



**Commonwealth  
Medicine**

Health Care Finance Solutions

# The Massachusetts Medicare Buy-In Quality Review Initiative

Presented by:

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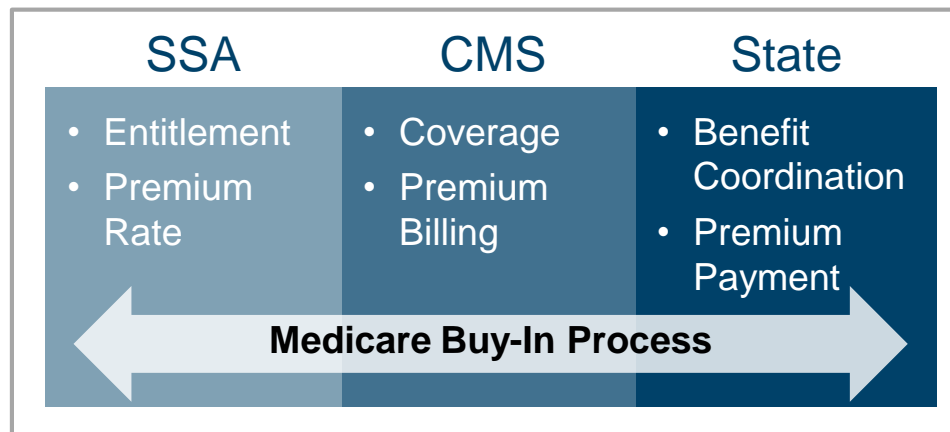
# Massachusetts Medicare Buy-In: Background

- Administered under the Massachusetts Medicaid program, MassHealth
- Approximately 248,000 Medicare Buy-In members
  - ~32,000 Part A Buy-In members
  - ~248,000 Part B Buy-In members
- Over \$48M in Medicare premiums paid by MassHealth on a monthly basis
- Commonwealth Medicine, Health Care Finance Solutions manages Medicare Buy-In operations and customer service as part of TPL activities through an interagency service agreement with MassHealth

# Medicare Buy-In: Challenge

**The operational complexity of Medicare Buy-In makes it difficult to reconcile payments and perform quality assurance functions**

- SSA determines Medicare entitlement and premium rates
- CMS manages Medicare coverage and premium billing
- States must identify and integrate multiple sources of eligibility and financial information to validate Medicare premium payments



- **Disconnects between Medicare Buy-In eligibility, operational, and finance activities may produce challenges leading to inaccuracies and overpayments**

## Medicare Buy-In Quality Review

Reviews monthly Medicare Buy-In state and federal eligibility and billing data to help ensure accuracy of all transactions and Medicare premium payments made by MassHealth



Supplements Medicare Buy-In operations by providing additional resources to:

- Research and work special projects
- Provide enhanced analysis and reporting
- Monitor program populations and trends



Identifies and pursues correction of discrepancies and potential state premium overpayments with SSA and/or CMS to recover inappropriate payments and realize ongoing cost savings:

- Medicare Part A Buy-In Eligibility Review
- Retroactive Part B Premium Equitable Relief



