Oregon ContraceptiveCare Client Eligibility Verification - Frequently Asked Questions

If you have a question that is not answered here, please contact Rachel Linz at 971-673-0358 or rachel.s.linz@state.or.us or Emily Elman at 971-673-0219 or emily.l.elman@state.or.us.

What is income verification?
The Centers for Medicare and Medicaid Services (CMS) requires that any individual enrolling in a Medicaid program (including CCare) must meet certain income eligibility requirements. For CCare, individuals must have income at or below 250% of the federal poverty level at the time of enrollment. Clients enrolling in CCare self-declare their income and household size on the enrollment form. State CCare staff verify clients’ income using a secure electronic process with the Oregon Employment Department, and suspend eligibility for clients whose income records indicate they may be above the eligibility guidelines (see below for details).

What is “preliminary income?”
Preliminary income or pre-enrollment income is what state CCare staff check each month. Because the Oregon Employment Department collects wage information on a quarterly basis, we have to start by checking clients’ income from the quarter before they enrolled (because their actual enrollment quarter income is not available yet). Clients will never have their eligibility terminated because of their pre-enrollment income, but we do suspend eligibility based on the pre-enrollment income check.

What is “actual income?”
Because we start with pre-enrollment income, we do go back and check clients’ wage information from the actual quarter when they enrolled in CCare. That information is available four times per year (see schedule below). Clients whose actual enrollment quarter income is above the eligibility guidelines will have their eligibility suspended. Clients whose eligibility has been suspended for actual enrollment quarter income will have their eligibility terminated after 45 days of suspension unless the discrepancy has been resolved.

<table>
<thead>
<tr>
<th>CCare Client Income Verification Schedule</th>
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<tbody>
<tr>
<td>Client enrolled during:</td>
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<tr>
<td>Q1 Jan. 1 – Mar. 31</td>
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<td>Q2 Apr. 1 – Jun. 30</td>
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<td>Q3 Jul. 1 – Sep. 30</td>
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<td>Q4 Oct. 1 – Dec. 31</td>
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What is the difference between suspended eligibility and terminated eligibility?
The client’s record in the CCare Eligibility Database will display a message explaining whether they are suspended or terminated. When a client’s eligibility has been suspended, state CCare staff can reinstate their eligibility, at which point the client can receive CCare services again. When a client’s eligibility has been terminated, the client will have to fill out a new CCare enrollment form (including
updated self-declared income) in order to receive CCare services. Clients whose eligibility has been terminated will still be in the CCare Eligibility Database so they can re-enroll.

This is the message that displays for a client with suspended eligibility:

This client is NOT currently eligible for CCare benefits

Wage records indicate client may be over CCare income threshold. CCare eligibility is suspended until client is contacted to resolve income discrepancy. Once explained, contact CCare state staff to reinstate client's eligibility.

This is the message that displays for a client with terminated eligibility:

This client is NOT currently eligible for CCare benefits

Eligibility dates were ended because client cannot verify income

Will CCare pay claims for a suspended client's visit?
If the visit occurred within the client’s eligibility period (before the date of suspension), CCare will reimburse for the visit. The client’s eligibility dates are shown in the client’s record in the CCare Eligibility Database. Any claim with a date of service after the client’s record has been suspended or terminated will be denied.

What do we need to do to resolve an income discrepancy?
For clients whose eligibility has been suspended for actual enrollment quarter income, clinic staff should contact the client and have a verbal conversation to confirm their income information. If the client has a reasonable explanation for the discrepancy, clinic staff should contact state CCare staff to have the client’s eligibility reinstated. You can call or email state CCare staff and we will reinstate their eligibility. If a client is in the clinic and state CCare staff are unavailable, leave a voicemail or send an email and we will reinstate their eligibility as soon as we are able. We will always trust the client’s word over the wage records that we search, so clients should not be turned away if state CCare staff are not available to lift a suspension right away.

What are considered “reasonable explanations” for being over income?
There are a number of reasons why a client’s reported income on the CCare Enrollment Form may not match what is found in the Oregon Employment Division’s records. Because employers are required to report earnings on a quarterly basis instead of a monthly basis, we are only able to determine an average monthly income. For example, a check of a client’s preliminary quarter’s earnings may put the client over income for CCare eligibility. However, when contacted the client may state that s/he had a job but then lost it and was receiving little or no income when enrolled in CCare. Another acceptable explanation could be that a client was unemployed when s/he enrolled in CCare but then found a job the next month which resulted in a high quarterly earnings.

A client’s eligibility may be reinstated if s/he provides one of the following explanations:

- Employment status changed at some point in the quarter
- Received a bonus or increase in pay at some point in the quarter
- Household size changed at some point in the quarter
There may be other reasonable explanations for an income discrepancy. If a client’s eligibility should be reinstated or if you are unsure, please contact Rachel Linz at 971-673-0358 or rachel.s.linz@state.or.us or Emily Elman at 971-673-0219 or emily.l.elman@state.or.us. Be sure to provide the explanation from the client in either the voice mail or email message. We will work with you reinstate eligibility whenever possible.

What if the client does not recall their income for the reported period?
If a client does not recall what her/his income was for the period, the state must use the information provided in the Oregon Employment Department records. If the records indicate that the client’s income is above the eligibility guidelines for their reported household size, CCare eligibility will remain suspended until the client can provide corrected information on their income and/or household size.

What if we cannot reach the client because they have moved or their phone number has changed?
If the client cannot be contacted, you will need to wait until the client makes contact with a CCare provider to receive services. At that time it is expected that efforts will be made to resolve the issue. If the client was suspended for preliminary income, their eligibility will remain suspended until actual income is checked. If the client was suspended for actual income, their eligibility will be terminated after 45 days unless the discrepancy is resolved within that time.

Suggested Scripts for Contacting Clients:
We recognize the challenges and sensitivity around contacting clients. It is important that clients be aware that they are being contacted because the state is following its obligation to ensure program integrity and maintain funding. We want to be sensitive to clients’ concerns around confidentiality. When contacting the client, try to maintain a light tone to prevent the client from feeling like they are being punished or second-guessed. Please see below for suggested scripts.

Suggested Script
Hello, my name is ____________ and I am calling from ________________. You have received family planning services from us/our clinic in the past through a program called CCare. We have been asked to confirm some of the information you provided on the CCare Enrollment Form and it appears that some of the information does not match our records search. There are, of course, many reasons why that could happen and we are hoping you can help us resolve this discrepancy.

Income Verification
You reported a monthly income of $_______ on the CCare Enrollment Form. This doesn’t appear to match records from the Oregon Employment Department’s records of reported wages [for the previous quarter/for the current quarter]. Since those records only provide information for three-month periods (or quarters) at a time, we are checking to see if something changed in your employment status or your income between that time and the month that you enrolled in CCare.

We also want to make sure we have your correct household size. Is it still [household size listed on enrollment form]?

Thank you for your time and helping to explain the difference in information.