

Reasonable Compatibility for Asset Verification

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Income Maintenance Advisory Committee (IMAC) Meeting



Agenda

- Background
- Policy Changes
- Systems Changes
- Next steps

Background

- Federal law requires states to implement an automated system for verifying assets for Medicaid.
- On June 23, 2018, DHS implemented a new integrated Asset Verification System (AVS) that obtains financial institution data through a third-party vendor.
- CMS recently provided guidance that AVS data is subject to a “reasonable compatibility” test.
 - If information from AVS would result in a termination or denial, verification must be requested from the member.

Background, continued

- Effective March 2, 2019, CARES will:
 - Separately track self-reported and AVS-reported asset amounts.
 - Apply a “reasonable compatibility” test to determine if verification of assets is required.
 - Automatically send AVS requests when changes are reported on AVS liquid asset types.
- Our goal is to comply with federal requirements while minimizing changes to the current process.

What has not changed?

- Overall process and timelines for sending, receiving, and matching AVS requests.
- Information returned by financial institutions.
- When and how asset information is shown on the VCL.

Policy Changes

Policy Changes

- AVS data may **only** be used to verify member-reported information if the amounts match exactly.
- If they do not match exactly (and the asset is not already verified through other methods), a reasonable compatibility test will be applied.
 - If the member reports being over the asset limit, eligibility will be denied without verification.
 - If AVS data and member-reported information both result in eligibility, verification may not be requested.
 - If AVS data shows that the person is over the asset limit, but the member reports being under the limit, verification must be requested.

Policy changes, continued

- AVS data may no longer be used to verify burial assets or annuities.
 - AVS may still indicate undisclosed assets of these types.
- An AVS request will be sent automatically if a change is reported to an AVS liquid asset or a new asset is added on the case.
- Reasonable compatibility will be applied separately to Medicare Savings Programs (MSP).
 - Someone could be not reasonably compatible for EBD Medicaid but be reasonably compatible for MSP.

Systems Changes

Systems Changes – Liquid Asset Page

- “Asset Amount” field updated to “Self-Reported Amount”
- 2 new fields added
 - AVS Amount
 - Auto-populated during the AVS asset matching process
 - Balance Date
 - Enabled if there is Health Care or MSP request
 - Used to help workers track whether AVS data or member-verified data is more recent.

System Changes – Liquid Asset Page

CARES Worker Web SYSTEMS User ID: XCTW06 User Name: H SUBRAMANIA Quick Select: CASE/RFA

Primary Person: REASONABLE COMPMAN 87F PP Case: 9003715891 Status: Pending Mode: Intake 3.5 01/14/2019

Action Items (2) Documents (0) Discrepancies (0) Work Items (1)

Navigation Menu: Search, CARES Home, Search, Inbox Search, Unlinked Documents, RFA / Case, Client Registration (0), Case Summary, Case Comments, Expected Changes, Application Entry (0), Case Information, Individual Demographics, Benefits/School, Individual Non Financial, Other Health Care Programs, Asset Information, Summary, AVS Asset Match, Gatepost, Liquid, Vehicle, Real Property, Personal Property, Burial

Liquid Assets

Cancel Reset Total: 5

Effective Period
Begin Month: 12 / 2018 End Month: MM / YYYY Last Updated: 01/07/2019
Delete Reason: [Dropdown]

Additional Information
Individual: REASONABLE COMPMAN 87F PP Sequence: 13
Type: CH - CHECKING ACCOUNT Verification: AF - AGENCY FORM
Jointly Owned? N - No Available? Y - Yes
Burial? N - No Verification: AF - AGENCY FORM
Self-Reported Amount: \$ 19 . 00
Balance Date: MM / DD / YYYY
AVS Amount: \$ 100 . 00

Independence Account Information
Independence Account? No Registration Date: MM / DD / YYYY
Pre-independence Account Balance Amount: \$.

