



DATE: July 30, 2015

OPERATIONS MEMORANDUM 15-07-02

SUBJECT: Implementation of the Family Planning Services (FPS) program under HealthChoices Expansion (HCE)

TO: Executive Directors

FROM: Inez Titus
Director
Bureau of Operations

PURPOSE

To inform County Assistance Offices (CAOs) of the implementation of and the application process for the FPS program, as well as the transition process for recipients of the SelectPlan for Women (SelectPlan) Waiver program six-month extension from January 1, 2015 through June 30, 2015.

BACKGROUND

On December 31, 2014 the Commonwealth of Pennsylvania's 1115 waiver for the SelectPlan program expired. At that time, the Centers for Medicare and Medicaid Services (CMS) granted a six-month extension until June 30, 2015. With CMS approval, the Commonwealth issued a special six-month extension to any woman who was a SelectPlan recipient on November 27, 2014 and was not receiving full Medical Assistance (MA). The Commonwealth is submitting a State Plan Amendment (SPA) to implement the FPS program effective July 1, 2015. The program will be implemented in two phases, one in June 2015 and the second in September 2015.

DISCUSSION

This document describes the following major provisions of the FPS program:

- Transition from SelectPlan to FPS for existing recipients.
- Eligibility Criteria.
- Processing of applications received in June 2015.
- Processing of applications received on or after July 1, 2015.
- Transition from PSF 10 to PSF 15 and PSF 14.
- Processing applications after September 25, 2015.

Transition from SelectPlan to FPS for Existing Recipients

All individuals who previously received the SelectPlan extension from January 1, 2015 through June 30, 2015, and were not receiving MA on June 27, 2015, were given a four-month automatic extension in the FPS program from July 1, 2015 through October 31, 2015. A letter was sent to these recipients during the week of June 3, 2015, explaining that they are receiving the four-month extension (See Attachment 1).

Eligibility Criteria

The FPS program follows similar rules to SelectPlan with certain exceptions:

- Available to women and men.
- No age criteria.
- Income limit of 215% of the Federal Poverty Limit (FPL). See MA Eligibility Handbook section 312, Appendix D for income limits.
- Available to individuals who are sterilized.

The remaining rules from SelectPlan still apply to the FPS program:

- Recipients cannot be pregnant.
- Except where noted below, Modified Adjusted Gross Income (MAGI) household rules are used.
- Except where noted below, MAGI income and resource rules are used.

Also, if an FPS applicant is already open for MA, the application will be denied with Reason Code 037 – Option 1 since MA covers FPS.

If an applicant is under age 21, he or she may choose on the application whether they are interested in being reviewed for full MA and FPS, or FPS only. If the applicant wishes to be reviewed for full MA, he or she must provide verification of all MAGI household income. If the parental income cannot be provided or the applicant chooses not to provide it, the applicant can be reviewed for FPS only and only the applicant's income is counted. If the applicant provides verification of parental income, it will be used in reviewing both full MA and FPS eligibility, unless the applicant requested to be reviewed for FPS only.

If an applicant is age 21 or older, all household income will be counted unless claiming "good cause".

As part of the application process for the FPS program, an applicant can claim “good cause” if the applicant feels that he or she cannot otherwise safely receive services or safely provide verification. The reasons that an individual could claim “good cause” are:

- Domestic violence.
- Individual is still on his or her parents’ or spouse’s insurance and feels that receiving services through that insurance would potentially result in physical, mental or emotional harm to the individual.

If an applicant claims “good cause”, he or she is not required to provide the income of their parent(s) or spouse for their FPS eligibility determination. The applicant must provide verification of his or her own income, if it is unavailable through electronic data sources. If an applicant claims “good cause”, the application is not reviewed for full MA coverage because the MAGI household income is not verified or being used.

Processing FPS program applications received in June 2015

The FPS program began on July 1, 2015. Applications for the program could be submitted beginning on June 1, 2015. If an application for FPS was received in June 2015, the CAO reviewed for full MA and then pended SelectPlan for Women on the Program Request screen. To process this application, the CAO will first review the application and determine if the individual meets SelectPlan criteria in June. SelectPlan criteria are:

- Woman.
- Age 18 through 44.
- Not pregnant or sterilized.
- MAGI Household income less than or equal to 214% FPL (see chart below).

