

CHANGE NOTICE FOR MANUAL NO. 06-24, REASONABLE OPPORTUNITY PERIOD PROCESS

DATE: May 31, 2024

Manual: Family and Children's Medicaid
Change No: 06-24
To: County Directors of Social Services

I. BACKGROUND AND CONTENT OF CHANGE

The Division of Health Benefits (DHB) has updated policies regarding the Reasonable Opportunity Period (ROP). The Centers for Medicare and Medicaid Services (CMS) published guidance that individuals are not limited to a once in a lifetime ROP. The changes noted below remove guidance for a once in a lifetime ROP and allow individuals unlimited ROPs. The ROP is required for individuals who have made a declaration of citizenship or satisfactory immigration status, and the local agency is unable to verify citizenship or satisfactory immigration status.

II. POLICY UPDATE

The following policies have been updated with the ROP process:

A. MA-3330, Alien Requirements Policy

1. Section X.A.4.d. (11) - The individual may submit another application at any time after the case is terminated. The caseworker must give the applicant another 90-day reasonable opportunity process. There is no limit to the number of ROP's allowed for any applicant.
2. North Carolina Health Choice (NCHC) and CHIP language have been removed.

B. MA-3332, U.S. Citizenship Requirements Policy

1. Section IV.B. - The 90-day reasonable opportunity period must be allowed each time an applicant applies for Medicaid. There is no limit.
2. This policy has been updated with the current NC FAST process procedures.

C. MA-3420, Medically Needy Recertification

1. Section II.L.4. - If immigration status cannot be verified via the ex-parte process, the beneficiary must be given a reasonable opportunity period.

2. Section II.L.5. - If a beneficiary failed to provide documentation confirming immigration status at the end of the ROP:
3. Section II.L.5.d. - The individual may reapply for Medicaid; the caseworker must process the application and allow another ROP.

D. MA-3421, Recertification Policy

1. Section II.L.4. - If immigration status cannot be verified via the ex-parte process, the beneficiary must be given a reasonable opportunity period.
2. Section II.L.5. - If a beneficiary failed to provide documentation confirming immigration status at the end of the ROP:
3. Section II.L.5.c. - The individual may reapply for Medicaid; the caseworker must process the application and allow another ROP.

III. EFFECTIVE DATE AND IMPLEMENTATION

The effective date is June 3, 2024.

If you have any questions regarding information in this letter, please contact your [Operational Support Team Representative](#).

DocuSigned by:

Jay Ludlam

06565C1C2A8F4C8...
Jay Ludlam

Deputy Secretary, NC Medicaid