



Policy Memo	
KDHE-DHCF POLICY NO: 2015-07-01	From: Jeanine Schieferecke, Senior Manager
Date: July 6, 2015	KEESM/KFMAM Reference: KFMAM 1408
RE: Implementation of Presumptive Eligibility for Pregnant Women and Hospitals and KEES Changes	Program(s): Presumptive Eligibility

This memo provides instruction for implementation of policy changes to the Presumptive Eligibility (PE) programs. These changes are effective with the implementation of KEES. Two new categories of Presumptive Eligibility have been created – PE for Pregnant Women and Hospital PE. There are also some changes to the Presumptive Eligibility Tool and general policy changes to all presumptive eligibility programs.

1. Policies Applicable to all Categories of Presumptive Eligibility

A. Start Date of PE Coverage

PE coverage begins on the date of the PE determination. The PE determination does not have to be completed on the date of service, but services are not covered prior to the date of the PE determination. The PE Tool has been modified to only capture the date of the PE determination, as the date of service is no longer relevant to the determination.

B. PE Coverage for Non-Citizens

Individuals who declare they are an eligible non-citizen are eligible for Presumptive Eligibility. Questions have been added to the PE Tool to capture the information necessary to accurately determine whether or not an individual meets the criteria of a qualified non-citizen. The following questions are presented to individuals who indicate they are not a U.S. citizen. The answers to these questions will allow the PE Tool to determine if the individual meets a qualifying non-citizen status.

- Is this person a Documented Non-citizen?
- What type of Documented Non-Citizen is this person?
- How long has this person been a Legal Permanent Resident or other legal status?

C. Primary Applicants

The Presumptive Eligibility Tool includes a new page called the Primary Applicant Information page. This page is used to gather information regarding the person, parent, or caretaker who is the head of household. The Primary Applicant may be applying for themselves and/or on behalf of others in their household. In addition, the Primary Applicant may be someone who has been appointed as a Medical Representative. When an individual wants to appoint a Medical Representative to act on their behalf, they must complete and sign the Medical Representative Authorization Form.

2. Presumptive Eligibility for Children

The KEES PE Tool that has been used by Qualified Entities since July, 2012 has also been modified. Changes made to the PE Tool for Children were primarily made based on improvements that have been identified since the PE Tool was initially developed. The changes made will be noticed by the Qualified Entities as the users of the PE Tool. No significant changes have been made to the results of the tool provided to the Clearinghouse for processing.

The changes made include the following:

- a. Number of Parents in the Household – Step-parents are now included in the determination for PE Children. The QE shall enter the number of parents (biological, adoptive, or step) in the household with available choices of 0, 1, or 2.
- b. Additional Parent/Guardian Information – When more than one parent is in the home, the tool will capture information about the second parent as well.
- c. Children in the Household – All children living in the home should be entered into the PE Tool. The applicant then has the opportunity to identify which children they are requesting coverage for. Even if one or more children are already receiving coverage, such as through SI, they should be entered on the PE Tool. This will allow the income to be counted correctly but only determines Presumptive Eligibility for those asking.
- d. Delete - A delete button was added so that an individual could be removed from the PE application if they were added in error. This will only appear when multiple children are listed on the application.
- e. Updated parameters to the correct age requirements for a child.

3. Presumptive Eligibility for Pregnant Women

Presumptive Eligibility for Pregnant Women is a new category of coverage.

A. Eligibility Requirements

A pregnant woman may receive a presumptive eligibility determination from any one of the five Qualified Entities. The PE determination can be completed up to and including the date of delivery. PE for PW cannot be determined for a date of service past the date of delivery or for treatment related to a miscarriage.

PE for PW is a MAGI determination; therefore, the pregnant woman must report her tax filing status and information about members of her tax household. For pregnant women who are claimed as a dependent by their spouse or parent, they must know the amount of income received by the individuals in that tax household. Presumptive Eligibility cannot be determined for individuals who do not have this information. This does not apply when the pregnant woman is being claimed as a dependent by someone other than the spouse or parent.

