

NC Department of Health and Human Services NC Medicaid

Recipient Eligibility Determination Audit (REDA) – Round 2, Cycle 3

Office of Compliance and Program Integrity

April 2024

Vision

- Ensure benefits are provided only to those individuals eligible for Medicaid benefits
- Identify and eliminate ineligible individuals from receiving Medicaid benefits



Recipient Eligibility Determination Audit

Round 1 to Round 2 & the IC Process

Round 2 Updated Approach

Medicaid Accuracy Standards

Accuracy Rate Approach

Strategic Plan Development

County Audit Process

County Cycle Assignment

Audit Prep & Findings Process

Corrections Process

Reporting Process

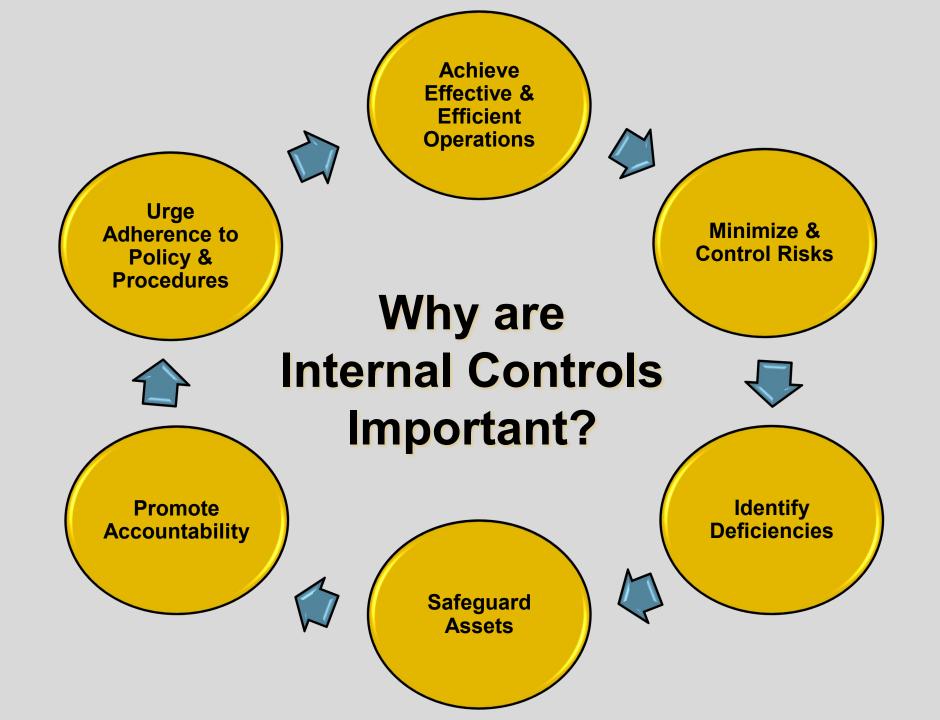
Recoupment Methodology

Joint Accuracy Improvement Plan

Responsibilities & Review Process

REDA – Round 1 to Round 2

- Under Round 1, all 100 counties were audited for CY 2019 through CY 2021 and an Accuracy Improvement Plan (AIP) was completed for all counties who did not meet eligibility accuracy standards
- Under Round 2, the Cycle 1 audit is complete; AIP was enacted and has been completed by all Cycle 1 counties who did not meet eligibility accuracy standards in CY 2022
- Round 2, Cycle 2 (CY 2023) was briefly paused for the Statewide CCU audit to be conducted and is now complete; AIP will begin soon for Cycle 2
- Auditing for Round 2, Cycle 3 (CY 2024) is set to commence on June 3, 2024



