

**DATE:** March 23, 2020

**OPERATIONS MEMORANDUM #20-03-02**

**SUBJECT:** Medical Assistance (MA) Processing Procedures during Coronavirus 2019 (COVID-19) Emergency

**TO:** Executive Directors

**FROM:** Inez Titus  
Director  
Bureau of Operations

**PURPOSE**

To inform County Assistance Offices (CAOs) of temporary exceptions to the processing procedures for MA during the COVID-19 emergency.

**BACKGROUND**

On March 13, 2020, President Trump declared a national emergency due to the rapid spread of the coronavirus known as COVID-19. Federal regulations allow for exceptions to normal processing procedures for MA in special circumstances such as a national emergency. Based on the regulations at 42 CFR 435.912, 435.952(c), and 435.912(e)(2)) states are allowed flexibility in managing workload in the event of staff shortages and allowed to provide for less restrictive verification processes. Due to possible impacts to CAO staff and workload and to MA applicants/beneficiaries, temporary exceptions to the verification and timeliness policy standards for processing MA applications, renewals and changes in circumstances are being implemented. Upon the Governor's authorization in accordance with the disaster emergency proclamation, the Secretary has also suspended any associated regulations outlined in the Pennsylvania Code.

**DISCUSSION**

With the issuance of this document, CAOs will follow a less restrictive verification process for MA (excluding Long Term Care and Home and Community Based Services application and cases) as outlined below:

- Complete an ex parte review using electronic data sources to obtain information if possible. If information cannot be obtained through electronic data sources or the applicant is unable to provide information,

accept self-attestation for all factors of eligibility other than citizenship and immigration status and process the application, renewal, or change of circumstances.

- A Reasonable Opportunity Period will be granted when citizenship and immigration status cannot be verified at application, following existing policy in the [MA Eligibility Handbook Chapter 322.2](#) and [322.35](#). If the individual is unable to provide verification of citizenship or satisfactory immigration status within 90 days due to extenuating circumstances, the CAO may extend the Reasonable Opportunity Period to allow the individual time to obtain the verification.

### **Timeliness Standards**

CAOs should follow existing processing times for MA applications, renewals and changes in circumstances whenever possible. However, due to the state of emergency, if the CAO is unable to process MA applications, renewals or changes in circumstances within existing processing times, the worker will narrate the reason for the delay in case comments.

### **NEXT STEPS**

1. Share and review this information with appropriate staff members.
2. Please submit a Policy Clarification request if you have questions regarding this Operations Memorandum.
3. This policy is in effect until further notice.