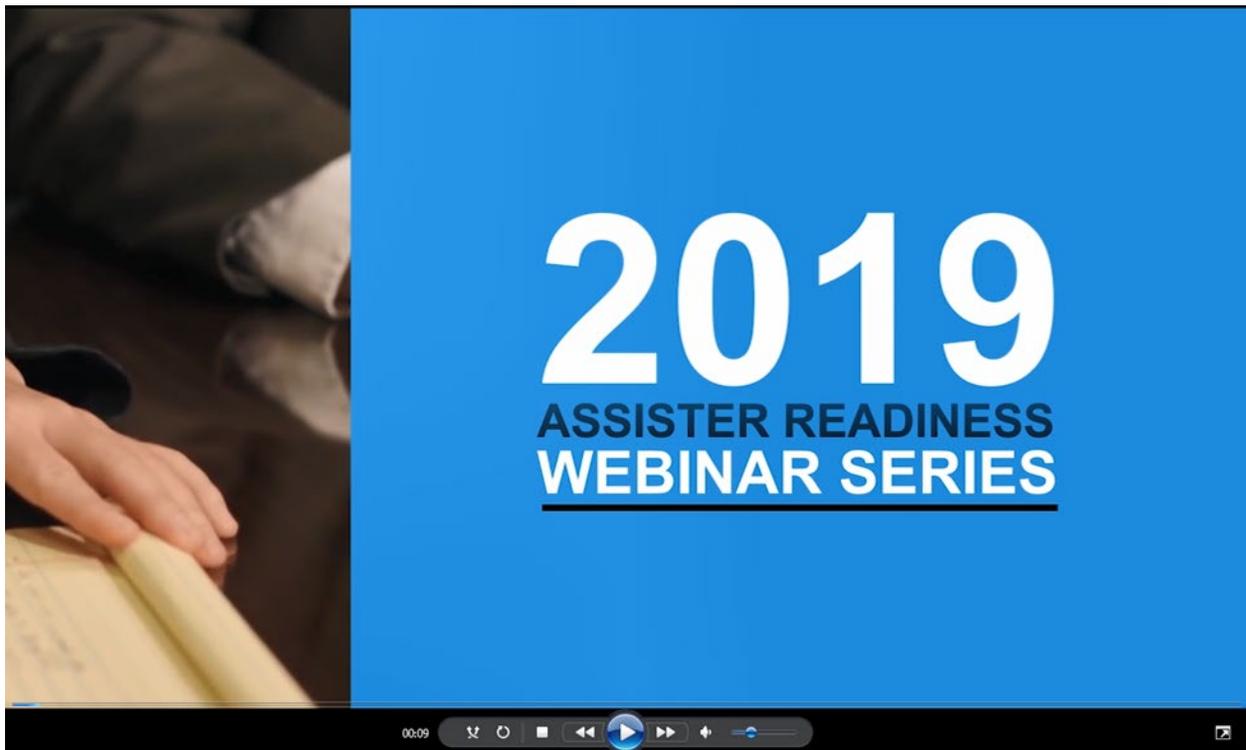


# Working with Consumers with Disabilities: Evaluating Coverage Options

---



**This document is a transcript of the Marketplace Assister Technical Assistance Webinar.**

## Table of Contents

Disclaimer.....	3
Cover Slide .....	3
2019 Assister Readiness Webinar Series Overview .....	3
Titled Slide: Working with Consumers with Disabilities: Introduction to Application Assistance.....	3
Overview .....	3
Application Assistance Scenario .....	4
PPACA & Eligibility for Health Coverage .....	4
PPACA & Eligibility for Health Coverage (Cont.) .....	4
Coverage Considerations for Consumers with Disabilities .....	4
Coverage Considerations (Cont.) .....	4
Coverage Considerations (Cont.) .....	5
Important Reminders.....	5
Options Outside the FFM for Consumers with Disabilities .....	6
Options Outside the FFM for Consumers with Disabilities (Cont.) .....	6
Options Outside the FFM for Consumers with Disabilities (Cont.) .....	6
Options Outside the FFM for Consumers with Disabilities (Cont.) .....	7
Options Outside the FFM for Consumers with Disabilities (Cont.) .....	7
Options Outside the FFM for Consumers with Disabilities (Cont.) .....	7
Options Outside the FFM for Consumers with Disabilities (Cont.) .....	7
Options Outside the FFM for Consumers with Disabilities (Cont.) .....	7
Options Outside the FFM for Consumers with Disabilities (Cont.) .....	8
Identify Health Coverage Options.....	8
Resources for Consumers with Disabilities .....	9
Knowledge Check Time!.....	9
Knowledge Check Answer .....	9
Key Points.....	10
Assister Readiness Webinar Series Resources.....	10

## Disclaimer

This presentation is intended as training and technical assistance for Marketplace assisters (i.e., Navigator grantees, certified application counselors (CACs) and other assisters). This presentation is not a legal document.

