



STATE OF DELAWARE
STATE COUNCIL FOR PERSONS WITH DISABILITIES
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MEMORANDUM

DATE: November 30, 2010

TO: Ms. Sharon L. Summers, DMMA
Planning & Policy Development Unit

FROM: Daniese McMullin-Powell, ^{DMMA}Chairperson
State Council for Persons with Disabilities

RE: 14 DE Reg. 360 [DMMA Proposed Public Assistance Reporting Information
System Reg.]

The State Council for Persons with Disabilities (SCPD) has reviewed the Department of Health and Social Services/Division of Medicaid and Medical Assistance's (DMMA's) proposed regulation regarding participation in a "Public Assistance Reporting Information System" (PARIS) published as 14 DE Reg.360 in the November 1, 2010 issue of the Register of Regulations.

Consistent with the "Background" section in the regulation, federal law effective in 2009 requires states to sign an agreement to participate in PARIS as a precondition of receiving Medicaid funding for automated data systems. The PARIS system is operational in all 50 states to "maintain program integrity and detect or deter improper payments". The attached June 21, 2010 CMS policy letter notes that PARIS has been operating since 1993. It permits states to identify cases in which persons are enrolled in Medicaid and other programs in more than one state. The CMS letter also recites that "PARIS may also be used as a tool to identify individuals who have not applied for Medicaid coverage, but who may be eligible based on their income." The text of the proposed DMMA regulation is based on the model attached to the CMS letter.

SCPD endorses the proposed regulation since DMMA is already participating in PARIS, and the regulation is essentially required to qualify for federal funding for automated data systems. In addition, Council has the following questions:

- Does DMMA utilize the PARIS system for other public benefits (e.g. food stamps)?
- Does DMMA use PARIS as a tool to identify individuals who have not applied for Medicaid coverage, but who may be eligible based on their income?

Thank you for your consideration and please contact SCPD if you have any questions or comments regarding our observations on the emergency regulation.

cc: Ms. Rosanne Mahaney
Mr. Brian Hartman, Esq.
Governor's Advisory Council for Exceptional Citizens
Developmental Disabilities Council

14reg360 dmma-pa reporting info system 11-10

Department of Health & Human Services
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop S2-26-12
Baltimore, Maryland 21244-1850



Center for Medicaid, CHIP, and Survey & Certification

SMDL# 10-009

June 21, 2010

Re: Public Assistance Reporting Information System (PARIS)

Dear State Medicaid Director:

This letter provides guidance on implementing requirements pertaining to Section 3 of the Qualifying Individual (QI) Program Supplemental Funding Act of 2008 (the QI Funding Act). This law amended section 1903(r) of the Social Security Act (the Act) to require that States have eligibility determination systems that provide for data matching through the Public Assistance Reporting Information System (PARIS) project or any successor system. PARIS is a system for matching data from certain public assistance programs, including State Medicaid programs, with selected Federal and State data for purposes of facilitating appropriate enrollment and retention in public programs. This provision took effect on October 1, 2009.

Background

Initiated in 1993, PARIS is a set of computer matches which enables State public assistance agencies (SPAAs) and Federal agencies to share information about applicants for and recipients of certain benefits. The project allows participating SPAAs to exchange their previous quarter's eligibility files for the Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), and Medicaid programs. Federal agencies such as the Department of Defense (DoD) and the Department of Veterans Affairs (VA) have likewise signed agreements to participate in PARIS.

State public assistance agencies enroll in PARIS and sign one or more matching agreements which permit them to participate in quarterly matches of client eligibility and enrollment data files. Under those agreements, in the months of February, May, August, and November of each year, SPAA applicant and recipient data files are transmitted to the DoD Defense Manpower Data Center. There, the data files are processed and the results transmitted to participating SPAAs.

PARIS is governed by a Board of Directors consisting of participating member States and the PARIS Project Director. The Board supports SPAAs in developing plans, processes, techniques, and activities to maximize the technical abilities of systems and staff participating in PARIS.

