

DATE:

OPERATIONS MEMORANDUM

SUBJECT: Suspension of Medical Assistance (MA) Benefits for Recipients Who Have Been Incarcerated.

TO: Executive Directors

FROM: Inez Titus
Director
Bureau of Operations

PURPOSE

To provide policy and procedures for the suspension of Medical Assistance (MA) benefits once a recipient is incarcerated. A new MA category, MG 99, will be introduced for the suspension of MA benefits.

BACKGROUND

Many inmates, particularly those with serious mental or physical health conditions, require essential health care upon release from incarceration. Currently, MA recipients who become incarcerated have their benefits closed. In order to improve the continuity of care for this population, the Department of Human Services (DHS) and Department of Corrections (DOC) created a process to ensure that MA recipients who are incarcerated will have their MA benefits suspended. This new process is derived from state law Act 76 of 2016, which requires an MA recipient to have their MA benefits suspended for up to a maximum of two years. This will provide a more efficient process for re-opening MA for individuals once they are released from incarceration.

DISCUSSION

In November of 2016, DHS released a shortened health care application for individuals being released from incarceration on the Commonwealth of Pennsylvania's Access to Social Services (COMPASS) website to help expedite the application process (OPS-16-11-05). Effective May 22, 2017, caseworkers will suspend MA benefits of recipients who have been incarcerated and place them into a new category and program status code, MG 99. This suspension process will be essential in re-opening individuals for MA benefits once they are released from incarceration. The process begins when a recipient's incarceration date into a correctional facility is received. Once the recipient's incarceration date is verified, the County Assistance Office (CAO) will run

maintenance on the case by suspending MA benefits and placing the individual in the new MG 99 category that has no MA benefits associated to it. The individual's eligibility status in MG 99 will display as "NA."

PROCEDURES

Implementation of this process requires actions by the CAO staff depending on the household composition. These scenarios are outlined below:

Steps when MA only benefits are open:

Single adult household with or without children:

1. Verify the individual's incarceration date using current procedures.
2. Enter case maintenance workflow.

NOTE: If the incarcerated individual is the only adult in the household and there are children on the case, the children must be removed from the case using Individual Delete mode. Children who are under age one or pregnant are required to remain open for MA and should not be deleted from the case.

3. Update the mailing address on the Household screen to the address of the institution the individual is residing in. No modification to residence address is needed.
4. Navigate to Individual Non-Financial Questions in eCIS and select 'Yes' in the Facility dropdown box.
5. The Facility Placement screen will be queued. Complete this screen for the appropriate individual including these dropdowns: Facility Type (72 – Correctional Facility), Admission Date, Source, and County of Placement.
6. If the incarcerated individual has income on the case record, it should be finalized using the last known pay date as the final pay date.
7. Run eligibility. This will fail the individual for their current MA benefits and open the individual in MG 99.
8. On the Client Notice screen, the system will roll up '056 B – Other Institutionalization, Including Imprisonment' notice and the '914 A - Incarcerated MA' notice. Select option B for the 056 notice to indicate the closure of MA benefits for incarceration.

Multiple adult household with or without children:

1. Verify the individual's incarceration date using current procedures.
2. Enter case maintenance workflow.
3. If the individual who has been incarcerated is the Payment Name, change the Payment Name to the other adult in the household while on the Household screen.
4. Navigate to Individual Non-Financial Questions in eCIS and select 'Yes' in the Facility dropdown box.
5. The Facility Placement screen will be queued. Complete this screen for the appropriate individual including these dropdowns: Facility Type (72 – Correctional Facility), Admission Date, Source, and County of Placement.
6. If the incarcerated individual has income on the case record, it should be finalized using the last known pay date as the final pay date.
7. Run eligibility. This will fail the individual for their current MA benefits and open the individual in MG 99 in the same record. The incarcerated individual will not be considered part of the household composition and will also not be counted towards budget composition.
8. On the Client Notice screen, the system will roll up '056 B – Other Institutionalization, Including Imprisonment' notice and the '914 A - Incarcerated MA notice'. Select option B for the 056 notice to indicate the closure of MA benefits for incarceration.