- The slides summarize complex statutes and regulations and do not create any rights or obligations.
- Complete and current legal standards are contained in the applicable statutes and regulations.
- Members of the press should contact the CMS Media Relations Group at [press@cms.hhs.gov](mailto:press@cms.hhs.gov).

## Cover Slide

Hello and welcome to the 2019 Assister Readiness Webinar Series! I'm Dara with the Consumer Support Group for the Marketplace and I'm joined by my colleague Sarah. We'll be guiding you through today's webinar. Content in this module focuses on *Working with Consumers with Disabilities: Evaluating Coverage Options*.

## 2019 Assister Readiness Webinar Series Overview

Here's an overview of the entire 2019 Assister Readiness Webinar Series. This module, *Working with Consumers with Disabilities: Evaluating Coverage Options*, is situated in the Week 4 installment of the series and falls under the topic of *Making Coverage Accessible*.

If you have not yet viewed the other modules under this week's topic, be sure to do so in advance of our Friday LIVE webinar. On Friday's webinar, you'll also have an opportunity to ask questions, so remember to take notes and please bring your questions.

## Titled Slide: Working with Consumers with Disabilities: Introduction to Application Assistance

<Silent>

## Overview

And now I'll turn it over to my colleague Sarah. In previous modules, you learned best practices for working with consumers with disabilities, including how to provide auxiliary aids and services. Now you're ready to help consumers with disabilities evaluate and obtain appropriate health coverage.

This module explains factors consumers with disabilities may consider and resources available to help them choose health coverage. We will cover these topics in three sections.

First we will briefly go over the protections for consumers with disabilities under the Patient Protection and Affordable Care Act or PPACA. Then we will identify factors affecting health coverage for consumers with disabilities. Afterwards, we will describe techniques for helping consumers with disabilities identify their coverage needs and coverage options. And finally, we will identify health coverage options for consumers with disabilities outside of qualified health plan options.

## Application Assistance Scenario

Let's start with section 1 by walking through a scenario that you may encounter as an assister.

Shelia is 59 and has diabetes. She has not been managing her diabetes well because she doesn't have health coverage. Her adult children are worried about her and would like your help enrolling her in coverage through her state's Marketplace. Shelia is anxious that she won't be able to enroll in coverage because she hasn't been taking care of herself and she has impaired vision.

How can you best help Shelia? Think about it for a moment. What would you do?

## PPACA & Eligibility for Health Coverage

You can ease Shelia's mind by explaining available health coverage options to her. In the past, due to her diabetes and impaired vision, she may have been denied coverage or paid higher premiums based on her pre-existing condition or disability. However, under the PPACA and regulations, job-based and non-grandfathered individual health plans aren't allowed to deny health insurance coverage to consumers or charge a higher premium for coverage based on a pre-existing condition, including a disability.

## PPACA & Eligibility for Health Coverage (Cont.)

You should also tell Shelia that the PPACA prohibits most health plans from placing annual and lifetime dollar limits on most benefits. The law also helps make wellness and prevention services such as cancer screenings and routine vaccinations more affordable by requiring many health plans to cover certain preventive services without a copayment, coinsurance, or deductible; and it creates new opportunities for state Medicaid programs to provide additional services to help low-income consumers with disabilities, particularly those who need long-term care at home and in the community.

## Coverage Considerations for Consumers with Disabilities

Now I'll turn it over to my colleague Sarah. Now that we have eased Sheila's mind by helping her understand that her disability won't prevent her from being eligible for affordable health care coverage, let's help Shelia understand how to evaluate her health care coverage options.

When helping consumers choose health coverage, you should discuss important factors that impact coverage. These factors are especially important when working with consumers with disabilities.

## Coverage Considerations (Cont.)

Consumers' costs include a plan's premium and other out-of-pocket costs for health services such as deductibles, coinsurance, and copayments. These payments cover items like prescriptions, doctor visits, and durable medical equipment; for example, wheelchairs and walkers.

