



March 23, 2023

Dear Ryan White HIV/AIDS Program Colleagues,

During the COVID-19 public health emergency (PHE), Congress enacted the Families First Coronavirus Response Act, which provided enhanced federal funding to states in exchange for keeping people continuously enrolled in Medicaid coverage throughout the PHE. In December 2022, the Consolidated Appropriations Act, 2023 decoupled the Medicaid continuous enrollment provision from the PHE, allowing states to begin processing Medicaid redeterminations (the unwinding period) as early as February 1, 2023, that may result in eligibility renewals or terminations on or after April 1, 2023. States must initiate renewals no later than April 2023 for all individuals enrolled in Medicaid and CHIP within 12 months of the beginning of the state's unwinding period and must complete renewals for all individuals within 14 months of the beginning of the state's unwinding period.

State Medicaid programs will begin contacting Medicaid enrollees and requesting information to begin the redetermination renewal process. When states resume redetermination reviews, up to 15 million people could lose their current Medicaid or CHIP coverage through a process called the continuous enrollment unwinding. In an effort to minimize coverage loss, the Centers for Medicare & Medicaid Services (CMS) is working with states and other stakeholders and has launched a multi-pronged communications approach¹ to inform people about renewing their coverage or transitioning to other available health care coverage options if they no longer qualify for Medicaid or CHIP. Marketplace-eligible clients losing Medicaid or CHIP coverage between March 31, 2023, through July 31, 2024, can enroll in Marketplace coverage via a Special Enrollment Period referred to as the "Unwinding SEP."

Health care coverage loss or gaps could have major implications for people with HIV, as studies have demonstrated that people with HIV have higher rates of viral suppression when they have Medicaid and receive services through the Ryan White HIV/AIDS Program (RWHAP), compared with Medicaid alone. The Health Resources and Services Administration's (HRSA) HIV/AIDS Bureau (HAB) is committed to working with CMS and RWHAP recipients and subrecipients to help minimize a potential loss of healthcare coverage due to the Medicaid continuous enrollment unwinding for RWHAP clients currently on Medicaid. As per [HRSA HAB Policy Clarification Notice 21-02 Determining Client Eligibility & Payor of Last Resort in the Ryan White HIV/AIDS Program](#),² RWHAP recipients and subrecipients must maintain policies and document their efforts to ensure that they assist clients to vigorously pursue

¹ Medicaid and CHIP Continuous Enrollment Unwinding: A Communications Toolkit. <https://www.medicaid.gov/resources-for-states/downloads/unwinding-comms-toolkit.pdf>

² HRSA HAB Policy Clarification Notice 21-02: *Determining Client Eligibility & Payor of Last Resort in the Ryan White HIV/AIDS Program*. <https://ryanwhite.hrsa.gov/sites/default/files/ryanwhite/grants/pcn-21-02-determining-eligibility-polr.pdf>

enrollment in health care coverage and that clients have accessed all other available public and private funding sources for which they may be eligible. Below are specific actions that RWHAP recipients and subrecipients can take as they assist clients with navigating the Medicaid continuous enrollment unwinding:

- Coordinate with state Medicaid agencies regarding their plans for resuming normal operations
- Inform and send reminders to clients about the steps they need to take to renew their Medicaid coverage
- Boost staff capacity dedicated to engagement, education, renewal, and enrollment activities for Medicaid eligible clients
- Identify clients who are enrolled in Medicaid and at risk of losing Medicaid coverage, and flag their charts to schedule appointments to assist them with seeking other sources of coverage
- Help clients identify and enroll in other coverage options, including the Marketplace and employer sponsored insurance, if they are no longer eligible for Medicaid
- Partner with key stakeholders (e.g., managed care organizations, assister programs) to conduct outreach activities to Medicaid enrollees.

RWHAP recipients and subrecipients should look to the **Access, Care, and Engagement Technical Assistance (ACE TA) Center**,³ which provides practical tools and resources to support Medicaid continuous enrollment unwinding activities. RWHAP recipients and subrecipients should also go to <https://medicaid.gov/renewals> to access state specific enrollment information and for additional resources to help inform individuals with Medicaid or CHIP about steps they need to take to renew their coverage or enroll in new coverage.

Thank you for your continued commitment to helping people with HIV access the care and treatment they need.

Sincerely,

/Laura W. Cheever/

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³ ACE TA Center. <https://targethiv.org/ace>