214% FPL			
Persons	Monthly	Annual	5% Disregard based on 100% FPL
1	\$2,099.00	\$25,188.00	\$49.05
2	\$2,841.00	\$34,091.00	\$66.40
3	\$3,583.00	\$42,993.00	\$83.75
4	\$4,325.00	\$51,895.00	\$101.50
5	\$5,067.00	\$60,798.00	\$118.40
6	\$5,809.00	\$69,700.00	\$135.75
7	\$6,551.00	\$78,603.00	\$153.05
8	\$7,293.00	\$87,505.00	\$170.40
Each Additional Person	\$742.00	\$8,903.00	\$17.35

If the individual meets these criteria, the CAO will:

1. Enter Case Processing (CP) for the record and begin the proper workflow (Case Open, Program Add or Individual Add).
2. On the Program Request screen, change the Process option to “Yes” and enter the application date as the program start date and October 31, 2015 as the program end date.
3. On the Individual Program Request screen, mark the box under “Family Plan” for whoever meets the SelectPlan criteria.
4. On the Program Request Questions screen, select the Special Category of “SelectPlan for Women – PSF 10” for the qualifying individual(s).
5. Proceed through CP and run eligibility. PSF 10 will pass as a NCE with only a Non-Financial result showing in the Eligibility block. Income and Resource tests will show as N/A.
6. Finish processing the case through CP.

If the individual is not eligible using SelectPlan criteria, but is eligible under the new FPS program criteria and submitted an application in June, the CAO will use the same process as described above, but will use a program start date of July 1, 2015.

If the individual is not eligible using either SelectPlan criteria or the FPS program criteria, the CAO will follow steps 1 through 5 above (using a NCE period of July 1, 2015 to October 31, 2015). After running eligibility, the CAO will perform an override of the non-financial result using reason code 904 – Pass to fail administrative override, and then finish processing the case through CP.

If the individual was authorized for either SelectPlan or the FPS program, a manual notice will be sent (see Attachment 2). A FPS program benefit package insert should be included (see Attachment 3).

If the individual was rejected, the MA rejection serves as the FPS rejection. If the individual requested “good cause”, an MA determination was not made and a manual notice will be sent (see Attachment 4). If the individual requested “good cause” and was ineligible for a reason other than income, a manual notice will be sent using the appropriate text (see Attachment 5).

If an individual requests “good cause” and is found eligible for FPS, the CAO will enter the phrase “Family Planning good cause” in the narrative. If the individual is under age 21, the CAO will enter the phrase “Family Planning under 21” in the narrative.

Processing FPS applications received on or after July 1, 2015

Effective with any applications received on or after July 1, 2015, only the FPS program criteria will be used and the program begin date will be the application date. If an application is received that indicates someone is requesting FPS:

- The caseworker will select MA as the benefit program on the Individual Program Request screen.
- When eligibility is run and the client is over the income limit for MA, the caseworker will then look at eligibility for FPS.
- The caseworker will use the Income Eligibility Result – MA screen to review the individual's MAGI household net income.
- If the individual is under age 21, but their household MAGI net income is over 215% FPL, the caseworker will manually review the individual's income as a household size of one using the FPS Income Computation sheet (see Attachment 6). Once the sheet is complete, it will be printed, then scanned and attached to the individual's record.
- The caseworker will go back to the Program Request screen and pend MAF-Family Planning using the application date as the Begin Date and October 31, 2015 as the End Date.
- The caseworker will finish processing the MA application and send out a correct denial notice and then go back into the case and process the FPS program request.

If an applicant is under 21 and cannot provide parental income, the individual will only be reviewed for FPS and cannot be reviewed for full MA.

NOTE: If an applicant is under the age of 21, they may submit an application for FPS on their own. If an individual under the age of 21 is not emancipated and submits an application, they are to be reviewed for FPS only. If the individual is emancipated, they may be reviewed for full MA and/or FPS, depending on their preference indicated on the application. If being reviewed for full MA, all standard MAGI rules apply. See MA Eligibility Handbook section 321.3 (Emancipation) for rules regarding emancipation.