It's important to encourage consumers to compare costs and coverage for the specific benefits offered by different qualified health plans otherwise known as QHPs and other coverage options, such as Medicaid, to ensure the selected coverage meets their needs.

### **Coverage Considerations (Cont.)**

Generally, in the context of health coverage, accessibility refers to the availability and inclusion of suitable doctors for consumers' needs and office accessibility. For example, consumers with a physical disability will need to choose a primary care physician who has an office with elevator access or accommodations. In Sheila's case, she may want to consider a doctor who has experience working with patients with vision impairments.

When you help consumers with disabilities evaluate accessibility, consider that they may require access to specific specialty providers, therapies, pharmacies, and suppliers. Consumers with disabilities often have longstanding relationships with providers who are familiar with their complex medical needs. It's important to determine whether these providers participate in the provider networks of any QHPs consumers are considering.

### **Coverage Considerations (Cont.)**

The third factor is quality. Quality health care should be safe, effective, patient centered, timely, efficient, and equitable.

### **Coverage Considerations (Cont.)**

And you want to make sure that the coverage the consumer is considering is adequate for his or her needs. What is adequate for one consumer may not be adequate for another. In addition to durable medical equipment, psychiatric or preventive care (e.g., coverage for some immunizations), consumers may also be interested in alternative care options or the availability of an attendant or personal care assistant to help maintain their functional capacity.

### **Coverage Considerations (Cont.)**

When you help consumers with disabilities evaluate coverage adequacy, make sure they review the Summary of Benefits and Coverage (SBC) for each QHP under consideration to compare available benefits and related costs. A link to the SBC for each QHP participating in the FFM is available at [HealthCare.gov](https://www.healthcare.gov). You can also help a consumer review a QHP's Evidence of Coverage (EOC). The EOC is different from the SBC because it provides more details on covered benefits, associated costs (such as premiums, deductibles, copayments, and coinsurance), and how to get services. You or the consumers you assist should be able to get the EOC from the QHP's website or by calling the QHP's customer service department. As we touched on earlier, review QHP provider directories to confirm that consumers' preferred providers are included in a QHP's network. And finally, review QHP prescription drug formularies to confirm that consumers' prescription medications are included in a QHP's formulary.

### **Important Reminders**

And here are two important reminders that we've covered in other modules, but would like to emphasize again.

You should make sure consumers know that they can only change QHPs when permitted during a Special Enrollment Period (SEP) or the individual market Open Enrollment Period. Remind consumers who want to change to a different QHP during a SEP that they may be limited in the type of QHP they

can choose. For example, a consumer may be able to select a new plan, but that plan may need to be within the same health plan category as the consumer's current QHP coverage.

And don't forget that you should not recommend any specific health insurance plan. Instead, help consumers understand the differences among plans. Now I'll turn back over to Dara to talk about other coverage options.

## **Options Outside the FFM's for Consumers with Disabilities**

Thanks Sarah. Let's go back and discuss the scenario with Shelia. She appreciates your help and feels so much better knowing she might be able to get health coverage. She wonders whether she has any other options besides enrolling in a QHP through the FFM.

If you are a Navigator, you should be prepared to offer at least basic information on other coverage options available to consumers with disabilities in addition to QHPs. These coverage options may include Medicaid, Social Security Disability Insurance (SSDI), Supplemental Security Income (SSI), the Ryan White HIV/AIDS Program, Medicare, and pharmaceutical assistance programs. Let's talk a little about these coverage options now.

## **Options Outside the FFM's for Consumers with Disabilities (Cont.)**

Earlier you talked to Shelia about ways PPACA protects her. As you begin helping Sheila fill out her FFM eligibility application, you should also tell Shelia that the application will help assess whether she may be eligible for Medicaid coverage based on her disability. If it appears Shelia may be eligible, the FFM will transfer her application to the state Medicaid agency so it can make a final determination.

In order to assess whether consumers may be eligible for Medicaid based on their disabilities, the Marketplace application asks whether each person in a household lives in a medical facility or nursing home, or whether they have a physical, mental, or emotional health condition that causes limitations in daily activities like bathing and dressing.

If consumers answer "yes" and their income information indicates they may be eligible for Medicaid based on disability, the application information will be sent to the state Medicaid agency to determine whether they qualify for Medicaid. Consumers also have the option to apply directly with their state Medicaid agency.

## **Options Outside the FFM's for Consumers with Disabilities (Cont.)**

Medicaid provides coverage for many consumers with disabilities. Consumers with disabilities who are eligible can get Medicaid-covered services that are determined medically necessary, including long-term care services and support.

