



DATE: **December 4, 2025**
July 8, 2022

OPERATIONS MEMORANDUM #22-07-02

SUBJECT: **Revised** Emergency Medical Assistance (EMA) for Noncitizens

TO: Executive Directors

FROM: **Robert Hixson** Robert Patrick
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PURPOSE

1. To ~~introduce~~ **provide** the **updated** Emergency Medical Condition Information Eligibility Form (PA 1917), which includes a list of emergency medical conditions that the County Assistance Offices (CAOs) may approve for EMA.
2. To provide updated guidance on the process for reviewing and processing EMA requests involving emergency medical conditions.

BACKGROUND

Certain noncitizens may be eligible to receive EMA to cover medical services necessary to treat emergency medical condition(s) if they meet all applicable eligibility requirements. Noncitizens who may be eligible for EMA include the following individuals:

- ~~Permanent residents~~ **Qualified noncitizens** (~~citizenship code 02~~) not pregnant or under age 21, subject to the five-year bar.
- ~~Temporary residents~~ **Lawfully present noncitizens** (~~citizenship code 03~~) not pregnant or under age 21.
- Undocumented noncitizens (~~citizenship code 05~~).
- Noncitizens with deferred action under Deferred Action for Childhood Arrivals. This population does not meet the criteria for being a qualified or lawfully present noncitizen and may be eligible for EMA only. They are not eligible for General Assistance (GA)-related Medical Assistance (MA) based on 8 U.S.C. § 1621 and 62 P.S. § 432(3).

Reminder: A Social Security Number (SSN) is not a condition of eligibility for EMA. The CAO should **not** pend for this information when opening EMA and should never close an EMA individual for failure to provide an SSN. See this exception to providing and applying for an SSN in [SHB 950.1](#) and [950.2](#).

~~Permanent residents~~ **Qualified noncitizens** subject to the five-year bar and ~~temporary residents~~ **lawfully present noncitizens**, not pregnant or under age 21, who report an emergency medical condition must first be reviewed for GA-related MA (PD/TD) and then EMA under a federally funded MA category. Since EMA only covers the medical services needed to treat the emergency medical condition, reviewing for GA-related MA as well as EMA will ensure that an eligible individual has full coverage under the adult benefit package. See the “Authorizing GA-related MA and EMA” section for more details.

All facts concerning the individual’s medical condition must be evaluated to determine if the medical condition manifests itself by acute symptoms of sufficient severity (including severe pain), such that the absence of immediate medical attention could reasonably be expected to result in:

- Placing the patient’s health or life in serious jeopardy
- Serious impairment to bodily functions
- Serious dysfunction of any bodily organ or part

Federal law prohibits using EMA to cover care and services related to an organ transplant procedure. However, EMA may cover an emergency medical condition related to an organ transplant but not part of the transplant procedure, if all other requirements are met.

Example: Monica receives a kidney transplant. Later, she develops an infection that meets the definition of an emergency medical condition. The kidney transplant may not be covered under EMA, but the infection may be covered under EMA.

NOTE: Tissue and cell transplants such as bone marrow will no longer be labeled as an organ for organ transplant purposes.

DISCUSSION

Application Process (AP)

~~Effective with the posting of this Operations Memorandum (Ops Memo), the CAO worker may approve certain emergency medical conditions for EMA in a non-Long-Term Care (LTC) MA category, using this Ops Memo and the PA 1917 as guidance. All~~

~~requests for LTC or Home and Community-Based Services (HCBS) EMA must be sent to the EMA mailbox for review by the clinical evaluation team.~~

~~If the medical condition is marked as “L. Any condition not described above” on the PA 1917, the CAO must send the emergency medical information to the EMA mailbox so that it can be reviewed by the Department of Human Services’ (DHS) clinical evaluation team. The clinical evaluation team consists of physicians with the Office of Medical Assistance Programs (OMAP), the Office of Mental Health and Substance Abuse Services (OMHSAS), the Office of Developmental Programs (ODP) and the Office of Long-Term Living (OLTL).~~