The following eligibility requirements must be met:

- a. Resident of Kansas
- b. U.S. Citizen or Qualified Non-citizen
- c. Age 19 and older (individuals under this age are processed on the PE Children program)
- d. Income below 171% of the Federal Poverty Level for the applicable household size. The household size includes the PW & the number of expected babies
- e. Has not received PE PW coverage already for this pregnancy

Note: A pregnant woman's statement is used to verify if she has already received PE coverage for the same pregnancy.

B. PE for PW Tool

The PE Tool has been modified to include a special module for Pregnant Women PE determinations only. This is a separate PE module from the one that exists for PE Children. If a pregnant woman and her child are both presenting for medical services, a PE determination can be done for both individuals. When this happens, the PE determination for the Pregnant Woman should always be completed first. The PE Tool has been designed to allow QE staff to transfer all of the PW data into the PE – Child tool to improve the efficiency of completing this dual determination.

C. PE – PW Medical Benefits

Women approved for presumptive eligibility on the PE – PW program have a limited medical benefits package. They have access to ambulatory prenatal care that does not cover inpatient care, labor and delivery, or services related to a miscarriage. They are not

enrolled in KanCare, therefore are not assigned to an MCO. Their coverage is provided under the fee-for-service model and medical providers must accept Kansas Medicaid in order to receive reimbursement. Questions regarding the PE PW Benefit Plan are directed to the Fiscal Agent. Members should call 1-800-766-9012. Providers should call 1-800-933-6593.

D. Newborns Born to PE – PW Individuals

A child born to a woman who is receiving PE – PW coverage is not automatically eligible for KanCare coverage. Unlike many other newborns of Medicaid mothers, they do not qualify as a deemed newborn. The PE – PW individual must report the birth and request coverage for the child to the KanCare Clearinghouse. Because the baby is not deemed, and not continuously eligible, a complete determination is required.

4. Hospital Presumptive Eligibility

The Affordable Care Act created a new designation for Presumptive Eligibility determinations: Hospital PE. In addition to children and pregnant woman, hospitals also have the ability to approve presumptive eligibility to certain groups of adults. Individuals who apply for Hospital Presumptive Eligibility do not have to be seeking medical services. They are also not required to be a patient or family member of a patient. They must meet the following general eligibility requirements:

- a. Resident of Kansas
- b. U.S. Citizen or Qualified Non-citizen
- c. Age 19 and older (individuals under this age are processed on the PE Children program)
- d. Meet the specific criteria of one of the three categories below.

The categories of adults covered by the Hospital PE program are described below.

A. Low Income Adults

This group is for individuals who are living in the home and caring for a child under the age of 19. They must have income below 38% of the Federal Poverty Level. This program includes a MAGI determination; therefore, the applicants must report their tax filing status and information about members of the tax household.

B. Former Foster Care

This group is for individuals who are currently under the age of 26 and were in Kansas Foster Care at the time of their 18th birthday. Eligibility for this program is based on the self-attestation of the applicant. PE is not provided if the individual was in foster care in

another state or for youth that are currently in foster care. There is no income or household test for this program.

C. Breast and Cervical Cancer (BCC)

This group is for individuals with BCC who were diagnosed by the Early Detection Works (EDW) program. This is based on the self-attestation of the applicant but they will be required to report details about their participation in the EDW program, such as the name of the EDW entity that completed their screening, the date the screening was completed, whether or not they are receiving continuous treatment, and if they are covered by other health insurance. All of these factors will be considered when determining eligibility for PE. There is no income test for this program.

5. PE Tool – Known Issues

The following outline some known issues with how the PE Tool functions and calculates presumptive eligibility. The following special processes must be followed by Qualified Entity staff to ensure that the correct presumptive eligibility is determined.