Steps when MA and SNAP (Supplemental Nutrition Assistance Program) benefits are open:

Single adult household with or without children:

1. Verify the individual's incarceration date using current procedures.
2. Enter case maintenance workflow.
3. Update the mailing address on the Household screen to the address of the institution the individual is residing in. No modification to the residence address is needed.

4. Navigate to the Budget Action screen in eCIS and select 'C – Closing' under the 'Action Code' dropdown and select Reason code '056 – Other Institutionalization, Including Imprisonment' as the reason for the closure.

NOTE: If the incarcerated individual is the only adult in the household and there are children on the case, the household must first be closed for SNAP benefits in Maintenance mode. The children will then be removed from the case using Individual Delete mode. Children under age one or pregnant and who are MA recipients are required to remain open and should not be deleted from the case. Steps 5 through 8 will be completed after removing children on the Demographics screen in Individual Delete mode.

5. Navigate to the Individual Non-Financial Questions screen and select 'Yes' in the 'Facility' dropdown.
6. The Facility Placement screen will be queued. Complete this screen for the appropriate individual including these dropdowns: Facility Type (72 – Correctional Facility), Admission Date, Source, and County of Placement.
7. If the incarcerated individual has income on the case record, it should be finalized using the last known pay date as the final pay date.
8. Run eligibility. Both the MA and SNAP benefits will be closed and the individual will be placed in MG 99.
9. On the Client Notice screen, the system will roll up '056 B – Other Institutionalization, Including Imprisonment' notice, the '914 A - Incarcerated MA' notice, and the '056 2 – Other Institutionalization, Including Imprisonment' notice. Select option B for the 056 notice to indicate the closure of MA benefits for incarceration.

Multiple adult household with or without children:

1. Verify the individual's incarceration date using current procedures.
2. Enter case maintenance workflow.
3. If the individual who has been incarcerated is the Payment Name, change the Payment Name to the other adult in the household while on the Household screen.

4. Navigate to the Individual Program Request screen in eCIS and deselect the SNAP check box for the incarcerated individual. In the 'SNAP Exclusion' dropdown box, select '61 - Non-Mandatory Household Member'.
5. Navigate to the Individual Non-Financial Questions screen and select 'Yes' in the 'Facility' dropdown box.
6. The Facility Placement screen will be queued. Complete this screen for the appropriate individual including these dropdowns: Facility Type (72 – Correctional Facility), Admission Date, Source, and County of Placement.
7. If the incarcerated individual has income on the case record, it should be finalized using the last known pay date as the final pay date.
8. Run eligibility. The incarcerated individual will be closed for MA benefits and placed into MG 99.

NOTE: The SNAP benefits should also change or may close due to the incarcerated individual being an N member on the case now.

9. On the Client Notice screen, the system will roll up '056 B – Other Institutionalization, Including Imprisonment' notice and the '914 A - Incarcerated MA' notice. Select option B for the 056 notice to indicate the closure of MA benefits for incarceration. Include the SNAP reason code 093 notice based on change or closure of SNAP benefits.

Steps when Cash Assistance (including A, J, and M budgets) is open on the case (may also include MA and SNAP):

Single adult household with or without children:

1. Verify individual's incarceration date using current procedures.
2. Enter case maintenance workflow.
3. Update the mailing address on the Household screen to the address of the institution the individual is residing in. No modification to the residence address is needed.
4. If the incarcerated individual has income on the case record, finalize using the last known pay date as the final pay date.

NOTE: If the incarcerated individual is the only adult in the household and there are children on the case and the household is open for SNAP benefits, the SNAP benefits must be closed for the household in Maintenance mode. The children who are one year old or older and not pregnant will then be removed from the case using Individual Delete mode. Children who are under age one or pregnant are required to remain open for MA and should not be deleted from the case. Steps 5 through 8 will be completed after removing children on the Demographics screen in Individual Delete mode.

