

**DATE: July 1, 2024**

# OPERATIONS MEMORANDUM #24-07-01

**SUBJECT:** End of the Unwinding Period for the Coronavirus (COVID-19) Public Health Emergency (PHE) and Return to Normal Processing

**TO:** Executive Directors

**FROM:** Robert Hixson Director

Bureau of Operations

# PURPOSE

To inform County Assistance Offices (CAOs) that the unwinding period referenced in Operations Memorandum (Ops Memo) 23-03-03 is ending on June 30, 2024, and CAOs will return to normal Medical Assistance (MA) processing effective July 1, 2024.

# BACKGROUND

The Consolidated Appropriations Act, 2023, delinked the end of the MA continuous coverage requirement from the end of the COVID-19 PHE. Consequently, the continuous coverage requirement ended on March 31, 2023. Guidance from the Centers for Medicare and Medicaid Services (CMS) explained that anyone whose MA was maintained during the continuous coverage requirement could not be closed until a full renewal was processed. CMS gave states a 12-month unwinding period to process renewals for individuals who were maintained in MA, including Long-Term Care (LTC) facility and Home and Community-Based Services (HCBS). To accommodate remaining unwinding renewals processing and any potential clean-up for the unwinding, states were allowed to continue unwinding renewal processing until June 30, 2024.

# DISCUSSION

Effective July 1, 2024, the policies and procedures related to the continuous coverage requirement that were addressed in Ops Memo 23-03-03 will be obsolete. The following sections of this Ops Memo will outline the return to normal processing.

Department of Human Services | Office of Income Maintenance

433 Health and Welfare Building | Harrisburg, PA 17120 [www.dhs.pa.gov](http://www.dhs.pa.gov/)

## System Changes to Remove COVID-19 Logic

System logic preventing maintained individuals from closing until a full renewal is processed will be removed after a renewal for every maintained case is processed. The new system logic will contain the following changes:

* Case Summary Screen
  + The “PHE Retained” column will no longer appear in the “Current Household Individuals” panel.
* Eligibility Result Summary Screen
  + The green edit message on this screen regarding COVID-19 maintained individuals will no longer appear.
* Case Narrative
  + An automatic case comment about COVID-19 maintained individuals will no longer be entered into the narrative.

A daily status will be issued when the COVID-19 logic is removed from the system.

## Inter-County Transfer (ICT)

The temporary process for completing an ICT outlined in

Daily Status D-23040601 is now obsolete. The CAO will follow the existing process found in [Ops Memo 22-03-01](https://pagov.sharepoint.com/sites/DHS-OIM/OpsMemos/CAO%20Procedure%20for%20Inter-County%20Transfers%20(ICT).docx).

## Public Assistance Reporting Information System (PARIS) Match (Exchange 9a)

The CAO will follow the existing policy in the MA Eligibility Handbook [(MAEH) 378 Appendix H](http://services.dpw.state.pa.us/oimpolicymanuals/ma/IEVS_SAVE_PACSES_and_SAR_Desk_Guide_-_MA_and_CHIP_-_041423.pdf). When an individual is identified through an Exchange 9a

PARIS data match as receiving a public benefit in another state, the following actions must be taken:

* Review the PARIS match identifying the individual as being enrolled in a public benefit program in another state.
* Request for the individual to provide verification of their Pennsylvania (PA) residency.
  + If verification is provided or obtained and the individual is a PA resident, take no action.
  + If verification provides proof that the individual is no longer a PA resident, then close MA.
  + If verification is not provided by the individual, and the caseworker makes a reasonable effort to obtain verification from available sources (e.g., the data exchanges and information in the case record), but is unable to verify PA residency, then close MA.

**NOTE:** After closing MA, if the caseworker obtains verification of the individual’s PA residency, MA benefits will be reinstated back to the date of closing.

## Overpayments

Do not file an MA overpayment for any MA recipient during the March 18, 2020, to March 31, 2023 continuous coverage period even if they were not continually enrolled. Additionally, after March 31, 2023, do not file an MA overpayment for any period before the recipient’s renewal is completed.

***Example:*** Individual was maintained in MG 91 and renewal date is set to August 31, 2023, during the unwinding. The period of March 18, 2020, to August 31, 2023, cannot be included when determining MA overpayments.