As the QE is ultimately responsible for accuracy of the determination, it is the responsibility of the QE to ensure their staff are aware of the issues and are following the proper processes and workarounds.

A. Mandatory Fields

Some of the fields marked as mandatory on the PE Tool are letting the user through the tool without completion. However, the PE determination will not calculate without the data or will cause additional problems in later processes. PE Tool users must always enter all fields marked as mandatory. The following specific data elements are impacted:

1. Non-citizen questions

When answering 'No' to the U.S. Citizen question, the follow-up question displays: 'Is this person a Documented Non-Citizen?' If this question is left blank, it will result in a PE denial for Undocumented Non-Citizen. To prevent this denial, QE staff should answer all PE Tool questions. If this result is received and was not expected, staff should navigate back to the Additional Consumer Information page and verify the answers to all questions.

2. Child's Date of Birth

The child's Date of Birth is a mandatory field on the Caretaker Medical Information Page, however currently the QE staff will be able to proceed without entering a date. If a date is not entered, or if there is non-numeric information entered in this field, the

system creates the child's birthday as 'Today's' date. This will have downstream impacts at the Clearinghouse during registration of the PE Tool.

B. PE Tool Mapping

When a QE is completing multiple PE determinations, the Tool was designed to be completed in a specific order: PE Adult tool, PE PW tool, PE Children tool. When completing in this order, the data entered on each tool is to be mapped to the next tool in order to prevent duplicate data entry. However, this mapping is not working correctly. The non-citizenship questions are not mapping correctly and therefore the PE Tool user must reenter this data in each of the PE tools.

C. Approval Letters

The PE Tool generates approval letters which are to be printed, signed, and provided to the consumer. A copy of the letter shall be maintained by the QE and faxed to the Clearinghouse as part of the PE Tool packet. There are two known issues related to approval letters.

1. PE PW Approval Letter

The PE PW approval letter produced by the PE Tool is not consistent with the policy. As stated above, PE PW consumers have a limited benefit package and are not a part of KanCare. The approval letter produced by the tool incorrectly states that the consumer *is* a part of KanCare and refers providers to bill the assigned Managed Care Organization (MCO). QE staff are not to use the PE PW approval letter produced in the tool. An alternative approval letter is provided as an attachment to this memo, along with instructions on how to complete the letter.

2. PE Adult - Spanish Approval letter

The Qualified Entity Staff Name is not populating on the Spanish version of the PE Adult approval letter. After printing, QE staff must print their name in this field before signing the letter.

D. Former Foster Care Determination

On the PE Adult tool, the Former Foster Care category is only available to individuals up to the age of 26. However, the PE Tool will approve individuals for this category regardless of age. When the QE staff are conducting the interview with PE applicants, if the applicant answers 'yes' to the question asking if they were in Kansas foster care on the date of their 18th birthday, if the person is age 26 or older the answer must be entered as 'no'.

E. Editing Data from the Summary Page

When clicking the Edit button on the Summary page and navigating back to the data collection page there are instances where the data previously entered is not saved on the data collection pages, or the data updates are not saved when navigating back to the summary page. When this occurs, QE staff must start a new PE Tool.

Options for addressing the invalid tool include leaving the PE Tool as an incomplete tool, or using the Withdrawal button which denies the PE tool on the basis of Client Withdrawal.

F. PE PW Tool – Errors when Submitting

When clicking the Accept Results button on the PE PW tool, an error is received. First, QE staff should be assured that the PE Tool is getting submitted accurately. After receiving the error, QE staff will need to clear their internet cache and delete cookies. They can then search and locate their PE determination in 'My PE Applications' so they can complete the process. In addition, if the QE staff were completing the PE Child tool next, the data entered on the PE PW tool will not auto populate into the PE Child tool and staff must reenter the information.

Note: This error is not occurring consistently. Users may not experience this problem.

