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Governor



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INCOME MAINTENANCE ADVISORY COMMITTEE (IMAC)

Thursday, February 15, 2018

1:00 – 3:30 p.m.

Dane County Job Center, 1801 Aberg Avenue - Ballroom, Madison, WI 53704

Or online at <https://connect.wisconsin.gov/imac/>

For audio, dial 877-820-7831, access code 361278

MINUTES

Non-State Attendees:

Jenny Hoffman, Bay Lake / Brown Co.	Kris Parkansky, Bay Lake / Marinette Co.
Cindi Flynn, Capital / Adams Co.	Kara Ponti, Capital / Dane Co.
Shawn Tessman, Capital / Dane Co.	Amy Baranek, Capital / Dodge Co.
Bill Blank, Capital / Juneau Co.	John Rathman, East Central / Outagamie Co.
Stephanie Ronnfeldt, Capital / Richland Co.	Annett Mooney, East Central / Marquette Co.
Ann Kriegel, East Central / Winnebago Co.	Linda Struck, Great Rivers / Eau Claire Co.
Ronda Brown, Great Rivers / St. Croix Co.	Whitney Escher, IM Central / Portage Co.
Nicole Rolain, IM Central / Marathon Co.	Melody Larson, Moraine Lakes / Walworth Co.
Brenda Zweck, Moraine Lakes / Walworth Co.	Sandy Potter, Moraine Lakes / Washington Co.
Debra Berg, Moraine Lakes / Waukesha Co.	Doreen Lang, Northern / Wood Co.
Mark Nelson, Southern / Green Co.	Kate Chambers, Southern / Iowa Co.
April Heim, Southern / Rock Co.	Jill Johnson, Southern / Jefferson Co.
Lorie Graff, Western / LaCrosse Co.	Kimm Peters, WKRP / Kenosha Co.
Nina Taylor, WKRP / Kenosha Co.	

State and Federal Attendees:

Abby Abernathy, DHS	Autumn Arnold, DHS
LaTanya Baldwin, DHS	Dale Crapp, DHS
Rebecca David, DHS	Tonya Evans, DHS
Matt Fanale, DHS	Erik Hayko, DHS
Paula Langbecker, DHS	Emily McFarland, DCF
Jen Mueller, DHS	Nicole Price, DCF
Gail Propsom, DHS	Angela Stanford, DHS
Melissa Todd, DHS	Debbie Waite, DHS
Pang Xiong, DHS	

1. Administrative Issues – Debbie Waite & John Rathman
 - Report attendance on-site by signing the sign-in sheet and, if attending remotely, by e-mailing Paula Langbecker of your attendance. E-mail is Paula.Langbecker@dhs.wisconsin.gov.
 - John Rathman introduced new WCHSA Executive Director – Katie Herrem. Katie shared her interest in meeting and getting to know IM and DHS participants and encouraged contacts from the group.

2. Approval of November 16, 2017 Meeting Minutes – Debbie Waite
 - Motion to approve the minutes was made, seconded and passed by voice vote.

3. Tribal Implications: Move to Statewide Family Care – Gail Propsom
 - DHS is in process of determining how to implement Family Care statewide as it impacts tribal agencies.
 - Most tribal agencies are interested in providing Family Care services to their members.
 - DHS has been negotiating with CMS on options for tribal agencies but CMS has been reluctant to approve a waiver for tribes, indicating that services need to be provided under the Family Care managed care structure. Conversations continue with CMS and with the tribes.
 - July 1 is the target to have a program in place for tribes that won't cause disruption to services provided to their tribal members.
 - Whatever is implemented should have little impact on Income Maintenance agencies.
 - Gail will provide update on tribal solution once finalized.

4. Division of Hearings and Appeals Relocation – Debbie Waite
 - Debbie Waite distributed and shared key information from a notice prepared by the Division of Hearings and Appeals on logistical and contact information about their upcoming plan to relocate their Madison offices in April. The notice reads as follows:
 - *We Are Moving!*
*Please be advised that on **April 10, 2018**, the Division of Hearings and Appeals will be moving from 5005 University Ave., Suite 201, Madison, WI, to 4822 Madison Yards Way, Madison WI 53705.*
 - *We anticipate a smooth transition with minimal service interruption before and after the move. Our post office mailing box remains the same at P.O. Box 7875.*
 - *Please note that on April 10th, DHA staff in the Madison office will not be answering phones or emails. In the event of an emergency or urgent situation on the day of our move, please contact DHA's Milwaukee office at (414) 227-4781 or email: DOADHAMilwaukee@wisconsin.gov.*
 - *Please pass along this information at your discretion and update your records as needed. For questions, please email DHAMail@wisconsin.gov.*

