
Medicaid Secretary-approved Minimum Essential Coverage

February 16, 2016

Background

While most types of Medicaid coverage are considered minimum essential coverage (MEC), the Internal Revenue Service did not recognize all types of Medicaid coverage as MEC. In a State Health Official Letter (SHO #14-002) issued in November 2014, the Centers for Medicaid & CHIP Services provided guidance on how coverage provided to low-income pregnant women, medically needy, and section 1115 beneficiaries could be recognized as MEC using authority under section 5000A(f)(1)(E) of the Internal Revenue Code of 1986. Under this provision, the Secretary, in consultation with the Treasury Secretary, may recognize as MEC coverage which is not recognized as MEC under the IRS regulations. In general, the Secretaries have determined that coverage provided to low-income pregnant women, medically needy, and section 1115 beneficiaries will be recognized as MEC if it is comparable to coverage afforded categorically needy Medicaid enrollees. SHO #14-002 describes the coverage standards and process by which coverage to low-income pregnant women, medically needy, and section 1115 demonstrations will be recognized as MEC.

Secretary-approved Minimum Essential Coverage Chart

Coverage to low-income pregnant women: Most states submitted state plan amendments (SPAs) which aligned the benefits provided to all pregnant women categories, and conformed to the standard in SHO #14-002. These states were made aware of the MEC designation with the approval of their SPA. The chart below reflects that coverage for pregnant women in these states is MEC. For states which did not elect to align the coverage for all pregnant women, CMS reviewed the coverage provided with the state in order to determine whether it meets the standard in SHO #14-002. In the chart below, coverage with an (*) denotes MEC/non-MEC designations as a result of this CMS-initiated review; these states were notified of the MEC designation in letters issued on February 12, 2016. Pregnant women with Medicaid coverage in states with either a MEC or MEC* designation will meet the requirement to maintain MEC.

Coverage to medically needy individuals: Not all states elect to provide medically needy coverage. MEC designations in this chart reflect coverage that has been determined comprehensive according to the standards outlined in SHO #14-002. Individuals who meet the state's medically needy income level without a spenddown requirement will have comprehensive coverage that is recognized as MEC. However, individuals who qualify for comprehensive coverage only after incurring medical expenses to meet a spenddown amount will not receive coverage that is recognized as MEC. A non-MEC designation indicates medically needy coverage that is not comprehensive; medically needy individuals in these states will not receive MEC coverage whether or not they have to meet a spenddown amount to receive coverage.

Coverage provided in a section 1115 demonstration project: MEC designations in the chart below reflect coverage has been determined comprehensive as outlined in SHO #14-002. Therefore, individuals enrolled in comprehensive section 1115 demonstration project coverage will have coverage that is MEC.

State	Pregnant Women MEC/Non-MEC	Medically Needy MEC/Non-MEC	Section 1115 Demonstrations	
			MEC	Non-MEC
Alabama	MEC*	N/A	N/A	Alabama Plan First Family Planning Demonstration
Alaska	MEC	N/A	N/A	N/A
Arizona	MEC	N/A	Arizona Health Care Cost Containment (State Plan benefits and ABP)	N/A
Arkansas	Non-MEC*	MEC (Coverage limitations are comparable to Marketplace)	<ul style="list-style-type: none"> Arkansas Healthcare Independence (State Plan benefits); AR-TEFRA-like (Benefits derived from demo); and ARKids (Benefits derived from demo). 	N/A
California	MEC*	MEC (State Plan benefits)	Bridge to Reform (State Plan benefits)	N/A
Colorado	MEC	N/A	Colorado Adult Prenatal Coverage (State Plan benefits)	N/A
Connecticut	MEC	MEC (State Plan benefits)	N/A	N/A
Delaware	MEC	N/A	Delaware Diamond State Health Plan (State Plan benefits)	N/A
District of Columbia	MEC	MEC (State Plan Benefits)	District of Columbia Childless Adults (State Plan benefits)	N/A