The CAO worker may approve EMA in a non-Long-Term Care (LTC) MA category for emergency medical conditions that are listed on the PA 1917 without review by the DHS Clinical Evaluation Team. Other emergency medical conditions not listed on the PA 1917 must be sent to the DHS Clinical Evaluation Team for review. All requests for LTC or Home and Community-Based Services (HCBS) EMA must be sent to the DHS Clinical Evaluation Team for review prior to authorization. See “Approving EMA Based on the PA 1917” section for specific scenarios describing when the CAO may approve EMA on their own and when a review by the DHS Clinical Evaluation Team is required. The DHS Clinical Evaluation Team consists of physicians within the Office of Medical Assistance Programs (OMAP), the Office of Mental Health and Substance Abuse Services, the Office of Developmental Programs and the Office of Long-Term Living.

~~If the CAO cannot approve EMA based on what is provided on the PA 1917, OMAP/OMHSAS/ODP/OLTL the DHS Clinical Evaluation Team will determine whether the medical condition meets the definition of an emergency medical condition and the time period the emergency medical condition will last. The CAO will use this information to determine eligibility for EMA.~~

NOTE: ~~OMAP/OMHSAS/ODP/OLTL~~ The DHS Clinical Evaluation Team verifies the existence of an emergency medical condition much like a doctor completes the PA 1663 to verify a disability exists for other MA categories.

Approving EMA Based on the PA 1917

The PA 1917 is not required to authorize EMA, but it is a verification form that lists ~~The PA 1917 lists the following~~ emergency medical conditions that can be authorized for non-LTC/HCBS MA by the CAO without ~~sending to the EMA mailbox for individual review by the DHS Clinical Evaluation Team.~~ These conditions and how EMA eligibility should be determined are as follows:

NOTE: All requests for LTC or HCBS EMA must be sent to the EMA mailbox.

Medical Condition		Treatment dates must not exceed:	The CAO will process as:
A.	High risk pregnancy	Nine months	Ongoing
B.	Type I diabetes (insulin dependent) under the age of 21	21 st birthday	Ongoing
G. B.	Diabetic emergencies	Two months	NCE (Non-Continuous Eligibility)
D. C.	Renal failure requiring ongoing dialysis	Six months	Ongoing
E. D.	Fracture of a bone in the skull, arm, leg, neck, spine, or pelvis that occurred within the past two months	Two months	NCE
F.	Hypertensive emergencies	Two months	NCE
G. E.	Unstable Seizure Disorder	Three months	Ongoing
H.	Cancer undergoing active treatment related to a current diagnosis	Six months	Ongoing
I. F.	Ventilator dependency	Three months	Ongoing
J. G.	Labor and delivery	One month	NCE
K. H.	Acute inpatient psychiatric hospitalization	One month	NCE
L. I.	Any condition not described above	Email the EMA Mailbox	See the "Authorizing EMA" and "Authorizing GA-related MA and EMA" sections

NOTE: If an older version of the PA 1917 is submitted and an emergency medical condition is selected that was removed from the current version of the PA 1917, the CAO should send the request with supporting medical documentation to the EMA mailbox for review by the DHS Clinical Evaluation Team. See **Scenario 5** below.

When the CAO receives the PA 1917 or other medical documentation for a noncitizen who is being reviewed for EMA, they will review the documentation and take the next steps provided in the following scenarios:

- **Scenario 1:** If any A through K H medical condition(s) are checked on the form and the treatment dates do not exceed the maximum treatment time frames listed above, the CAO may process authorize non-LTC/HCBS EMA without sending to the EMA mailbox for review. The CAO will send the medical documentation for individuals with certain emergency medical conditions to the EMA mailbox after they have been authorized so they can be case managed by the DHS Clinical Evaluation Team. See “Sending Authorized Individuals to the EMA mailbox for Case Management” section below.
- **Scenario 2:** If any A through H medical condition(s) are checked on the form and the treatment dates exceed the maximum treatment time frames listed above, the CAO will send the medical documentation to the EMA mailbox for review by the DHS Clinical Evaluation Team.
- **Scenario 3:** If any A through H medical condition(s) are checked on the form and the request is for LTC or HCBS, the CAO will send the medical documentation to the EMA mailbox for review by the DHS Clinical Evaluation Team.
- **Scenario 4:** If “L I - Any condition not described above” is checked on the form, the CAO will send the EMA request with supporting medical documentation to the EMA mailbox for review by the DHS Clinical Evaluation Team.
- **Scenario 5:** If the PA 1917 is not provided or is an older version that verifies an emergency medical condition that was removed from the most current PA 1917 or there is conflicting information, the CAO will send the request with supporting medical documentation to the EMA mailbox for review by the DHS Clinical Evaluation Team.

