

-Revised 02/10/14-

DATE: December 16, 2013

OPERATIONS MEMORANDUM 13-12-02

SUBJECT: Inbound Federally-Facilitated Marketplace (FFM) Account Transfers

TO: Executive Directors

FROM: Tom Strickler
Director
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PURPOSE

To inform County Assistance Offices (CAOs) of the inbound FFM account transfer procedure that is effective statewide on December 16, 2013.

BACKGROUND

The ACA makes several major changes to the Medical Assistance (MA) application process by requiring a single, streamlined application for all insurance affordability programs, which include MA, Children's Health Insurance Program (CHIP), Advance Premium Tax Credits and Cost-Sharing Reductions. In accordance with the federal requirements, individuals may submit MA applications through the FFM, Commonwealth of Pennsylvania Access to Social Services, CAOs, or by phone. Effective December 16, 2013, CAOs will receive account transfers for individuals who applied to the FFM and were determined or assessed eligible for MA. This document discusses the procedures CAOs must follow when electronic accounts are transferred from the FFM.

DISCUSSION

CAOs **must** process every FFM account transfer (initiated, updated and rejected) as an application because the FFM requires a decision response for each FFM account transfer. When multiple FFM account transfers for the same household are received, CAOs must process each account transfer separately in the order they were received. CAOs must process an FFM account transfer, even if it is received for an individual who is already open for MA. Caseworkers and clerical staff will not be able to reject FFM account transfers up front in Application Processing (AP) or Case Processing (CP) modes.

CAOs must determine eligibility for MA for individuals who are assessed as potentially eligible for CHIP. If the individual is not eligible for MA, a referral must be made to CHIP, in accordance with the procedures outlined in [OPS080911](#).

FFM Account Transfer Application

FFM account transfers will appear as a separate work item in the Activity Assignment Details section of the Workload Dashboard. They will have a form number that will begin with an “F”. Application information will be displayed in the Applicant Information section on the first page of the FFM Account Transfer Document.

Refer to [Attachment 1](#) for an example of the Applicant Information Section of the FFM Account Transfer and [Attachment 2](#) for possible values in the Fields for the Applicant Information Section.

The FFM will send information in the account transfer that is labeled either “Verification Affirmed” or “Verification Inconsistent.”

- “Verification Affirmed” means that all information in the account has been verified by the FFM.
- “Verification Inconsistent” means that the client’s Social Security number, citizenship or Verified Lawful Presence status has not been confirmed.

FFM account transfers will not have all the fields required to process an application in eCIS. For mandatory fields not included in FFM account transfers, CAOs must use the default values indicated below:

eCIS Screen	Mandatory Field	Default Value
Household	Housing Assistance	3 – No Housing Assistance
Demographics	Highest Grade Completed	Unknown or base it upon age if under 18; if over 18, enter 12
School Attendance	School Name	Public
	School Type	Base it upon age: 6-12 – elementary; 13-15 – middle/junior high; 16-18 – high school
	School Attendance	Full time
Veteran	Veteran Service Code	A (Army)
	Service Begin Date	18 th birthday
	Veteran Benefit Type	03
	Veteran Benefit Status	N
	Veteran Benefit Verification	N

Alien/Refugee	Alien/Refugee US Entry Date	Use data from Systematic Alien Verification for Entitlements (SAVE)
	Country of Origin	Use data from SAVE

The CAO responsibilities for processing FFM account transfers differ depending on the model Pennsylvania uses to interact with the FFM. Currently, Pennsylvania uses the FFM determination model in which the FFM determines eligibility for MAGI MA for applications submitted to the FFM. Pennsylvania intends to change from the FFM determination model to the FFM assessment model in which the FFM assesses individuals who apply to the FFM as potentially eligible for MAGI MA and transfers their information to Pennsylvania for final determination.

At this time, the date Pennsylvania will change from the FFM determination to the FFM assessment model has not been determined. Additional information about the date Pennsylvania changes from the determination model to the assessment model will be posted in the near future.

The Determination Model

During the determination model, the FFM will transfer electronic accounts to CAOs when:

- An individual is determined eligible for Modified Adjusted Gross Income (MAGI) MA.
- An individual is assessed as potentially eligible for Non-MAGI MA.
- An individual is assessed as potentially eligible for CHIP as a part of a mixed case. If the FFM application contains only CHIP referrals, it will be sent directly to CHIP for processing.
- An individual is requesting that full assessment of eligibility for MA or CHIP be conducted by the state. The FFM will transfer these electronic accounts as Non-MAGI MA assessments.
- An individual is assessed as potentially eligible for Emergency MA benefits.
- An individual is assessed as potentially eligible for Refugee MA benefits.
- An individual reports changes to the FFM. In this situation, a new FFM account transfer, which must be treated as a new FFM application, will be sent to CAOs.

