

ISSUE DATE October 24, 2014	EFFECTIVE DATE August 25, 2014	NUMBER 01-14-19, 08-14-15, 09-14-14, 31-14-17, 33-14-13, 47-14-02
SUBJECT Presumptive Eligibility for Pregnant Women		BY  Vincent D. Gordon, Deputy Secretary Office of Medical Assistance Programs

PURPOSE:

The purpose of this bulletin is to:

1. Notify providers that Modified Adjusted Gross Income (MAGI) must now be used when making a presumptive eligibility (PE) determination for pregnant women;
2. Update the income guidelines for PE based upon the 2014 Federal Poverty Level (FPL) and the MAGI eligibility determination;
3. Revise the MA 332, Presumptive Eligibility Application; and
4. Obsolete Medical Assistance (MA) bulletin 99-88-04, "Healthy Beginnings – Presumptive Eligibility Program" issued April 1, 1988.

SCOPE:

This bulletin applies to providers enrolled in the MA Program and qualified to provide pregnancy related services, including outpatient hospital clinics, independent clinics, federally qualified health centers, rural health centers, certified registered nurse practitioners, physicians, midwives and birth centers

BACKGROUND:

On April 1, 1988, in an effort to encourage early prenatal care, the MA Program began to allow pregnant women to receive MA coverage for ambulatory prenatal care before they have been formally determined eligible by the County Assistance Office (CAO).

The Affordable Care Act (ACA) of 2010 made several major changes to the Medicaid Program, such as eliminating various income disregards being used by states and adopting MAGI rules as defined in the Internal Revenue Code. The ACA also aligned "family size" with the MAGI definition of "household".

COMMENTS AND QUESTIONS REGARDING THIS BULLETIN SHOULD BE DIRECTED TO:

The appropriate toll free number for your provider type

Visit the Office of Medical Assistance Programs Web site at
<http://www.dpw.state.pa.us/provider/healthcaremedicalassistance/index.htm>

DISCUSSION:

Providers enrolled in the MA Program that are qualified to provide pregnancy related services and eligible to receive payment under the MA Program, may make PE determinations for pregnant women.

The criteria used to determine PE for pregnant women is based on self-attestation by the applicant, but verification, such as paystubs for income, is encouraged. PE for pregnant women is based on the following:

1. Categorical eligibility (must self-attest to pregnancy)
2. Satisfactory Citizenship /Immigration status - U.S. Citizen, Permanent Resident, Temporary Resident, Refugee/Asylee
3. State residency
4. Identity
5. MAGI based on household size

MAGI is the methodology used for determining MA eligibility under the provisions of the Affordable Care Act. MAGI takes into account the household's tax filing status and is used for certain individuals including parents/caretakers, pregnant women, infants and children. To determine MAGI-based household income, certain types of income are excluded and the only deductions allowed are tax deductions.

The MAGI income limit for pregnant women is 215% of the annual FPL. Please see the 2014 Income Limit for Pregnant Women, attached. The Department of Public Welfare (Department) will advise providers of future FPL updates through issuance of a provider Quick Tip, which will be available on the Department's website at:

<http://www.dpw.state.pa.us/publications/forproviders/QuickTips/index.htm>

PROCEDURE:Determining PE eligibility

The MA provider and PE applicant must complete Part A and Part B of the Presumptive Eligibility Application (MA 332), attached, and, if the applicant wants to apply for ongoing MA, the Application for Healthcare Coverage (PA 600HC). To assist the PE applicant in determining their MAGI under Part A, providers should ask the individual if they filed, or plan to file a Federal Income Tax Form and if the individual was, or expects to be claimed as a dependent by another taxpayer. Household size is based on the individuals included in the tax household, including the unborn child(ren). The tax household size determines the income limit to be used.

The following steps should be taken to determine PE eligibility:

1. Determine the correct tax household size. Please see the Desk Guide to Tax Household Size, attached. The unborn child(ren) must be counted when determining household size.
2. Determine net monthly income:
 - a. Take the gross monthly income and subtract the countable tax deductions. (See MA332 for a complete list of countable tax deductions.) Do *not* count income from child support, Worker's Compensation, depreciation from self-employment, or Veteran's Administration disability benefits.
 - b. If the household's income exceeds the income limit after deductions, disregard five percent (5%) of 100% of the FPL for the family size. This figure is on 2014 Income Limit for Pregnant Women chart, attached. This amount is the tax household's net monthly income.
3. Compare the net monthly income to the income limit for the PE applicant's household size to determine income eligibility. If the net income is equal to or less than the applicable income limit, the PE applicant is eligible.
4. If income eligible, the provider must complete Part B of the MA 332, inform the PE applicant of the eligibility determination and provide the PE applicant a copy of the MA 332.

When a determination of PE for a pregnant woman is made, the provider must encourage and assist the PE applicant in applying for ongoing MA. The PE provider must inform the PE applicant that an ongoing MA application is not required, and she is not required to provide verification if she does not want to continue the MA application process. The provider must inform the applicant of her right to withdraw the application. The provider must submit two copies of the MA 332 to the individual's CAO within five (5) business days. If the PE applicant wants to apply for ongoing MA, the provider must include the PA600HC with the MA332. This may be done by mail or fax; or the applicant may hand-carry the completed MA 332 and PA 600HC to their local CAO. CAO contact information is available on the Department of Public Welfare website at:

<http://www.dpw.state.pa.us/findfacilsandlocs/countyassistanceofficecontactinformation/index.htm>

How CAOs Will Process PE Applications

Only one PE period will be authorized per pregnancy. The CAO will review the PE applicant's history to determine if prior PE periods were authorized during the current pregnancy. If so, the CAO will send a notice of ineligibility for PE.

- The PE authorization will be completed within five business days of receipt in the CAO.
- The PE begin date is the date PE is determined (the signature date on the MA 332).
- The end date of the PE period is the earlier of:

- The last day of the month following the month in which the determination of presumptive eligibility is made, if no application for ongoing MA is received by that date; or
- The date the eligibility determination for ongoing MA is made, if an application for MA is received by the last day of the month following the month in which the determination of presumptive eligibility is made. The PE period will be extended if ongoing MA eligibility has not been determined by the last day of the PE period.
- The CAO will pend ongoing MA during the processing of PE if the applicant is applying for ongoing MA.
- The CAO will send a notice of eligibility for PE to the applicant and the provider.
- The CAO will inform the presumptively eligible woman of any required verification needed to determine ongoing MA eligibility.
- Once verification is received, the CAO must follow requirements for a timely determination of MA eligibility for PE recipients.
- The CAO will send a notice of eligibility or ineligibility for ongoing MA to the individual if an ongoing MA application was submitted.

Pregnant women who are eligible for PE receive services under Healthcare Benefit Package 6 through the Fee-For-Service delivery system. Services provided during the PE period are limited to ambulatory prenatal care. If a pregnant woman incurs medical expenses not covered under the PE period, such as an inpatient admission, the CAO can make retroactive MA coverage available to cover medical expenses if the woman is found eligible for ongoing MA coverage.

Attachments:

Presumptive Eligibility Application (MA 332)
Desk Guide to Tax Household Size
2014 Income Limits for Pregnant Women