Exception: If a PA 1917 is not provided, the CAO may verify an emergency medical condition for labor and delivery without sending the medical documentation to the DHS Clinical Evaluation Team for review.

NOTE: At the end of a high-risk pregnancy, the postpartum period is not considered part of the original emergency medical condition unless otherwise indicated by the DHS Clinical Evaluation Team. If there are complications resulting from the birth, an individual must submit a new PA 1917. The newborn must be authorized for one year and the renewal for the newborn is due 12 months from the open date.

Example: Janine gave birth to her child on April 12th. The birth was reported to the CAO on April 15th. The CAO acted on this reported change on April 16th by adding the newborn and sending an advance notice to close Janine effective May 1st.

See the “Authorizing EMA” section of this Ops Memo for more details.

Requesting an EMA Review by the DHS Clinical Evaluation Team

A dedicated mailbox has been created for EMA review requests. The CAO must email requests to ra-pwemarequest@pa.gov, listed in the Outlook Global address list as **PW, EMA Request**. The request must include the following:

- In the subject of the email: “County/Record Number and last name of individual”. Include “LTC” or “HCBS” if the individual is applying for LTC or HCBS.

Example: 01/1234567 Smith LTC

- As email attachments: The PA 1917 and supporting medical documentation, such as:
 - Hospital admission history and physical and discharge summaries, including rehab hospitals clinic or Emergency Room notes.
 - Results of pathology reports or biopsies, ~~especially when for a diagnosis of cancer.~~
 - Results of other diagnostic testing that supports the diagnosis and presence of an emergency medical condition (e.g., CT, labs, ultrasound).

If the size of the email exceeds system limits, the CAO may send more than one email. The CAO must provide updated medical documentation for renewals. All documentation must also be scanned into the Imaging Repository.

NOTE: The Medical Evaluation Form (MA 51) and the HCBS Eligibility/Ineligibility/Change Form (PA 1768) verify functional eligibility for LTC-related services. These forms do **NOT** verify that the individual has an emergency medical condition requiring LTC/HCBS. Verification of functional eligibility and verification of an emergency medical condition that warrants treatment via LTC-related services are two distinct determinations.

NOTE: Include the necessary medical documentation listed above to support an emergency medical condition so that OMAP/OMHSAS/ODP/OLTL **the DHS**

Clinical Evaluation Team can complete an immediate determination without requesting additional documentation from the CAO.

- Information to be included in the body of the email is as follows:
 - Individual's name (Last, First, Middle)
 - Recipient Identification number, if there is one
 - Any hospitalization dates

The ~~OMAP/OMHSAS/ODP/OLTL~~ **DHS Clinical Evaluation Team** physician will review the EMA request and provide a response to the county's Area EMA mailbox within five business days. The ~~OMAP/OMHSAS/ODP/OLTL~~ **DHS Clinical Evaluation Team** physician will contact the Area mailbox if they require additional information for review. The existing dedicated mailboxes for area staff to receive EMA request responses from ~~OMAP, OMHSAS, ODP and OLTL~~ **the DHS Clinical Evaluation Team** will continue to be used. Once received, area staff will relay this information to the CAO worker that submitted the request. The Area EMA mailboxes are as follows:

- Area 1: ra-pwarea1ema@pa.gov (PW, Area 1 EMA)
- Area 2: ra-pwarea2ema@pa.gov (PW, Area 2 EMA)
- Area 3: ra-pwarea3ema@pa.gov (PW, Area 3 EMA)
- Area 4: ra-pwarea4ema@pa.gov (PW, Area 4 EMA)
- Area 5: ra-pwarea5ema@pa.gov (PW, Area 5 EMA)
- Area 6: ra-pwarea6ema@pa.gov (PW, Area 6 EMA)

NOTE: If the CAO needs clarification on correspondence received that involves the EMA process or policy, they should contact their Area EMA mailbox. If the Area Staff assigned to monitor the mailbox has questions, they may contact the Bureau of Policy (BOP) at ra-pwemapolicy@pa.gov (PW, EMA Policy).