FFM Account Transfers and MA Eligibility Begin Date

For applications submitted through the FFM during the determination model, MA eligibility begins as follows:

- Determinations with the FFM application date before up to and including December 31, 2013 – MAGI MA eligibility begins on January 1, 2014.
- Determinations with the FFM application date of on and after January 1, 2014 and after – MAGI MA eligibility begins on the date the application was submitted to the FFM.
- Assessments with the FFM application date before and including December 31, 2013 – Non-MAGI MA eligibility begins on January 1, 2014, if the CAO determines an individual eligible.
- Assessments with the FFM application date of January 1, 2014 and after – Non-MAGI MA eligibility begins on the date the application was submitted to the FFM, if the CAO determines an individual eligible.
- ~~Assessments as a part of mass transfer~~ – Non-MAGI MA eligibility begins on the date of mass transfer, if the CAO determines an individual eligible.
- ~~Assessments after the mass transfer~~ – Non-MAGI MA eligibility begins on the date of the transfer from the FFM, if the CAO determines an individual eligible.
- Mixture of assessments and determinations with the FFM application date before up to and including December 31, 2013 – MAGI and Non-MAGI MA eligibility begins on January 1, 2014, if the CAO determines an individual eligible for Non-MAGI MA.
- Mixture of assessments and determinations with the FFM application date of on and after January 1, 2014 and after – MAGI and Non-MAGI MA eligibility begins on the date the application was submitted to the FFM, but no earlier than January 1, 2014, if the CAO determines an individual eligible for Non-MAGI MA.
- If the individual has unpaid medical expenses in the retroactive period, the CAO must determine retroactive MA eligibility for the individual.

When the FFM assesses an individual as potentially eligible for non-MAGI MA, the CAO must make a determination of eligibility within 30 calendar days of the date the application is transferred to Pennsylvania by the FFM.

Processing FFM Account Transfers in eCIS

When caseworkers process account transfers in which the FFM has determined an individual eligible for MAGI MA, they must choose an appropriate MAGI MA category from the Special Category dropdown box for each individual on the Program Request Questions screen, based on the information on the FFM account transfer. The system will determine the appropriate target type automatically.

Note: A Special Category on the Program Request Questions screen is required only when the FFM has made the eligibility determination for MAGI MA.

Refer to [Attachment 3](#) for information on how to select MAGI budgets and [Attachment 4](#) for FFM Account Transfer Scenarios.

When the FFM determines eligibility for MAGI MA and the CAO opens MAGI MA based on the FFM determination, the individual will receive a stand-alone notice with the reason code 966F that will include specific language for FFM determinations and will exclude income calculations and appeal language.

FFM Account Transfers with Individuals Known to eCIS

Caseworkers must process FFM account transfers with individuals who are new to eCIS in Case Open mode. If FFM account transfers contain individuals who are currently receiving benefits, including those receiving MA, caseworkers must process them in Program Add mode.

If an FFM determination is received for an individual who is already open for other benefits and there is a discrepancy between the FFM information and information stored in eCIS, caseworkers must:

- Enter the case in Maintenance mode.
- Adjust the information in eCIS based on the information received in the FFM determination and enter the verification code “P – Verification pending” for inconsistent information.
- Generate a PA 253, giving the client 10 calendar days to return pending items, and exit the case.

- When the information requested on the PA 253 is returned, go to Maintenance mode and adjust the information in eCIS based on the verification received from the individual. Change the verification code to “D – Document in record” or “E – Electronic Document.” Keep the MA application pending.
- If the information requested on the PA 253 is not returned within 10 calendar days, go to Maintenance mode and answer “Yes” to the question “Is pending verification already requested for this application?” on the Pending Verifications Items screen. Close existing budgets with the reason code 042 for failure to provide verification, keeping the MA application pending.
- Process MAGI MA in Program Add mode using a special category to open ongoing MA.

Note: The CAO must treat Non-MAGI assessments as regular applications and follow existing procedures.

If an FFM determination is received for an individual who has a pending application at the CAO, the CAO must follow the procedure below:

- Clerical staff will print the FFM application, but will not import it.
- A caseworker will compare the information on the FFM account transfer with the pending CAO application.
- If the information is the same or comparable, the caseworker will send a PA 253 if it has not already been sent.
- If the information is not comparable, the caseworker will ask for an explanation of the discrepancy on the PA 253. If the PA 253 already has been sent, the caseworker will contact the individual for an explanation of the discrepancy.
- When the verification requested on the PA 253 is returned, the caseworker will process pending Cash/Supplemental Nutrition Assistance Program (SNAP)/Low-Income Home Energy Assistance Program (LIHEAP) applications to dispose of the application number.
- If the verification requested on the PA 253 is not returned, the caseworker will reject pending Cash/SNAP/LIHEAP applications to dispose of the application number.

- Clerical will import the FFM application; the caseworker will process MA to dispose of the application number and send a response to the FFM.

The Assessment Model

During the assessment model, the FFM will perform MA eligibility assessments for all applications submitted to the FFM and will transmit electronic accounts of individuals who appear to be eligible for MA to the CAOs. A Special Category on the Program Request Questions screen will not be used for MA applications received by the FFM during the assessment model period.

For applications submitted to the FFM during the assessment model, CAOs must use the date the application was submitted to the FFM as the MA eligibility begin date.

When the FFM transmits the electronic account, CAOs must:

- Review the electronic account and, if no additional information is required, promptly determine eligibility. CAOs must not request duplicative information or documentation.
- For FFM account transfers with the Overall Verification Status “Verification Affirmed”, accept information from the FFM as verified upon receipt for MA applications.
- If additional information is needed, CAOs are to complete the eligibility review and request verification in accordance with [OPS130904](#).
- Process the application within 30 calendar days of the date the application was submitted to the FFM.

NEXT STEPS

1. Share and review this information with appropriate staff members.
2. Please contact your area manager if you have questions regarding this Operations Memorandum.
3. This Operations Memorandum will become obsolete upon release of revised Handbook changes.

Attachments