



Policy Memo	
KDHE-DHCF POLICY NO: 2015-06-01	From: Jeanine Schieferecke, Senior Manager
Date: June 8, 2015	KEESM/KFMAM Reference: KEESM 2145.4 and 2146.6; KFMAM 2046.01
RE: Reasonable Opportunity Periods	Program(s): All Medical Assistance Programs

This memo provides new instruction regarding Reasonable Opportunity Periods. Reasonable Opportunity (RO) Periods were implemented for U.S. citizens in Policy Memo 2014-01-01 and for non-U.S. citizens in Policy Memo 2014-11-01. This memo modifies processing instructions for these policies. New instructions were originally released on January 16, 2015 and have been in place since that date.

Policies are applicable to all medical assistance programs and are effective as indicated above, unless specifically indicated otherwise. The process described below shall be followed until KEES is implemented. Updated instructions involving the use of the Federal Data Services Hub will be provided at that time.

Items 1 and 2 below are provided for background purposes only and are not changing.

1. U.S. CITIZENS

Applicants who declare to be a US citizen are provided an RO Period in order to obtain citizenship and identify verification. If verification isn't available through other sources (including data sources, the existing case file or by the applicant), an RO period is established for applicants who declare citizenship status. Once the RO period is established, documentation is then requested from the applicant. Prior medical assistance may also be provided as part of an RO period.

If proof of citizenship and identity is received, the RO period ends and additional information is not necessary. If proof is not received, action is taken to end coverage.

2. NON-U.S. CITIZENS

Applicants who declare to be a qualifying non-citizen are provided an RO Period in order to provide verification of immigration status. If verification isn't available through other sources (including SAVE, the existing case file or verification supplied by the applicant), an RO period is established for all applicants who declare a qualifying non-citizen status. Once the RO period is established, documentation is then requested from the applicant. Prior medical assistance may also be provided as part of an RO period.

2.1 ELIGIBLE NON-CITIZENS

The following table lists all immigration statuses that could qualify an individual as an eligible non-citizen. Some of these statuses require a five year wait following the date qualifying status is obtained. For individuals who must meet the 5 year wait, the date of entry is required in order to establish if they are a qualified non-citizen.

Must meet 5 Year Wait	Eligible without wait
Lawful Permanent Residents	Asylees and Refugees
Paroled into the U.S. for at least one year	Cuban/Haitian entrants
Conditional entrant granted before 1980	Victims of trafficking and his or her spouse, child, sibling, or parent or individuals with a pending application for a victim of trafficking visa
Battered non-citizens, spouses, children, or parents	Granted withholding of deportation
	Member of a federally recognized Indian tribe or American Indian born in Canada

3. LENGTH OF REASONABLE OPPORTUNITY PERIOD

The length of the RO period is three months from the date the approval action is taken. When the RO is approved, a request for information is sent to the individual requesting necessary proof of citizenship or non-citizenship status. The information is due three months from the date of approval. If verification is provided or received prior to the due date, the RO period is removed and full eligibility continues. For all others, the case is evaluated by the due date of the information required.

Example: The application is approved with an RO period on April 23rd. The due date in the information request notice will be July 23rd. The case is evaluated on July 23rd.

If the information has not been received, an additional request for information is sent, allowing an additional 10 days to provide the information. If the information is not received by the second due date, action is taken to end coverage, allowing for timely and adequate notice. This action only impacts the individual subject to the RO.

Individuals are only allowed one Reasonable Opportunity Period. Individuals who have been granted an RO period and are closed for failing to provide verification, and subsequently reapply for benefits shall be required to provide verification of their citizenship or immigration status prior to approval.

4. KAECSSES PRAP CODING

As a reminder, the following KAECSSES PRAP codes are used to document and track the status of citizenship and identity verification.

Comprehensive List of Citizenship and Identity PRAP codes	
IM	Identity/Citizenship Verification Requirement Met - Use when the individual has satisfied both the citizenship and identity verification requirements.
IE	Exempt From Citizenship and ID Verification - MC and SSI - This code is used for all individuals exempt from verification due to Medicare or SSI recipient status. Enter the code when Medicare beneficiary or SSI recipient status is verified.
IP	Identity/Citizenship Verification - Pended - Use for individuals approved for a Reasonable Opportunity period, or when pending for additional verification.
ID	Identity/Citizenship Verification Requirement Failed (benefits were denied or terminated) - Use when the individual fails to meet the verification requirements.
IC	PPS Only - Identity/Citizenship Pended - A special code to be used only by PPS staff for cases where medical assistance is authorized, but verification is pending. Primarily for new FC and AS children in out of home placements. The code remains in place if verification is never received.

As always, when the status of citizenship and identity verification changes, it is important to remove the incorrect PRAP code and replace with the correct one. Do not leave both PRAP codes present.

Example: If an individual is approved for a Reasonable Opportunity period, the PRAP code should be updated to IP. Once documentation is received, the IP is removed and replaced with IM.

5. CONCLUSION

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

Tim Schroeder, Elderly and Disabled Program Manager – tschroeder@kdheks.gov

Jeanine Schieferecke, Senior Manager – jschieferecke@kdheks.gov