Financial Institution Name And Address Information
Account Number: [Field]
Name: WWW
Address: [Field]
City: [Field] State: [Dropdown]

System Changes – Assets Determination Summary Page

- Reasonable Compatibility Results section is added
- If assets are Reasonably Compatible, assets eligibility results will pass

CARES Worker Web - Assets Determination Summary - Windows Internet Explorer provided by DHS - State of Wisconsin

User ID: XCTW06 User Name: H SUBRAMANIA Quick Select: CASE/RFA

Primary Person: REASONABLE COMPMAN 86F PP Case: 9003715891 Status: Pending Mode: Intake 3.5 12/18/2018

Action Items (1) Documents (0) Discrepancies (0) Work Items (1)

Assets Determination Summary

Cancel Reset

Assistance Group Overview

Assistance Group:	MS - SSI RELATED MA FOR AGED, BLIND AND DISABLED (CAT NDY)	Sequence:	1
Benefit Begin Date:	01/01/2019	Benefit End Date:	
Determination Date:	12/18/2018		

Results

Assistance Group Status:	O - OPEN	Eligibility Status:	PASS
Assets Eligibility Determination Results:	PASS	FoodShare Categorically Eligible:	No

Counted Assets

Vehicle Assets:	\$	—
Liquid Assets:	+	1,500.00
Real Property Assets:	+	—
Personal Property Assets:	+	—
Life Insurance Assets:	+	—
Lump Sum Assets:	+	—
Burial Assets:	+	—
Deemed Assets:	+	—
Assets Allocated Out:	—	—
Assets Allocated In:	+	—
Total Counted Assets:	\$	1,500.00
Asset Limit:	\$	2,000.00
Overage Amount:	\$	—

Reasonable Compatibility Results

Asset Limit:	\$ 2,000.00
Total Countable Assets (Reported):	\$ 1,500.00
Total Countable Assets (Data Sources):	\$ 1,500.00
Test Results:	Reasonably Compatible

System Changes – Assets Determination Summary Page

- If assets are Not Reasonably Compatible, assets eligibility results will pend

The screenshot displays the 'Assets Determination Summary' page in the CARES Worker Web system. The top navigation bar includes the user ID (XCTW06), user name (H SUBRAMANIA), and case information (Case: 9003715891, Status: Pending, Mode: Intake). The left navigation menu lists various system functions such as 'Search', 'Inbox Search', and 'Case Summary'. The main content area is titled 'Assets Determination Summary' and contains the following information:

Assistance Group Overview			
Assistance Group:	MS - SSI RELATED MA FOR AGED, BLIND AND DISABLED (CAT NDY)	Sequence:	1
Benefit Begin Date:	01/01/2019	Benefit End Date:	
Determination Date:	12/17/2018		
Results			
Assistance Group Status:	P - PEND	Eligibility Status:	PENDING
Assets Eligibility Determination Results:	PENDING	FoodShare Categorically Eligible:	No
Counted Assets			
Vehicle Assets:	\$	—	
Liquid Assets:	+	1,500.00	
Real Property Assets:	+	—	
Personal Property Assets:	+	—	
Life Insurance Assets:	+	—	
Lump Sum Assets:	+	—	
Burial Assets:	+	—	
Deemed Assets:	+	—	
Assets Allocated Out:	-	—	
Assets Allocated In:	+	—	
Total Countable Assets:	\$	1,500.00	
Asset Limit:	\$	2,000.00	
Overage Amount:	\$	—	
Reasonable Compatibility Results			
Asset Limit:	\$	2,000.00	
Total Countable Assets (Reported):	\$	1,500.00	
Total Countable Assets (Data Sources):	\$	2,002.00	
Test Results:			Not Reasonably Compatible

Next steps

Next Steps

- Operations Memo: new and amended Operations Memos planned for February 15, 2019
- Recorded demo: planned for the week of February 25, 2019
- Training:
 - A new training is anticipated to be published on February 18, 2019.
 - Information about the training to be shared at the January IMAC Training Subcommittee.