Effective October 1, 2009, based on the provisions of the QI Funding Act, all States are required to sign an agreement to participate in PARIS as a condition of receiving Medicaid funding for automated data systems (including the Medicaid Management Information System). Prior to passage of the QI Funding Act, participation in the PARIS project was voluntary. PARIS is still a voluntary program with respect to SNAP and TANF.

States can use the PARIS data match to ensure that individuals enrolled in Medicaid or other public assistance benefits in one State are not receiving duplicate benefits based on simultaneous enrollment in the Medicaid program or other public benefit programs in another State. In certain circumstances, PARIS may also be used as a tool to identify individuals who have not applied for Medicaid coverage, but who may be eligible based on their income.

States may choose to match their SPAA data against other States' Medicaid, TANF, and/or SNAP program data through the PARIS interstate match. The interstate match can also provide States with information about applicants for and recipients of workers' compensation and child care benefits. States may also participate in one or more matches with Federal agency data (e.g., data provided by the VA or DoD).

The VA match provides States with information on the eligibility of SPAA applicants and recipients for benefits under the Federal Veterans' programs. For example, the Washington State Department of Social and Health Services documented Medicaid program savings of \$8.2 million during State fiscal years 2006 through 2009, which resulted from the use of PARIS in identifying veterans and their dependents and appropriate public assistance and VA benefits for which they are eligible.

In order to demonstrate compliance with the new requirements in section 1903(r) of the Act, each State must amend its Medicaid State plan to document its participation in PARIS. For your convenience, until a State plan preprint page is approved through the Paperwork Reduction Act process, we are enclosing a template that States may wish to use for such a State plan amendment. The template would add a subsection "c" to Part 4.32, "Income and Eligibility Verification System," and would amend Enclosure #2, Section 4.32(c) by adding the following language:

The State has an eligibility determination system that provides for data matching through the Public Assistance Reporting Information System (PARIS), or any successor system, including matching with medical assistance programs operated by other States. The information that is requested will be exchanged with States and other entities legally entitled to verify title XIX applicants and individuals eligible for covered title XIX services consistent with applicable PARIS agreements.

Thank you for your attention this matter. We look forward to our continuing work together to assure that the Medicaid program operates at the highest level of integrity while also ensuring that individuals who are eligible for Medicaid/CHIP and other public programs have the opportunity to enroll and receive needed services. If you have any questions about the PARIS system, please contact Mr. George Patterson, at 410-786-4609 or george.patterson@cms.hhs.gov.

Sincerely,

\s\

Cindy Mann
Director

Enclosure

cc:

CMS Regional Administrators

CMS Associate Regional Administrators
Division of Medicaid and Children's Health

Ann C. Kohler
NASMD Executive Director
American Public Human Services Association

Joy Wilson
Director, Health Committee
National Governors Association

Matt Salo
Director of Health Legislation
National Governors Association

Debra Miller
Director for Health Policy
Council of State Governments

Christine Evans, M.P.H.
Director, Government Relations
Association of State and Territorial Health Officials

Alan R. Weil, J.D., M.P.P.
Executive Director
National Academy for State Health Policy

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STATE PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT

State: _____

Medical Assistance Program

Transmittal Number:

Effective:

4.32 Income and Eligibility Verification System

The Medicaid agency has established a system for income and eligibility verification in accordance with the requirements of 42 CFR 435.940 through 435.960. (Section 1137 of the Act and 42 CFR 435.940 through 435.960)

(c) ATTACHMENT 4.32-A describes in accordance with 42 CFR 435.948(a)(6) the information that will be requested in order to verify eligibility or the correct payment amount and the agencies and the State(s) from which that information will be requested.

The State has an eligibility determination system that provides for data matching through the Public Assistance Reporting Information System (PARIS), or any successor system, including matching with medical assistance programs operated by other States. The information that is requested will be exchanged with States and other entities legally entitled to verify title XIX applicants and individuals eligible for covered title XIX services consistent with applicable PARIS agreements.

OMB Approval Number:

Revision Number: