

-REVISED 6/1/18-
Policy Clarifications –
Medicaid – Long Term Care
PMN-18897-479

Submitted: 4/30/18

Agency: CAOs

Subject: Reconsideration Policy for Community HealthChoices (CHC) Waiver and Long Term Care (LTC) Recipients

Question: What is the reconsideration policy for individuals receiving the CHC waiver or MA LTC who do not complete their renewal, or submit their renewal after their record has been closed?

Response By: Division of Health Services

Date: 5/1/18

The **County Assistance Office (CAO)** must determine continuing eligibility using all available paperwork and information in the case record when an individual requests reconsideration, submits required documents, and it is within 90 days of benefit closure. Always review information available through electronic data sources. If eligible, reopen benefits effective the day after benefits closure.

With the implementation of CHC, the CAO is to begin waiver services on the day of processing when authorizing an application for CHC waiver services. In the case of reconsideration of a closed case only due to a missing, incomplete, or untimely renewal, the CAO will authorize the CHC waiver retroactively to the day after the closure date in eCIS to avoid any gap in coverage, if all information is received within the reconsideration window, regardless of the date of system processing. The same logic applies to a CHC MA LTC recipient, whose case closed due to failing to complete the renewal process. The CAO is to authorize MA LTC back to the day after the budget and facility code closed in eCIS.

Once the CAO authorizes CHC waiver services or MA LTC retroactively, the Office of Medical Assistance Programs (OMAP) will enroll the individual into a CHC Managed Care Organization (MCO) retroactively for accurate provider billing and to prevent any gap in MCO coverage.

To provide OMAP with the information required for retroactive enrollment, the CAO is to follow the ~~reconsideration policy in Long Term Care Handbook 479.3 regarding individuals whose benefits are closed due to failure to complete the renewal process.~~ steps below after opening benefits for an individual in CHC, ~~whose benefits are closed due to failure to complete the renewal process timely:~~

- Email RA-PWEnrollmentUnit@pa.gov with the following information:
 - Master Client Index (MCI) number of the recipient
 - First and Last name of the recipient
 - Retroactive effective date of opening
 - Date data entry was completed by the CAO

Note: This procedure is effective the original date of issuance of this Policy Clarification and does not apply to cases processed for this reason prior to that date. Cases processed between January and April 2018 have been addressed separately by OMAP.

Example: Mr. A is a CHC waiver recipient, who had a renewal which was due in ~~February 2018~~ **May 2018**. The CAO sent Mr. A the renewal packet and request for verification to determine continuing eligibility. Mr. A did not return the renewal packet, and his case was closed for failure to provide the renewal and income and resource

verifications, effective ~~February 28, 2018~~ May 31, 2018. On ~~April 2, 2018~~ July 2, 2018, the CAO receives Mr. A's renewal packet and all necessary income and resource verification to determine eligibility. The CAO is to enter the 'Begin Date' on the Program Request screen as the day after budget closure and the 'Begin Date' on the Waiver screen as the day after waiver closure, regardless of the date of system processing. This eliminates any gap in coverage for Mr. A. ~~After authorization, the worker emails the required information to~~ RA-PWEnrollmentUnit@pa.gov as stated above.

~~Once the CAO authorizes CHC waiver services or LTC MA retroactively, the Office of Medical Assistance Programs (OMAP) will enroll the individual into a CHC Managed Care Organization (MCO) retroactively for accurate provider billing and to prevent any gap in MCO coverage.~~

Note: If reconsideration is requested for a closure due to a change in circumstances, authorize the CHC waiver effective the date of system processing.