Sending Authorized Individuals to the EMA Mailbox for Case Management

As discussed above, the CAO may authorize EMA without requesting a review by the DHS Clinical Evaluation Team if Scenario 1 applies. However, individuals who are authorized for EMA by the CAO due to certain emergency medical conditions listed on the PA 1917 must have their case managed by the DHS Clinical Evaluation Team. To ensure these individuals are placed in Case Management, the CAO will send individuals who have the following conditions to the **PW, EMA Request** mailbox at ra-pwemarequest@pa.gov:

- High risk pregnancy
- Renal failure requiring ongoing dialysis
- Fracture of a bone in the skull, arm, leg, spine, or pelvis that occurred within the past two months
- Unstable seizure disorder
- Ventilator dependency

The email will include the following:

- In the subject of the email: “County/Record Number, last name of individual and Case Management Determination/Referral”

Example: 01/1234567 Smith – Case Management Determination/Referral

- As email attachments: The PA 1917 and supporting medical documentation (if any).

The CAO does not need to send this Case Management email to the EMA mailbox when a review by the DHS Clinical Evaluation Team is required, and the CAO sent it for the review. The DHS Clinical Evaluation Team is already aware of this individual and will ensure the individual is placed in Case Management as appropriate.

DHS Clinical Evaluation Team Requesting an EMA Case Update for Case Managed Individuals

The CAO may receive requests through their respective Area mailbox from the DHS Clinical Evaluation Team regarding EMA case updates and requests. The DHS Clinical Evaluation Team will initiate these requests, and will indicate whether their request is urgent, or not, in the subject line of their email addressed to the respective Area mailbox. The CAO will complete the request within the following timelines (if the individual is otherwise eligible):

- For an urgent update, the CAO has a **24-hour** deadline to take the action.

Example: Individual's EMA coverage is ending, and an extension is being requested for ongoing treatment such as dialysis or scheduled surgery. (Surgeries may be canceled if coverage is not extended.)

- For a routine update, the CAO has a **five-business** day deadline to take the action.

Authorizing EMA

When authorizing a noncitizen for EMA, the CAO must enter the **correct** emergency medical condition in the 'Nature of Emergency' field on the 'Noncitizen/Refugee' screen in the Electronic Client Information System (eCIS). **It is very important to enter the correct emergency medical condition in this field because the DHS Clinical Evaluation Team uses this field to verify an individual's emergency medical condition for services that require prior authorizations (i.e., their approval before the service is provided) and continuing EMA.**

The CAO must also enter the treatment dates as listed on the PA 1917. If ~~OMAP/OMHSAS/ODP/OLTL~~ **the DHS Clinical Evaluation Team** provides different treatment dates for the emergency medical condition, the CAO should enter ~~OMAP/OMHSAS/ODP/OLTL's~~ **the DHS Clinical Evaluation Team's** dates on the 'Noncitizen/Refugee' screen instead of the dates on the form.

- If the treatment period is two months or less, the CAO will process EMA as NCE in the appropriate federally funded MA category.
- If the treatment period is more than two months, the CAO will process the EMA as ongoing in the appropriate federally funded MA category.
- In both NCE and ongoing EMA cases **that are case managed**, OMAP will send information on whether the emergency medical condition time period has been extended or whether the emergency medical condition has ended to area staff. The CAO must set an alert for ~~45~~ **45** days before the end date of the treatment to reach out to the EMA mailbox in case they did not receive information from OMAP already. If the individual's MA is due for renewal, the CAO must provide any additional medical documentation to the EMA mailbox.

