Date: March 18, 2020

Subject: MA Eligibility During COVID-19 Emergency Disaster Declaration

To: All Physical Health (PH) HealthChoices Managed Care Organizations (MCOs) – Statewide

From: Laurie Rock, Director, Bureau of Managed Care Operations

Purpose:

The Department of Human Services (DHS) Office of Medical Assistance Programs (OMAP) is issuing this Operations Memorandum to provide direction to Physical Health HealthChoices Managed Care Organizations (PH-MCOs) regarding member eligibility and continued access to services.

Background:

On March 6, 2020, Governor Wolf issued an emergency disaster declaration in response to the presence of the coronavirus (COVID-19) in Pennsylvania. On March 18, 2020, the President signed into law H.R. 6021, the Families First Coronavirus Response Act (FFCRA) (Pub. L. 116-127). In compliance with FFCRA individuals will maintain medical assistance coverage unless they fall under one of the exemption categories listed below.

OMAP is aware of MCO members who were scheduled to lose their Medical Assistance (MA) eligibility on April 1 due to redetermination efforts that were not completed prior to the COVID-19 crisis. These members did not lose their MA eligibility on April 1 and remain enrolled in their HealthChoices MCOs. Consistent with federal Medicaid policy related to the COVID-19 crisis, DHS has determined that MA recipients will retain their eligibility until the end of the emergency declaration.

Discussion:

County Assistance Offices (CAOs) have been instructed not to close or decrease (MA) benefits during the disaster declaration. Members whose MA eligibility terminated since March 18, 2020 will have their eligibility reinstated. Please note that continued eligibility does not apply to the following circumstances:
• A member is no longer a resident of Pennsylvania.
• A member requests that their benefits be closed (voluntary withdrawal).
• A member has passed away.
• A member who is incarcerated.

Next Steps:

DHS will continue to work with the PH-MCOs to resolve any eligibility issues until the 834 member eligibility files are corrected to reflect ongoing eligibility for members terminated after March 18th. PH-MCOs and their network providers are to continue providing services to members even if they have a termination date, except for individuals who are no longer residing in Pennsylvania, who have requested that their benefits be closed, who have passed away, or who are incarcerated. MCOs will receive capitation for those individuals for the extended eligibility time period. A reconciliation may be required. PH-MCOs should direct any members who have inadvertently lost coverage to contact their CAO.

Obsolete:

This MC OPS Memo will remain in effect while a valid disaster declaration authorized by the Governor related to the COVID-19 virus remains in effect. OMAP may re-issue this Ops Memo as appropriate.