5. GAP Filling Policy and Process Clarifications – Autumn Arnold

- An amendment to Operations Memo 17-35 will be published to announce some policy clarifications, a process change regarding overpayments, and a few minor procedural changes related to GAP.
- Gap filling policy:
 - Gap filling refers to the “gap” that is created when someone’s monthly income is too high and the person doesn’t qualify for BC+, but their annual income is too low and the person doesn’t qualify for a premium tax credit at the Marketplace.
 - When someone is denied or terminated from BC+ because they have too much monthly income, agencies have been instructed to determine if the person could qualify on the basis of their projected annual income under these circumstances:
 - If it’s apparent to the agency that the annual income will be below 100% FPL.
 - If the person has been sent to us from the Marketplace with a gap filling indicator
 - If the person has a letter from the Marketplace telling them that they may qualify on the basis of their annual income, and/or
 - If the person requests a determination based on annual income.
 - Agencies are responsible for assessing the person’s annual income for the tax year and if the person is found to be below 100% FPL, the IM agency sends an email to EM CAPO, which manually certifies the member through the end of the calendar year.
 - Members are responsible for reporting changes to the IM agency, and the agency needs to let EM CAPO know if the person is now above the 100% annual threshold, or moves out of state, or is no longer eligible for some other non-financial reason.
 - Agencies should also be considering gap filling eligibility prior to establishing an overpayment – even if the overpayment is because someone failed to report an increase in household income.
- Policy clarifications:
 - Gap filling applies to backdated months.
 - If the request spans two calendar years, then agencies are going to need to look at both calendar years.
 - If SWICA data is available for past quarters, agencies may use SWICA as verification of income for those quarters.
 - Aside from the issue of looking at past months, all of the policies and procedures for gap filling in backdated months are the same as gap filling in non-backdated months.
 - In the initial publication of 17-35, agencies had been directed to consider gap filling when determining overpayments. The amendment clarifies that this includes overpayments for any months when MAGI rules were in effect, and that

if a member requests a review of an overpayment that has already been established for gap filling, agencies must review it. DHS has worked with PACU to establish a process for reversing overpayments if needed and have included this in the Ops Memo.

- Process change regarding overpayments:
 - BadgerCare Plus overpayments have been the subject of a number of recent fair hearing decisions. ALJs have ruled that until someone actually exceeds the annual income limit of 100% FPL, it cannot be determined that they are not eligible for gap filling.
 - To avoid situations in which an overpayment is established that turns out to not actually be an overpayment, agencies are now being asked to wait until they know that someone has exceeded 100% for the calendar year before establishing an overpayment for months in that year.
 - Consortia expressed concern over case load. Debbie Waite suggested bringing topic to IMOA to share best practices or strategies for process change to manage efficiency.
- Minor procedural changes:
 - To better manage gap filling requests, EM CAPO has created a gap-filling-specific mailbox for agencies to use instead of the general EM CAPO mailbox: DHSgapfilling@dhs.wisconsin.gov.
 - Agencies should now send two additional pieces of information as part of gap filling referrals to EM CAPO:
 - One is the monthly income amount that made them ineligible under regular gap filling rules.
 - If the member reports being over the annual income limit during the certification period and the IM agency notifies EM CAPO in order to end the gap filing certification, the annual income amount they reported should be included.
- Notice changes:
 - As Rachel Witthoft described at last month's IMAC, one of the CARES changes being made as part of the ACA Compliance project is that if a parent, caretaker or childless adult is denied or terminated only because of excess income, the reason code will let them know that if their annual income is below the 100% FPL threshold, they might qualify for BC+ based on their annual income.
 - In October 2016, DHS clarified that IM agencies are responsible for acting on reported changes for people who are enrolled under gap filling, but DHS did not update the manual notices that EM CAPO sends to provide members with IM contact information. DHS is currently working to update the manual notices.

