



POLICY MEMO

Title: Sunsetting of Remote Assistance and Limited Authorized Representative Flexibilities (Revised)	Topic: Eligibility Policy
Audience: Eligibility Sites, County Departments of Human/Social Services, Medical Assistance (MA) Sites, and Eligibility Application Partners (EAP)	Sub-Topic: Implementation
Supersedes Number: HCPF PM 25-003	Division: Eligibility Division
Effective Date: July 1, 2025	Office: Medicaid Operations Office
Expiration Date: July 1, 2028	Program Area: Medical Assistance
Key Words: Telephonic, Signature, Voice, Verbal, Attestation, Recording, Application, Renewal, Non-MAGI, MAGI, CHP+, Authorized Representative	
Legal Authority: Section 1902(e)(14)(A) of the Social Security Act, 42 CFR 435.908	
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Policy Memo Number: HCPF PM 25-008 Issue Date: Nov. 19, 2025 Approved By: Ralph Choate	

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Purpose and Audience:

The purpose of this Policy Memo is to inform Eligibility Sites (county departments of human/social service and Medical Assistance (MA) Sites, and Eligibility Application Partners (EAP)) of the sunsetting of flexibilities that were allowed by the Centers for Medicare and Medicaid Services (CMS) during the COVID-19 Public Health Emergency (PHE) and subsequent unwinding period.

Information:

During the COVID-19 PHE, the Department's federal partner, CMS, allowed state Medicaid agencies to adopt certain temporary strategies intended to assist members to apply for and maintain Medicaid coverage through their application and renewal process. As of June 30, 2025, these strategies are no longer available to states. The Department previously released PM 21-001 titled Remote Application Assistance and

OM 24-005 titled Limited Authorized Representatives for Signing Applications or Renewals. This policy memo supersedes previously mentioned memos.

Remote Application Assistance

This flexibility allowed application assisters such as Counties, Medical Assistance (MA) Sites, Eligibility Application Partner (EAP) Sites, Presumptive Eligibility (PE) Sites, and Certified Application Assistance Sites (CAAS) the option to assist applicants to complete and sign the application remotely. This process was not mandatory.

With this flexibility, if an assister helped complete an application remotely, they were required to complete the Acknowledgement of Receipt of Verbal Consent form and attach it to the individual's application. Because this flexibility is no longer available, assisters can no longer sign applications remotely on behalf of the applicant, and a Receipt of Verbal Consent form is no longer required or accepted for this purpose.

Assisters may still help individuals complete the application; however, the applicant must sign the application. As described at 42 CFR 435.908, "the agency must provide assistance to any individual seeking help with the application or renewal process in person, over the telephone, and online."

Limited Authorized Representatives for Signing Applications or Renewals

The Department utilized this flexibility in order to afford an additional accommodation for those who may require assistance with the signature aspect of applications or renewals. This flexibility allowed members to name a Limited Authorized Representative expressly for the purpose of signing their application or renewal. These Limited Authorized Representatives were not added to CBMS as they did not have full Authorized Representative responsibilities.

Action To Be Taken:

These flexibilities can no longer be used after 6/30/2025. For members who need assistance with completing or signing an application, or may need help from an Authorized Representative, members should follow existing processes available at Counties, Medical Assistance (MA) Sites, Eligibility Application Partner (EAP) Sites, Presumptive Eligibility (PE) Sites, and Certified Application Assistance Sites (CAAS).

Attachment(s):

None

HCPF Contact:

Please contact the Medicaid Inbox with the email listed below if you have any questions.

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