

DATE: March 7, 2022

OPERATIONS MEMORANDUM #22-03-01

SUBJECT: CAO Procedure for Inter-County Transfers (ICT)

TO: County Assistance Offices (CAOs)
Executive Directors

FROM: Robert Patrick
Acting Director
Bureau of Operations

PURPOSE

To provide revised instructions to CAOs for handling ICTs.

BACKGROUND/DISCUSSION

CAOs will process ICTs on cases when a client reports an address change to another county within the commonwealth. When a client reports a move from one county to another, the county that receives the report of the address change will update the address, review the change(s) in eCIS, assess all impacts to benefit amounts, and reopen the case in the gaining county if all required information is available. If all required information is not available to complete the ICT immediately:

- If the losing CAO receives the report of the address change, they should follow all normal processing steps to obtain verification and complete the ICT
- If the CSC receives the report of the address change, they should follow existing policies to obtain verification and complete the ICT
- If the gaining CAO receives the report of the address change, they should work with the losing county's ICT liaison to ensure all required information is requested and the transfer is completed timely

This Operations Memo will provide information common to all ICTs. The appendices are benefit specific and provide more detailed instruction based on benefit type.

How to handle ICT concerns/questions/problems

1. Each CAO/District Office (DO) should identify an ICT Liaison and alternate that will be responsible for presenting and/or resolving ICT concerns that arise.
2. ICT concerns will be e-mailed to the generic CAO address with the subject "ICT Liaison Issue". The e-mail is to then be directed to the ICT Liaison within the CAO/DO.

NOTE: If the gaining CAO discovers an issue with an ICT once it's been transferred, the gaining CAO should resolve the issue with the ICT before forwarding the issue to the ICT liaison of the losing CAO. (Example: SNAP semi-annual report (SAR) is due and is received prior to ICT being sent. Losing CAO did not run the SAR. SAR form is in imaging (Gaining CAO should run SAR.). Any concerns regarding able-bodied adults without dependents (ABAWD) status should also be directed to the ICT Liaison.

Advance closure date(s) will follow procedures per:

- **CASH 123.72 - 123.7 Changes in Residence**
- **SNAP 523.5 - 523.5 Permanent Move to Another County in Pennsylvania**
- **Medical Assistance 323.6 - 323.6 Changes in Residence**

NEXT STEPS

CAOs will follow the instructions in the appendixes for specific benefit types.

Enclosures: The below appendixes outline the steps staff should follow when completing an ICT for these budgets

Appendix A – SNAP Cases
Appendix B – LTC Cases
Appendix C – Medicaid Cases
Appendix D – DAP Cases
Appendix E – TANF Cases

ATTACHMENT

Attachment 1: [ICT Form](#)

Appendix A – SNAP Cases

Active SNAP

1. The office that receives the report of the address change will complete the ICT and open the case in the new record if all required information is available.
2. If the client reports a change in household composition, income, or resources; verification must be collected, and the case must be reviewed. Please refer to steps under pending verification
3. The office that receives the report of the address change will complete all pending Work Items identified via Assignment Search due within the timeframe of the closure date.
4. If a SAR or renewal is due within the timeframe of the system ICT advance closure date(s), the county that receives the report of the address change will complete the SAR or renewal if all information is available. If verification is needed, please refer to the steps under pending verification.
5. If a SAR or renewal is due within 2 months of the closure, and the correct date cannot be entered when the case is opened, the office that receives the report of the address change will enter the earliest date possible, narrate the date entered with the reason, and send a SAR or renewal identifying the correct due date and the gaining CAO's address. Once the SAR or renewal is processed in the gaining CAO, the correct SAR or renewal date will then be entered and narrated.
6. The county that receives the report of the address change should make sure citizenship and identity verifications, as well as the last 2 renewals, SARs, and/or applications for benefits (if available), are in imaging.
7. Change address
 - a. To identify new gaining county, please use the County/Zip Locator <https://tools.usps.com/go/ZipLookupAction!input.action>
 - b. If moving to a districted county, please use the tools below to determine district
 - i. Allegheny CAO – [Allegheny Zip Codes by Area](#)
[Allegheny Zip Codes by District](#)
 - ii. Delaware CAO – [Delaware Zip Code List](#)
 - iii. Luzerne CAO – [Luzerne Zip Code List](#)
 - iv. Philadelphia CAO – [Philadelphia CAO Address List](#)
 - v. Westmoreland CAO – always assign new case to Greensburg District
8. Narrate all changes: address, phone number, rent, shelter utility allowance (SUA), household composition, etc. Review and narrate ABAWD status, enter appropriate code into CIS.
9. Review new address, household composition, employment of each budget group member and income types and amounts available to each budget group member, and compare this to what is recorded in eCIS.