# Massachusetts Medicare Buy-In Quality Review

## Part A Buy-In Eligibility Review

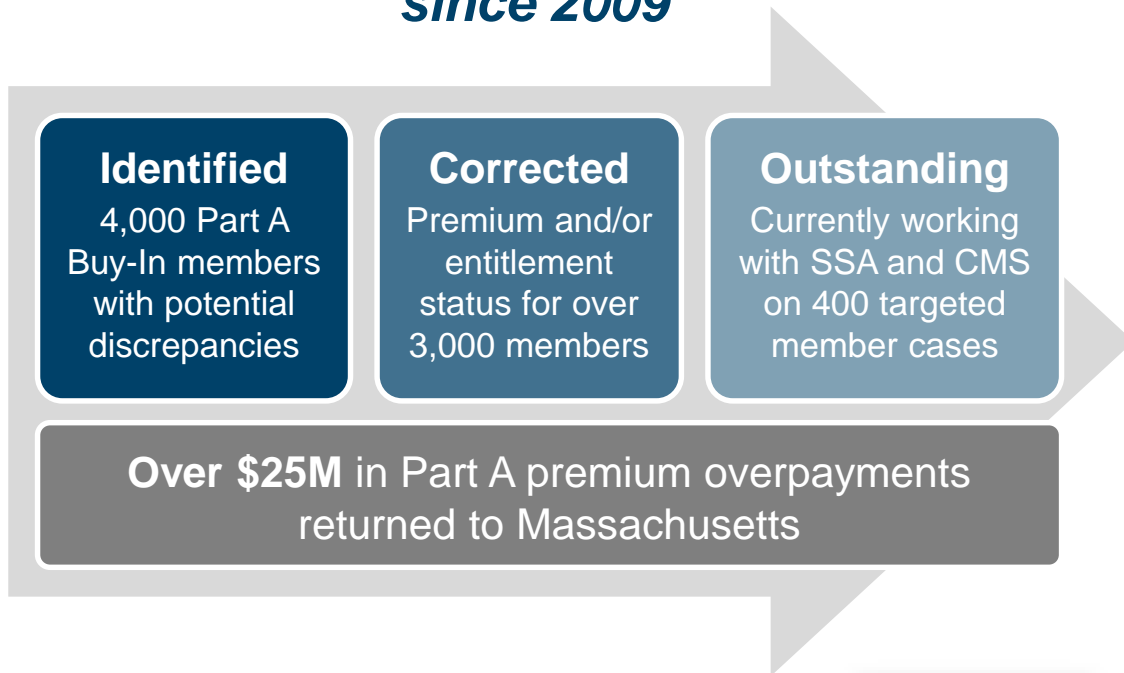
- Analyzes state and federal data for Medicare Part A Buy-In members to evaluate Part A entitlement status and premium payment rates
- Identifies members for whom Massachusetts is paying or has paid:
  - Full Part A premium, but appear to qualify for premium-free Part A
  - Reduced Part A premium, but appear to qualify for premium-free Part A
  - Full Part A premium, but appear to qualify for reduced premium Part A

Part A Premium Rate	# Work Quarters	2019 Monthly Premium Amount	2019 Annual Premium Amount
Full	0-29	\$437	\$5,244
Reduced	30-39	\$240	\$2,880
Free	40+	\$0	\$0

# Massachusetts Part A Buy-In Eligibility Review

- Ongoing collaboration with SSA Regional Office and CMS to refer member information for Part A entitlement review and correction, when needed
- To date, over \$25M returned to Massachusetts for Part A premium overpayments
- In July 2019, CMS acknowledged that Massachusetts continues to identify discrepancies not currently addressed by CMS premium review and reconciliation programs