State	Pregnant Women MEC/Non-MEC	Medically Needy MEC/Non-MEC	Section 1115 Demonstrations	
			MEC	Non-MEC
Florida	MEC	Non-MEC (Coverage is not comparable to either the state plan or Marketplace coverage)	<ul style="list-style-type: none"> • MEDS AD (State Plan benefits and HCBS); • Medicaid Managed Care (State Plan benefits) 	Florida Family Planning Demonstration
Georgia	MEC	MEC (Coverage limitations are comparable to Marketplace)	N/A	Georgia Planning For Healthy Babies Family Planning Demonstration
Hawaii	MEC	MEC (State Plan Benefits)	Quest Integration (State Plan benefits)	
Idaho	Non-MEC*	N/A	N/A	N/A
Illinois	MEC	MEC (State Plan Benefits)	N/A	N/A
Indiana	MEC	N/A	<ul style="list-style-type: none"> • Healthy Indiana Plan 1.0 (State Plan benefits); and • Healthy Indiana Plan 2.0 (State Plan benefits) 	N/A
Iowa	MEC	Non-MEC (Coverage is not comparable to either the state plan or Marketplace coverage)	<ul style="list-style-type: none"> • Iowa Health and Wellness Plan (State Plan benefits); and • Marketplace Choice Plan (Premium Assistance). 	Family Planning Network Demonstration
Kansas	MEC	MEC (State Plan Benefits)	KanCare (State Plan benefits)	N/A
Kentucky	MEC	MEC (Coverage limitations are comparable to Marketplace)	N/A	N/A

State	Pregnant Women MEC/Non-MEC	Medically Needy MEC/Non-MEC	Section 1115 Demonstrations	
			MEC	Non-MEC
Louisiana	MEC	Non- MEC (Coverage is not comparable to either the state plan or Marketplace coverage)	N/A	Greater New Orleans Community Health Connection (Limited benefit package, provider network, geography)
Maine	MEC	MEC (State Plan Benefit)	Individuals with HIV/AIDS: • Individuals with income at or below 100% of the FPL receive full state plan benefits.	Individuals with HIV/AIDS: • Individuals at or below 250% of the FPL who receive limited services such as DME, PT, dental, HCBS, optometry.
Maryland	MEC	MEC (State Plan Benefit)	Maryland Health Choice (State Plan benefits)	N/A
Massachusetts	MEC	MEC (State Plan benefits)	MassHealth Comprehensive Demonstration (State Plan benefits)	N/A
Michigan	MEC	MEC (State Plan benefits)	Healthy Michigan (State Plan benefits)	Michigan Family Planning Demonstration
Minnesota	MEC	MEC (State Plan benefits)	Prepaid Medical Assistance (State Plan benefits)	• MN Reform 2020 (Targeted Special Needs); and • Minnesota Family Planning Demonstration.
Mississippi	MEC	N/A	Healthier Mississippi Demo: • Children up to age 20 Receive State Plan benefits); and • Adults receive most-state plan services with limitations on non-EHB.	Mississippi Family Planning Demonstration

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Missouri	MEC	N/A	N/A	<ul style="list-style-type: none"> Gateway to Better Health (Limited benefit package, provider network, geography); and Missouri Family Planning Demonstration.
Montana	MEC	MEC (State Plan benefits)	N/A	<ul style="list-style-type: none"> Montana Basic Medicaid for Able-Bodied Adults (Limited benefits and DMEs); and Montana Plan First Family Planning Demonstration.
Nebraska	MEC	MEC (Coverage limitations are comparable to Marketplace)	N/A	N/A
Nevada	MEC	N/A	Comprehensive Care Waiver (State Plan benefits)	N/A
New Hampshire	MEC	MEC (State Plan benefits)	N/A	N/A
New Jersey	MEC	Non-MEC (Coverage is not comparable to either the state plan or Marketplace coverage)	New Jersey Comprehensive (State Plan benefits)	N/A
New Mexico	MEC*	N/A	Centennial Care (State Plan Benefits)	N/A