5. If Cash Assistance and/or SNAP remains open, close the budget(s) in Maintenance mode following existing procedures. Continue to follow current notice procedures. Notice '056 3 - Other Institutionalization, Including Imprisonment' will be sent to the individual. If there is also a SNAP budget that has been closed, notice '056 4 – Other Institutionalization, Including Imprisonment' will be rolled up.
6. Request a new MA application number for the incarcerated individual.
7. In the existing case record, enter all required case information in Case Open mode in eCIS.
8. Navigate to the Individual Non-Financial Questions screen and select 'Yes' in the 'Facility' dropdown box.
9. The Facility Placement screen will be queued. Complete this screen for the appropriate individual including these dropdowns: Facility Type (72 – Correctional Facility), Admission Date, Source, and County of Placement.
10. Run eligibility. The individual will be placed in MG 99.
11. When the incarcerated individual is opened in MG 99, a 914 A notice will not be generated on the Notice Screen. Manually send the 914 A notice to the incarcerated individual using the text and citation below:

“You qualify for suspended Medical Assistance benefits for up to two years while incarcerated. During your incarceration, you may only be eligible for Medical Assistance to cover your cost of care if you are an inpatient in a hospital or other medical institution.

This is the law we used to make this decision: 62 P.S. § 441.1.

Your benefits will stay the same until there is a change in your case.”

Multiple adult household with or without children:

1. Verify individual's incarceration date using current procedures.
2. Enter Individual Delete mode.
3. If the individual who has been incarcerated is the Payment Name, change the Payment Name to the other adult in the household on the Household screen.
4. Remove the incarcerated individual from the Cash Assistance budget along with the SNAP budget, if one is open, in Individual Delete mode in eCIS following existing processes. Continue to follow current notice procedures. Notice '093 1 – Other Change in Number of Persons' will be rolled up with the SNAP reason code 093 notice, if SNAP benefits change or close.
5. Request a new MA application number and new case record number for the incarcerated individual.
6. In the new case record, enter all required case information in Case Open mode.
7. On the Household screen, use the same residence address from the case record in which the incarcerated individual was removed and enter the institution address as the mailing address.
8. Navigate to the Individual Non-Financial Questions screen and select 'Yes' in the 'Facility' dropdown box.
8. The Facility Placement screen will be queued. Complete this screen for the appropriate individual including these dropdowns: Facility Type (72 – Correctional Facility), Admission Date, Source, and County of Placement.
9. Run eligibility. The individual will be placed in MG 99.
10. When the incarcerated individual is opened in MG 99, a 914 A notice will not be generated on the Notice screen. Manually send the 914 A notice to the incarcerated individual using the citation and text below:

“You qualify for suspended Medical Assistance benefits for up to two years while incarcerated. During your incarceration, you may only be eligible for Medical Assistance to cover your cost of care if you are an inpatient in a hospital or other medical institution.

This is the law we used to make this decision: 62 P.S. § 441.1.

Your benefits will stay the same until there is a change in your case.”

Renewal of MG 99:

- As part of the MA suspension, MG 99 will be renewed automatically annually. The MG 99 reapplication date will be set to the last day of the 11th calendar month based on the Eligibility Begin Date.
- MG 99 will be excluded from the Enhanced MAGI (Modified Adjusted Gross Income) Renewal (EMR) process and the renewal alert will be suppressed.
- The incarcerated individual will not receive a renewal packet for MG 99.
- MG 99 budget ‘Re-App Due Date’ field on the Budget Authorization screen in eCIS will not be editable.

Renewal of MG 99 when closing other MA budgets on the case for Failure to Provide (Reason Code 042):

- If the other budgets on the case record are closed due to ‘Reason Code 042 – Information Not Provided’, the individual in the MG 99 budget must remain open. Follow the steps listed below:
 1. Deselect the other household members for MA on the Individual Program Request screen when running the renewal for the other budgets. MG 99 will remain open, but ‘Reason Code 063’ will default for the other household members.
 2. Change this by choosing ‘Reason Code 042’ for failure to provide information.

Closure of MG 99:

- If the individual is released from incarceration within two years of placement, manually close the MG 99 budget.

NOTE: If at any time the MG 99 budget is closed and re-opened, the two year closure date will re-start. MG 99 budgets should only be open for two years per state law, Act 76. The CAO should update the reapplication date using current procedures to ensure the MG 99 budget is not open for more than two years.

- If the individual is incarcerated for more than two years, the system will automatically close the budget at the end of the last month of the two year span.

Processing an MG 99 Manual Closure to open MA – MA and MA/SNAP cases:

1. The correctional facility will submit a COMPASS application 5 to 15 calendar days prior to the release date.
2. After the application is submitted, add the incarcerated individual to the original case record in which the MG 99 budget is currently open, if appropriate.

