

NUMBER

#20-21-13

DATE

December 15, 2020

OF INTEREST TO

County Directors

Social Services Supervisors and
Staff

Financial Assistance Supervisors
and Staff

Tribal Chairpersons and Tribal
Health Directors

Health Care Eligibility
Operations (HCEO) Managers,
Supervisors and Staff

ACTION/DUE DATE

Please read information and
follow issued instructions.

EXPIRATION DATE

December 15, 2022

DHS Announces a Change to Processing PARIS Interstate Matches for MHCP Enrollees During the COVID-19 Public Health Emergency

TOPIC

A change to processing Public Assistance Reporting Information System (PARIS) interstate matches received for Minnesota Health Care Programs (MHCP) enrollees during the COVID-19 public health emergency.

PURPOSE

This bulletin explains a change to processing PARIS interstate matches received for MHCP enrollees during the COVID-19 public health emergency.

Contact

County, tribal agencies and DHS workers should submit Medical Assistance (MA) and MinnesotaCare policy questions via HealthQuest. All others should direct MA and MinnesotaCare questions to:

Health Care Eligibility and Access (HCEA) Division
PO Box 64989
540 Cedar Street, St. Paul, MN 55164-0989

SIGNED

MATT ANDERSON
Assistant Commissioner/State Medicaid Director
Health Care Administration

TERMINOLOGY NOTICE

The terminology used to describe people we serve has changed over time. The Minnesota Department of Human Services (DHS) supports the use of "People First" language.

I. Background

On April 29, 2020, the Department of Human Services (DHS) (hereafter referred to as “we”) published [Bulletin #20-21-02](#), announcing temporary eligibility policy changes for Minnesota Health Care Programs (MHCP) to ensure enrollees maintain coverage during the COVID-19 emergency. In that bulletin, we stated that PARIS interstate matches would continue for MHCP enrollees, and we issued a revised process for handling these matches in ONEsource.

PARIS is an information exchange system by the Administration for Children and Families, U.S. Department of Health & Human Services (HHS) that provides state public assistance agencies with client data resulting from state and federal computer matching. PARIS provides a quarterly interstate match to identify possible concurrent eligibility and erroneous payments made for the same beneficiary in more than one state.

CMS published an interim final rule, effective November 2, 2020, which reinterprets section 6008(b)(3) of the Families First Coronavirus Response Act (FFCRA) under which states seeking the temporary enhanced federal funding must maintain enrollees coverage through the end of the month in which the COVID-19 public health emergency ends (also known as the “continued enrollment condition”). The new rule makes a number of changes affecting current temporary COVID-19 policies, including to the processing of PARIS interstate matches. This is the first of several bulletins we will issue to implement changes due to the interim final rule.

This bulletin discusses a change to temporary policies about processing PARIS interstate matches received for MHCP enrollees during the COVID-19 public health emergency.

The policy changes in this bulletin apply to all of the following Medical Assistance populations and subprograms:

- Medical Assistance for Families with Children and Adults (MA-FCA)
- Medical Assistance for People Age 65 and Older, Blind or Disabled (MA-ABD)
- Medical Assistance for Employed Persons with Disabilities (MA-EPD)
- Medical Assistance for Long-Term Care (MA-LTC)
- Medical Assistance under the TEFRA Option
- Medical Assistance Northstar Care for Children
- Medical Assistance for the Treatment of Breast and Cervical Cancer (MA-BC)
- Medical Assistance for People Receiving Services at the Center for Victims of Torture (MA-CVT)
- Medicare Savings Programs (MSP): Qualified Medicare Beneficiaries (QMB), Service Limited Medicare Beneficiaries (SLMB), Qualified Individuals (QI) and Qualified Working Disabled (QWD)
- Emergency Medical Assistance (EMA)
- Minnesota Family Planning Program (MFPP)

The policy changes in this bulletin apply to all MinnesotaCare populations, including MinnesotaCare for Deferred Action Childhood Arrivals (DACA).

These policy changes apply to all MA and MinnesotaCare enrollees including enrollees from or receiving services from a tribal nation.

II. PARIS Interstate Match Processing During the COVID-19 Emergency

Before December 15, 2020, temporary policies for processing PARIS matches during the COVID-19 public health emergency did not permit closing MA or MinnesotaCare if the enrollee failed to respond to a request for information (RFI) following a PARIS match. County, tribal and DHS workers were only permitted to close MA or MinnesotaCare due to a PARIS match if an enrollee responded and confirmed he or she is no longer a resident of the state.

Effective December 15, 2020, in addition to closing an enrollee who respond and confirms he or she is no longer a state resident, workers must also close MA and MinnesotaCare for an enrollee who appears in a PARIS match, if:

- the worker has made a reasonable attempt to verify the enrollee’s state residency, and
- the enrollee has failed to respond to a RFI about their Minnesota residency.

A reasonable attempt to verify an enrollee’s state residency includes but is not limited to: reviewing case file information, calling all known enrollee phone numbers, checking with other program areas if the enrollee is a recipient of other public programs, and examining all available information technology systems data. Document attempts to verify the enrollee’s state residency in the case file and case notes.

If the worker is unable to contact the enrollee, the worker must send an RFI for proof of state residency. After 10 days, if the enrollee does not respond to the request, and a reasonable attempt to verify the enrollee’s state residency has occurred and been documented, close MA or MinnesotaCare with 10 day advance notice. The reason for closure must be “not a state resident.”

If an enrollee responds after the effective date of closure and provides verification that he or she is still a resident of Minnesota, reinstate MA or MinnesotaCare back to the date of closure. There is no time limit to restoring coverage if the person is found to be a Minnesota resident following closure for this reason.

This new temporary policy does not apply to returned mail or other circumstances where the agency receives inconsistent information about an enrollee’s Minnesota residency. Workers must not close MA or MinnesotaCare for an enrollee who fails to respond to an RFI during the public health emergency, unless that request was specifically prompted by receipt of a PARIS match.

III. Action Required

Effective December 15, 2020, county, tribal and DHS workers must follow the policies outlined in this bulletin and corresponding updated ONEsource instructions.

IV. Legal References

Additional Policy and Regulatory Revisions in Response to the COVID-19 Public Health Emergency, *Federal Register*, Vol. 85, No. 71142 (Nov. 6, 2020)

Americans with Disabilities Act (ADA) Advisory

This information is available in accessible formats for people with disabilities by calling 651-297-3862 or toll free at 800-657-3672, or by using your preferred relay service. For other information on disability rights and protections, contact the agency's ADA coordinator.