

DMA ADMINISTRATIVE LETTER NO: 03-14, ASSET VERIFICATION SYSTEM (AVS)

DATE: March 13, 2014

SUBJECT: Asset Verification System (AVS)

DISTRIBUTION: County Directors
Medicaid Supervisors
Medicaid Eligibility Staff

I. BACKGROUND

Federal regulations require all states to implement a program to verify the liquid assets of individuals held in financial institutions when determining Medicaid eligibility. North Carolina's Asset Verification System (AVS) is an automated system that obtains electronic financial information for individuals applying or subject to redetermination for Aged, Blind and Disabled Medicaid. Caseworkers submit asset verification requests and receive responses through NCFAST.

Previously, Medicaid caseworkers had no way to verify applicants/beneficiaries were fully disclosing all assets. With AVS, there is a more accurate disclosure of a/b's financial information. Additionally, AVS automated system reduces the need for manual requests and follow-up by staff and the applicant/beneficiary.

II. POLICY PRINCIPLES

- A. AVS is only used to verify assets for Aged, Blind and Disabled Medicaid programs, including Special Assistance (SA) and Medicaid Qualified Medicare Beneficiaries (MQB). AVS is not used for Medicaid to Families with Dependent Children (MAF) cases.**
- B. AVS is used at application, review and changes in circumstances.**
- C. AVS can be accessed for applications and ongoing cases in NCFAST. The Medicaid caseworker can request verification of assets provided by the a/b or send a request to verify any existing assets.**
- D. Responses are received from financial institutions that may be located in North Carolina, bordering state or across the country. However, not all financial institutions participate in the program. Financial institutions include:**
 - 1. Banks
 - 2. Related brokerage firms
 - 3. Credit Unions
 - 4. Savings and Loans

- E. AVS can verify liquid asset evidence of checking, savings, CD, Money Market, IRA, and Keogh. Other types of AVS responses can include Christmas club, trust, Annuity, Burial Funeral, Custodial other, Custodial Retirement and Rent Security.**
- F. AVS can provide monthly balances held by the applicant/beneficiary at any time in the immediate past 60 months. This monthly balance is what existed as of 12:01 a.m. on the first day of the month in question. All Accounts may not be known to the system.**

III. POLICY AND PROCEDURES

A. A New AVS Request

The caseworker may request a search at any time. Requests will generally be submitted at application, recertification and change in circumstances. The a/b is still required give consent and authorization to access financial records.

1. An AVS request can be initiated by clicking on the AVS Data tab on the Income Support page in NC FAST.
2. The Request AVS Data Dialog Box will display. Select the household member for the request and start/end dates. (By selecting household member the system will automatically send the Name, SSN and address for that household member).
3. Enter a Start Date.
4. Enter a Look Back Date. This will auto populate 60 months prior to the start date. An end date can be entered if the entire 60 months review is not needed.
5. The Look Back Date indicates how far in the past the Medicaid caseworker requires financial information.
6. Click "Save."
7. Most results are received within 7 calendar days; but it could take up to 15 days or longer to receive a response. Several responses may come back over time. Additional information may continue to be received day 15 through 60 prompting a new task to be generated. If a response comes back after the case is processed, treat it as a change in circumstances.
8. Responses can be viewed on the AVS data tab.

B. AVS Responses

NCFAST will generate a task on the 15th day prompting the caseworker to check for a response.

1. Responses can be viewed on the OVS on the AVS data tab. This tab is where the caseworker will find the following information:
 - a. The most recent request will be at the top of the page.
 - b. Each response is listed individually within the same response.
 - c. This page will also display a record for each request that has been made creating a history with responses that can be reviewed at a later date.
 - d. Additional details will display the current and retro months and a tab for the past months with a list of all the other monthly balances received in the response for that resource.
 - e. Caseworker can select any of the monthly records on the current and retro months tab to update an existing account or create a new account record in the liquid resources evidence.

2. Successful Response

- a. If response is accepted, the caseworker will receive an “Acknowledgment is Successful” message.
- b. Successful responses with status “Received” are when the financial institution finds a match and the information is provided to NCFASST, or
- c. If no match is found, most of the response is blank and will say “No account found.”