If the client is eligible for the FPS program, the caseworker will send out a manual notice (see attachment 2), with benefit package insert (see Attachment 3).

If the client is ineligible for the FPS program, the caseworker must process the application and manually fail the individual by completing an override on the Eligibility Screen. If the client claimed "good cause" and was not reviewed for MA, the caseworker will send out a manual notice (see Attachments 4 and 5).

NOTE: If an individual claims “good cause”, they cannot be reviewed for full MA benefits. Because there is no MAGI determination, the caseworker will have to complete a manual calculation using the FPS Income Computation sheet (Attachment 6). Once the sheet is complete, it will be printed, then scanned and attached to the individual’s record.

Only an individual who claims “good cause” or who is under age 21 can be reviewed for FPS only. If there is no indication of “good cause”, the individual 21 years of age or older will be reviewed for full MA coverage first.

NOTE: If an individual is under age 21 or claims “good cause” and is open for other benefits as part of another household, the individual will be reviewed for FPS in their own case record.

If an individual requests “good cause” and is found eligible for FPS, the CAO will enter the phrase “Family Planning good cause” in the narrative. If the individual is under age 21, the CAO will enter the phrase “Family Planning under 21” in the narrative.

Headquarters will use the narratives to identify those individuals who apply after June 1, 2015 who must be transitioned to PSF 14 when Phase 2 is implemented.

Transition from PSF 10 to PSF 15 and PSF 14

In September 2015, the Client Information System will be updated to incorporate the FPS program as part of the MA cascade for those applications that are reviewed for full MA before being reviewed for FPS. Once this update has been completed, caseworkers will be able to process both the MA request and the FPS request at the same time and system notices will be generated.

As part of the update, two new category/program status code combinations will be introduced:

- PSF 15 (part of cascade) – Used for FPS recipients who were first evaluated for MA.
- PSF 14 (not part of cascade) – Used for FPS recipients who were not reviewed for MA because they claimed “good cause” or are under 21 and only want to be reviewed for FPS, or are under 21 and are over income for PSF 15 using household MAGI net income.

Also as part of the system update:

- Any woman who received the four-month extension because she had previously received the SelectPlan extension will be systematically moved into PSF 14 as an ongoing benefit and have her renewal automatically set for either November 30, 2015 or December 31, 2015.
- Anyone who applied and was found eligible for FPS from June 1, 2015 through October 2015 will be systematically moved into PSF 15 or 14 based on if “Family Planning good cause” or “Family Planning under 21” was indicated in the narrative. These recipients will have their renewal automatically set for 11 months after their program Begin Date.
- A notice will be sent when the transition is completed.

Processing Applications After September 28, 2015

Beginning September 28, 2015, PSF 15 will be a part of the MA cascade, but it will be reviewed only if the caseworker indicates on the Individual Program Request screen that the individual is interested in the FPS program. Caseworkers will be able to process these requests using normal processing procedures.

PSF 14 is not a part of the MA cascade because an individual who requests “good cause” or who is under 21 and unemancipated cannot be reviewed for full MA benefits. To capture the “good cause” or under age 21 request, a new code will be added to the Cash/MA ETP field. The code will be:

24 – Family Planning Services program claiming good cause exception or under age 21

If ETP code 24 is selected, when eligibility is run, the system will review the individual for PSF 14 only using MAGI rules.

If an individual is under age 21 and requests both full MA and FPS, but their household MAGI net income is over 215% FPL, the caseworker will:

- Complete processing the MA and PSF 15 denial, issuing the appropriate system generated MA denial notice.
- Re-AP the application using only the individual who requested FPS. This includes creating a new record number if the individual is already listed as a household member on another open budget.
- Process the individual’s case and select ETP code 24. This will review the applicant for PSF 14 only and generate the appropriate system notice based on the individual’s eligibility.

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:

[Attachment 1](#) - Family Planning Mailer

[Attachment 2](#) – PA 162 Family Planning Eligible

[Attachment 3](#) – Family Planning Service program benefit package insert

[Attachment 4](#) - PA 162 Family Planning Income Ineligible

[Attachment 5](#) – Notice Text for OPS Memo

[Attachment 6](#) - Family Planning Calculation Sheet