals. During the unwinding period, enrollees remain protected under the COVID-19 continuous coverage policies until their first eligibility renewal occurs. After an enrollee’s renewal is conducted, the enrollee is subject to standard eligibility policies.

This bulletin announces the end of Minnesota’s unwinding period effective June 1, 2024, the resumption of periodic data matching for some MHCP enrollees and provides information about certain temporary strategies that will continue through December 2024.

The policies described in this bulletin apply to the following MHCP:

- Medical Assistance for Families with Children and Adults (MA-FCA)
- Medical Assistance for People Age 65 and Older, Blind or Disabled (MA-ABD)
- Medical Assistance for Employed Persons with Disabilities (MA-EPD)
- Medical Assistance under the TEFRA Option
- Medical Assistance for Children in Foster Care, Northstar Adoption Assistance and Kinship Assistance
- Medical Assistance for the Treatment of Breast and Cervical Cancer (MA-BC)
- Medical Assistance for People Receiving Services at the Center for Victims of Torture (MA-CVT)
- Medicare Savings Programs (MSP): Qualified Medicare Beneficiaries (QMB), Service Limited Medicare Beneficiaries (SLMB), Qualified Individuals (QI) and Qualified Working Disabled (QWD)
- Emergency Medical Assistance (EMA)
- Minnesota Family Planning Program (MFPP)
- MinnesotaCare

## II. Standard MHCP Eligibility Policies

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Minnesota’s unwinding period ends effective June 1, 2024. By this date, MHCP enrollees who had been protected under COVID-19 continuous coverage policies will have had an eligibility renewal conducted during the unwinding period. Therefore, beginning June 1, 2024, standard eligibility policies and procedures apply to all enrollees, including those related to enrollees reporting, and agencies acting on, changes in circumstances.

See the Eligibility Policy Manual (EPM) [Section 1.3.2.1 MHCP Changes in Circumstances](#), [Section 1.5 MHCP Mandatory Verifications](#), and [Section 1.3.2.4 Inconsistent Information](#) for more information.

Certain MHCP enrollees who are subject to a program asset limit, and who have assets that exceed that limit have an asset disregard until their second annual renewal is conducted after March 31, 2023. See [Bulletin #23-21-19](#) for more information about the temporary asset disregard. Beginning with renewals due for July 2024 eligibility, enrollees in the asset disregard group will start to have their second annual renewals conducted after March 31, 2023, and program asset limits will apply. The temporary asset disregard will be phased out over 12 months starting with the July 2024 renewal cohort and ending with the June 2025 renewal cohort.

For enrollees in the asset disregard group, all standard eligibility policies for changes in circumstances unrelated to their assets apply beginning June 1, 2024. Standard eligibility policies for changes in circumstances related to their assets apply after an enrollee's second annual renewal occurs.

## Periodic Data Matching (PDM) Resumes in July 2024

Before the COVID-19 public health emergency, DHS conducted PDM to identify enrollees on MA for Families with Children and Adults (MA-FCA) and MinnesotaCare with eligibility supported by the Minnesota Eligibility Technology System (METS) who might no longer qualify for those programs. PDM is a process that checks electronic data sources for discrepant information in between annual renewals. Enrollees who receive a PDM discrepancy notice must respond by contacting their servicing agency to resolve the discrepancy within 30 days. An enrollee who does not respond is no longer eligible for MA or MinnesotaCare, and coverage is closed with 10-day advance notice. See EPM [Section 2.1.1.2.5 MA Periodic Data Matching](#) and [Section 3.1.2.3 MinnesotaCare Periodic Data Matching](#) for more information about PDM.

Beginning April 1, 2020, DHS suspended PDM due to COVID-19 continuous coverage policies. Subsequently, the 2023 Minnesota legislature passed a law that requires DHS to restart the PDM process twelve months after the resumption of eligibility renewals, which occurred in July 2023.

DHS will restart the PDM process in July 2024. The first closures for enrollees who do not respond to a PDM discrepancy notice will occur at the end of September 2024. All automated PDM processes, including DHS mailing of discrepancy notices and automatic closure of eligibility and coverage for enrollees who do not respond to resolve discrepancies, will occur as they did before PDM was suspended. Eligibility policies related to resolving PDM discrepancies will apply.

Children under age 19 enrolled in MA have continuous MA eligibility between their annual eligibility renewals. METS will not identify PDM income discrepancies for children under age 19. PDM income discrepancies will occur for other MA enrolled household members who are not children under age 19. Inconsistent information or changes in circumstances that are reported or discovered as a result of PDM do not affect the child's MA eligibility between renewals unless an exception to continuous eligibility has occurred. See [Bulletin #23-21-27](#) for more information on continuous MA eligibility for children under age 19 and PDM.

## III. Continuation of Certain Strategies Through End of 2024

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During the unwinding period, DHS requested, and the Centers for Medicare & Medicaid Services (CMS) approved several temporary strategies designed to reduce MHCP enrollee closures for not completing the renewal process and to increase ex parte renewals. The federal waiver authority for these strategies was initially set to expire at the end of the unwinding period on May 31, 2024. However, CMS has indicated that states may continue to use these strategies under existing waivers through December 31, 2024. DHS will provide information about the further extension or sunset of these strategies in a future bulletin. Agencies must continue to use and apply these temporary strategies through the rest of calendar year 2024.