Note: Although the financial institution did not find a match in their system, the financial institution name, branch and institution ID’s are returned to identify which institution is responding.

3. Failure Response

A “failure” response with status “Will not respond” or “Unknown to the financial Institution” means the institution found a partial match but the name or SSN does not match their information. **The caseworker will receive a task to proceed with the manual verification process for that institution.** The caseworker will need to work with the a/b to find the error.

Please Note: Only request information from the a/b if there is no response from AVS or information received is inconsistent. Continue to follow procedures for requesting information.

4. If an error occurs when the request is made the status will be updated with the reason for the error and the acknowledgement date will remain blank. The caseworker will need to resubmit the request.

C. Processing Task

1. When the AVS task is opened, the caseworker will see the following:
 - a. Financial Institution Details,
 - b. Current & Retro Monthly Balances, and
 - c. Previous History Monthly Balances which is a list of all the other monthly balances received in the response for that account.
2. Caseworker will be able to compare the Current & Retro Monthly Balances to existing liquid resource evidence by selecting the “Compare” action.
3. All existing monthly balances in the “Current & Retro Monthly Balances” section will be displayed on the “AVS Evidence Update” page which will allow the caseworker to select any or all the balances they need to import to evidence.
4. Additional information may continue to be received day 15 through 60 prompting a new task to be generated.
5. The caseworker can determine which evidence to act upon.
6. There is a 60-day hard cut-off day from the date of the acknowledgement date.
7. The caseworker will need to match the active asset to the new response to update the evidence to the income support case to assist eligibility determination.
8. If no data is found, caseworker will make a note, no action is required and the process stops.

D. Training

The AVS training Webinar and additional information can be located in NCFast by visiting the following link: <https://dhhs.ncgovconnect.com/p27224985/>

E. Unacceptable Use

The AVS System may not be used for any of the following:

1. To obtain or attempt to obtain from the AVS any information which the caseworker has not been authorized to access.
2. The creation or transmission of unauthorized information, unauthorized requests for information or information that is knowingly erroneous.
3. The creation or transmission of any offensive, obscene or indecent images, data or other material, or any data capable of being resolved into obscene or indecent images or material.

4. The creation or transmission of material which is designed or likely to cause annoyance, inconvenience or needless anxiety.
5. The creation or transmission of defamatory material.
6. The transmission of material such that infringes the copyright of another person.
7. The transmission of unsolicited commercial or advertising material either to other Caseworkers, or to Caseworkers connected to other networks, save where that material is embedded within, or is otherwise part of, a service to which the Caseworker has chosen to subscribe.
8. Deliberate unauthorized access to facilities or services accessible via the AVS System.
9. Deliberate activities with any of the following characteristics:
 - a. Corrupting or destroying other Caseworkers' data.
 - b. Violating the privacy of other Caseworkers.
 - c. Using the AVS in a way that denies service to other Caseworkers (for example, deliberate or reckless overloading of access links or of switching equipment).
 - d. Other misuse of the AVS or networked resources, such as the introduction of viruses.

F. Questions Regarding AVS

The County DSS should designate an individual to contact their NCFAST AVS liaison who will contact AVS' contractor, Accuity with questions regarding Requests. When contacting Accuity, the contact person will need the Request ID, as it will allow a Customer Support Specialist to immediately identify and access the request in question. The Customer Support Center can be reached at 855-807-9822.

Accuity customer services Questions and concerns that might require a contact with Accuity include the following:

1. Questions about Financial Institutions, or
2. Questions about a Request submitted by DMA, or
3. Questions about a Response provided by Accuity on behalf of a Financial Institution, or
4. Questions about an overdue Follow-Up Status.

Please note: It is imperative that the County DSS contact Accuity directly and not contact a Financial Institution directly. The services provided by Accuity are intended to provide a single point of contact for caseworkers and the Financial Institutions streamlining the transfer of information and providing needed answers to questions.

IV. EFFECTIVE DATE AND IMPLEMENTATION

This policy is effective upon receipt.

If you have any questions regarding this information, please contact a Medicaid Program Representative.

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Acting Director

(This material was researched and written by Ena Lightbourne and Margaret Marshall, Medicaid Eligibility Unit)