

NUMBER

#21-21-03

DATE

April 26, 2021

OF INTEREST TO

County Directors

Social Services Supervisors and
Staff

Financial Assistance Supervisors
and Workers

Mille Lacs Tribal TANF

Tribal Chairpersons and Tribal
Health Directors

Health Care Eligibility
Operations (HCEO) Managers,
Supervisors, and Staff

ACTION/DUE DATE

Implement effective
upon issuance

EXPIRATION DATE

April 26, 2023

DHS Explains Treatment of PUA and PEUC for Minnesota Health Care Programs

TOPIC

How to treat Pandemic Unemployment Assistance (PUA) and Pandemic Emergency Unemployment Compensation (PEUC) for Minnesota Health Care Programs (MHCP).

PURPOSE

This bulletin provides information about how to treat PUA and PEUC when determining eligibility for MHCP.

CONTACT

Counties, tribal agencies, and HCEO should submit policy questions via HealthQuest.

All others should direct questions to the following:

Health Care Eligibility and Access (HCEA) Division
PO Box 64989
540 Cedar Street St. Paul, MN 55164-0989

SIGNED

MATT ANDERSON
Assistant Commissioner/State Medicaid Director
Health Care Administration

TERMINOLOGY NOTICE

The terminology used to describe people we serve has changed over time. The Minnesota Department of Human Services (DHS) supports the use of "People First" language.

I. Background

In March 2020, Congress established Pandemic Unemployment Assistance (PUA) and Pandemic Emergency Unemployment Compensation (PEUC) through the Federal Coronavirus Aid, Relief, and Economic Security (CARES) Act. These payments were later extended through the Consolidated Appropriations Act, 2021 (CAA) and extended again through the American Rescue Plan Act (ARPA) of 2021.

This bulletin describes how PUA and PEUC are treated for Medical Assistance (MA) and MinnesotaCare applicants and enrollees. The policies in this bulletin apply to all MinnesotaCare populations and the following Medical Assistance populations and subprograms:

- Medical Assistance for Families with Children and Adults (MA-FCA)
- Medical Assistance for People Age 65 and Older, Blind or Disabled (MA-ABD)
- Medical Assistance for Employed Persons with Disabilities (MA-EPD)
- Medical Assistance under the TEFRA Option
- Medical Assistance Northstar Care for Children
- Medical Assistance for the Treatment of Breast and Cervical Cancer (MA-BC)
- Medical Assistance for People Receiving Services at the Center for Victims of Torture (MA-CVT)
- Medicare Savings Programs (MSP): Qualified Medicare Beneficiaries (QMB), Service Limited Medicare Beneficiaries (SLMB), Qualified Individuals (QI) and Qualified Working Disabled (QWD)
- Emergency Medical Assistance (EMA)
- Minnesota Family Planning Program (MFPP)

II. Pandemic Unemployment Assistance (PUA)

PUA provides weekly benefit payments to people not otherwise eligible for regular unemployment compensation. PUA was initially implemented in Minnesota beginning in April 2020. It now provides up to 79 weeks of compensation available through September 6, 2021.

As a result of a recent Minnesota Court of Appeals decision, high school students are now eligible to receive PUA. Accordingly, the Minnesota Department of Employment and Economic Development (DEED) is paying PUA to qualifying high school students.

On January 7, 2021, Governor Walz issued Executive Order 21-03. The order excludes PUA payments made to high school students when determining eligibility for Minnesota Health Care Programs (MHCP), subject to federal approval. States cannot be granted federal approval to make changes to the modified adjusted gross income (MAGI) methodology, so PUA is counted as income for MA-FCA applicants and enrollees, including high school students. DHS has requested federal approval from the Centers for Medicare & Medicaid Services (CMS) to exclude PUA payments when determining MA eligibility for high school students who do not use the modified adjusted gross income (MAGI) methodology. Federal approval of this income exclusion is pending with CMS.

For MA-FCA, count PUA as income for all applicants and enrollees, including high school students.

For MA-ABD and MA-FCA with a spenddown, count PUA as income for applicants and enrollees who are not high school students. Send in a Health Quest if you are determining eligibility for MA-ABD or MA-FCA with a spenddown for a high school student receiving PUA.

For people with an asset test, treat PUA as an asset if retained after the month of receipt.

For MinnesotaCare, count PUA toward projected annual income for all applicants and enrollees.

III. Pandemic Emergency Unemployment Compensation (PEUC)

PEUC is additional weeks of unemployment compensation for people who have exhausted their regular benefit. PEUC was initially implemented in Minnesota beginning in April 2020. It now provides up to 53 extra weeks of unemployment compensation available through September 6, 2021.

For MA, count PEUC as income for all applicants and enrollees. For those with an asset test, treat PEUC as an asset if retained after the month of receipt.

For MinnesotaCare, count PEUC toward projected annual income for all applicants and enrollees.

IV. Action Required

County, tribal and DHS workers must follow the policies outlined in this bulletin and instructions issued in advance of, and following, the publication of this bulletin.

In keeping with Emergency Executive Order 20-12, DHS is maintaining coverage for MA and MinnesotaCare enrollees for the duration of the COVID-19 public health emergency. Therefore, for individuals who were enrolled in MA or MinnesotaCare on or after March 18, 2020, do not take negative action on a case unless the enrollee can be closed for a reason permitted under the temporary COVID-19 emergency policies. See bulletins [#20-21-02](#), [#20-21-10](#) and [#20-21-13](#) for more information.

Americans with Disabilities Act (ADA) Advisory

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