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Verifying Beneficiary Attestation for Work Requirement & Community Engagement

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Agenda

1. Introductions
2. Levels of Verification
3. Tools for Accepting Data
4. Applications of Verification Programs



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POLICY CONSIDERATIONS FOR COMMUNITY ENGAGEMENT


- Defining mandatory participants (e.g., age, family composition, exemptions)
- Consideration for other voluntary participation and appropriate outreach
- Defining minimum participation (e.g., 80 hrs/month)
- Qualifying activities & limits
- Allowance for lapses in activities
- Impact to Medicaid eligibility status
- Workforce employment & training program opportunities
- Access to supportive services (e.g., transportation, child care, counseling)




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POLICY CONSIDERATIONS




Who's covered and who's eligible for an exemption?




What is allowed and how is work verified?




What are the consequences of non-compliance?




How will the process operate?




What technology is needed?



What will it cost?




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CHALLENGES IN COMPLIANCE VERIFICATION

In an early implementation, only one channel was offered, a website, for reporting qualified work activities and associated hours. Less than 10% of those required to report did so on a monthly basis, leading to nearly 18,000 who lost Medicaid benefits because they failed to report activities.

- Cost and complexity are driving states towards self-attestation solutions
- Attestations measure engagement but are not an indicator of employment independence
- Unverified compliance monitoring results in administrative burden without verified outcomes
- Full multi-channel compliance monitoring is too costly and too complicated
- Telephonic reporting, paper mailings of pay stubs, even scanners with uploads to authenticated web portals are burdensome, costly and inefficient.
- Consumers, including Medicaid beneficiaries, are increasing using digital media for transactions, shifting away from more conventional channels (e.g., phone, FAX, mail)



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LEVELS OF COMPLIANCE VERIFICATION

- States are setting levels of compliance verification based on law, waiver rules, and cost considerations
 - **Less stringent verification:** lower administrative cost, less program integrity
 - **More stringent verification:** higher administrative cost, more program integrity



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LEVELS OF COMPLIANCE VERIFICATION

- There are essentially three levels of verification
 1. **Fully automated verification:** members are deemed compliant, non-compliant, or exempt based on enhanced eligibility verification info
 2. **Attestation and audit:** Use of the above, plus non-exempt members self-attest periodically, and may be asked to provide verification of exemption and/or compliance
 3. **Self attestation:** members are simply asked if they comply or can claim an exemption on a periodic basis



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LEVELS OF COMPLIANCE CHECKING

Alternatives

Description

- 1. Fully Automated Work Verification**
(Automated Eligibility Verification supplies state/commercial data)

- Application of state-preferred data sources and/or commercial data sources to assess compliance for all members required to meet program requirements

- 2a. Self Attestation with Program Integrity Verification Sampling**
(Web Portal for Attestation/Exemption Request Forms)

- Self-Attestation with verification through system
- Verification of statistically valid sample of submissions
- Use of web portal to submit attestation or exemption request



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LEVELS OF COMPLIANCE (CONT.)

Alternatives

Description

- 2b. Self-Attestation with Manual Verification**
(Manual verification through paper forms and outbound calling)

