



DATE: November 20, 2014

OPERATIONS MEMORANDUM #14-11-05

SUBJECT: Changes to Presumptive Eligibility for Pregnant Women and the MA332

TO: Executive Directors

FROM: Tom Strickler
Director
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PURPOSE

To inform the County Assistance Offices (CAOs) of changes in policy to Presumptive Eligibility (PE) for Pregnant Women and the use of the MA332.

BACKGROUND

Qualified Medical Assistance (MA) providers of pregnancy services have provided PE to pregnant women in Pennsylvania since 1988. These providers include doctor's offices, outpatient clinics, birth centers, nurse midwives, federally qualified health centers and hospitals. PE providers for pregnant women use the MA332 PE application and the Application for Health Care Coverage (PA600HC). Currently, PE providers are required to submit an MA application with the MA332 PE application. Due to recent guidance from the Centers for Medicare and Medicaid Services (CMS), there are changes to the PE policy and procedure for pregnant women.

DISCUSSION

Effective immediately, qualified PE providers of pregnancy services are no longer required to submit a PA600HC when submitting an MA332 PE application. PE providers for pregnant women should encourage and assist a PE applicant in applying for ongoing MA. However, a PE applicant may choose whether to apply for ongoing MA or not. The provider must advise the PE applicant that she will only receive the PE period of eligibility if she does not submit a PA600HC and complete the ongoing MA application process.

If a pregnant woman initially applies for PE only, and later applies for ongoing MA during the PE period, the PE period must not end before the ongoing MA determination is made. The PE period must be extended to allow for the ongoing MA determination to be made.

As a result of these policy changes, the MA332 ([see Attachment](#)) has been revised to capture all the information that is required to process and authorize a PE period. The MA332 now includes:

1. Applicant's demographic information.
2. Household composition.
3. Income source, type and frequency for applicant and household members.
4. Tax filing status.
5. Income source, type and frequency.
6. Tax deduction information.
7. A MAGI income computation table.

PE providers of pregnancy services use the MA332 to determine PE for pregnant women. The PE provider informs the pregnant woman of her eligibility and gives her a copy of the MA332. The PE provider must submit two copies of the MA332 to the local CAO within five business days of making the PE determination.

A PE applicant cannot appeal the eligibility decision made by a qualified PE provider of pregnancy services.

CAO PROCEDURES

PE eligibility is determined by the qualified MA PE provider. The CAO must process and approve PE within five working days after receiving the MA332. Electronic verification and case data will not be used when processing a PE period; only the information provided by the PE provider is used. If the PE provider determined a pregnant woman eligible for PE, the PE period must be authorized unless the PE applicant received a prior PE period within the same pregnancy.

The CAO must review the case to see if the PE applicant had a prior PE period during the same pregnancy. If the PE applicant previously received a PE period within the same pregnancy, the CAO should reject the PE application using reason code 981/E.

If the CAO receives the MA332 **without** a PA600HC:

1. Process a PE period for the applicant. The PE begin date is the date the provider determined PE, which is the date the MA332 was signed.
2. Enter “Yes” on the Pregnancy Screen, where it asks the Presumptive Eligibility question.
3. Authorize PE and issue a notice of eligibility to the PE applicant and the provider. Thoroughly narrate actions in Case Comments, including the dates of the PE period.

If the CAO receives the MA332 **with** a PA600HC:

1. Process a PE period for the applicant. The PE begin date is the date the provider determined PE, which is the date the MA332 was signed
2. Enter the PE Begin date on the Program Request screen. The system will enter a future close date. Pend ongoing MA.
3. Enter “Yes” on the Pregnancy Screen, where it asks the Presumptive Eligibility question.
4. Authorize PE and issue a notice of eligibility to the PE applicant and the provider.
5. Process ongoing MA beginning the date the PA600HC was received. Obtain the necessary verification through the existing case record or through electronic data sources. If verification cannot be obtained, send a PA253 with a due date. If the verification is not received, reject ongoing MA with a 042 reason notice code.

NOTE: The MA application must be reviewed for retroactive MA if the individual has unpaid medical expenses during the retroactive period.

6. Issue a notice of eligibility for ongoing MA to the individual. Thoroughly narrate actions in Case Comments, including the dates of the PE period.

IMPORTANT: The PE recipient may apply for ongoing MA at any time during the PE period. If the PE period expires prior to the determination of ongoing MA, extend the PE period by authorizing a second PE period beginning the day following the end date of the first PE period. The first PE period must be in

closed status in order to authorize a second PE period and pend ongoing MA. The CAO must process the ongoing MA application timely.

PE for Pregnant Women Examples:

Example 1: Mary applies for PE on 10/1 through her nurse midwife, who is a PE for pregnant women provider. She chooses not to apply for ongoing MA at the time of the PE application. The PE provider submits the MA332. The CAO authorizes a PE period from 10/1 to 11/30. On 11/28, Mary submits a completed PA600HC to the CAO. The CAO extends the PE period by authorizing another PE period beginning 12/1, if ongoing MA has not yet been determined. Mary provides all required verification to the CAO on 12/14. The caseworker determines ongoing MA eligibility effective 11/28 (the date the MA application was received) and the PE period closes.

Example 2: Jane applies for PE and MA on 4/15 through a federally-qualified health center that provides PE. The PE provider submits an MA332 and PA600HC to the CAO on 4/15. The CAO authorizes PE effective 4/15 to 5/31. The caseworker sends a PA253 requesting verification to Jane. Jane provides verification on 5/14. On 5/14, the caseworker determines ongoing MA eligibility effective 4/15 and the PE period closes.

Example 3: Lisa applies for PE on 6/1 through her local hospital, a PE provider for pregnant women. She does not wish to apply for ongoing MA but agrees to apply for PE. Her baby is due 12/15. The PE provider submits an MA332 to the CAO. The CAO authorizes a PE period beginning 6/1 and ending on 7/31. On 10/1, Lisa visits a birth center, and agrees to apply for PE and MA. On 10/2, the CAO receives an MA332 with a PA600HC and verifications submitted by the birth center for Lisa. The CAO reviews the case and rejects the PE application because Lisa already received a prior PE period within the same pregnancy. The CAO sends a notice of ineligibility to Lisa and the birth center. The CAO reviews the PA600HC and sends a PA253 requesting verification for ongoing MA. On 10/28, the CAO receives the required verifications and authorizes ongoing MA effective 10/2 for Lisa.

Example 4: On 3/1, Sue applies for PE through an outpatient OB clinic that provides PE for pregnant women. She does not wish to apply for ongoing MA. The PE provider submits the MA332 to the CAO on 3/1. The CAO authorizes a PE period beginning 3/1 and ending 4/30. On 7/15, Sue goes to a hospital that provides PE for pregnant women. The hospital submits an MA332 for Sue. Again Sue refuses to apply for MA. The CAO reviews the case and rejects the PE application because of the prior PE period, and sends a notice to Sue and the hospital.

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 becomes obsolete upon release of the revised Handbook.

[Attachment](#)