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Department of Health Services
Division of Medicaid Services

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Date: June 8, 2018

DMS Operations Memo 18-15

To: Income Maintenance Supervisors
Income Maintenance Lead Workers
Income Maintenance Staff

Affected Programs:
- ☒ BadgerCare Plus
- ☒ FoodShare
- ☒ Medicaid
- ☐ SeniorCare
- ☒ Caretaker Supplement
- ☐ FoodShare Employment and Training

From: Rebecca McAtee, Bureau Director
Bureau of Enrollment Policy and Systems
Division of Medicaid Services

Changes to Date of Death Procedures

CROSS REFERENCE

FoodShare Wisconsin Handbook, Section 3.3.1 Food Unit/FoodShare Assistance Group/Relationships and Section 7.1.1.9 Expungement
BadgerCare Plus Eligibility Handbook, Section 9.4 Changes and Section 25.1 Application
Medicaid Eligibility Handbook, Section 2.1 Applications Introduction and Section 20.7 When to Verify
SSI Caretaker Supplement Handbook, Section 3.1.15 Verification
Process Help, Section 44.2.2.2 Social Security/SSI Income Queries

EFFECTIVE DATE

June 23, 2018

PURPOSE

This Operations Memo announces new policy and enhancements to CARES functionality related to the following:

- A delay of the termination of health care, Caretaker Supplement, and FoodShare benefits when CARES receives a date of death (DOD) data exchange for a member from Social Security Administration (SSA)
- New correspondence that will automatically be sent to notify the primary person on a case when CARES receives a DOD from SSA
- An expiration period followed by expungement of FoodShare benefits after the termination of eligibility due to all food unit members being deceased

BACKGROUND

Currently, SSA provides CARES with a DOD when an individual who has applied for or is receiving benefits is reported to SSA as deceased. CARES checks SSA data exchanges for DOD information during the driver flows for application, person add, and renewal, as well as during overnight batch runs. Currently, the information from this data exchange is considered to be verified upon receipt for FoodShare, Caretaker Supplement, and health care.

However, recent changes in federal regulations now require that a notification be sent to the member when a DOD is received from a data exchange. Members or applicants will have 10 calendar days to contact the agency in the event the notification is incorrect. If the income maintenance (IM) agency receives no response within this period of time, or the death is confirmed by another source, the date of the death will be considered verified.

If the entire food unit is deceased, the FoodShare QUEST card will be deactivated, the benefits will be unavailable at the end of the month, and benefits will be expired after 62 days. Unused benefits will no longer remain on the Electronic Benefits Transfer (EBT) account for 365 days following the last transaction.

The following terms are used in this memo:

Term	Definition
Refutation Period	The 10 days following the receipt of the SSA DOD during which the applicant, member, applicant's or member's family, or applicant's or member's authorized representative needs to contact the agency to correct DOD information if appropriate.
Expiration	EBT benefits will be expired on day 63 following the month in which DOD was verified. When benefits are expired, they are removed from the member's EBT account.

POLICY

The following policy is effective June 23, 2018, for FoodShare, Caretaker Supplement, and all categories of health care except SeniorCare.

When an SSA data exchange indicates that an eligible member or applicant has died and the IM agency has not received any other information to confirm the death, the member, another family member, or the member's representative must be allowed 10 days to respond to a DOD letter prior to benefits being impacted. This is to prevent benefits from being terminated or reduced solely on the basis of a DOD data exchange.

- For ongoing cases, the member for whom a death match was received will still be considered to be alive and benefits for the member or others on the case will not be changed or pended during this time. The case should be pended when verifications, such as earned income, are needed. Benefit changes due to changes in eligibility will still need to be processed.
- For an application, person add, or renewal, the worker must wait at least 10 days for a response before confirming eligibility for the application, renewal, or person add.

This 10-day period is known as the refutation period and will follow the current Verification Checklist logic with regard to setting the response due date (that is, the "10 days" will be extended to a longer

period to allow for mailing delays due to weekends or holidays). The refutation period may only be shortened when any of the following events occur:

- A family member or his or her representative confirms the DOD
- A worker verifies a DOD through a third-party source, such as a local newspaper obituary
- The DOD is disputed and the member states he or she is not deceased

Note: For Wisconsin Shares Child Care Subsidy (Child Care) and Wisconsin Works (W-2) program policy and process related to DOD information from SSA, refer to Wisconsin Shares Child Care Subsidy Policy Manual and Wisconsin Works (W-2) Manual.

CARES

AUTOMATED PROCESSES WHEN A DATE OF DEATH MATCH IS RECEIVED

When a DOD is received from SSA, the following automatic processes will occur:

- The DOD is automatically populated on the member's Permanent Demographics page either in an overnight batch run, or in real-time during application and person add processing.
- The Date of Death Source field on the Permanent Demographics page is automatically set to "? – AWAITING REFUTATION."
- The SSA Verification field on the Household Members page is automatically set to "X - EXCLUDED BY SYSTEM."
- A DOD notification letter is sent to the Primary Person on the case to allow for the correction of the member's DOD information, if necessary.
- The refutation period begins the day the letter is sent to the Primary Person and will continue for 10 days.
- A banner displays on the Case Summary page to inform the worker that the DOD refutation period is set for at least one person on the case.

To prevent the issuance of benefits to members who die during ACCESS enrollment, applicants for whom DOD information is received during enrollment will not be automatically confirmed during the refutation period.