10. If an application, SAR, or renewal is pending or overdue, the CAO caseworker processing the ICT will process any benefit changes, then complete the ICT procedure.
11. If the household's certification is current, discuss ABAWD requirements for the new CAO and review household circumstances. Send PA 1841, Work Requirement for Receipt of Supplemental Nutrition Assistance Benefits (available on [DocuShare](#)) if applicable.
12. If the household reports Shelter/Utility cost changes, follow procedures outlined in SNAP 560.8.
13. To process the ICT of SNAP use Reason Code 099, Option 3.

Pending verification:

If the gaining CAO receives the report of the address change and pending verification is needed on the case, they should coordinate with the losing CAO's ICT liaison to ensure all pending verifications are requested and returned. If the losing county or a CSC receives the report of the address change, they can follow existing procedures to ensure the pending verification is requested and returned.

- If verification is not received, follow procedures outlined in SNAP 570.4

Ending steps:

1. Advise the client that their request has been processed and give them the address of the CAO in the new county of residence
2. CIS will generate proper notice.
3. Narrate the actions taken and the circumstances surrounding the change.
4. The county that receives the report of the address change should close the current case and reopen the case in the gaining county's record number. Assign to caseload 4545 in the new county.
5. Complete the ICT Template and e-mail it to the gaining CAO general mailbox with a cc to the losing CAO general mailbox. Flag for any concerns – ABAWD, MA issues, etc. Note: This step is not needed if the gaining CAO completed the ICT.

Appendix B- LTC Cases

Active LTC and HCBS

1. The office that receives the report of the address change will update the address
2. If the client reports a change in household composition, income, or resources; verification must be collected and the case must be reviewed
3. The office that receives the report of the address change will complete all pending Work Items identified via Assignment Search due within the timeframe of the closure date if all required information is available.
4. If a renewal is due within the timeframe of the system ICT advance closure date(s), the office that receives the report of the address change will complete the renewal.
5. If a renewal is due within 2 months of the closure and the correct date cannot be entered when the case is opened, the gaining CAO will enter the earliest date possible, narrate the date entered with the reason, and send a renewal identifying the correct due date and the gaining CAO's address. Once the renewal is processed in the gaining CAO, the correct renewal date will then be entered and narrated.
6. If a renewal is not due within these timeframes, the office that receives the report of the address change should complete a partial renewal per LTC HB 476.3.
7. The county that receives the report of the address change should make sure citizenship and identity verifications, as well as the last 2 renewals and/or applications for benefits (if available), are in imaging. (The Resource Assessment should be scanned before the case record is transferred. If the gaining CAO receives the information regarding the address change and the resource assessment is not in imaging, the ICT Liaison should contact the ICT Liaison from the losing county for the resource assessment to be scanned.
8. Change address
 - a. To identify the new gaining county, please use the County/Zip Locator <https://tools.usps.com/go/ZipLookupAction!input.action>
 - b. If moving to a districted county, please use the tools below to determine district
 - i. Allegheny CAO – [Allegheny Zip Codes by Area](#)
[Allegheny Zip Codes by District](#)
 - ii. Delaware CAO – [Delaware Zip Code List](#)
 - iii. Luzerne CAO – [Luzerne Zip Code List](#)
 - iv. Philadelphia CAO – [Philadelphia CAO Address List](#)
 - v. Westmoreland CAO – always assign new case to Greensburg District
9. Narrate all changes: address, phone number, rent, SUA, household composition, etc.