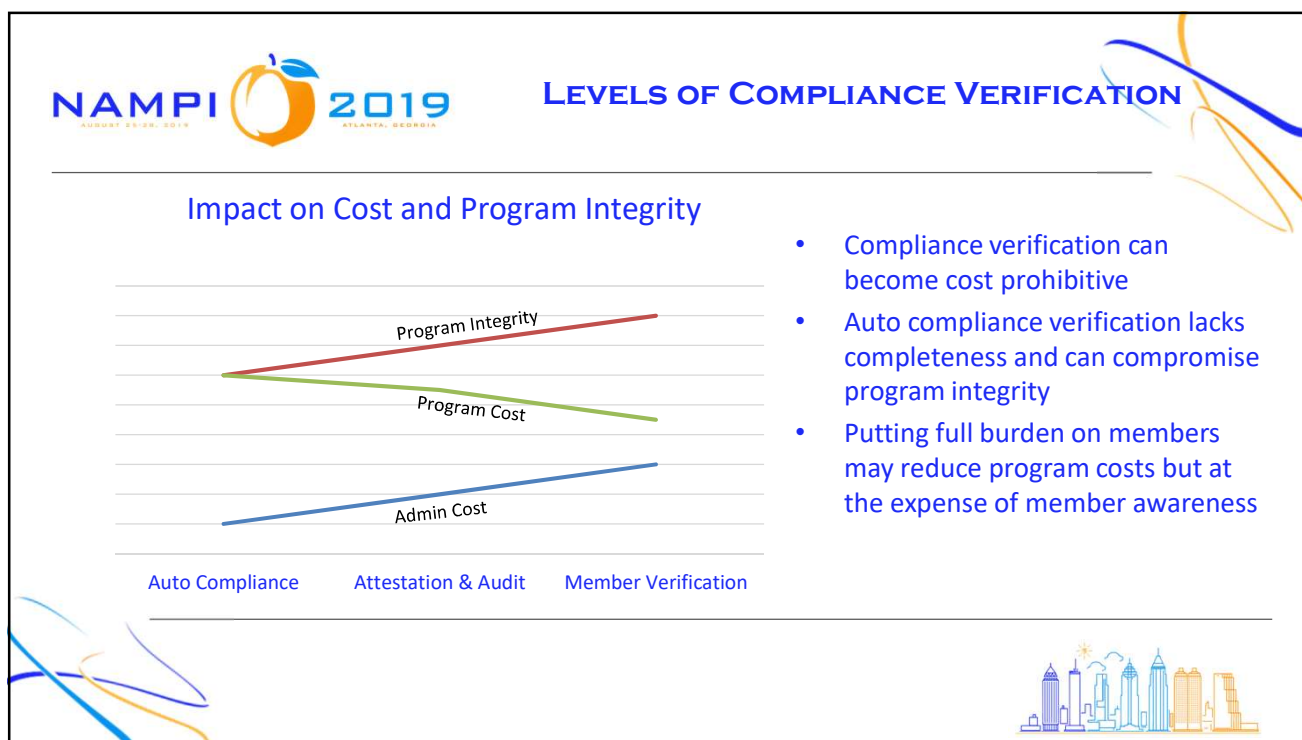
- Self-Attestation within 3 months of eligibility decision and annually at redetermination
- Manual outbound calling to verify using existing call center staff
- Use of paper forms to submit attestation or exemption forms

- 3. Member Reporting (Monthly)**

- Member provision of evidence of work and/or work-related activities on monthly basis



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NAMPI 2019 AUGUST 25-26, 2019 ATLANTA, GEORGIA

STRATEGIES FOR ADDRESSING ADMINISTRATIVE COST

- A “digital by default” strategy may be appropriate for compliance verification
- Business Process Management is increasingly turning to digital channels to meet members where they are
 - 67% of household with income < \$30K own smart phones [Pew Research]
 - 71% of online minutes in U.S. is through mobile devices [Comscore]
- Conventional channels such as phone, fax and mail will not go away, but are becoming less desirable for consumers
 - Consumers have higher expectations for visualization and user experience
 - Some states have already implemented mobile apps for applications, enrollment, and member management

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MEMBER REPORTING CHANNELS

- Tools to gather data from Members
 - Call Center
 - IVR
 - Paper Documents
 - Web Portal
 - Mobile App

