

# **DHB ADMINISTRATIVE LETTER NO: 05-23, UNITED STATES POSTAL SERVICES (USPS) NATIONAL CHANGE OF ADDRESS (NCOA) AND UNITED STATES POSTAL SERVICES RETURNED MAIL**

**DATE:** March 7, 2023

**SUBJECT:** United States Postal Services (USPS) National Change of Address (NCOA) and United States Postal Services Returned Mail

**DISTRIBUTION:** County Departments of Social Services  
Medicaid Supervisors  
Medicaid Eligibility Staff

## **I. BACKGROUND**

North Carolina has requested that CMS provide authority under section 1902(e)(14)(A) of the Act to allow the state to accept updated in-state enrollee contact information from the U.S. Postal Services (USPS) National Change of Address (NCOA) and USPS returned mail without any additional confirmation from the individual.

The purpose of this letter is to provide guidance to counties on updating mailing addresses utilizing USPS returned mail forwarding address or NCOA to update beneficiary contact information during the Continuous Coverage Unwinding (CCU) period.

## **II. INTRODUCTION**

Under Section 1902(e)(14)(A) of the Act, the request was approved and will enable the state to accept updated in-state contact information received from NCOA or USPS returned mail without additional information from the individual.

Under this authority, the state will treat updated in-state contact received from NCOA or USPS returned mail as reliable and will update the beneficiary's case record with the new

contact information without first sending a notice to the beneficiary address on file to provide them with the opportunity to dispute the address change.

#### **A. Two Returned Mail Requirements During the CCU**

As a condition of claiming the temporary FMAP increase after March 31, 2023, states must attempt to ensure that it has up to date contact information for each individual for whom it conducts a renewal, and when there is returned mail. States must undertake a good faith effort to contact the individual using more than one modality prior to disenrollment on the basis of returned mail.

1. For the first condition, in the 9<sup>th</sup> month of a 12-month cp and in the 3<sup>rd</sup> month of a six-month cp, the state will automatically conduct outreach via text, email and robo call to the beneficiary. This process will continue through the duration of the unwinding period.
2. For the second condition, when the worker is unable to complete the recertification via the exparte process and must send the DHB-5097 Request for Information or the NC FAST 20020, the state will automatically attempt contact through the following modalities: text, email or robo call.

#### **B. County Responsibility**

1. There is no county responsibility in the advance outreach to obtain up to date contact information or for the alternate modalities of contact for returned mail.
2. However, the local agency **is** responsible for and expected to update the mailing address reported on the weekly returned mail report as outlined below and when there is returned mail with an “in state forwarding address” on the yellow label.
3. The local agency is required to update any reported change of address, email or phone number, in NC FAST within 7 business days. This is a requirement of the Franklin v. Kinsley Settlement agreement.

### **III CONTENT OF CHANGE**

#### **A. All Returned Mail**

When mail is returned to the local agency, they are expected to ensure that the mail was sent to the intended address by comparing the completeness and accuracy of the address on the returned mail against information in the applicant/beneficiary’s record.

1. If returned mail has a yellow sticker with an in-state forwarding address, the county will update the address in NC FAST without additional verification and send the original mailing to the forwarding address. Allowing 30 calendar days from the date of re-mailing, for the beneficiary to respond.

2. If the address contains errors or missing information, such as Apt #, the county will correct the address and must resend the returned mail to a completed address. Allowing 30 calendar days from the date of remailing, for the beneficiary to respond.
3. If subsequent mailing to beneficiary's correct address is **not** returned, the county is not required to take additional steps.
4. If subsequent mailing to a corrected address **is** returned, the county would check internal agency records and electronic sources to determine if there is another address on file and follow the returned mail/unable to locate policy outlined below. For further details refer to MA-3421 MAGI Recertification/MA-2320 Recertification policy.

## **B. USPS and NCOA**

There is not a state electronic interface with the USPS or NCOA; however, the NC Enrollment Broker and Prepaid Health Plans (PHPs) validate addresses against the NCOA database. A report is generated every Thursday and is sent to NC FAST. The Returned mail report is located in NC Fast under Reports and then the Returned Mail Reports tab. The local agency is expected to review the returned mail report promptly and update addresses without requiring further verification. Refer to the job aid, Returned Mail Report, in NC Fast Help for further instructions.

1. Returned Mail/Unable to Locate
  - a. Document all attempts to locate the beneficiary. Documentation must include the date of the attempt and the outcome.
    - (1) Review agency records and other program records for a current address, including:
      - Food and Nutrition Services
      - Work First Family Assistance
      - Other agency records and/or electronic sources as needed.
    - (2) Review current electronic sources for an updated address, such as (not an exhaustive list):
      - ACTS
      - ESCWS
      - SDX
      - SOLQ
      - TWN

- (3) Attempt to contact the beneficiary by telephone to obtain a current address.
- (4) Send a DHB-5097/DHB-5097sp, Request for Information to the most recent mailing address to request verification of a new address.

2. If all attempts to locate the beneficiary are unsuccessful:

Ensure that all requirements regarding the DHB-2187, Notice of Potential Change in Medicaid Eligibility, are followed. Refer to MA-3421 MAGI Recertification section VIII.A.


- a. Medicaid benefits may not be terminated until 60 calendar days after the date the DHB-2187 was mailed.
- b. The caseworker must review the DHB-2187 in NC FAST to determine the date mailed. Then use the Time Standards chart to calculate the 60<sup>th</sup> calendar day.
- c. Send an **adequate** DSS-8110 to terminate Medicaid effective the last day of the month in which the 61<sup>st</sup> day falls. Follow policy in MA-3430/MA-2420, Notice and Hearings Process.

3. If the local agency **is able to locate** the beneficiary prior to the end of the current certification period, reopen the terminated case from the first day of the month after the month of termination and authorize benefits through the end of the certification period.

## II. IMPLEMENTATION

This letter is effective upon receipt and will remain effective until May 31, 2024.

If you have any questions regarding this information, please contact your [Medicaid Operational Support Team representative](#).

DocuSigned by:  
  
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Jay Ludlam  
Deputy Secretary, NC Medicaid