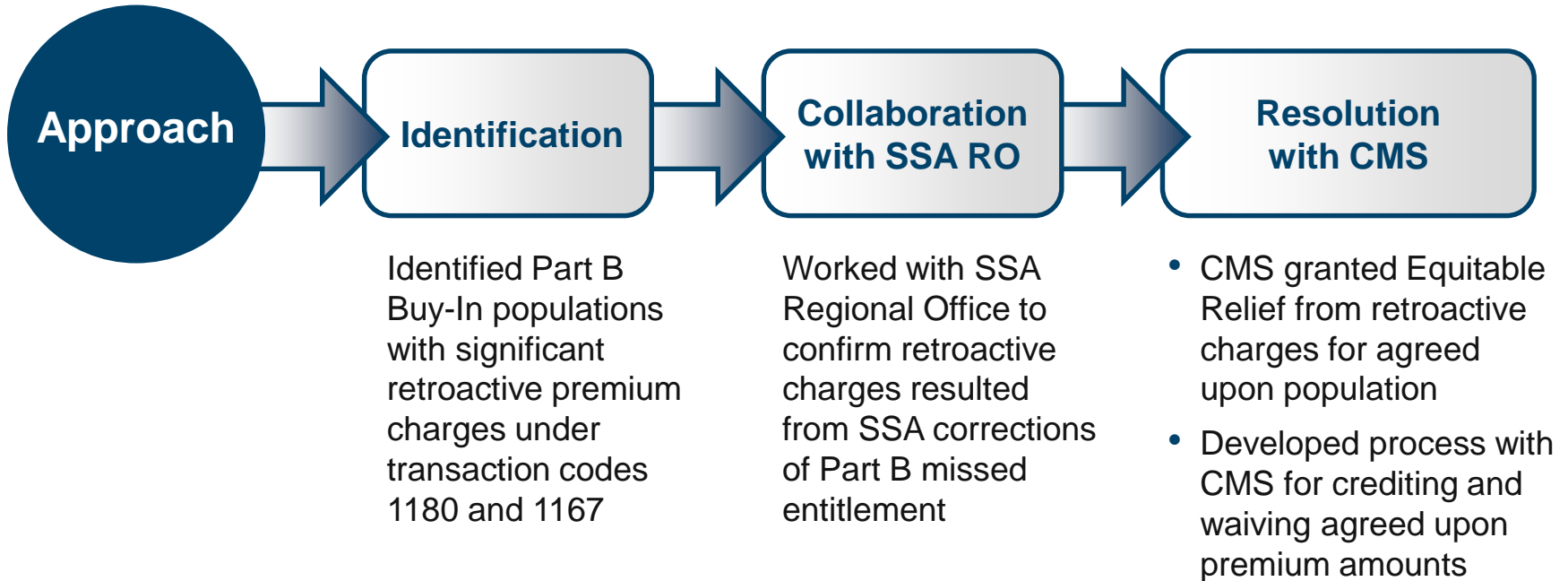
## *Activities and Outcomes since 2009*



## Retroactive Part B Premium Equitable Relief

- As a Section 1634, "Auto-Accrete State," Massachusetts may be charged retroactive Part B premiums for SSI recipients who are granted retroactive Medicare entitlement and are automatically accreted to the Part B bill
  - Transaction codes 1180 and 1167
- Working with the SSA Regional Office on a Medicare Missed Entitlement project, Massachusetts identified Part B Buy-In members for whom significant retroactive Part B premium amounts were being charged when SSA granted retroactive entitlement
  - Retroactive premiums charged for periods of retroactive entitlement granted when SSA corrected periods of missed Medicare benefits
  - Retroactive Part B charges dated as far back as the 1990s
  - No ability for MassHealth to recover costs of services from Medicare for the lengthy retroactive periods

# Retroactive Part B Premium Equitable Relief





## CMS Equitable Relief Decision

- In December 2014, CMS agreed to provide Equitable Relief for 2,101 identified MassHealth members
  - CMS stated that Equitable Relief would be granted for these specific cases due to “delays [that] occurred in establishing Medicare entitlement for these individuals” by the Federal Government
  - Retroactive Part B premiums for periods over 1 year from the SSA adjudication date would be refunded or waived
    - Refunds for retroactive charges already accreted to Part B bill
    - Waivers of future retroactive charges as member cases are adjudicated by SSA

## Population Status as of July 2019

Group	Status	# of Members
1	Approved for Medicare & Equitable Relief received	687
2	Not eligible for Equitable Relief*	945
3	Approved for Medicare & Equitable Relief not yet received	165
4	Pending SSA Adjudication	304
<b>Total</b>		<b>2,101</b>

\* Ineligible based on retroactive Medicare entitlement period of less than 12 months, or determined not entitled to Medicare

# Retroactive Part B Premium Equitable Relief

## Savings as of July 2019

SFY	# of Refunds	Total Refund Amount	# of Waivers	Total Waiver Amount	Total Equitable Relief Received
SFY15	295	\$1,465,084	58	\$328,972	\$1,794,056
SFY16	235	\$1,423,759	16	\$147,064	\$1,570,823
SFY17	2	\$17,767	59	\$571,611	\$589,378
SFY18	1	\$1,718	14	\$144,628	\$146,346
SFY19	0	\$0	7	\$59,936	\$59,936
<b>Total</b>	<b>533</b>	<b>\$2,908,328</b>	<b>154</b>	<b>\$1,252,211</b>	<b>\$4,160,539</b>

# Thank you

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