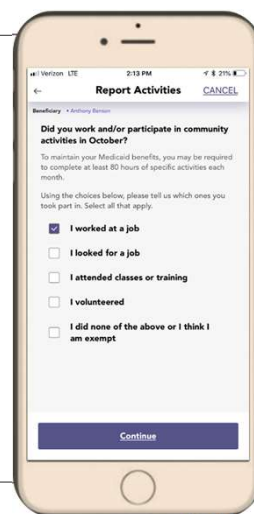


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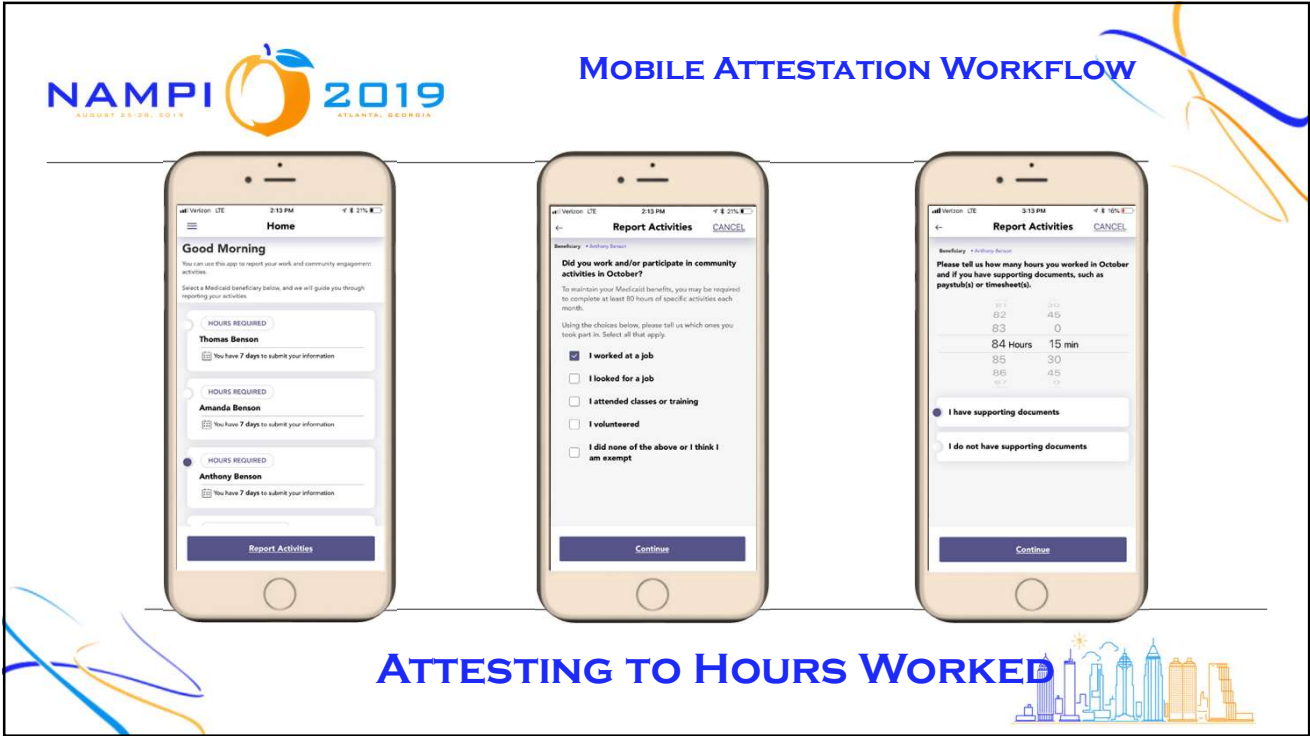


SELF-REPORTING ENGAGEMENT ACTIVITIES

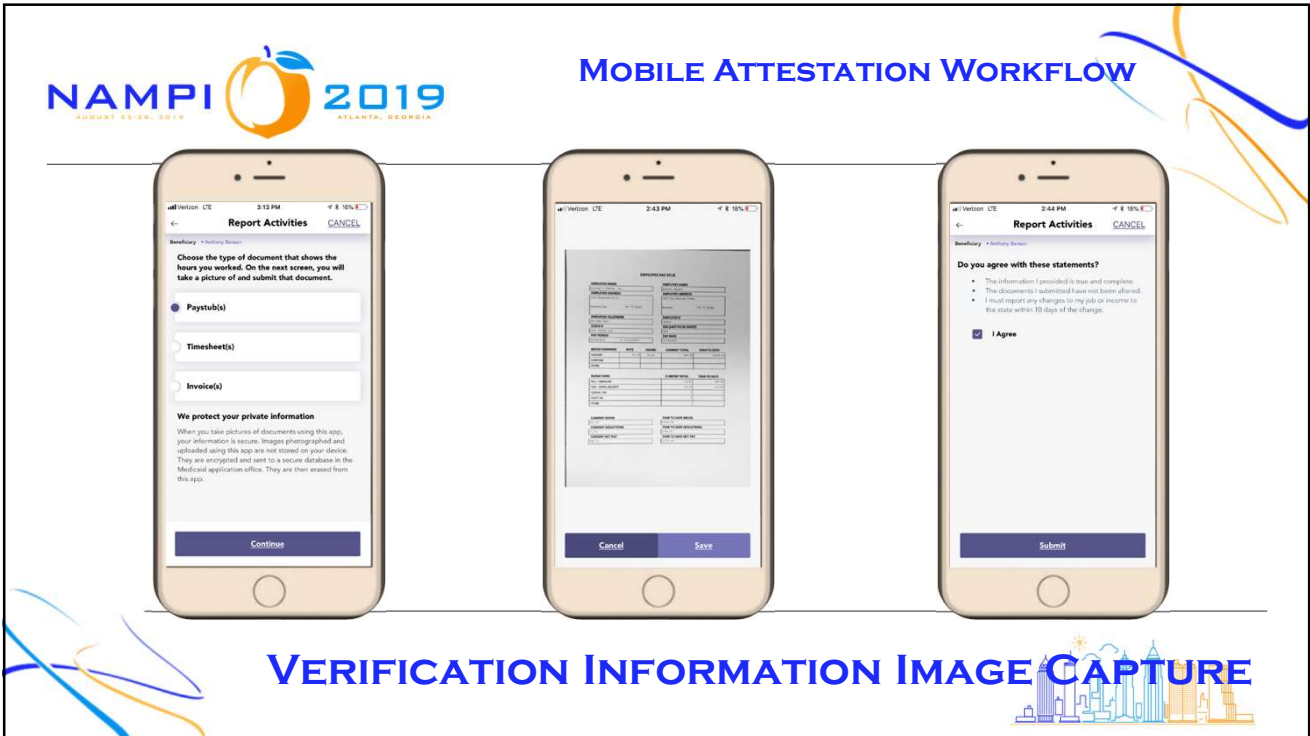
- Simplify user experience
- Encourage healthy behaviors
- Limit need for telephonic and mail-based support
- Facilitate tracking of activities that can lead to independence from medical assistance
- **REPORTING** can be accompanied by image capture of verification documents



