



Date: December 14, 2015

DHCAA Operations Memo 15-47

To: Income Maintenance Supervisors
Income Maintenance Lead Workers
Income Maintenance Staff

| | |
|---|--|
| Affected Programs: | |
| <input checked="" type="checkbox"/> BadgerCare Plus | <input type="checkbox"/> Caretaker Supplement |
| <input checked="" type="checkbox"/> FoodShare | <input type="checkbox"/> FoodShare Employment and Training |
| <input type="checkbox"/> Medicaid | |
| <input type="checkbox"/> SeniorCare | |

From: Shawn Tessmann, Bureau Director
Bureau of Enrollment Policy and Systems
Division of Health Care Access and Accountability

Electronic Residency Verification

CROSS REFERENCE

- FoodShare Wisconsin Handbook, [Section 3.2.1 Residence](#) and [Section 1.2.3.5 Wisconsin Residency Verification](#)
- BadgerCare Plus Eligibility Handbook, [Section 3.3 Determining State Residency](#)

EFFECTIVE DATE

January 1, 2016

PURPOSE

The purpose of this Operations Memo is to announce a new process for researching leads for childless adults who are potentially living outside the state of Wisconsin. The leads will derive from a new data exchange being implemented in January 2016 based on information retrieved by the vendor from data matching with many different types of data sources and will appear on a report displaying the out-of-state address the member used as well as the date the address was used.

BACKGROUND

Wis. Stat. § 49.84(7) requires the Department of Health Services to establish a data exchange to electronically verify residency. The Department will implement this exchange for non-homeless childless adults receiving BadgerCare Plus in order to reduce incorrectly issued benefits to individuals living out of state. The statute contains exceptions for individuals who reside in nursing homes, children who are placed in foster care, and individuals receiving FoodShare benefits who have already provided an acceptable form of residency verification. As a result, those populations will not be considered as part of this initiative.

Monthly data exchanges will begin starting January 1, 2016. An individual's residency will not be queried through this data exchange process more than once in a six-month period.

POLICY

There are no policy changes associated with this initiative.

PROCESS

At the beginning of each month, a new report containing leads for consortia to work will be loaded into Microsoft SharePoint. The report will contain the information from CARES and the additional following fields:

- Out of state flag
- Address matched flag
- Best address
- Best city, state, and ZIP code
- Date and time for the best address

Income maintenance (IM) agencies will need to research the leads that are on the report, starting with a review of the CARES Worker Web (CWW) case. If a case is currently closed, the worker will need to make a case comment and add a note on the report stating that the case is currently closed. Income maintenance agencies will have 30 days from the date the report is available in Microsoft SharePoint to work the leads. Once all the leads have been worked, IM agencies need to upload the same report with their findings to Microsoft SharePoint.

For individuals who are currently open for health care, workers will need to research the case to determine if residency is questionable.

RESEARCH TO VERIFY RESIDENCY

Information received from the report should be considered leads, and IM agencies will need to research these leads in order to determine if a member has possibly violated residency requirements and should receive a Residency Verification letter. The leads generated through this process are not sufficient evidence to pend a case or send a Residency Verification letter without further research. At minimum, this research should include the following steps:

- Reviewing case comments, especially to see if the alternate address has a reasonable explanation or if the case is already under review for returned mail, out-of-state usage, etc.
- Contacting the state the person is reported to be living in to verify that he or she is not receiving benefits there as well.
- For members with a FoodShare component, reviewing Electronic Benefits Transfer (EBT) card usage history to determine if a pattern of use and the lead indicates possible out-of-state residence.

Example 1: Joan lives in Green Bay, Wisconsin, per CWW, but a lead indicates an address in Mississippi. When viewing the EBT card usage for the prior three months, all transactions are showing in Mississippi. If additional research does not provide evidence that she is more likely living in Wisconsin, Joan should receive a Residency Verification letter.

Example 2: Bob lives in Milwaukee, Wisconsin, per CWW, but a lead indicates an address in Illinois. When viewing the EBT card usage for the prior three months, transactions are showing in the following five states: Wisconsin, Illinois, Minnesota, Michigan, and Indiana. Bob is an over-the-road truck driver based on information found on the Employment page in CWW. His EBT usage is not an indicator of out-of-state residence. Additional research is needed.

Additionally, IM agencies should use any other sources that are relevant to their decision of whether or not to send a Residency Verification letter. This could include client contacts, online data exchanges, and Internet searches, depending on what is allowable by the agency and appropriate for the case.

Note: Be mindful of privacy rules and guidelines when consulting third parties about member information.

If the research reveals that residency is not questionable, document the steps taken in the case comments and continue to the next lead. If the research does confirm that Wisconsin residency is questionable, pend the case for residency verification in CWW by entering a “?” in the Resides In WI verification field on the Current Demographics page and send the verification checklist requesting verification of residency from the member. Document the action taken in the case and the results of this follow-up. If research involves a direct client contact during which a member confirms that he or she does not reside in Wisconsin and does not intend to reside in Wisconsin, there is no need to send a Residency Verification letter; process this as a reported change of address and document the actions taken in the case comments. For any outcome, including referrals to fraud, IM agencies should both add notes to case comments and select the appropriate outcome from the list in the lead report.

CONTACTS

BEPS CARES Information and Problem Resolution Center

DHS/DHCAA/BEPS/JS