

TO: Local District Commissioners, Medicaid Directors

FROM: Gabrielle Armenia, Director
Division of Eligibility and Marketplace Integration

SUBJECT: Public Assistance Reporting Information System (PARIS) Uniform Guidelines

ATTACHMENT: Acceptable documents for proof of Residency

EFFECTIVE DATE: Immediately

CONTACT PERSON: Local District Support Unit
Rest of State (ROS) (518) 474-8887
NYC (212) 417-4500

The purpose of this General Information System (GIS) message is to advise local departments of social services (LDSS) and the Human Resources Administration (HRA) of requirements related to processing Public Assistance Reporting Information System (PARIS) matches. The PARIS is a federal match that identifies consumers who are reported to be receiving public benefits in more than one state. The Office of the New York State Comptroller (OSC) recently conducted an audit which included a review of the PARIS process for Medicaid recipients in New York State. The findings of the audit indicate a uniform process for districts to use when conducting resolution of PARIS matches is needed.

As a reminder, all PARIS matches must be investigated and processed within 60 business days of the release of the quarterly PARIS report. An e-mail is sent to the district when a new quarterly PARIS report is made available. Follow-up e-mails are sent 35 and 45 days after the release of the report to ensure districts are investigating their matches. A closing e-mail is sent on the 60th day.

Districts are required to do the following when resolving a PARIS match:

- determine if the consumer resides in New York State;
- disenroll the consumer from Medicaid if state residency cannot be verified or it is determined the consumer no longer resides in the state;
- request capitation payments from the consumer's Medicaid managed care plan, when appropriate; and
- report the results of the PARIS match for every matched consumer in either the Access database used by the Department for Rest of State (ROS) or IRIS for HRA.

While each county may use multiple modalities to attempt to contact a PARIS matched consumer, a written request for residency documentation is required. The consumer must be given 30 days to respond and provide a copy of one of the documents listed in Attachment I of this guidance. A copy of the letter and any documentation provided by the consumer must be included in the consumer's case record. Record retention is required for auditing purposes.

If, after the 30 days, there is no response from the consumer or if the consumer confirms they have moved out of state, the consumer's Medicaid eligibility must be terminated in the Welfare Management System (WMS) using the appropriate closing code. Consumers who are enrolled in a

managed care plan must be disenrolled from their plan. The timing for disenrollment is based on the start date of benefits reported by the "other state." Disenrollment must occur beginning with the first full month after the "other state" start date and ending with the last month the consumer had coverage in managed care. However, the recoupment period is limited to six (6) years, so if for some reason, the "other state" start date exceeds six (6) years, the consumer can only be disenrolled to six (6) years from the current month.

Districts are responsible for notifying managed care plans and the Office of the Medicaid Inspector General (OMIG) of a consumer's retroactive managed care disenrollment, per the direction on page 2 of GIS 19 MA/03. The Department will send follow up emails to confirm this step was completed on select cases.

Districts must enter a resolution for the PARIS match in the Access database, for ROS districts or in IRIS, for HRA, upon completion of the investigation. Cases should only be recorded as resolved after a final eligibility determination is made. Please do not mark cases ahead of making a final determination.

Districts should inform the other state if New York State residency is verified. Counties can locate contact information for the other states on the federal PARIS website: <https://acf.gov/paris/map/state-interstate-match-contact>

If a district is unable to resolve all of the PARIS matched consumers within the allotted 60 business days, please reach out to the Department at: Paris_Match@health.ny.gov, and provide an explanation for the delay. Any matches not resolved in 60 days still need to be processed. The Department will continue to send follow up e-mails on any unresolved cases. All PARIS matches must either have NYS residency confirmed or be closed.

Special handling for Supplemental Security Income (SSI) Cases: When districts close cases for consumers receiving Supplemental Security Income (SSI) benefits, their Medicaid coverage will be reopened through the State Data Exchange (SDX) process if the Social Security Administration (SSA) still has New York as the state of residency. Districts should still investigate when an SSI beneficiary appears on the PARIS match. This includes making a written request for residency information and redetermining eligibility based on the outcome of that request. To prevent reopening of the case, the consumer should be instructed to report any changes, such as changes to their address to the SSA. Direct the consumer to update their account at: <https://www.ssa.gov/personal-record/update-contact-information>

The Department will review a sample of PARIS matched consumers from each quarterly match. The review will ensure the consumer's eligibility is consistent with the disposition marked in the respective PARIS database. Cases will also be reviewed to ensure retroactive managed care disenrollment occurred and recoupment of premiums sought, if appropriate. The Department will reach out for further explanation regarding any discrepancies found or if there are questions about the handling of a matched consumer. Please review these requests for explanation and respond as soon as possible.

NOTE: When accessing the database, if no cases appear, it may be that your county did not have any consumers with a PARIS match for that quarter. However, feel free to send an email to: Paris_Match@health.ny.gov to confirm this is correct and it was not a systems issue. If the lack of consumers is due to a system error, the Department will work with the county to resolve the issue.

Please direct any questions to your local district support liaison.