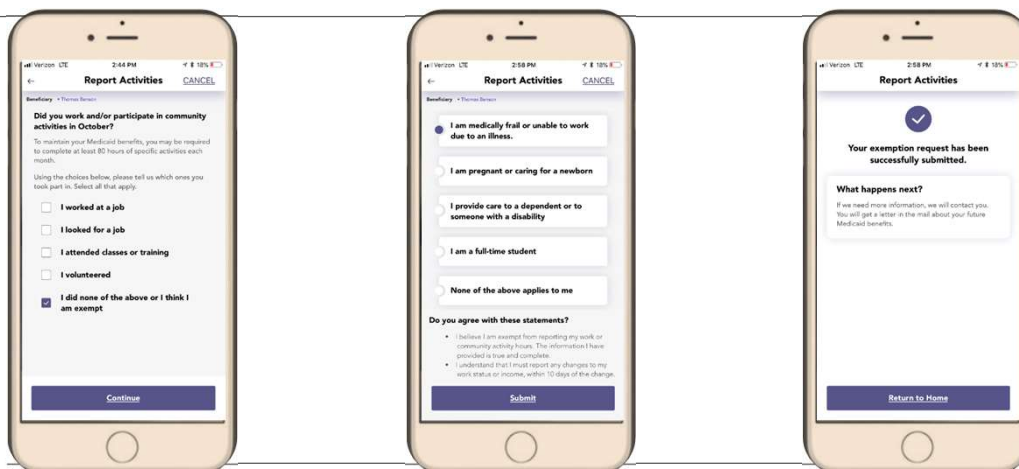
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REGISTER AN EXEMPTION



DIGITAL TOOLS ENABLING COMPLIANCE

The screenshot displays the Mploy recruitment system interface. Key elements and annotations include:

- Navigation Bar:** Contains links for FIND JOBS, HOT JOBS, JOB CARDS, MY PROFILE, BADGES, MESSAGES, and Mark. A blue callout bubble points to the Mark link with the text "Talk to my coach".
- Dashboard Metrics:**
 - STRATEGIC SCORE: 5.98%
 - Q-A-I: 36-16-0
 - INTENSITY SCORE: 0.00%
 - DOCUMENTS: + 14
 - CONTACTS: + 14 Supporters 0
- Job Search Phases:** A blue callout bubble points to the "Job search phases" section, which includes a "TIMESHEET" and a table of job search stages:

OPPORTUNITIES	APPLIED	SET INTERVIEW	INTERVIEW	VERBAL JOB OFFER	JOB
20	12	4	0	0	0
- Job Cards:**
 - A "CREATE NEW JOB CARD HERE" button is located in the top left of the job cards area.
 - A "Job Card" callout bubble points to a specific job card for "SECURITY FINAN... Customer Service ...".
 - The job card shows a "20.00%" progress bar and a "MOVE CARD" button.
 - Another job card for "KMART CORPORAT... Customer Service" shows a "8.00%" progress bar and a "MOVE CARD" button.
- Annotations:**
 - Red dashed boxes highlight the "TIMESHEET" table, the "CREATE NEW JOB CARD HERE" button, and the two job cards.
 - A blue callout bubble points to the "Job seeker moves a job card after each step is completed" text, which is positioned near the "MOVE CARD" buttons.