10. If the case information is unchanged and a renewal is not due in the month of the reported address change, the caseworker will discontinue Medicaid effective the day before the third cash assistance payment date after the move is reported using Reason Code 099 (NOTE: The caseworker will only have to enter the information for: new county address and phone number.)
11. The office that receives the report of the address change should end date the current facility based on the MA 103 or waiver based on the PA 1768, and add a new facility or waiver screen for the gaining county with the appropriate codes and dates and ensure all TPLs are correct.
12. A notice will be sent advising the client that their request has been processed. The notice will also provide them with the address of the CAO in the new county of residence
13. eCIS will generate proper notice.
14. Narrate the actions taken and the circumstances surrounding the change.
15. The county that receives the report of the address change should close the current case and reopen the case in the gaining county's record number. Assign to caseload 4545 in the new county.
16. Complete the ICT Template and e-mail it to the gaining CAO general mailbox with a cc to the losing CAO general mailbox. Flag for any concerns – MA issues, etc. Note: This step is not needed if the gaining CAO completed the ICT.

Appendix C – Medicaid Cases

Active Medicaid

1. The office that receives the report of the address change will update the address
2. The office that receives the report of the address change will complete all pending Work Items identified via Assignment Search due within the timeframe of the closure date if the information is available.
3. If a SAR or renewal is overdue or due within the timeframe of the system ICT advance closure date(s) or if there is an application pending, the office that receives the report of the address change will complete the SAR, renewal, or application if it is available.
4. If a SAR or renewal is due within 2 months of the closure, and the correct date cannot be entered when case is opened, the CAO that receives the report of the address change will enter the earliest date possible, narrate the date entered with the reason, and send a SAR or renewal identifying the correct due date and the gaining CAO's address. Once the SAR or renewal is processed in the CAO, the correct SAR or renewal date will then be entered and narrated.
5. The county office that receives the report of the address change should make sure citizenship and identity verifications, as well as the last 2 renewals, SARs, and/or applications for benefits (if available), are in imaging.
6. Change address
 - a. To identify new gaining county, please use the County/Zip Locator <https://tools.usps.com/go/ZipLookupAction!input.action>
 - b. If moving to a districted county, please use the tools below to determine district
 - i. Allegheny CAO – [Allegheny Zip Codes by Area](#)
[Allegheny Zip Codes by District](#)
 - ii. Delaware CAO – [Delaware Zip Code List](#)
 - iii. Luzerne CAO – [Luzerne Zip Code List](#)
 - iv. Philadelphia CAO – [Philadelphia CAO Address List](#)
 - v. Westmoreland CAO – always assign new case to Greensburg District
7. Review the individual/budget group's new address, household composition, employment of each budget group member and income types and amounts available to each budget group member, and compare this to what is recorded in eCIS.
8. If the client reports a change in household composition, income, or resources; verification must be collected if required by policy in [MAEH Chapter 378](#) , and the case must be reviewed. The CAO should only request verification if necessary.
9. Narrate all changes: address, phone number, household composition, etc.
10. If the case information is unchanged and a renewal is not due in the month of the reported address change, the caseworker will discontinue Medicaid effective the day before the third cash assistance payment date after the move is reported

- using Reason Code 099 (NOTE: The caseworker will only have to enter the information for: new county address and phone number.)
11. The CAO will inform the client to contact Health Choices at 800-440-3989 if their MCO needs to be changed.
 12. A notice will be sent advising the client that their request has been processed. The notice will also provide them with the address of the CAO in the new county of residence.
 13. eCIS will generate proper notice.
 14. Narrate the actions taken and the circumstances surrounding the change.
 15. The county that receives the report of the address change should close the current case and reopen the case in the gaining county's record number. Assign to caseload 4545 in the new county.
 16. Complete the ICT Template and e-mail it to the gaining CAO general mailbox with a cc to the losing CAO general mailbox. Flag for any concerns – MA issues, etc. Note: This step is not needed if the gaining CAO completed the ICT.

Active Supplemental Security Income (SSI)/State Supplementary Payment (SSP) and Pennsylvania Combined Application Project (PA CAP) Supplemental Nutrition Assistance Program (SNAP)

1. Review the State Data Exchange (SDX) (IEVS Exchange 6) for address information.
2. If the reported address change has been updated in SDX, change address.
3. If the reported address change has not been updated in SDX, tell the Supplemental Security Income (SSI) recipient that he or she must report changes directly to the Social Security Administration (SSA). The CAO should assist by sending the PA 1781 to SSA if needed following current policy.
4. Review Exchange #6, SDX information, and once address has been updated, make the correct changes.
5. To process ICT for SSP use Reason Code 099, Option D. This will set the correct closing date.
6. If the client also receives PA CAP (SNAP), close Reason Code 052, Option 3 to close the SNAP per OPS [07-01-04](#).
7. Advise the client that their request has been processed and give them the address of the CAO in the new county of residence.
8. CIS will generate proper notice.
9. Narrate the actions taken and the circumstances surrounding the change.
10. The county that receives the report of the address change should close the current case and reopen the case in the gaining county's record number. Assign to caseload 4545 in the new county.
11. Complete the ICT Template and e-mail it to the gaining CAO general mailbox with a cc to the losing CAO general mailbox. Flag for any concerns – ABAWD, MA issues, etc. Note: This step is not needed if the gaining CAO completed the ICT.