Application Approvals ~ Recertifications Instructions Complete Section A, prior to each approval disposition (application approval, recertification) to ensure the a/b is evaluated for all programs and authorized for the greatest eligible program/benefit. A/B NAME CNDS ID Male Female DATE OF BIRTH GENDER What is the a/b's citizenship status - U.S. citizen, qualified alien. undocumented? (potential for full Medicaid or emergency only) A. Evaluation for all Programs **EVALUATION NOTES/DETAILS** LEADS TO POTENTIAL ELIGIBILITY: Υ Ν If Y indicated, a statement regarding the evaluation RESULT must be noted in this column. Is the a/b a caretaker of a minor child under age 18? (potential MAF) Did the a/b receive MAF/C at least 3 of the preceding 6 months but now ineligible due to new/increased income? (potential Transitional) Is the a/b age 19 or 20? (potential MAF/N) Is the a/b age 18 or under? (potential MAF/MIC) Is the a/b pregnant? (potential MPW) Is the a/b disabled (or does the a/b allege disability)? (potential MAD/HCWD & Franklin v. Kinslev considerations) Is the a/b age 65 or older (or will turn age 65 during application processing period)? (potential MAA) Is the a/b former SSI/SA recipient who lost SSI/SA due to RSDI? (potential Passalong eligible) Is there an indication of need for LTC, SA, or CAP? (potential for additional services) Does the a/b have Medicare? (potential MQB) Is there an indication of medical need for evaluation under medically needy coverage groups (old, current, anticipated medical expenses)? (potential MAF/M, MAABD/M) Is there potential eligibility under Medicaid Expansion (MXP) as the a/b has countable income at or below 133% FPL? (Medicaid Expansion was effective in NC as of 12/1/2023) Does the a/b meet FPP (MAF/D) eligibility requirements (not pregnant, countable income at or below 195% FPL, non-financial criteria)? (Note: A/B cannot opt out of FPP; FPP is a Medicaid program and if a/b is eligible, they must be authorized. Disclaimer: This template is not a registered State form. Please review the template for accuracy and make any required changes, as deemed necessary for

Active Action: Evaluation/Documentation Checklist

Agency use.

Checklist:

(Active Action)

Evaluation for All Programs

Checklist:

(Negative Action)

Evaluation for All Programs & **Denials for Failure** to Provide Information & Voluntary **Termination**

Denial ~ Termination ~ Reduction in Bene	TITS			
<u>structions</u> Complete Section A, prior to each negative disposition (denial, termination, reduction) to ensure ab is evaluated for all programs. Also, complete Section B, prior to the negative disposition for Denial for Failure to Provide Information to ensure policy is followed. Complete Section C, for voluntary requests for termination of Medicaid. If an application, remember to evaluate for RETRO and/or OXGONKO based on the ab's needs.)				
A/B NAME			CNDS ID	
	Male	Female	DATE OF BIRTH	
GENDER				
Vhat is the arb's citizenship status - U.S. citizen, qualified alien, undocumented? (potential for full Medicaid or emergency only)				
. Evaluation for all Programs EADS TO POTENTIAL ELIGIBILITY PRIOR TO DENIAL, TERMINATION, R REDUCTION IN BENEFITS:	Y	N	EVALUATION NOTES/DETAILS If Y indicated, a statement regarding the <u>evaluation RESULT</u> must be noted in this column.	
the a/b a caretaker of a minor child under age 18?				
potential MAF) iid the a/b receive MAF/C at least 3 of the preceding 6 months but now ineligible due to new/increased income?				
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toes the a/b meet FPP (MAF/D) eligibility requirements (not pregnant, countable income at or below 195% FPL, non-financial criteria)?				
8. Processing Checklist - Denial for Failure to Provide Information				
EADS FOR APPROPRIATE EVALUATION PRIOR TO DENIAL FOR FAILURE TO PROVIDE INFORMATION:	Y	N	EVALUATION NOTES/DETAILS	
Vas NCFAST checked to see if there are other agency records for the missing/required information?				
Answer "Y" for no other agency records and/or info that would not be in other agency records.) bid the DHB-5097's request the same, required information twice (2x) and was the information necessary to determine eligibility?				
Vere the two (2) DHB-5097's sent to the a/b (and their Authorized Representative, if applicable)?				
Vere the DHB-5097's at least 12 days apart? las the application pended the full 45 processing days (or 90 days if MAD)?	<u> </u>			
2. Voluntary Termination of Medicaid				
EQUIREMENT FOR REQUESTS FOR VOLUNTARY TERMINATION:	Y	N	EVALUATION NOTES/DETAILS	
the ab requests voluntary termination of Medicaid and the request was received in <u>writing</u> , have ALL of the below requirements been het? If requests is not in <u>writing</u> , proceed to next question. 1. Writien requests specifically requests Medicaid termination? 2. Writien request is uploaded to NCFAST? 3. Does NCFAST documentation indicate that the individual understood that they and/or their children may still be eligible for Medicaid and chose not to continue? (<i>the above is satisfied</i> , advocume antification is required, utilizing the DSS-8110.)				
the ab requests voluntary termination of Medicad via telephone or in person, have ALL of the below requirements been met? 1. Has the County DSS explained to the individual tatt they or their children may still be eligible for Medicaid? If yes, is documentation in NCFAST that the individual understood and chose not to continue? 2. Has the DHB-2050, Voluntary Request to Terminate Medicaid, been provided to the beneficiary and the beneficiary made aware that their signature is required? 3. Before termination, is the signed DHB-2050 saved to NCFAST? See exception below and proceed to next question if a/b meets the exception. The AMS signature is required? In a source for Medicaid in the new state.				
the ab requests voluntary termnation of Medicaid via <u>telephone</u> or <u>in person</u> AND <u>meets the exception</u> , have ALL of the below equirements been met? 1. Has the beneficiary moved to another state and is applying for Medicaid in the new state? 2. Does NCFAST documentation indicate the beneficiary's termination request and include details of the conversation with the beneficiary regarding their move to another state and Medicaid application with the other state?				
Verbal request for Medicaid termination is allowable if the A/B has moved to another state and is applying for Medicaid in the new				

