STATE OF CONNECTICUT
DEPARTMENT OF SOCIAL SERVICES
PROGRAM INFORMATION BULLETIN

Claudette J. Beaulieu, Deputy Commissioner

June 1, 2010
Date

INFORMATION BULLETIN NO: 10-02

PROGRAM: Medicaid /HUSKY A

Subject: EMS closure codes to support the Reasonable Opportunity Period (ROP) for Medicaid.

Overview	Federal law was recently changed to allow for the granting of Medicaid to individuals claiming to be U.S. citizens or nationals who were otherwise eligible, even if documentation of citizenship was not provided to the department. In the event that a client is unable to verify his or her citizenship via an inquiry done with the Social Security data base, a Reasonable Opportunity Period (ROP) is created during which Medicaid eligibility can continue. (Please see recently issued Program Information Bulletin 10-01 for detailed information.) At the end of the ROP, individuals who have failed to verify his or her citizenship are no longer eligible for Medicaid. If the client reapplies for Medicaid, fails to verify U.S. citizenship or nationality, and has previously exhausted his or her ROP, the individual is not eligible until documents are received or a successful SSA inquiry is done. Three new denial reason codes have been created for this situation. Listed below are the new EMS reason codes workers must use to close cases at the end of the ROP or to deny an individual if he or she reapplies for Medicaid, verification of U.S. citizenship is missing, and the ROP has expired.
New EMS ROP closure codes.	New ROP Closure Codes: EMS is being modified to provide for the use of three new <u>client level</u>, <u>worker entered</u>, reason codes for use when a recipient's citizenship claim has not been successfully verified. Entry of these codes will result in the discontinuance of Medicaid assistance for the unverified client, and in some cases, the entire assistance unit. The following new EMS ROP closure codes should be used to terminate Medicaid eligibility within 30 days after the end of the ROP. Workers should set an alert on ROP cases to comply with this discontinuance timeframe. 10 day advance notice requirements must be given prior to ROP discontinuance. Timely Fair Hearing requests regarding ROP closures shall continue eligibility for that individual beyond the end of the ROP.

New EMS ROP closure codes (cont.)	The three new <u>discontinuance</u> codes are:
	640 Failed to verify citizenship during 90 day Reasonable Opportunity Period (ROP).
	641 Failed to verify identity during 90 day Reasonable Opportunity Period (ROP).
	642 Failed to verify citizenship and identity during 90 day Reasonable Opportunity Period (ROP).
	There are three additional codes for use when an applicant, who previously received the benefit of a ROP, reapplies for Medicaid assistance, and still does not have verification sufficient to satisfy citizenship and identity verification requirements. Entry of these codes will result in Medicaid <u>denial</u> of eligibility for a client or the entire assistance unit, if appropriate.
	The three <u>denial</u> codes are:
	643 Failed to verify citizenship. You already received a 90 day Reasonable Opportunity Period (ROP) to provide this verification.
	644 Failed to verify identity. You already received a 90 day Reasonable Opportunity Period (ROP) to provide this verification.
	645 Failed to verify citizenship and identity. You already received a 90 day Reasonable Opportunity Period (ROP) to provide this verification.
	Please note that when changing the status of an individual member on EMS from DI or IP to RE as an interim change, EMS does not force the entry of citizenship and identity verification valid values on DEM2. Therefore, workers should be extra attentive to this EMS limitation so that citizenship and identity requirements are enforced in these situations for these individuals when they become REs.
	Individuals who lose or who are not eligible for Medicaid due to ROP policy are still part of the needs group (as appropriate per UPM policy) and their income and assets (as appropriate per UPM policy) will count towards the remaining eligible members in the household.
	UPM policy will be issued soon regarding the ROP.

Disposition: Retain for future reference.
Distribution: Medicaid Eligibility Staff
Responsible Unit: Family Support Team   860-424-5540

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DJB