NOTE: If their address or other circumstances have changed, they may need to be placed in a new case record.

3. The system will then show a pending MA application on the Case Summary Screen in eCIS.
4. Select 'Program Add' to enable the authorization of MA benefits for a future release date. This is a two-step process:
 - a. Change the existing MA benefits on the Program Request screen to 'No'.
 - b. Select MA under Program, 'Yes' under Process, and a begin date equal to the release date if the application is submitted before or on the release date. Use the application date as the begin date for applications submitted after the release date.

NOTE: If the household is open for SNAP benefits, the caseworker should not remove the SNAP exclusion code until client contact has been made.

5. Navigate to the 'Facility Placement' screen and end date the facility record along with entering the discharge date and discharge code of '01 – Routine Discharge'.

NOTE: On this screen, two different red error messages may be displayed. The first red error message, "Discharge Date cannot be greater than 15 days" will be displayed if the discharge date is more than 15 days in the future. The second red error message, "Program Request Date must be aligned with the Discharge Date" will be displayed if the program request date and discharge date are not aligned and the discharge date is in the future.

6. Run eligibility. The MG 99 budget will be closed and the individual will be opened in a new MA budget, if eligible. The system will default the notice reason code to 914 with option B.

NOTE: The MG 99 budget will close 15 days from the date the action to close the budget is taken. If the closure of MG 99 results in a change in budget for other individuals in the household, existing MA benefits for these individuals will also be closed 15 days from the process date.

Processing an MG 99 Manual Closure when an Individual is released from Incarceration, but no application has been submitted:

Single adult household with or without children:

1. If information is received that an incarcerated individual who is active MG 99 has been released (for example, through Exchange 10), verify the individual has been released from incarceration.
2. Enter case maintenance mode.
3. Navigate to the Individual Program Request screen and deselect MA for the individual.
4. Navigate to the Facility Placement Screen and enter the discharge date with discharge code 01 – Routine Discharge.
5. Run eligibility.
6. Navigate to the Notice screen and suppress the notice.
7. Send out a manual 914 B Ineligible notice with the following text only:

“You no longer qualify for suspended Medical Assistance benefits effective [date] because you are no longer incarcerated.

This is the law we used to make this decision: 62 P.S. § 441.1.”

Multiple adult household with or without children:

1. If information is received that an incarcerated individual who is active MG 99 has been released (for example, through Exchange 10), verify the individual has been released from incarceration.
2. Enter Individual Delete mode.

3. Navigate to the Facility Placement screen and enter the discharge date with discharge code 01 – Routine Discharge.
4. Navigate to the Demographics screen and remove the individual who has been released from incarceration with Reason code 062 – Whereabouts Unknown.
5. Run eligibility.
6. Navigate to the Notice screen and suppress the notice.
7. Send out a manual 914 B Ineligible notice with the following text only:

“You no longer qualify for suspended Medical Assistance benefits effective [date] because you are no longer incarcerated.

This is the law we used to make this decision: 62 P.S. § 441.1.”

Auto Closure of MG 99:

- If an individual is not released within two years of the current MG 99 budget start date, the system will automatically close the MG 99 budget.
- A new system-generated notice, with closure reason 914 option C, will be sent to the individual for the automated closure of MG 99.
- An auto case comment will be generated with text explaining why the budget was closed.

NOTE: The new option code, 914 C, will not be displayed in the option dropdown because this notice is system driven and will only be sent out due to the automated closure of MG 99 after the two year period.

- Once the MG 99 budget is auto-closed, the individual will be removed from the case. If the MG 99 budget being auto-closed is for a single person case, the case will be closed.
- If the individual is in a multiple person household, the individual will be removed if the individual had MA benefits only.

- If the incarcerated individual was on a MA and SNAP case, the MG 99 budget will be closed. However, the individual will remain in the SNAP budget as an 'N' member until the SNAP exclusion code is removed and the individual is deleted manually from the case.

NOTE: If an application was received for an incarcerated individual whose MG 99 budget was auto closed, either:

- Create a new case in Case Open mode.
- Use the Program Add function if the individual is still on the case.

NEXT STEPS

1. Review this Operations Memorandum with appropriate staff.
2. Contact your Area Manager if you have any questions