Example: Samuel is **in renal failure and requires ongoing dialysis** undergoing ~~treatment for his cancer diagnosis~~. ~~OMAP determined he needs treatment for four months and~~ **The PA 1917 provides verifies** treatment dates of March 1st - June 30th. The CAO will authorize ongoing MA, **send an email to the PW, EMA Request mailbox to ensure the individual is placed in Case Management**, and set an alert for ~~June 15th~~ **May 16th** to reach out to the EMA mailbox to see if the emergency medical condition will continue beyond June 30th.

- If OMAP verifies the condition persists then the CAO will continue ongoing MA benefits and will set an alert to again reach out to OMAP ~~45~~ 45 days before the most current treatment end date.
- If OMAP verifies the condition has ended **or does not have enough information at the time to verify whether the condition will continue**, the CAO will send an Appointment Notice and Verification Checklist (PA 253) allowing 30 days for the individual to respond and provide documentation that a new or the existing emergency medical condition exists. The individual will remain open while gathering the medical documentation.
 - **The CAO will use the following language on the Pending Verification Screen in the “Additional Information” field when pending for additional medical documentation to ensure that the information is the most recent/new information available for review:**
 - **“Please provide your most recent updated medical documentation that has not previously been provided for review.”**
 - If the CAO receives the medical documentation, the individual will remain open while OMAP reviews the documentation.
 - If no information is received, the CAO will close MA benefits and send the appropriate EMA closure notice.

REMINDER: The CAO must determine whether the EMA recipient is financially eligible for MA on an annual basis.

Authorizing GA-related MA with EMA

~~Permanent residents~~ **Qualified noncitizens** subject to the five-year bar and ~~temporary residents~~ **lawfully present noncitizens**, not pregnant or under age 21, who report an emergency medical condition must first be reviewed for GA-related MA (PD/TD) and then reviewed for EMA under a federally funded MA category. In order to determine if an individual is eligible for both GA-related MA and EMA the CAO will perform the following steps:

- To review for GA-related MA, the CAO will not enter the emergency medical condition information on the Noncitizen/Refugee screen. The CAO will enter all other case data and run eligibility to determine if the individual will be eligible for ongoing GA-related MA.

NOTE: If an emergency medical condition is entered, eCIS will not evaluate the individual for GA-related MA.

- If the individual is eligible for GA-related MA, the CAO will send the GA-related MA eligible notice and will re-AP the application and enter the EMA as an NCE, regardless of the treatment date time frame of their emergency medical condition.
- The CAO will follow the steps outlined above in the “Authorizing EMA” section such as:
 - Entering the ‘Nature of Emergency’ field on the ‘Noncitizen/Refugee’ screen in eCIS.
 - Entering the treatment dates as listed on the PA 1917 or provided by ~~OMAP/OMHSAS/ODP/OLTL~~ the DHS Clinical Evaluation Team.

The CAO will then run eligibility and authorize the NCE, if otherwise eligible.

- If ineligible for GA-related MA, the CAO will send the GA-related MA ineligible notice and will re-AP the application and review for EMA. The CAO will enter the emergency medical condition information, and authorize EMA if the individual is otherwise eligible, following policy in the “Authorizing EMA” section. The CAO will send the appropriate EMA eligible notice.

Notices

Individuals must be provided with proper notice of actions taken based on their emergency medical condition. Most EMA notices are available in eCIS under Reason Code 976. When authorizing or denying/terminating EMA, most of the EMA notices will be available on the Notice screen, but the CAO will need to select the appropriate notice. The date fields and condition information will be prepopulated based on data entry in eCIS. If the appropriate EMA notice option is not displayed in the selection, the CAO will need to send a manual notice. The following ~~All~~ EMA notices are located in the “[Emergency Medical Assistance](#)” folder on Docushare. ~~and will be available in eCIS when system updates are made:~~

The EMA notices are:

- 976 H: MA - EMA Closure Notice
- 976 I: MA - EMA Authorization Notice
- 976 J: MA - EMA Denial Notice
- 976 L: MA - EMA Combination Authorization/Denial Notice
- 976 M: LTC - EMA Authorization Notice

