The End of the COVID-19 Public Health Emergency: Table of Contents



No Cost Access to COVID-19 Tests, Vaccines, Treatments

- March 22, 2022: Federal funding to cover testing and treatment for uninsured individuals ran out
- April 5, 2022: Federal funding to cover provider fees for vaccinations for uninsured individuals ran out
- January 2023 (anticipated): Federal funding to purchase and distribute vaccines will run out and these activities will transition to the commercial market
- End of the PHE: Many requirements protecting coverage of and access to COVID-19 tests, vaccines, and treatments are tied to the PHE and will either end right away or one year after, depending on people's coverage type

Flexibilities Addressing the Provider Workforce

- Now: Many provider licensure and scope-of-practice flexibilities vary by state, and flexibilities in some states have expired
- **152 days after the PHE ends**: Some provider flexibilities on virtual care expire (some flexibilities for Medicare were extended an additional 151 days after the PHE is declared over)
- October 21, 2024: Liability protections for the <u>expanded pool of health care workers</u> that can administer vaccinations expires

Flexibilities for Virtual Care

- Now: Many virtual care flexibilities vary by state, and flexibilities in some states have expired
- End of the PHE: The Telehealth Notification, which provides enforcement discretion regarding HIPAA Rules in using technologies, expires
- 152 days after the PHE ends: Some virtual care flexibilities for Medicare expire (these were extended an additional 151 days after the PHE is declared over)
- End of calendar year that PHE ends: Medicare physician supervision requirements (which were modified to include "virtual presence" of a supervising clinician) return to pre-PHE rules

Flexibilities Addressing Social Determinants of Health

- End of PHE: The Center for Medicare & Medicaid Services' relaxed enforcement of its prohibition of mid-year benefit enhancements for Medicare Advantage organizations ends
- December 31, 2024: State fiscal recovery funds must be obligated
- December 31, 2026: State fiscal recovery funds must be spent

Medicaid Continuity of Coverage Requirements

- 12 months from the end of the PHE: States must have initiated all Medicaid renewals and other outstanding eligibility actions
- 14 months from the end of the PHE: States must have completed pending actions initiated during the unwinding period

American Rescue Plan Act (ARPA) State Funding

- December 31, 2024: State fiscal recovery funds must be obligated
- December 31, 2026: State fiscal recovery funds must be spent

Broadband Investments

- December 31, 2024: State fiscal recovery funds must be obligated
- December 31, 2026: State fiscal recovery funds must be spent

ARPA Enhanced Subsidies

• December 31, 2025: The Inflation Reduction Act <u>extended</u> the enhanced premium subsidies created by ARPA (which would otherwise have ended December 31, 2022)

Postpartum Medicaid Extension Option

• March 31, 2027: Statutory authority for the extended postpartum coverage option expires