Checklist:

Application Withdrawals

WITHDRAWAL TEMPLATE					
Date/Time with	drawal request	adt			
	lethod of conta				
	esting withdraw				
Person reque	esung withdraw	/dl			
YES	NO	Withdrawal Procedures			
Discussion of alt	ternatives to wi	thdrawal:			
		Open-shut for period of time eligibility can be established			
		Reopening the app to protect original date of application			
		Reapply for retro coverage to reduce deductible			
Withdrawals via	mail, ePass, or	voice mail message:			
		One attempt made to contact individual by phone to discuss alternatives			
		Contact successful			
		Contact unsuccessful			
		Attempt to contact has been documented in NCFAST			
		Withdrawal discussion and results have been documented in NCFAST, if contact successful			
	individual prio	r to proceeding with withdrawal, included:			
Discussion with	Individual, prio	Individual who is aged (65 or older), blind, or disabled			
		Individual who has Medicare			
		Individual who has need for Long Term Care services, CAP, SA			
		Individual who has minor children in the home (caretaker/relative)			
		Individual who has unpaid medical bills			
		Individual who is pregnant			
		Individual who has need for 1-, 2-, or 3-months retro			
		Family planning program discussed and coverages reviewed (FPP)			
		Medicaid Expansion coverage explored/discussed (MXP)			
		If individual needs assistance obtaining verifications, County can assist			
		If excess reserve, individual has options to reduce/rebut reserve			
		If excess income, individual can explore deductible			
		All other programs and services discussed and offered including HIPP, Food and Nutrition			
		Services, Work First, WIC, Transportation Services, Lifeline/Link-up, Estate Recovery, Medicaid			
		Managed Care, and Voter Registration			
		Also discussed Federally Facilitated Marketplace (FFM) and individual understands that by			
		withdrawing application they would not be eligible for certain tax credits and subsidies provided by			
		the FFM			
	oto to proceed	with Withdrawal Request:			
		ocumented in NCFAST):			
Detailed Reason i	or withdrawar (d	ocumented in NOFAST).			
Additional explana	tions and respor	nses (documented in NCFAST):			
		Individual understands that by withdrawing their application they still have the ability to reapply at			
		anytime for any reason			
		Application has been withdrawn per individual's request and the DHB-8109 generated and mailed			
		along with NVRA cover letter and voter registration			
Disclaimer: This te necessary for Agen		egistered State form. Please review the template for accuracy and make any required changes, as deemed			
	,	rev. 2/22/2024			

Checklist:

Conducting Inquiries

Date and Time of Inquiry:					
YES	NO	Inquiry Procedures			
cussion at Inq	uiry:				
		Individual's right to apply explained			
		Individual/AR advised they may apply again at any time			
		Individual/AR understands they cannot receive benefits without submitting an application			
A-5094 – Notic	e of Right to A	pply for Benefits:			
		Individual/AR understands right to appeal if they believe they were discouraged from applying			
		Individual/AR signed the DMA-5094			
		Original DMA-5094 given to Individual/AR			
		DMA-5094 uploaded to NCFAST			
A-5095 - Inquir	y Form:				
		DMA-5095 dated			
		DMA-5095 captures individual/AR's name, address, and telephone number			
		All relevant facts captured on the DHB-5095			
		(No old, unpaid, or anticipated medical bills, nor anticipated medical expenses w/in \$300 of potential deductible: Individual/AR declines opportunity to reduce resources, if			
		applicable; Accurate calculation of reported income, resources, and deductible amount) DMA-5095 indicates all programs discussed, the individual evaluated for, or the individual was			
		referred, to include reference to the following			
		(Individual does not meet eligibility requirements for all Medicaid programs and			
		has been referred to the FFM; Individual understands they must be eligible for Medicaid/NCHC			
		get tax credits and cost sharing; Medicare Low Income Subsidy (LIS) program information			
		provided; If individual opts to return and apply for retro benefits only, all other eligibility factors			
		must be met in the retro period; Retro benefit and application time frame were explained)			
		DMA-5095 contains documentation on why the individual decided not to apply			
		Individual/AR signed the DMA-5095			
,		If individual refuses to give a reason for not applying and/or refuses to sign the DMA-5095, the			
		refusal has been documented on the DMA-5095 and appeal rights explained			
í		Original DMA-5095 given to Individual/AR			
		DMA-5095 uploaded to NCFAST			
	I/AR decided n				

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An audit finding is a road map to a fix!



Round 2 Updated Approach

- Audit Actions may include any combination of the below:
 - **Application Approvals** Ο
 - **Recertification Approvals** \bigcirc
 - Application Denials

Ο

- Application Withdrawals Ο
- **Case Terminations/Reductions Compliance Monitoring** \bigcirc Inquiries **Change from Round 1**

Round 2 Updated Approach (Cont'd)

- Sample Month for Audit Actions will be two-months prior to the Review Month
 - Allows the County adequate time to provide the agency Reception Log for inquiries completed in the sample month
 - Allows QA to initiate audit activities on the first workday of the review month and provide audit findings to the County in an expedited timeframe
 - Expedited notification of audit findings allows the County additional time to correct eligibility issues, address erroneous eligibility, and/or overpayment potential, if identified
 - Allows for internal QA checks-and-balances to ensure audit accuracy and consistency across all counties

Medicaid Accuracy Standards

- Eligible applicants are approved 96.8% of the time
- Eligible applicants are not denied, withdrawn or terminated 96.8% of the time
- The eligibility determination process is free of technical errors, that do not change the outcome of the eligibility determination, 90% of the time

Accuracy Rate Approach

- Number of cases cited in error divided by the number of cases reviewed (per accuracy standard)
- Monthly stats provided to allow county to conduct policy training for improvement over the annual audit reporting cycle
- Annual accuracy rate provided at the completion of the REDA audit

Strategic Plan Development

- Enhanced audit workbook and reporting process
- OCPI/QA collaboration with all 100 Counties during REDA Rounds 1 and 2 for an improved, streamlined audit process
- OCPI/QA presentation at the Social Services Institute
 - > August 2019: 'Medicaid Eligibility Monitoring'
 - August 2022: 'Working Beyond Limits to Mitigate Risks for Continuous Improvement'
 - August 2023: 'Stronger Together, We CARE! <u>Collaboration Achieves Risk</u> <u>Elimination</u>'
- Continued Collaborations:
 - County DSS Director's Association
 - Economics Program Committee
 - NC FAST (access, training and document management)
 - Operational Support Team
 - Eligibility Services





County Audit Process

Sample Methodology under Round 2:

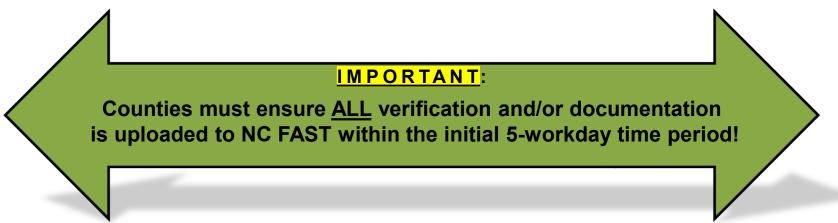
- 1. Continue to pull an NC FAST monthly sample for eligibility accuracy rate computation
- Conduct an audit of randomly selected actions taken
 2-months prior to the review month
- 3. Include County-determined actions for application approvals, recertification approvals, application denials and withdrawals, case terminations/reductions, and inquiries
- 4. UPDATE: The negative sample includes recertification actions that result in termination and reduction in benefit; REDA will include compliance monitoring to measure the County's compliance with Franklin v. Kinsley policy requirements from the Settlement Agreement

Inquiry Sample

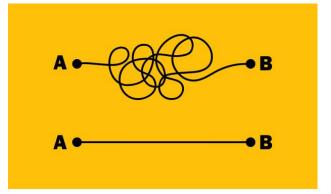
- For Counties using the NC FAST Reception Log, NC FAST will generate the monthly sample → No additional action needed
- For Counties using an internal database for inquiry tracking, the County must provide an exported file of the Reception Log to include all inquiries taken each month
 - QA Staff will reach out to the County to obtain the exported log prior to initiation of audit activities for each Sample Month*
 - OCPI/QA will generate a monthly sample of inquiries using the County's exported log
- For Counties that use a manual Reception Log, the County must provide the manual log to include inquiries taken each month
 - QA Staff will reach out to the County to obtain the manual log prior to initiation of audit activities for each Sample Month*
 - OCPI/QA will generate a monthly sample of inquiries using the County's manual log

*NOTE: To prepare for QA requests for Reception Logs, please have your monthly Reception Logs available by the 10th Calendar Day of the next month

- A list of cases will be provided to the County Liaisons, DSS Director and other identified staff, as directed by the County DSS
- Upon receiving the list of cases, Counties have 5 workdays to upload to NC FAST all verification and/or documentation used in the eligibility determination process
- The 5-workday upload period will be reassessed once Counties are required to maintain the entire Medicaid record within NC FAST



 Please help us help you by ensuring all documentation or verification that supports the County's actions is available for review in NC FAST



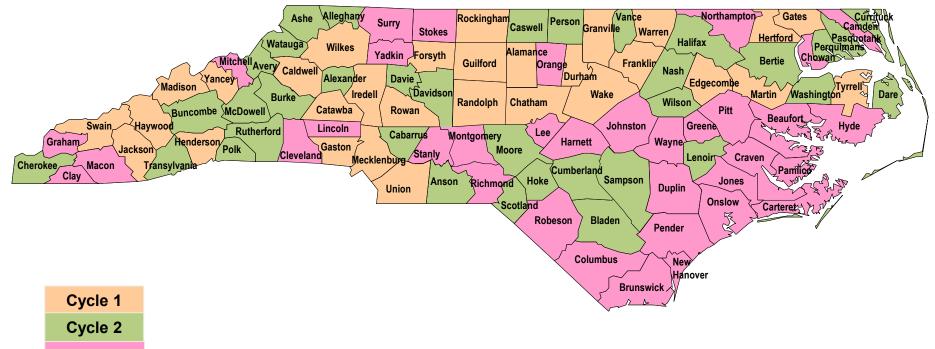
- Counties should utilize the 5-workday upload period to ensure that ALL supporting documentation and verification has been uploaded
- Failure to upload ALL relevant documentation or verification could result in repeated interruptions or unnecessary errors
- Counties who properly utilize the 5-workday upload period will find the audit process less taxing with less interruptions

 The County DSS should not take any <u>corrective action</u>, on cases selected for the audit, until the DHB-7002 is provided with audit findings

Per directive from Centers for Medicare & Medicaid Services (CMS), no corrective actions should be taken on cases selected for testing prior to case review

- Reporting Process for Errors Cited
 - Counties will be given 5 workdays to refute error findings
 - State will make final decision on error findings cited
 - Counties will have 20 calendar days to provide verification of case correction

