*As subrecipients of federal financial assistance, Eligibility Sites must ensure that all programs, services, and activities meet the requirements of applicable federal and state laws, rules and regulations. As required by* [*42 CFR §435.945(d)*](https://www.ecfr.gov/current/title-42/part-435/section-435.945)*,* [*42 CFR §435.403(a) and (m)*](https://www.ecfr.gov/current/title-42/part-435/section-435.403) *and* [*42 CFR §433.400(d)(1)(ii)*](https://www.ecfr.gov/current/title-42/part-433/section-433.400)*, Eligibility Sites are responsible for establishing a process to ensure Eligibility Sites are complying with* [*42 CFR §435.945(d)*](https://www.ecfr.gov/current/title-42/part-435/section-435.945)*,* [*42 CFR §435.403(a) and (m)*](https://www.ecfr.gov/current/title-42/part-435/section-435.403) *and* [*42 CFR §433.400(d)(1)(ii)*](https://www.ecfr.gov/current/title-42/part-433/section-433.400) *that requires PARIS be reviewed and considered an indicator of a potential residency change but not considered verification of a residency change. HCPF is providing this sample template for Eligibility Sites to meet the requirements documented in* [*42 CFR §435.945(d)*](https://www.ecfr.gov/current/title-42/part-435/section-435.945)*,* [*42 CFR §435.403(a) and (m)*](https://www.ecfr.gov/current/title-42/part-435/section-435.403) *and* [*42 CFR §433.400(d)(1)(ii)*](https://www.ecfr.gov/current/title-42/part-433/section-433.400)*.*

*While Eligibility Sites are required to have written procedures to comply with* [*42 CFR §435.945(d)*](https://www.ecfr.gov/current/title-42/part-435/section-435.945)*,* [*42 CFR §435.403(a) and (m)*](https://www.ecfr.gov/current/title-42/part-435/section-435.403) *and* [*42 CFR §433.400(d)(1)(ii)*](https://www.ecfr.gov/current/title-42/part-433/section-433.400)*, Eligibility Sites are not required to use this sample template. This template may not be an exact fit for your Site size, staffing structure and operations. All Eligibility Sites should develop their procedure for*[*42 CFR §435.945(d)*](https://www.ecfr.gov/current/title-42/part-435/section-435.945)*,* [*42 CFR §435.403(a) and (m)*](https://www.ecfr.gov/current/title-42/part-435/section-435.403) *and* [*42 CFR §433.400(d)(1)(ii)*](https://www.ecfr.gov/current/title-42/part-433/section-433.400) *in consultation with their appropriate leadership authorities. Eligibility Sites do not need to submit their procedure to HCPF unless requested to do so during a Management Evaluation (ME) Review, Desk Review, or other request.*

*To use this template, please update agency specific information in the areas that are [Bold and in Brackets] and remove these top italicized paragraphs. This plan should be on the Site’s letterhead once updated.*

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**[Site letterhead, including Eligibility Site Name, Address, etc.]**

**[Eligibility Site Name]**

**[Address]**

**[City, State ZIP]**

**[Phone/FAX/website/email]**

**Policy Title**: PARIS Research and Prior Aid Procedure

**Reference**: [*42 CFR §435.945(d)*](https://www.ecfr.gov/current/title-42/part-435/section-435.945)*,* [*42 CFR §435.403(a) and (m)*](https://www.ecfr.gov/current/title-42/part-435/section-435.403) *and* [*42 CFR §433.400(d)(1)(ii)*](https://www.ecfr.gov/current/title-42/part-433/section-433.400)

**Effective Date**: **[Month Day, Year]**

**Director’s Approval**: **[Name, Title, signature if possible]**

**Revision Date**: **[Month Day, Year]**

**REASON FOR POLICY**

Federal Regulation 42 CFR 435.403(a) says a State must provide medical assistance to eligible residents, including residents who are absent from the State. Federal Regulation 42 CFR 435.403(m) prescribes that the State where the member is physically located is considered the State of residence. Federal Regulation 42 CFR §435.945(d) requires all State eligibility systems to review the Public Assistance Reporting Information System (PARIS) to check whether members may be receiving duplicate benefits in one or more states. Federal Regulation 42 CFR §433.400(d)(1)(ii) requires that States must take reasonable measures to determine residency before terminating medical assistance.