- **976 N:** LTC - EMA Denial Notice
- **976 O:** LTC - EMA Combination Authorization/Denial Notice
- **976 P:** LTC - EMA Closure Notice
- **976 Q:** MA/LTC - MA EMA Authorization/LTC EMA Denial Notice
- **976 R:** MA/LTC - MA EMA Authorization/LTC EMA Closure Notice
- **976 S:** HCBS - EMA Denial Notice
- **976 T:** MA/HCBS - MA EMA Authorization/HCBS EMA Denial Notice
- **976 U:** HCBS - EMA Closure Notice
- **976 V:** HCBS - EMA Authorization Notice

NOTE: For EMA denial notice text that specifically relates to an organ transplant or post-transplant procedures, area staff should contact BOP at ra-pwemapolicy@pa.gov.

Appeals

If an individual appeals an EMA decision **and the appeal is regarding the decision as it relates to the emergency medical condition**, the CAO must handle the appeal in accordance with usual appeal procedures; however, information must be emailed **within one business day** of the receipt of the appeal, or additional information provided for the appeal to the **PW, EMA Request** mailbox with the subject line “Appeal Received – County/Record Number and last name of individual”. Include “LTC” or “HCBS” in the subject line if the individual is appealing the rejection of either of those benefits. The ~~OMAP/OMHSAS/ODP/OLTL~~ **DHS Clinical Evaluation Team** physician who reviewed the individual’s emergency medical condition will participate in the hearing as a witness for the CAO.

NOTE: If the ~~OMAP/OMHSAS/ODP/OLTL~~ **DHS Clinical Evaluation Team** physician is not available to participate in the hearing, the CAO should request a continuance. If the request for a continuance is denied, the ~~OMAP/OMHSAS/ODP/OLTL~~ **DHS Clinical Evaluation Team** physician will provide a detailed letter to the CAO to explain why the individual’s condition does not meet the criteria for an emergency medical condition.

The CAO may also request legal representation from the Office of General Counsel (OGC). The CAO must forward the appeal information **within one business day** to the OGC. If an attorney is assigned, the CAO will make all the evidence available to the OGC.

Upon receiving the Notice of Date and Time of the hearing, that information must be emailed, **within one business day**, to the **PW, EMA Request** mailbox (and OGC attorney if involved) with the subject line “Appeal Received – County/Record Number and last name of individual”.

If the CAO is notified that an appeal is withdrawn, the CAO must, **within one business day**, forward the notification of the withdrawal in an email to the **PW, EMA Request** mailbox (and OGC attorney, if involved) with the subject line “Appeal Withdrawn – County/Record Number and last name of individual”. Include “LTC” or “HCBS” in the subject line if applicable.

NEXT STEPS

1. Share and review this information with appropriate staff members.
2. Direct questions regarding this Operations Memorandum (Ops Memo) to your Area Manager.
3. This Ops Memo obsoletes Information Memorandum Emergency Medical Assistance for Noncitizens.
4. This Ops Memo will become obsolete when this information is incorporated into the MA Handbook.

ATTACHMENT

[Attachment 1: PA 1917](#)

[Attachment 2: MA – EMA Authorization Notice](#)

[Attachment 3: MA – EMA Denial Notice](#)

[Attachment 4: MA – EMA Combination Authorization/Denial Notice](#)

[Attachment 5: MA – EMA Closure Notice](#)

[Attachment 6: LTC – EMA Authorization Notice](#)

[Attachment 7: LTC – EMA Denial Notice](#)

[Attachment 8: LTC – EMA Combination Authorization/Denial Notice](#)

[Attachment 9: LTC – EMA Closure Notice](#)

[Attachment 10: MA/LTC – MA EMA Authorization/LTC EMA Denial Notice](#)

[Attachment 11: MA/LTC – MA EMA Authorization/LTC EMA Closure Notice](#)

[Attachment 12: HCBS – EMA Authorization Notice](#)

[Attachment 13: HCBS – EMA Denial Notice](#)

[Attachment 14: MA/HCBS – MA EMA Authorization/HCBS EMA Denial Notice](#)

[Attachment 15: HCBS – EMA Closure Notice](#)