# Oregon Reproductive Health Access Fund
# Enrollee Verification FAQs

ORHP

**If you have a question that is not answered here, please contact us at rh.enrollment@oha.oregon.gov.**

## Background

The RH Access Fund uses three funding sources to reimburse for clinical services, CCare, RHEA, and Title X. Each funding source has different requirements. CCare requires us verify the eligibility for enrollees who mark U.S. Citizenship on their RH Access Fund Enrollment Form. This document answers frequently asked questions about the eligibility verification process.

## Key Terms

**Client**: is a person with reproductive capacity who is seeking reproductive health, family planning, or abortion services at a RHCare, CCare, or AbortionCare clinic.

**Enrollee:** a client who has completed the RH Access Fund Enrollment Form and is enrolled in RH Access Fund.

## OHP Enrollment Checks

### Why do state staff check for OHP Enrollment?

OHP enrollment is checked for all enrollees because our funding does not allow them to be enrolled in both OHP and the RH Access Fund. This applies only to full benefit OHP coverage (OHP Plus); a client covered by CWM or CWM Plus may enroll in the RH Access Fund.

### How do state staff check for OHP Enrollment?

Prior to claims processing each month, Ahlers generates a list of enrollees for whom a claim was submitted to the RH Access Fund. This list is matched against MMIS records to see if any enrollees had active OHP enrollment on the date of service on the claim. This is called a 270/271 match.

If an enrollee has active OHP eligibility, their submitted claim will be rejected, and this will appear in the RH Access Fund OHP Coverage Report. Additionally, Ahlers will terminate the enrollee's RH Access Fund enrollment in the eligibility database. Clinics will then need to submit the claim to OHP or the client's CCO for payment. Note that the RH Access Fund OHP Coverage Report will also list enrollees who had CWM coverage on the date of service of the submitted claim; however, this is informational only and these enrollees will retain their RH Access Fund coverage.

If a client no longer has active OHP eligibility, they may re-enroll into the RH Access Fund by completing a new enrollment form.

## Citizenship Verification

### Why do state staff verify enrollees' U.S. Citizenship?

The RH Access Fund uses three funding sources to reimburse for clinical services, and each source has different requirements. One of these funding sources, CCare, requires that US Citizenship be verified for enrollees who marked U.S. Citizenship on the Enrollment Form. We use this funding source when possible, because it allows us to obtain a federal funding match for services provided to eligible enrollees.

We do not verify information provided by enrollees who marked Eligible Immigration Status, Another Status, or who leave the citizenship/immigration question blank on the Enrollment Form, because the funding sources that pay for services provided to these enrollees do not require verification.

### How do state staff verify U.S. Citizenship?

Each month, state staff generate a list of enrollees who completed an enrollment form in the previous month. From this list we select all enrollees who marked U.S. Citizenship on the Enrollment Form.

U.S. Citizenship

State staff send the names, dates of birth (DOB), and SSNs of enrollees who marked U.S. Citizenship to the Social Security Administration (SSA) for SSN and citizenship verification.

To verify citizenship for enrollees who enrolled without an SSN, state staff attempt to find an SSN by searching state databases. All SSNs that are found are sent to the SSA for verification. As an additional measure, enrollees who do not know their SSN should complete an Oregon birth record request form, or an out-of-state birth certificate request (see instructions for requesting out-of-state birth certificates).

If state staff are unable to find an enrollee, or their information could not be verified, the enrollee is still eligible for the RH Access Fund; however, clinic staff should ask the client to provide proof of their citizenship. See the end of this document for a sample script for contacting clients to verify their citizenship status.

Eligible Immigration Status

State staff do not verify the immigration status of enrollees with Eligible Immigration Status. These enrollees are not required to submit immigration documentation or SSN.

Another Status

State staff do not verify the status of enrollees with Another Status. These enrollees are not required to submit documentation or SSN.

Unknown Status (i.e., enrollees who leave the citizenship/immigration status question blank)

State staff do not verify the status of these enrollees. These enrollees are not required to submit documentation or SSN.

## Income Verification

### Which enrollees' income is verified, and why?

All the funding sources for the RH Access Fund require enrollees to meet certain eligibility criteria to enroll. One of the eligibility criteria is having an income at or below 250% of the federal poverty level at the time of enrollment. All enrollees self-report their income on the Enrollment Form. For enrollees who mark Eligible Immigration Status or Another Status this is sufficient to meet our funding requirements. However, for enrollees who mark U.S. Citizenship, our funding requires us to verify that their income falls at or below the income limit.

### How do state staff verify enrollees' income?

The income of enrollees who mark U.S. Citizenship on the Enrollment Form is verified quarterly using wage information from the Oregon Employment Department. Enrollees whose income is found to be over the income limit for their household size will have their coverage suspended. Enrollees whose coverage is suspended (according to the schedule below) will be listed in the RH Access Fund Eligibility Status Update spreadsheet that is sent via email.

### When do state staff verify enrollees' income?

Wage information from the Oregon Employment Department is available on a quarterly basis (see schedule below). We check the wage information of enrollees who mark U.S. Citizenship from the quarter when they enrolled, and calculate a monthly average.

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Enrollees whose average monthly income is above the income limit for their stated household size will have their coverage *suspended*. Enrollees whose coverage has been *suspended* will have their coverage *terminated* after 45 days of suspension unless the discrepancy has been resolved.

| Enrollee Income Verification Schedule | |
|---|---|
| **Enrollee Enrolled During:** | **Income Will be Checked In:** |
| Jan. 1 – Mar. 31 (Q1) | May |
| Apr. 1 – Jun. 30 (Q2) | August |
| Jul. 1 – Sep. 30 (Q3) | November |
| Oct. 1 – Dec. 31 (Q4) | February |

**What is the difference between suspended coverage and terminated coverage?**

The enrollee's record in the RH Access Fund Eligibility Database will display a message explaining whether they are suspended or terminated.