## Emergency Medical Assistance (EMA)

EMA recipients are non-citizens who are eligible for MA because they have an Emergency Medical Condition (EMC) and meet other applicable eligibility requirements. The CAO will follow the existing guidance for processing EMA requests found at

[MAEH 322.35](http://services.dpw.state.pa.us/oimpolicymanuals/ma/322_Citizen_Noncitizen/322_3_Alien_Status.htm) and in Ops Memo 22-07-02.

## MA for Workers with Disabilities (MAWD)

The CAO will follow the existing policies for MAWD when:

* Entering good cause for unpaid premiums for all MAWD recipients. See [MAEH 316.66](http://services.dpw.state.pa.us/oimpolicymanuals/ma/316_MAWD/316_06_Premiums.htm) for more information.
* Reviewing for MAWD prior to closing MA, including HCBS. See [MAEH 316.1](http://services.dpw.state.pa.us/oimpolicymanuals/ma/316_MAWD/316_01_General_Policy.htm) for more information.
* Reviewing for MAWD Workers with Job Success prior to closing MAWD. See Ops Memo 22-07-01 for more information.

## Disability Advocacy Program

The CAO will follow the existing policies in [Supplemental Handbook 820](http://services.dpw.state.pa.us/oimpolicymanuals/supp/820_Disability_Advocacy_Program/820_Title.htm), Ops Memo 18-03-02, and Ops Memo 20-09-05 when processing:

* Medical Review Team Referrals.
* Social Security Administration Referrals.

## Supplemental Security Income (SSI) Recipients

The CAO will follow the standard procedure at [MAEH 387.53](http://services.dpw.state.pa.us/oimpolicymanuals/ma/387_SSI/387_5_MA_Coverage_for_SSI_Recipients.htm) when reviewing for other MA (including Special SSI MA) budgets following the suspension of an SSI budget.

## MA Spend-down Cases

The CAO will follow the spend-down policy found in MAEH [368.4](http://services.dpw.state.pa.us/oimpolicymanuals/ma/368_Determining_Eligibility_for_NMP/368.4_NMP_Spend-Down.htm) and [369.4](http://services.dpw.state.pa.us/oimpolicymanuals/ma/369_Determining_Eligibility_for_MNO/369_4_Continuing_MNO.htm) as well as LTC Handbook (LTCH) [468.23](http://services.dpw.state.pa.us/oimpolicymanuals/ltc/index.htm#t%3D468_Eligibility_and_Payment%2F468_2_MA_LTC_Eligibility_Step_1.htm) and [468.231](http://services.dpw.state.pa.us/oimpolicymanuals/ltc/index.htm#t%3D468_Eligibility_and_Payment%2F468_2_MA_LTC_Eligibility_Step_1.htm) for processing spend-down.

## LTC Facility Recipients Transitioning to the Community

When an LTC facility recipient is discharged from the facility and requests either HCBS or MA, the recipient must meet the income and resource requirements for these benefits before being authorized in the new program. The CAO will follow the policy found in [LTCH 468.2](http://services.dpw.state.pa.us/oimpolicymanuals/ltc/index.htm#t%3D468_Eligibility_and_Payment%2F468_2_MA_LTC_Eligibility_Step_1.htm) when determining eligibility for HCBS or the policy found in the MAEH when determining eligibility for non-LTC related MA such as Healthy Horizons.

**Reminder:** Individuals applying for HCBS with income exceeding 300 percent of the Federal Benefit Rate must be reviewed for MAWD if they meet the non-financial requirements found in [MAEH 316](http://services.dpw.state.pa.us/oimpolicymanuals/ma/index.htm#t%3D316_MAWD%2F316_01_General_Policy.htm)[http://services.dpw.state.pa.us/oimpolicymanuals/ma/index.htm](http://services.dpw.state.pa.us/oimpolicymanuals/ma/index.htm#t%3D316_MAWD%2F316_Title.htm).

# ADDITIONAL INFORMATION

2024:

The following Ops Memos and Policy Clarifications are obsolete effective July 1,

* Ops Memo 23-03-03, Revised Expiration of the Continuous Coverage Requirement for Medical Assistance (MA) as Required by the Consolidated Appropriations Act, 2023
* PMA-21685-376, End of the Unwinding Period for the Continuous Coverage Requirement due to the COVID-19 Public Health Emergency
* PMA-21366-309, Evaluations for the Children’s Health Insurance Program (CHIP) for Children in COVID Maintained Medical Assistance (MA) Budgets

# NEXT STEPS

* 1. Share and review this information with appropriate staff members.
  2. Direct questions regarding this Ops Memo to your Area Manager.