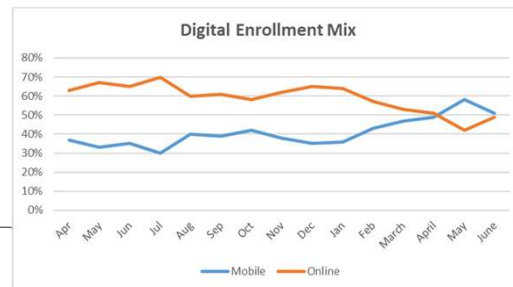
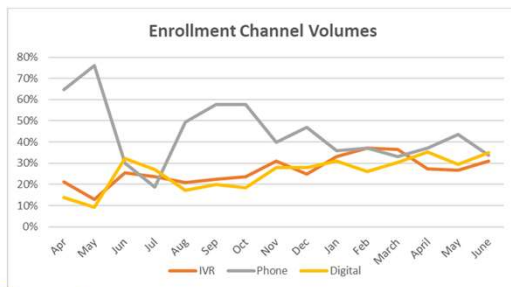


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CHANNEL UTILIZATION BY BENEFICIARIES

- Digital became the leading channel in June with 35% of enrollments being requested through web and mobile channels.
- Mobile remained the leading digital channel in June at 52% of digital enrollments.
- Over 6,900 mobile enrollments since customer launch
- Google Play and App store ratings remain above 4.5 stars.
- Continue to see a steady volume of members using mobile to manage their contact information



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VERIFYING BENEFICIARY REPORTED DATA

- Once beneficiary attestation data has been collected and a verification level has been chosen, then the data must be verified against other data of record.
- Many sources of verification data exist depending upon what type of data is being verified
- Data can come from State sources, Federal databases, and other third-party sources

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DATA SOURCES FOR VALIDATION

	Dept of Revenue	PARIS	Dept of Labor	Natl New Hire Dir.	BENDEX	SAVE	MMS	Criminal History	Dept of Corrections	Lottery	Commission Vital	Records	SSDMF
Physical address	✓	✓											
Earned income			✓	✓			✓						
Unearned income			✓		✓								
Citizenship/Lawful Perm. Residence						✓							
Liquid Assets and Financial Accounts							✓						
Real and Personal Property	✓												
Incarceration Status								✓	✓				
Lottery Winnings										✓			
Death Information											✓	✓	

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COMPLIANCE TRACKING SOLUTION

- Track compliance at an individual level
- Report on compliance and compliance trends at a local, regional, state level
- Integrate compliance tracking with customer service

WORK & COMMUNITY ENGAGEMENT TRACKING

User: System Admin | Logged In As: Application Supervisor | My Account | Knowledge Base | Change Role | Logout

Case: DEMO14002 Consumer: COOPER, M L

Call Type:
 --Please Select--
 Start Call

Case / Consumer

WCE

Complaint

Task

Miss

> WCE Search

WCE Tracking# 6595

Consumer Details

Compliance

Exemption Work Hours Income

Current Compliance Status

Compliance Status	Status Date	Report Reason	Start Date	End Date
No data available				

Previous Compliance Status

Compliance Status	Status Date	Report Reason	Start Date	End Date
Compliant	September		09/30/2018	09/30/2018
Compliant	August		08/31/2018	08/31/2018
Compliant	July		07/31/2018	07/31/2018
Compliant	June		06/30/2018	06/30/2018
Compliant	May		05/31/2018	05/31/2018
Compliant	April		04/30/2018	04/30/2018
Compliant	March		03/31/2018	03/31/2018
Compliant	February		02/28/2018	02/28/2018
Compliant	January		01/31/2018	01/31/2018

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SUPPORT OF OTHER AGENCY OBJECTIVES

- These same program integrity tools could be used with any program that requires some level of beneficiary compliance checking
 - Medicaid, SNAP, TANF, SSI and SSDI Eligibility Redetermination
 - Health & Wellness
 - Waiver eligibility
 - Community Service & Rehab
 - Workforce Development
 - Actuarial analysis & rate setting
 - Interplay with other benefit programs



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Questions and Discussions



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Thank You!

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