### A. Accept Telephonic Signatures Without a Voice Recording

On May 9, 2023, DHS directed agencies to begin accepting MHCP applications and renewals by telephone. As a part of this process, a telephonic signature must be obtained. Although federal regulations require states to voice record the telephonic signature, DHS obtained temporary permission to accept telephonic signatures without voice recording. If an agency is not able to voice record the signature, the agency may gather the signature verbally and document acceptance of the signature in the enrollee case file. Agencies must continue to accept application and renewal signatures by telephone without a voice recording in accordance with current procedures through December 31, 2024.

### B. Accept Contact Information Updates from MCOs

On March 13, 2023, DHS published [Bulletin #23-21-05](#) announcing a temporary policy to accept MHCP enrollee contact information updates from managed care organizations (MCOs). Agencies must treat an in-state address, phone number or email address update from an MCO as reliable and update the case record without the additional step of contacting the household to confirm the information. This policy applies to all MHCP enrollees and households that receive their medical services through MCOs. Agencies must continue to accept updated contact information from MCOs in accordance with current procedures through December 31, 2024.

### C. Accept In-State Address Updates from U.S. Postal Service Returned Mail

On December 19, 2023, DHS published [Bulletin #22-21-11](#) announcing a temporary policy to accept Minnesota address updates on mail returned by the United States Postal Service (USPS). DHS directed agencies to treat an in-state forwarding address from the USPS as reliable and update the case record without the additional step of contacting the household to confirm the information. Agencies must continue to accept in-state address information from USPS returned mail in accordance with current procedures through December 31, 2024.

## D. Strategies to Improve Ex Parte Renewals

During the unwinding period, DHS implemented numerous temporary ex parte renewal strategies to make better use of electronic data sources and increase the number of MHCP enrollees whose eligibility is renewed without the enrollee having to complete a renewal form. Ex parte renewal processes will continue to include these strategies through December 31, 2024.

### Ex Parte Renewal Strategies for MA-FCA and MinnesotaCare

On October 9, 2023, DHS published [Bulletin #23-21-23](#) announcing a temporary strategy to auto renew MA-FCA and MinnesotaCare cases when one or more enrollees due for renewal have gross income verified for the Supplemental Nutrition Assistance Program (SNAP), Minnesota Family Investment Program (MFIP) or Tribal Temporary Assistance for Needy Families (TANF) benefits that is at or below the enrollee's applicable income limit. The SNAP and TANF auto renew strategy began with MA-FCA and MinnesotaCare renewals for January 2024 eligibility.

In January 2024, DHS implemented changes to METS to permit additional MA-FCA and MinnesotaCare enrollees who meet all non-financial eligibility factors for renewal to automatically renew when either of the following occur:

- The enrollee has zero income previously verified for eligibility, and the electronic data sources queried during the ex parte renewal process return no income data.
- The enrollee has income at or below 100% of the federal poverty guideline (FPG) for the family size previously verified for eligibility, and electronic data sources queried during the ex parte renewal process return no income data.

The zero income and 100% FPG income renewal strategies began with MA-FCA renewals for April 2024 eligibility.

DHS will continue to apply the SNAP and TANF, zero income and 100% FPG renewal strategies in the auto renewal process through MA-FCA renewals conducted in December 2024, for February 2025 eligibility. DHS will also use these strategies for January 2025 MinnesotaCare renewals.

### Ex Parte Renewal Strategies for MA-ABD and Medicare Savings Programs (MSP)

On June 22, 2023, DHS published [Bulletin #23-21-18C](#) announcing a new simplified renewal process, the ex parte process for MA-ABD and MSP enrollees which began with renewals due for August 2023 eligibility. Within the ex parte renewal process, county and tribal eligibility workers use reliable electronic data sources to verify certain enrollee information and redetermine and renew eligibility. The ex parte process includes several temporary waiver strategies that reduce the number of steps a worker would otherwise need to take to verify stable sources of income and permit enrollees who previously verified having no income or very little income to be renewed.

The temporary strategies allow eligibility for enrollees who meet all other MA-ABD or MSP eligibility factors to be renewed via the ex parte process if any of the following apply:

- The enrollee only had Retirement, Survivors, and Disability Insurance (RSDI) or Railroad Retirement Benefits at the time of the most recent previous MA-ABD or MSP determination.

- The enrollee's income for purposes of determining SNAP, MFIP or Tribal TANF eligibility was determined to be at or below 100% FPG.
- The enrollee has zero income previously verified for eligibility, and the electronic data sources queried during the ex parte renewal process return no income data.
- The enrollee has income at or below 100% of the federal poverty guideline (FPG) for the family size previously verified for eligibility, and electronic data sources queried during the ex parte renewal process return no income data.

These strategies will continue to be part of the ex parte renewal process for MA-ABD and MSP renewals conducted through December 2024, for February 2025 eligibility. [See Bulletin #24-21-06 DHS Modifies Ex Parte Renewal Process for MA-ABD and MSP Enrollees](#) for more information on the ex parte process for these enrollees.

## IV. Action Required

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County and tribal workers must implement the policies outlined in this bulletin and follow ONEsource instructions related to this bulletin.

## V. Legal Authority

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Social Security Act, Section 1902(e)(14)(A)

Consolidated Appropriations Act, 2023 (Public Law Number 117-328)

Section 6004 of the Families First Coronavirus Response Act (Public Law Number 116-127)

Laws of Minnesota 2023, chapter 22, section 2

### Americans with Disabilities Act (ADA) Advisory

This information is available in accessible formats for people with disabilities by calling 651-297-3862 or toll free at 800-657-3672 or by using your preferred relay service. For other information on disability rights and protections, contact the agency's ADA coordinator.