



CHIP Policy Clarification

CHIP POLICY CLARIFICATION 2020-05

ISSUE DATE: April 1, 2020

REISSUE DATE: June 17, 2020

EFFECTIVE DATE: Immediately

SUBJECT: Self-attestation on applications and renewals; enrolling children prior to initial premium payment; and continuation of coverage

TO: CHIP MCOs

FROM: *Patricia Allon*
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Executive Director of CHIP

PURPOSE:

To issue guidance for accepting self-attestation on applications and renewals and enrolling children prior to initial premium payments during COVID-19 public health emergency in Pennsylvania.

BACKGROUND:

On March 6, 2020, Governor Wolf issued a [disaster declaration](#) in response to the presence of the COVID-19 coronavirus in Pennsylvania. On March 13, President Trump declared a national emergency concerning the Novel Coronavirus Disease (COVID-19) outbreak. Through these declarations, the Pennsylvania Children's Health Insurance Program (CHIP) is working towards removing administrative and financial barriers families may be facing during this time and providing increased access to children's healthcare.

Through the CHIP Disaster Relief State Plan Amendment (SPA), CHIP is requesting the flexibility to accept self-attestation to complete eligibility determinations at application and renewal. 42 CFR 457.380. CHIP is also requesting the ability to enroll children at eligibility determination and not pend enrollment until initial premium payment is made. Under the same



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authority, CHIP is also requesting a delay in premium payments and continuation of coverage (no disenrollment) for families until the end of the public health emergency. 42 CFR 457.505(a), 457.510(b) and (c), 457.515(a) and (c). The CHIP Disaster Relief SPA is retroactive to March 1, 2020.

DISCUSSION:

Self-Attestation

During the course of the COVID-19 public health emergency, and at the state's discretion, CHIP is allowing families who are unable to provide verification of application or renewal verification the ability to self-attest to the information on the application. Self-attestation is asserted by signing the application. MCOs and the Office of CHIP (OOC) will continue to attempt to verify information through available electronic sources such as the Social Security Administration Database, TALX, and Equifax. If information cannot be verified through those sources, then the information on the signed application will be considered verified. Individuals who self-attest to ineligibility criteria such as over age, undocumented or illegal residency status, or having private insurance will remain ineligible for CHIP. A denial letter for those ineligibility reasons is appropriate. Unsigned applications will be sent incomplete notices per existing policy.

When an application is received that has no income completed, and neither the MCO nor the OOC are able to verify income through an available electronic source, the application will be processed as if it has no income and transferred to Medical Assistance through the Healthcare Handshake.

If an application does not include a Social Security Number (SSN) or Date of Birth (DOB), the MCO must attempt to contact the family to obtain this information at least three different times by telephone. Email contact is not acceptable due to the information being PHI. This minimal information must be entered into CAPS for an application to process. If the MCO cannot reach the family after three attempts, then applications missing an SSN or DOB will be sent an incomplete letter. If there is still no response to the incomplete letter, then the application is denied.

Enrolling Eligible Children Prior to Initial Premium Payment

For the duration of the public health emergency, MCOs are to enroll children who are pending initial premium payments. Families are still responsible for paying premiums. Deloitte is developing a CAPS system adjustment so children are enrolled into the appropriate Free, Subsidized, or Full Cost premium paying category. MCOs should work with CHIP families on initializing premium payments as soon as possible but may not disenroll families for failure to pay premiums. If a family is unable to pay premiums, the MCO should work with the family in order to develop a plan to pay premiums. If the family indicates that their income has changed significantly, a reassessment should be completed.

Continuation of Coverage



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During the COVID-19 public health emergency, CHIP MCOs are to temporarily suspend the disenrollment of enrollees due to administrative or financial circumstances. Financial circumstances include, but are not limited to, failure to pay premiums, failure to provide renewal information, failure to provide information regarding disability status, and whereabouts unknown.

Families are still responsible for providing required information and paying premiums; however, those obligations may be delayed until the current public health emergency has ended if a family is unable to pay the premium at this time and requests a delay from the MCO. If a family states that their inability to pay premiums is due to a loss or decrease in income, then the MCO should adjust the income in CAPS and run a reassessment. If the family is determined to be in a FREE or lower Subsidized tier, then the family is moved to that tier. If the family is determined to be MA income eligible, then the family is transferred to the County Assistance Office via the Healthcare Handshake. MCOs must continue to work with families on premium collections through payment plans or other financial mechanisms which ease premium payment burdens on families.

Information on CHIP coverage related to COVID-19, including FAQ document, can be found on the [CHIP website](#).

Additional information about EMTALA requirements and COVID-19 can be found [here](#).

Additional information is also available on the [CDC website](#) and through [CMS](#).

The Pennsylvania Department of Health has a dedicated page for COVID-19 that provides regular updates. Click [here](#) for the most up to date information regarding COVID-19.

NEXT STEPS

1. Review the information in this policy clarification with appropriate staff.
2. Implement this policy clarification immediately.
3. This policy clarification will remain in effect while a valid disaster declaration authorized by the Governor related to the COVID-19 virus remains in effect. The OOC may re-issue this policy clarification as appropriate.
4. Questions concerning this transmittal should be directed to J. Diane Brannon-Nordtomme, CHIP Policy Director at (717) 705-4196 or via email at jbrannonno@pa.gov.