State	Pregnant Women MEC/Non-MEC	Medically Needy MEC/Non-MEC	Section 1115 Demonstrations	
			MEC	Non-MEC
New York	MEC	MEC (State Plan benefits)	New York Partnership (State Plan benefits)	N/A
North Carolina	MEC*	MEC (State Plan benefits)	N/A	N/A
North Dakota	MEC	MEC (State Plan benefits)	N/A	N/A
Ohio	MEC	N/A	N/A	N/A
Oklahoma	MEC	N/A	Oklahoma SoonerCare (State Plan benefits and Premium Assistance)	N/A
Oregon	MEC	N/A	Oregon Health Plan (State Plan)	Oregon Family Planning Demonstration
Pennsylvania	MEC	MEC (State Plan benefits)	Healthy Pennsylvania (State Plan benefits)	Pennsylvania Family Planning Demonstration
Rhode Island	MEC	MEC (State Plan benefits)	Global Consumer Choice: <ul style="list-style-type: none"> • Mandatory and optional state plan groups (State Plan benefits and some additional services); and • Individuals whose eligibility is derived from the demonstration (full State Plan benefits). 	Global Consumer Choice: <ul style="list-style-type: none"> • Elderly who receive adult day care, home health care services and case management; • Adults with disabilities who receive HCBS-like services;

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Rhode Island (cont.)				<ul style="list-style-type: none"> Youth with SED not eligible for Medicaid receive detection and intervention services; and Family planning.
South Carolina	MEC	N/A	N/A	N/A
South Dakota	Non-MEC*	N/A	N/A	N/A
Tennessee	MEC	MEC (State Plan benefits)	TennCare: <ul style="list-style-type: none"> Mandatory and optional state plan populations receive State Plan benefits; Medically eligible children receive all state plan benefits except for some LTSS; Choices 217 individuals receive state plan benefits; and Non-pregnant adults - benefits derived from demo and places limitations on non-EHB LTSS. 	N/A

State	Pregnant Women MEC/Non-MEC	Medically Needy MEC/Non-MEC	Section 1115 Demonstrations	
			MEC	Non-MEC
Texas	MEC	MEC (State Plan benefits)	Texas Healthcare Transformation and Quality Improvement (State Plan benefits)	N/A
Utah	MEC	N/A	<ul style="list-style-type: none"> • Primary Care Network: Adults eligible under section 1925 & 1931 and medically needy adults – receive a slightly reduced state plan package; • adults with income at or below 200% of the FPL who receive premium assistance; • COBRA-eligible adults with income below 200% of the FPL who receive premium assistance; and • CHIP children who receive premium assistance. 	Primary Care Network: <ul style="list-style-type: none"> • Adults with income at or below 95% of the FPL receive a limited primary and preventative care benefit package; and • high-risk pregnant women who receive services related to pregnancy.
Vermont	MEC	MEC (State Plan benefits)	Global Commitment to Health Comprehensive: <ul style="list-style-type: none"> • Mandatory and optional state plan populations receive State Plan benefits. 	Global Commitment to Health Comprehensive: <ul style="list-style-type: none"> • Individuals with moderate needs who receive a subset of HCBS services.
Virginia	MEC	Non-MEC (Coverage is not comparable to either the state plan or Marketplace coverage)	Virginia FAMIS MOMS and FAMIS Select: <ul style="list-style-type: none"> • Uninsured pregnant women receive State Plan benefits. 	Virginia FAMIS MOMS and FAMIS Select: <ul style="list-style-type: none"> • CHIP with premium assistance do not receive wrap around services.

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			MEC	Non-MEC
Washington	MEC	MEC (State Plan benefits)	N/A	Washington Take Charge Family Planning Demonstration
West Virginia	MEC	MEC (State Plan benefits)	N/A	N/A
Wisconsin	MEC	N/A	Badger Care Reform (State Plan benefits)	N/A
Wyoming	MEC	N/A	N/A	Wyoming 'Pregnant by Choice' Family Planning Demonstration