Depending on the state where Shelia lives, the FFM either provides a final decision on whether she is eligible for Medicaid or sends Shelia's application information to the state Medicaid agency to make a final decision. In certain states, an FFM can only determine consumers' Medicaid eligibility based on their household income and not on other criteria. So if it appears Shelia may be eligible for Medicaid on another basis, such as disability, the FFM will transfer her application to the state Medicaid agency to make a final determination.

## Options Outside the FFM for Consumers with Disabilities (Cont.)

Next, let's discuss Supplemental Security Income or SSI and Social Security Disability Insurance SSDI Programs. Although SSI and SSDI are different in many ways, both programs are administered by the Social Security Administration (SSA). Consumers who have disabilities and meet medical and financial criteria may qualify for the benefits under both programs.

SSI pays benefits to some consumers, including consumers with disabilities, based on financial need and whether they meet other eligibility requirements. SSDI pays benefits to consumers and certain family members if they or their family member worked long enough to qualify for Social Security and paid Social Security taxes. SSDI beneficiaries are automatically eligible for Medicare after 24 months of receiving SSDI benefits. To qualify for both SSI and SSDI, consumers must also meet certain medical criteria. In most states, consumers who receive SSI automatically qualify for Medicaid coverage. In a few states, SSI beneficiaries are not automatically eligible for Medicaid, although they will still qualify in most situations. Some states use more restrictive Medicaid eligibility criteria which differ from state to state.

## Options Outside the FFM for Consumers with Disabilities (Cont.)

Key considerations for assisting consumers with disabilities to understand Medicaid and SSI/ SSDI eligibility include the following. Not everyone with a disability is automatically eligible for Medicaid. This includes some SSI beneficiaries in a few states and consumers who receive SSDI benefits.

Although health coverage isn't automatic, nearly all states offer coverage to people with disabilities who aren't eligible for SSI, but are determined by the Social Security Administration or their state Medicaid agency to have a disability and an income below state-established thresholds.

Consumers who are seeking Medicaid coverage based on disability must demonstrate they have an impairment that prevents them from performing "substantial gainful activity" for at least one year if they don't receive SSI or SSDI. Once a disability determination is made, the consumer must pass an asset test and meet specific income requirements to be considered for Medicaid eligibility. Most states have Medicaid programs that encourage people with disabilities to work by extending them full Medicaid coverage— even when their employment affects their eligibility for SSA-related disability benefits.

Some consumers with disabilities who aren't otherwise eligible for Medicaid may wish to purchase health coverage through an FFM. Because eligibility criteria vary, you should refer consumers to their state Medicaid agency for help with Medicaid questions you aren't able to answer.

## Options Outside the FFM for Consumers with Disabilities (Cont.)

Now let's briefly talk about the Ryan White HIV/AIDS Program. The Ryan White HIV/AIDS Program provides HIV-related services for consumers who don't have sufficient health coverage or financial resources. The program fills gaps in coverage not met by other health coverage. To find out more about the Ryan White HIV/AIDS program, visit: <https://hab.hrsa.gov>

## Options Outside the FFM for Consumers with Disabilities (Cont.)

Now let's discuss Medicare. Medicare provides health coverage for:

- Consumers who are age 65 and older;

- Consumers younger than age 65 who have received Social Security or railroad retirement disability benefits for 25 months;
- Consumers younger than age 65 who have been medically determined to have Amyotrophic Lateral Sclerosis (ALS) and who receive Social Security or railroad retirement disability benefits; and
- Consumers of any age who have End-Stage Renal Disease, which is permanent kidney failure requiring dialysis or kidney transplant.

Medicare entitlement based on a determination of disability and receipt of disability benefits also requires that consumers, their spouses, or family members have earned sufficient quarters of coverage (QCs). The same number of QCs is required for SSDI eligibility. Consumers who are eligible for or receiving SSDI are also eligible for Medicare after a 24-month waiting period. However, consumers with ALS do not have a waiting period after they begin SSDI and can receive Medicare right away. For more information, visit [www.ssa.gov](http://www.ssa.gov) or [www.Medicare.gov](http://www.Medicare.gov).

### Options Outside the FFM for Consumers with Disabilities (Cont.)

For our final coverage option we will discuss today, let's talk about pharmaceutical assistance programs. Some pharmaceutical companies offer additional pharmaceutical assistance programs, also called prescription drug assistance programs or patient assistance programs. These programs provide free or low-cost medications to consumers who can't afford to buy their medicine. CMS doesn't endorse any particular pharmaceutical assistance program.

### Identify Health Coverage Options

Now let's get back to the scenario. Let's say that based on her Marketplace application answers, Shelia is eligible to enroll in a QHP through the FFM. You are now helping Sheila compare several available plans she may choose from. Shelia says insulin for her diabetes is expensive and she wants to be sure it's covered. She also hopes she can get coverage to help with her vision.

Assessing a consumer's needs is an important beginning step to helping them identify appropriate health coverage. This includes consumers with disabilities. So to provide effective assistance to Shelia, you should:

- Work with Shelia to help identify and understand her coverage priorities and needs.
- Review her coverage options, highlighting how each option addresses her needs.
- And lastly, remember to consider other coverage options and refer Shelia to other health coverage programs for which she may qualify.

Because Shelia has a vision impairment, you might be required to provide her with additional accommodations. Additional information on best practices for accommodating consumers with disabilities can be found in the Assister Readiness Webinar Series Week 4 module entitled *Working with Consumers with Disabilities: Providing Appropriate Services and Accommodations*, as well as the *Best Practices and Etiquette* module. If you have not viewed these modules, be sure to do so. And now I'll turn it over to Sarah.

## Resources for Consumers with Disabilities

Thanks Dara. Remember, resources are available to help consumers with disabilities understand their coverage options. Take note of the following tools to help consumers with disabilities:

- Finding Coverage and Pricing Options is a tool to help consumers find available private health plans;
- Your Insurance Company and Costs of Coverage is a search tool that allows consumers to find a basic profile of their health insurance company; and
- Understanding Insurance is a resource that helps consumers understand their options, rights, and protections under the Affordable Care Act.

## Knowledge Check Time!

Now let's do a quick knowledge check! Here is the scenario: Shelia's friend, Brady, is 42 years old and doesn't have health insurance. He's been getting SSDI for almost 2 years. Brady uses a wheelchair and takes prescription medicine to help control pain. He heard he might be able to get health coverage through the Marketplace in his state.

Which of the following would help Brady in learning about the best health coverage options for him?

- A. Information about drug companies offering prescription drug assistance programs.
- B. Information about a plan Shelia selected that should also work for Brady because they both have pre-existing conditions.
- C. Information about Medicare for consumers with disabilities who have been getting SSDI for more than 24 months.
- D. Information about online resources where Brady can get more information to help him understand his health coverage options.

What do you think the answer is? Think about it for a moment.

## Knowledge Check Answer

The correct answers are A, C, and D. Because Brady takes prescription medication regularly, he may benefit from learning about prescription drug assistance programs (just remember to follow CMS guidance on referring consumers to other organizations when discussing drug assistance programs). Along with providing health coverage for consumers 65 and older, Medicare also provides health coverage for consumers who receive Social Security or railroad retirement disability benefits (after a 24-month waiting period and if consumers, their spouses, or their family members have earned a certain number of QCs). Since Brady is approaching the end of the 24-month waiting period, he should know about his upcoming transition to possible Medicare coverage entitlement.

Remember that online resources are available to help consumers with disabilities get health coverage. And you can discuss all available health plans, but you may not disclose to Brady the specific plan Shelia selected without first getting Shelia's consent. Doing so without her consent would violate the privacy and security standards you agreed to uphold.

## Key Points

Now, let's review some key points to remember:

The PPACA expands health coverage options for all consumers, including people with disabilities, and provides them with additional protections.

Your role as an assister is to assess all consumers' needs effectively, including consumers with disabilities, and to help them get coverage.

Like all other consumers, individuals with disabilities should consider cost, accessibility, quality, and adequacy when choosing their health coverage; and lastly, additional coverage options may exist for consumers with disabilities, including Medicaid, the SSI and SSDI programs, the Ryan White HIV/AIDS Program, Medicare, and pharmaceutical assistance programs.

## Assister Readiness Webinar Series Resources

Congratulations on completing the *Working with Consumers with Disabilities: Introduction to Application Assistance* module of the Assister Readiness Webinar Series! This completes the Week 4 modules.

Please feel free to visit the Assister Readiness Webinar Series Resources listed on this slide, including: training materials for Navigators and other assisters; and the assister webinars webpage.

If you have topical questions about this presentation: Navigators please contact your Project Officer directly. CACs can email the CAC Inbox at [CACquestions@cms.hhs.gov](mailto:CACquestions@cms.hhs.gov).

We hope you've enjoyed the Assister Readiness Webinar Series.