County Cycle Assignment



Cycle 3

County Cycle Assignment CY 2024

CYCLE 3									
Beaufort	Brunswick	Camden	Carteret	Chowan					
Clay	Cleveland	Columbus	Craven	Duplin					
Graham	Greene	Harnett	Hyde	Johnston					
Jones	Lee	Lincoln	Macon	Mitchell					
Montgomery	New Hanover	Northampton	Onslow	Orange					
Pamlico	Pender	Pitt	Richmond	Robeson					
Stanly	Stokes	Surry	Wayne	Yadkin					



Auditors and Audit Preparation

Auditors



- **OCPI's Quality Assurance Analysts (QAA)**
- Auditors consisting of temporary staff who are retired and former employees of the State of NC and County DSS
- Audit activities will be conducted via review of documentation and verification within NC FAST
- Actions will be audited to ensure compliance with Medicaid policy in effect at the action date under review including Continuous Coverage Unwinding (CCU), Medicaid Expansion, or other special provisions

Auditors and Audit Preparation – Cont'd Audit Tools

- Reporting documents provided to the County
 - DHB-7002 (Case Findings Report)
 - DHB-7001 (County Error Response)
 - **o DHB-7005 (Case Correction Verification)**



Case Findings Correct Case

- DHB-7002 Case Findings Report
 - Auditor sends DHB-7002 to County DSS, OCPI/QA Staff, and OST
 - $\circ~$ No further action required on the case



Case Findings Error Case

 DHB-7002 Case Findings Report, DHB-7001 County Error Response, & DHB-7005 Case Correction Verification



- Auditor sends DHB-7002, DHB-7001 & DHB-7005 to County DSS, OCPI/QA Staff, and OST
- County DSS has 5 workdays to respond to the auditor with a concurrence or rebuttal using the DHB-7001
- <u>Note</u>: A statement has been added to the reporting documents advising Counties to reach out to your OST Representative should you need guidance or direction on how to properly correct errors cited

Case Findings Reporting Documents Reminders

- Reporting documents will be provided, through secure/ encrypted email, to County Staff as designated by the County DSS
 - The County should ensure all reporting documents are maintained for future reference
 - Once the DHB-7002 Case Findings Report has been provided by the auditor, the County should <u>immediately</u> initiate corrections for cases cited in error
 - The County should ensure case corrections are complete, adequate, and timely

Corrections Process

- The County DSS should not take corrective action, on cases selected for the audit, until the DHB-7002 is provided with audit findings. Per CMS directive, no <u>corrective actions</u> should be taken on cases selected for testing <u>prior</u> to case review
- Upon notification of audit findings on the DHB-7002, the County should immediately initiate case corrections for error(s) cited
 - If a County is unsure of appropriate corrective actions, it is imperative that the County reach out to their OST Representative for guidance BEFORE initiating corrections and submitting the DHB-7005 Correction Verification form to QA
 - Improper corrective actions could get pulled into an audit and could result in additional audit errors and County-responsible overpayments as well
- If a case is cited with multiple errors and the County submits a rebuttal request for one error, the County should immediately initiate case corrections for any other error(s) cited on the case

Corrections Process – Cont'd

- Counties are allowed no more than 20 calendar days, from the date of the initial DHB-7002 Case Findings Report, to submit the DHB-7005 Case Correction Verification to the QA auditor
 - If corrections cannot be completed within the 20 calendar days, the County must document the corrective action they have initiated, along with the anticipated completion date, and submit the DHB-7005 to the QA auditor <u>on or before</u> the 20-calendar day deadline
 - Do not delay submission of the DHB-7005 as corrections will be reviewed and feedback provided if corrections do not appear adequate, per policy
 - Delays can also result in continued erroneous benefits and/or additional County-responsible overpayments
- Improper corrective actions, or delays in completing adequate and timely case corrections, not only potentially impact Countyresponsible overpayments but may impact the potential for error adjustments on the back-end of the audit