Forced Closing for Immediate Medical Need for New Managed Care

Review the managed care dating rules to review when new managed care will open.

If there is an immediate medical need to have case closed before ICT closure date, follow the steps below ONLY AFTER an 099 closing has been completed and if an immediate opening will occur.

1. On the Case Summary Screen, select 'Maintenance' from the "What would you like to do today?" dropdown and click the 'Next' button.
2. This will bring you to the Case Non-Financial Household screen. Make any necessary changes.
3. You must navigate to the budget action screen on the left-hand navigation menu and enter the closure action and reason (Reason Code 052).
4. Click the 'Next' button to go to the 'Execute Eligibility' screen.
5. Before running eligibility, you can see the budget is set to close in the future. To change a future close date and ensure an immediate closure, select 'No' from the Apply Adverse Action dropdown on the screen. The system will present the next close date whose deadline can be met without regard to the 15-day notice rule. Then click the 'Run Eligibility' button.
6. After running eligibility, the close date should be the earliest close date possible.
7. Continue processing through the case and complete all mandatory (*) fields. Suppress the notice, submit the case, and clearly narrate the actions taken and why the notices were suppressed.
8. Assign to caseload 4545.

Appendix D – Disability Advocacy Program (DAP) Cases

Active Disability Advocacy Program (DAP)

Once the benefit case record in the losing county is closed ICT, the open SSA or Medical Review Team (MRT) Only DAP referral in the DAP module will auto-close immediately with the ICT Code as the Final Social Security Income (SSI)/Social Security Disability Insurance (SSDI) Result Code (SSA Referrals) or in the MRT Decision Field (MRT Only Referrals).

When the Benefit Case Record opens in the gaining County, for SSA Referrals:

On the Disability Screen, the “Referred to DAP” and “Type of Referral” fields will systematically populate and be disabled to match the information from the losing county. Once the case is committed, a new SSA referral will be created for the gaining county based on the data that was pre-populated on the disability screen.

In addition, data from the prior referral in the losing county will be populated in the new referral in the gaining county and the DAP work item activity will correspond to the prior referral in the losing county.

For example: if the client was at ALJ Appeal Pending with 300 days remaining when the DAP SSA Referral closed in the losing county, when the DAP SSA referral opens up in the new county (same day), the work item activity will pick up at ALJ Appeal Pending with 300 days remaining.

When the Benefit Case Record opens in the gaining county for MRT Only Referrals:

On the Disability Screen, the “Referred to DAP” and “Type of Referral” fields will systematically populate and be disabled to match the information from the losing county. Once the case is committed, a new MRT Only referral will be created for the gaining county based on the data that was pre-populated on the disability screen.

The “MRT Referral” in the DAP Functions Module will open and populate the data in the DAP Module as it was in the losing county’s prior referral.

The “MRT DAP Alert” in the new county will start over, giving the MRT/DAP worker in the new county the maximum amount of time to address/take action on it. The due dates for the alerts being brought over to the gaining county will be based on either the DAP Referral Date or the MRT Referral date (whichever is more recent).

For example, if the losing county’s open MRT referral closed and had a DAP 251 pending 30 days when it was closed, when the MRT Only referral opens in the new county, the DAP 251 alert will restart to 45 days.

It is important for all DAP/MRT workers to thoroughly narrate where they are in DAP cases so that if the case closes ICT, the DAP/MRT worker in the new county can pick up where that losing county left off. If a CAO needs to reach out to the losing county or the gaining county to clarify something with a particular DAP/MRT case, the ICT Liaison should reach out as needed. Depending on the complexity of the request, at the CAO's discretion, the MA Ombudsman may reach out instead.

Appendix E –TANF Cases

TANF clients will continue to be ICT following existing ICT procedures