G. Household Size – PE Adult

The PE Adult tool is incorrectly counting the household size in some situations. When the applicant answers 'Yes' to filing taxes, 'Yes' to being claimed as a dependent on someone else's tax return and the relationship type between the tax payer and the applicant = Other, the household size is incorrect. In this scenario, the only people being counted in the home are the Applicant + Spouse if answered yes to being married or the Additional Parent/Guardian + number of babies expected if 'Yes' to pregnant. The Number of Minor children in the home and the Number of dependents claimed by the tax payer are not being counted in the household size.

When this situation occurs, a special process will be required if the Low Income Caretaker is being denied by the PE Tool for excess income. QE staff must determine the correct household size, and compare it to the Income chart outlined below. If the PE applicant would qualify using the correct household size, then the QE must enter \$0 income into the PE Tool so that it will approve eligibility. A special note must be made on the Fax Cover Sheet when submitted to the Clearinghouse so they are aware that this workaround was applied and what the correct amount of income is for the household.

Caretaker Medical	
Household Size	38% Caretakers and Children
1	373
2	505
3	637
4	768
5	900
6	1032
7	1164
8	1295
Extra Person	132

H. SSP Application Issues

1. SSP Mapping

The PE Tool and SSP were designed so that when linking the PE tool to the SSP application, the PE tool would map data into the SSP to avoid duplicate entry of information. In some cases, information is not all mapping as planned. Information may have to be re-entered.

2. PDF of the SSP Application

When an SSP Application is completed after linking to the SSP from the PE Tool, a PDF is not being produced of the application. It is accurately submitted to KEES, but the consumer will not be able to access the PDF of the application to print/save.

I. My PE Applications

After starting a PE – CHILD Tool, the user is not able to go back and review the Confirmation page. This impacts several actions which are outlined below.

1. Re-printing the Approval/Denial Letter

The user will not be able to print another copy of the Approval/Denial letter if it was not already printed. To get a copy of the notice, contact the Help Desk at 1-844-723-5337- Option 2. Users won't be able to re-print the Approval/Denial notice, access the Release of Information form, link to the SSP or finish an Incomplete Tool.

2. Incomplete PE Tools

If a PE Tool is not completed the first time it is started, the user will be unable to access it to complete it. A new PE Tool must be completed.

3. Release of Information

The pre-populated version of the Release of Information is not available. The user must access the blank Release form from the PE Tool home page.

4. Link to the SSP

When not able to access the Confirmation page, the user won't be able to link to the SSP from the PE Tool. Access the SSP directly to complete the online application.

J. Tax Page for PE – Pregnant Woman and PE – Adult Tool

There are two situations where a special process may need followed related to the tax household for an applicant. These are: an applicant who is not filing taxes and also not being claimed as a tax dependent, or an applicant who is being claimed as a tax dependent by someone other than their parent or spouse. In these situations, the tax questions on the PE Tool must be completed with the following answers in order to get the correct result.

- What is the name of the Taxpayer: NA
- What is the relationship of the taxpayer to the pregnant woman: Other
- How many dependents does the taxpayer claim on their return: 0
- Does the pregnant woman know the gross income of this taxpayer: Yes
- What is the gross income of the taxpayer: 0

6. Additional Resources

The following additional resources are available to QE staff and Clearinghouse PE staff:

- PE Resource Manual
- Hospital PE Policy Training
- PE Child/PE PW Policy Training
- PE Adult Tool Training
- PE PW/Child Tool Training
- PE for PW Approval Letter (English and Spanish)
- PE Form Instructions
- Medical Representative Authorization Form

7. Questions

For questions about the functionality of the PE Tool, contact the KEES Help Desk at 1-844-723-5337.

For questions or concerns related to this document, please contact one of the KDHE Medical Policy Staff listed below.

Allison Miller, Family Medical Program Manager – amiller@kdheks.gov

Russell Nittler, Senior Manager – rnittler@kdheks.gov

Jeanine Schieferecke, Senior Manager – jschieferecke@kdheks.gov