6. 2018 CARES Release Schedule - Jen Mueller

- See “2018 CARES Projects” handout for more detail.
- The CARES Project listing as of February 12, 2018 is subject to change.
- March 2018 Projects:
 - Not discussed but listed in handout to create a complete picture.
- May 2018 Projects:
 - BEPS/IM Communication Tool will be an internal tool used by CARES Call Center, Training and IM QC to track communications.
 - The scope of the tool has been discussed at IMOA Subcommittee conversations.
 - Rollout strategy has been determined.
- June 23, 2018 Projects:
 - Organizations as Authorized Reps
 - ACA has policy authorizing organizations to be authorized reps for members.
 - Currently reviewing how the health care policy affects other programs, and what to do when there are other programs on the case.
 - Currently building system changes to support authorized rep as an organization.
 - Regulatory Compliance – Death Data Match
 - When CARES will support verifying death and expunge benefits from Quest Card upon notice of a death.
 - Administrative Screens Modernization
 - Administrative Structure:
 - Screens used to manage worker and organization structure in CARES by DHS Security and State Staff.
 - Screens used to manage business administration functionality and reference data in CARES by select DCF BITS and select DHS system staff and Call Center Staff.
 - TAPP demonstrations will be scheduled for June 8 and June 15.
 - All Operations Memos will release on or before June 8.
- October 27, 2018 Projects:
 - ABAWD Naming Conventions
 - To maintain compliance with FNS requirements, need to eliminate exempt and non-exempt from ABAWD
 - Will make the change to ABAWD and non-ABAWD in a way that transcends time and reports.
 - ACCESS Mobile Phase I
 - Launching ACCESS mobile app for Android and IOS. Features will include:
 - Basic snapshot of user’s current benefit status
 - List of verification items that are pending on case and status of documents recently submitted
 - Ability to upload verification documents using mobile phone camera
 - Reminders when action is needed on case
 - Option to receive push notifications when action needed on case
 - FAQs and links to other resources

- MyACCESS account set-up and recovery functions to make management easier and more user-friendly
- ACA Compliance – Check InterChange (iC) for MEC
 - Creating an interface between CARES and iC to check for minimum essential coverage for the FFM for Medicaid programs which are determined outside of CARES.
- Kofax Upgrade – phased rollout
 - Moving from Kofax Ascent Capture to Kofax Total Agility
 - Will be a soft roll-out requiring IT engagement.
- Extension and Premiums Enhancements
 - Completing items that could not be completed in first phase
 - Focusing on applying late verification rules to build extensions for a past month after a failure to verify and applying late renewal rules to build extension for a past month.
 - Other smaller items included as well.
- Workload Tracking Reports
 - Reports will track work completed by Economic Support workers.
 - Starting project over at business requirements with updated scope.
- Overpayment Calculation Tool in CWW – tentative
 - Building an overpayment tool within CARES Worker Web which automatically calculates the overpayment amount per month for Medicaid and Badger Care Plus, so that overpayment error can be calculated and a referral and claim can be entered into BRITS for investigation and recovery.
 - Tool should assist worker in determining, based on policy and case details, whether or not the overpayment can be pursued.
 - Scope is significant.
- Screens Modernization - tentative
 - Scope – Remaining overpayment screens and is tentative.
 - There is not a workgroup in place yet.
- TAPP demonstration for October projects scheduled for September 14, October 12, October 19
- Project to be determined:
 - Reports Modernization – Moving Ad-Hoc and Control-D reports to IMMR

7. WorkNumber Access Follow-Up – Erik Hayko

- DHS currently contracts with TALX, aka Equifax, for access to the WorkNumber. DHS staff recently met with TALX to discuss the status of sun-setting/cancelling of the free fax employer verification currently offered by the WorkNumber and learned:
 - A sunset/end date is still not known nor determined.
 - When the sunset/end occurs, the alternatives that counties will have will be to:
 - Enter into a long term (annual or multi-year) contract with Equifax committing to a certain number of verifications per year
- OR
 - Enter into a short term (50 verifications or another set number) contract with Equifax. This will be at a higher rate than a long term agreement

OR

- Make employment requests directly to the employer.
- DHS has purchased 33,000 verifications per year at a cost of \$8.00 per verification and current use is for program integrity by OIG, FSQC and MAQC, and at MilES for cases where the member has not provided employment verification during the eligibility determination and renewal process.
- Equifax is exploring pricing options that could be made available to counties by leveraging the volume from the DHS contract while maintaining separate contracts with the counties. Counties would still need to pay for the verifications. However, this may be an advantage if a county is already under contract as lower pricing may be realized. More information will be forthcoming.
- Consortia asked that this conversation be referred to IMOA to discuss consortia's interest in having DHS:
 - Explore pricing options that might be available due to DHS contract, so that employment verification requirements can be processed more efficiently
 - Send a reminder notice to employers of the statutory requirement to provide employment verification if requested by the IM agency
 - Check with Equifax on how and when the messages to consortia/counties on sun-setting the current relationships are being sent
 - Check with Equifax on how many free verifications are supported for WI, using 2017 as a sample year
 - Check with DCF Child Support to determine if it has an agreement with Equifax for free verifications and what the verification process looks like.

8. CARES Call Center Update - Becky David

- See "Ops Memo" handout for more detail.
- Administrative renewal process occurs in the eleventh month of a member's certification period, prior to sending out 45-day renewal letters. This past weekend, there was a data exchange issue and the administrative renewal process was not completed. All cases due for renewal in March were sent through the normal renewal process and members were sent the 45-day renewal letters.
 - Administrative renewal process will be run this Saturday, February 17th 2018 for cases due for renewal in March 2018. If the case meets the administrative renewal requirements, the members will be sent the administrative renewal notices. If the case does not meet the administrative renewal requirements this weekend, no further notification will be sent through this process, as all members had received the 45-day renewal notices.
 - A CARES Coordinator notice was sent 2/16/2018 with this information. A follow up CARES Coordinator notice will be sent upon completion of the 2/17/2018 Administrative Renewal process run.