Reporting Process

- Auditor will provide a monthly Summary of the County's accuracy rates
- Auditor will provide a monthly Summary of the County's compliance with Franklin v. Kinsley policy requirements
- Auditor will conduct a monthly consultation call to discuss the County's performance
 - Counties may opt to attend consultation calls on a quarterly basis; Monthly consultations are recommended
 - Counties are encouraged to actively participate in monthly consultation meetings as well as analyze audit finding data provided by their QA Auditor
 - Counties are also encouraged to take immediate action to implement internal control activities, continue to use internal controls developed during a previous AIP process (if applicable), reassess current improvement initiatives, and make any adjustments to their Internal Control Processes to mitigate risk, reduce improper eligibility determination actions, and safeguard assets
 - <u>IMPORTANT</u>: QA will monitor and track the County's improvement efforts and results during the 10-month audit to determine the impact to future AIP requirements

Reporting Process – Cont'd

- At the completion of each quarter, the County will be provided their updated quarterly accuracy rates
 - Updated quarterly accuracy rates will include potential error finding adjustments based on the County's corrective actions and the impact to the original eligibility decision
 - Therefore, it is crucial that Counties immediately react to error(s) cited and take timely, adequate corrective actions
 - Reminder: Please reach out to your OST Representative should you need guidance/policy clarification BEFORE initiating case corrections
- At the completion of the 10-month audit process, the county will be provided their annual accuracy rates
- The Department will submit an annual report to the Joint Legislative Oversight Committee detailing the county's performance

Recoupment Methodology (CCU) County Overpayment Calculation

The state will conduct a review of state expenditures paid for the month of initial determined eligibility through the month of audit review

Recoupment Methodology (Non-CCU) County Overpayment Calculation

The state will conduct a review of state expenditures paid for the month of initial determined eligibility through the month of case correction/termination to calculate the overpayment



Joint Accuracy Improvement Plan (AIP)

- If a County DSS does not meet the accuracy standards, an AIP will be implemented
- Key Stakeholders for developing the AIP
 - County DSS (Director and Identified Staff)
 - NC Medicaid Office of Compliance & Program Integrity
 - NC Medicaid Operational Support Team
 - NC Medicaid Eligibility Services



Responsibilities & Review Process Quality Assurance Team

- Conduct Medicaid eligibility determination reviews, in accordance with SL 2017-57 guidelines
- Communicate with the County DSS liaisons identified by the county
- Provide monthly audit findings to the County DSS
- Share all audit communications with County DSS, OCPI/QA Staff & OST within required timeframes

Responsibilities & Review Process Quality Assurance Team – Cont'd

- Review County rebuttal requests
- Report findings to OST/ES
- Joint State/Local Agency Accuracy Improvement Plan (QA, OST, ES, and County DSS)
- Conduct a monthly review of auditor's accuracy and adherence to audit processes

Responsibilities & Review Process County DSS

- Identify two county liaisons for audit questions and resolutions
- Ensure all case documentation and verification is available in NC FAST (within the initial 5-workday time period)
- Make case corrections, for cases cited in error, within 20 calendar days <u>or less</u>
- Take proactive measures to improve annual accuracy rate
 - Conduct a Root Cause Analysis to identify the cause of the error
 - **o** Immediately initiate training
 - Implement internal control activities to mitigate errors



COMING SOON

- June 2024 Cycle 3, Round 2 Commences
- Today's Webinar, "<u>Recipient Eligibility</u> <u>Determination Audit (REDA) – Round 2, Cycle</u> <u>3 (April 2024)</u>," will be posted to the NC Medicaid Division of Health Benefits website

Resources for Reference

Session Law 2017-57, Section 11H.22.(e)

SL 2017-57, Section 11H.22.(e) - Report on Support Improvement in the Accuracy of Medicaid Eligibility Determinations Audit of County Medicaid Determinations

Dear County Director Letter (DCDL), March 31, 2022, Audit of County Medicaid Eligibility Determinations https://medicaid.ncdhhs.gov/media/11251/download?attachment

Cycle 3, Round 2 – REDA Webinar and FAQs

https://medicaid.ncdhhs.gov/counties/nc-medicaid-eligibility-training

Alex Sunset Provision: Subchapter 23C – Application for Medicaid Benefits, Section .0100 – Application Process

Future Questions

Do Not Hesitate to Reach Out

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