**DEFINITIONS [Site: add any other definitions you feel would be helpful]**

Applicant-an individual who is seeking an eligibility determination for Medical Assistance through the submission of an application.

CBMS - Colorado Benefits Management System is the computer system that is utilized to determine an applicant or member’s eligibility for public assistance in the state of Colorado.

Eligibility Site-a location outside of the the Department of Health Care Policy and Financing that has been deemed by the the Department of Health Care Policy and Financing as eligible to accept applications and determine eligibility for applicants or members.

Eligibility worker-individual who is authorized to determine an applicant or member’s eligibility for public assistance in the state of Colorado.

HCPF-the Department of Health Care Policy and Financing. The single State agency designated to administer the Colorado Medical Assistance Program under Title XIX of the Social Security Act and Colorado statutes.

Medical Assistance- all medical programs administered by the Department of Health Care Policy and Financing.

Member-a person who is eligible for or receiving a Medical Assistance Program. “Member” is used interchangeably with “recipient” and “client” when the person is eligible for the program.

PARIS-Public Assistance Reporting Information System; federal matching program that checks if public assistance recipients may be receiving duplicate benefits in one or more states.

**POLICY STATEMENT**

A PARIS match is considered an indicator of a potential residency change but is not considered verification of a residency change. **[Site Name or identified Staff]** must reach out to the individual to confirm continued residency in Colorado. When residency becomes questionable between two states that cannot determine where a member resides, the State where the member is physically located is considered the State of residence. **[Site Name]** is not permitted to delay eligibility determination while researching a PARIS match.

**PROCEDURE**

**PARIS**

1. **[Site Name or identified Staff]** will review PARIS with every application, change report and renewal.
	1. A member who has never received benefits will not appear on a PARIS match at application.
		1. Members must be actively receiving assistance for the PARIS interface to match with an individual.
	2. Project 7175 modified the PARIS interface process for all Medical Assistance categories to post to the Residency page in CBMS.
		1. When the PARIS Interface process updates the Residency page, a VCL will be sent out to the member requesting residency verification.
		2. Residency can be self-attested by the member.
		3. If a member fails to provide verification for residency, the member will be terminated for failure to provide verification.
2. [PARIS] information is not considered verified upon receipt and must be manually verified before any adverse case action is taken. Verification of the information is required before any adverse action can be taken.
	1. Pending eligibility determination is considered an adverse case action, **[Site Name or identified Staff]** will not delay the eligibility determination and move forward while researching the match and allow CBMS to issue a Verification Checklist (VCL).

**PRIOR AID**

1. If an applicant or member indicates they have or may have had assistance in another state, **[Site Name or identified Staff]** may not require proof of benefits closure as a condition of continuing the eligibility determination.
	1. **[Site Name or identified Staff]** may ask for clarification and should assist the client in resolving their prior aid status.
2. **[Site Name or identified Staff]** will notmanually enter, pend or close a case if prior aid information is reported by an applicant.
	1. **[Site Name or identified Staff]** will assist the member in closing their prior aid case and case comment on the prior aid.
3. When there is a PARIS match, CBMS will automatically generate a Verification Checklist (VCL) for residency.
	1. If the applicant/member fails to respond to the residency VCL, the case will close via the automated CBMS process.

**MONITORING [Site: identify responsible staff for compliance and how it will be monitored and how results may be used]**

**STAFF TRAINING**

**[Site: identify responsible staff and Who is trained? When are they trained (annually, at hire, when the Department releases updated memo, rule, etc.) Be certain to include how you are documenting and tracking trainings]**