9. Regional Enrollment Network (REN) Update – John Rathman

- John Rathman shared that he and Lorie Graff (Western) continue to participate in REN discussions relating to: a) how assistors are engaging with customers who may

be over income b) the provisions and impact of the reinsurance plan proposed by Governor Walker for 2019, including detail from the Office of the Commissioner of Insurance.

- This is a link to the OCI materials from the Joint Finance Committee meeting: <https://oci.wi.gov/Pages/PressReleases/20120212Reinsurance.aspx>

10. Income Maintenance (IM) Funding & - Debbie Waite/John Rathman Contract Updates

- Debbie Waite reported that all contract documents and administrative memos are in good status. Anticipated to come in next few weeks for consortia review is draft administrative memo to support distribution of 2017 Q2, Q3, and Q4 estate recovery funding amounts.

11. Consortia Feedback – John Rathman

- Consortia reiterated their urgent need for the DHS 2017 Race and Ethnicity report which is used to populate their civil rights plans. Debbie Waite indicated publication and SharePoint posting was imminent.
- Consortia re-requested information and support from DHS on obtaining EEOC poster and certain required form translations as required by the civil rights plan document. Debbie Waite indicated an update would be coming out from staff on what DHS could or could not provide.
- Consortia reported making significant progress on pulling together more detailed proposals on five CARES project recommendations to be included in the 2019 prioritization process. Goal is to get these to DHS by end of February. Top two priorities as of now are:
 - 1) system initiatives to assist with discrepancies volumes and efficiency
 - 2) system initiatives to help with reduction of active and other error rates
- At ES PAC meeting on March 15, operational leads will bring and share lists of needed clarifications or handbook updates for EBD LTC policy to be reviewed in EBD LTC subcommittee or other forum.
- Consortia reported delays in receiving overpayment recovery incentive payments on MA, FS, AFDC and other programs since last fall and asked if DHS staff could track source of delay. (Post Meeting Update: DCF indicated incentive payments for 4th quarter of 2017 would be loaded by February 21.)
- Consortia asked that there be joint discussion between DHS and DCF about opportunities to create consistencies in how self-employment is handled in policy and eligibility determinations. Program Coordination subcommittee meeting in April was suggested as the venue to hold this discussion.
- Consortia reported that, at the IMOA subcommittee meeting on March 2, each will be prepared to share the name of one representative to participate in the DACUM

curriculum design exercise related to possible creation of an associate degree program for Income Maintenance workers.

12. Administrative Memos - Debbie Waite

- See notes on Agenda Item 10

13. Subcommittee & Work Group Updates - Debbie Waite

- See “IMAC Subcommittee Update” handout for an update on the subcommittees.

14. Miscellaneous Updates / Other / Public Comment

- CHIP Update – Debbie Waite shared that:
 - Since the January meeting of IMAC, two federal legislative actions occurred that extended funding for CHIP for 10 years. These were:
 - A continuing resolution passed on January 22, which extended government funding through February 8, 2018. This resolution included 6 years of funding for CHIP.
 - A bill passed to extend government funding through March 23, 2018, which added four more years of funding to the original six..
 - The continued funding includes a step-down of the enhanced federal funding rate paid to states for CHIP:
 - The 23 percent enhanced CHIP match rate will continue through FY 2018 and FY 2019. In Wisconsin, this “bump” provides a 94% match rate.
 - The bump reduces to 11.5 percent in FY 2020, or about 82% for Wisconsin.
 - After FY 2020, this enhanced CHIP match rate is eliminated and the match rate will return to states’ regular enhanced CHIP match rates, which in Wisconsin is about 71%.
 - The continued funding also included an extension of the Maintenance of Effort requirement for children with income up to 300% FPL through the end of the same 10-year period. This means that states may not put eligibility policies into place for children that are more restrictive than those in place on March 23, 2010, the date when the Affordable Care Act was enacted.
 - Other than the extension of the MOE, the continuation of funding is not tied to any significant programmatic changes that impact Wisconsin at this time.
- No other public comment was shared.

15. Tentative March 15, 2018 Meeting and Future Agenda Topics

- State Special Session Updates
- Federal Policy Updates
- March CARES Release
- CARES Project Request Process Update
- Childless Adult Waiver Status Update

- FNS Midwest Partners Conference August 1-3– Battle Creek, Michigan