***Suspended:*** When an enrollee's coverage has been suspended, state staff can reinstate their coverage, at which point we will reimburse for RH Access Fund-covered services again.

> **This client is NOT currently eligible for RH Access Fund**
>
> **Wage records indicate client may be over RH Access Fund income limit. RH Access Fund coverage is suspended until client is contacted to resolve income discrepancy. Once explained, contact RH Program state staff to reinstate client's coverage.**

***Terminated:*** When an enrollee's coverage has been terminated, they must complete a new RH Access Fund Enrollment Form (including updated self-reported income) to re-enroll in the RH Access Fund. Enrollment records for enrollees whose coverage has been terminated will remain in the RH Access Fund Eligibility Database

> **This client is NOT currently eligible for RH Access Fund benefits**

**Coverage was ended because client cannot verify income. Client MUST fill out a new enrollment form before billing the RH Access Fund.**

### Will the RH Program pay claims for enrollees whose coverage has been suspended or terminated?

If the visit occurred before the date of suspension or termination the RH Access Fund will reimburse for the visit. The enrollee's coverage dates are shown in the enrollee's record in the RH Access Fund Eligibility Database. The RH Access Fund will deny any claims with a date of service after the enrollee's coverage has been suspended or terminated.

### What do we need to do to resolve an income discrepancy?

Clinic staff should contact the enrollee and have a verbal conversation to confirm their income information for the month when they enrolled. If the enrollee has a reasonable explanation for the discrepancy, clinic staff should contact state staff to have the enrollee's coverage reinstated. You can call or send a secure email to state staff and we will reinstate their coverage. Do not ask the enrollee for pay stubs or other paper documentation.

### What if the enrollee is checking in for a visit right now, and their coverage is suspended?

If an enrollee is checking in or having a visit right now and state staff are unavailable, leave a voicemail or send a secure email and we will reinstate their coverage as soon as we are able. We will always trust the enrollee's word over the wage records that we search, because we are calculating a monthly average and we know that many enrollees have income that changes from month to month. <u>Enrollees should not be turned away if state staff are not available to lift a suspension right away.</u>

### What are considered "reasonable explanations" for being over income?

There are several reasons why an enrollee's reported income on the RH Access Fund Enrollment Form may not match what is found in the Oregon Employment Division's records. Employers only report earnings on a *quarterly* basis instead of a *monthly* basis, therefore we are only able to determine an *average* monthly income. For example, an enrollee may state that they were unemployed when they enrolled but then found a job the next month which resulted in high quarterly earnings and a monthly average that is above the limit. In this case, the enrollee would still be eligible for the RH Access Fund if their income was below the limit during the month they enrolled.

An enrollee's coverage may be reinstated if they provide 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 an enrollee's coverage should be reinstated or if you are unsure, please contact us at rh.enrollment@oha.oregon.gov. Be sure to provide the explanation from the enrollee in either the voice mail or secure email message. We will work with you to reinstate coverage whenever possible.

### What if the enrollee does not recall their income for the reported period?

If an enrollee does not recall what their income was for the period, the state must use the information provided in the Oregon Employment Department records. If the records indicate that the enrollee's income is above the income limit for their reported household size, coverage will remain suspended until they can provide corrected information on their income and/or household size, or until 45 days after the suspension date, at which point coverage will be terminated.

## Following Up with Enrollees

### What if we cannot reach the enrollee because they have moved or their phone number has changed?

If the enrollee cannot be contacted, you will need to wait until the enrollee makes contact with a RHCare or CCare clinic to receive services. At that time, efforts should be made to resolve the issue. If the enrollee has been suspended and the discrepancy cannot be resolved within 45 days after the date of suspension, the enrollee's coverage will be terminated and the client will need to complete a new RH Access Fund enrollment form, and the income verification process will start over.

#### *Sample Scripts for Contacting Enrollees:*

We recognize the challenges and sensitivity around contacting clients/enrollees. It is important to make them aware that they are being contacted because the state is following its obligation to maintain funding. We want to be sensitive to clients'/enrollees' concerns around confidentiality. When contacting them, try to maintain a light tone to prevent them from feeling like they are being punished or second-guessed. Please see below for suggested scripts.

*Sample Script for Verifying Income*

*Hello, my name is __________ and I am calling from ______________. You enrolled in the RH Access Fund and we have been asked to confirm some of the information you provided on the Enrollment Form. It appears that some of the information does not match our records search. There are many reasons why that could happen, and we are hoping you can help us resolve this discrepancy.*

*You reported a monthly income of $______ on the RH Access Fund Enrollment Form. This doesn't appear to match records from the Oregon Employment Department's records of reported wages. 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 during that time period.*

*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.*

*Sample Script for Collecting Citizenship Documentation*

*Hello, my name is __________ and I am calling from ______________. You enrolled in the RH Access Fund and we have been asked to confirm some of the information you provided on the Enrollment Form.*

*You marked on the RH Access Fund Enrollment Form that you have U.S. Citizenship. We have not been able to find records to confirm this. To help us pay for your services, could you please bring in proof of your U.S. citizenship, like a passport, or birth certificate? [If client has not provided their SSN] We can also use your SSN to verify your U.S. Citizenship, are you able to provide your SSN?*