

Vigorously Pursuing Client Health Care Coverage Enrollment Policy

BACKGROUND:

In order to ensure compliance with payor of last resort requirements, Ryan White HIV/AIDS Program (RWHAP) recipients and sub-recipients must make every effort to ensure eligible individuals are expeditiously enrolled in other health care coverage programs (i.e. Medicaid, Medicare, health insurance) for which they are eligible. The Health Resources and Services Administration (HRSA) HIV/AIDS Bureau (HAB) requires recipients and sub-recipients to maintain policies regarding the process for the pursuit of enrollment for all clients (“vigorously pursue”), to document the steps during their pursuit of enrollment for all clients, and establish stronger monitoring and enforcement of sub-recipient processes to ensure that clients are enrolled in other health care coverage programs if eligible.

POLICY:

- RWHAP Part B recipients and sub-recipients must notify and educate clients about the availability of plans for which the client is eligible and enrollment periods for those plans.
- RWHAP Part B recipients and sub-recipients must inform clients about possible consequences for not enrolling in health care coverage for which they are eligible (i.e., future increased premiums, penalties, ineligibility for other public entitlements or programs).
- RWHAP Part B recipients and sub-recipients must encourage and refer clients to enroll into health care coverage for which they are eligible, providing enrollment assistance when possible.
- RWHAP Part B recipients and sub-recipients should educate clients about the use of health care coverage for which they are eligible to receive covered services.
- RWHAP Part B recipients and sub-recipients should educate clients about resources available to assist with maintaining health care coverage for which they are eligible (i.e., assistance with insurance premiums and copayments).
- RWHAP Part B recipients and sub-recipients must document the specific actions performed in assisting clients with the above.
- If after extensive documented efforts by the RWHAP recipient and sub-recipient the client remains unenrolled in health care coverage for which they are eligible, the client may continue to receive services through the RWHAP Part B program.
- ISDH will assess sub-recipients’ compliance with vigorous pursuit requirements during annual sub-recipient site visits.

Indiana State Department of Health (ISDH)

HIV Services Program (HSP)

HSP Policy #18-03

DOCUMENTATION:

- RWHAP Part B recipients and sub-recipients must document the extensive efforts taken to refer, encourage and assist clients with enrolling in health care coverage plans for which they are eligible according to agency protocols.
- Documentation must be made available for review by ISDH upon request.

GUIDANCE:

- Refer to related HSP Payor of Last Resort Policy

EXCEPTIONS:

- None

REFERENCES:

[Health Resources and Services \(HRSA\) HIV/AIDS Bureau \(HAB\) Policy Clarification Notice \(PCN\) #13-01: Clarifications Regarding Medicaid-Eligible Clients and Coverage of Services by the Ryan White HIV/AIDS Program](#)

[HRSA HAB PCN #13-04: Clarifications Regarding Clients Eligible for Private Health Insurance and Coverage of Services by Ryan White HIV/AIDS Program](#)

Implemented: March 15, 2018