ELIGIBILITY DURING THE REFUTATION PERIOD

During the refutation period, eligibility for FoodShare, Caretaker Supplement, and health care members will not be affected or pended due to a DOD data exchange while a ?" is displayed in the Date of Death Source field. Member eligibility will not be denied or terminated due to a DOD data exchange until or unless a new DOD source code is entered into CWW based on one of the following events:

- A member, family member, or his or her representative confirms the DOD.
- A worker verifies a DOD through a third-party source, such as a local newspaper obituary.
- The refutation period expires with no response from the member or member's authorized representative and the worker has taken no action to deny or terminate eligibility.

AUTOMATED PROCESSES AFTER DATE OF DEATH REFUTATION PERIOD ENDS

The following automatic processes will occur after the refutation period ends if no response is received from the member or member's representative or no action is taken by a worker:

Food Unit, Assistance Group, or Caretaker Supplement	Automatic Process
All FoodShare, health care, and Caretaker Supplement cases	• The Permanent Demographics page Source field is updated to "DX – System Generated Update." • FoodShare, health care, and Caretaker Supplement cases are scheduled to go through the next batch eligibility run. • The following case comment is automatically added: "The date of death confirmation period has expired and a batch eligibility trigger has been set." • After eligibility is determined in the next batch run, the following will occur: o CWW automatically closes or adjusts benefits, if appropriate. o A Notice of Decision is generated, if appropriate.
Food units in which all individuals are deceased	• The FoodShare case closes with the next overnight batch run. • No Notice of Decision is sent for FoodShare. • At the end of the month in which the refutation period ends, a file is sent to FIS which will deactivate the QUEST card. • Expiration of the FoodShare benefits occurs 63 days following the month in which the DOD was verified.
Health care and Caretaker Supplement cases in which the entire household is deceased	• The health care/Caretaker Supplement case is closed with the next overnight batch run. • A file is sent to interChange when the DX-Data Exchange source code is populated at the end of the refutation period. • No Notice of Decision is sent for health care.
Food units in which the primary person is deceased and there are surviving food unit members	• A Notice of Decision is sent to the household notifying them that the case is closing and that they will need to reapply. • The QUEST card remains active and benefits remain available to the household. • No information is sent to FIS.
Health care and Caretaker Supplement cases in which the primary person is deceased and there are surviving household members	• A Notice of Decision is sent to the household notifying them that the case is closing and they will need to reapply. • Alert 548 DOD RECD-REV CASE-RUN ELIG is generated.

Food Unit, Assistance Group, or Caretaker Supplement	Automatic Process
Food units and Caretaker Supplement cases in which someone other than the primary person is deceased and there are surviving food unit or household members	• FoodShare and Caretaker Supplement benefits change based on adverse action logic. • A Notice of Decision is sent to the household indicating the new FoodShare and Caretaker Supplement benefit amount.
Health care cases in which someone other than the primary person is deceased and there are surviving household members	Alert 548 DOD RECD-REV CASE-RUN ELIG is generated on the case at the end of the refutation period to inform the worker to run eligibility. Given the current limitations of batch eligibility for health care determinations, the worker must run eligibility to ensure that the remaining members have their eligibility redetermined for all categories of health care. **Note**: More information about alert 548 can be found in CUAH in CARES Mainframe and on the new Alert Code Help Text Search page in CWW.

Example 1: Expiration of FoodShare benefits timeline

- DOD is received on July 12 for a one-person food unit.
- During the next 10 days, the information is not refuted.
- On July 23 the case is scheduled to run through the next nightly batch run.
- On July 31 a file with the DOD for the member is sent to FIS.
- On August 1 the card is deactivated and any benefits scheduled for disbursement are canceled.
- On October 2 the benefits are expired (63 days later).

WORKER PROCESS FOR EXPEDITED FOODSHARE BENEFITS

Under certain conditions, workers can postpone the FoodShare interview and confirm expedited FoodShare benefits. Ongoing FoodShare benefits will be pended for the interview, but if the interview is not completed by day 30, benefits will be denied due to lack of interview. The worker must address any DOD received from SSA that is associated with a member's case during the FoodShare interview.

WORKER PROCESSES WHEN DOD INFORMATION IS VERIFIED BEFORE THE REFUTATION PERIOD ENDS

Workers should verify a DOD (the Source field on the Permanent Demographics page should indicate a verified status) before confirming eligibility results. Workers will be notified of a DOD by a warning message on the Confirm Eligibility page when the DOD is received from a real-time data exchange during one of the following driver flows:

- Application
- Program add
- Renewal
- Person add

The worker can deny or terminate health care, Caretaker Supplement and FoodShare benefits by doing the following:

1. Select a verification Source value, such as "FM – FAMILY MEMBER," from the drop-down menu in the "Individual Details" section of the Permanent Demographics page.
2. Run eligibility and confirm. The member will be considered deceased regardless of the refutation due date and the following will happen automatically:
    - Health care and Caretaker Supplement benefits are denied or terminated for the member.
    - Any benefit amounts scheduled to be added to the member's EBT account are canceled.
    - At the end of the month, the QUEST card is deactivated if there are no living members of the food unit.
    - All FoodShare benefits are expired on day 63 following the month in which the DOD was verified.

Example 2: Verified before the end of the refutation period

Bob receives health care and FoodShare benefits as the only member on his case. His DOD is received through the SSA data exchange, so the Source field in the "Individual Details" section on the Permanent Demographics page will automatically be updated with a "?" and a letter is sent to Bob's household. During the refutation period, a family member responds to the letter to confirm Bob's death. A worker manually changes the "?" in the Source field to "FM," runs eligibility, and confirms. Health care is terminated upon confirmation and the QUEST card is deactivated at the end of the month. Any benefits scheduled for issuance the following month are canceled and all benefits are expired on day 63 following the month in which the DOD was verified.

WORKER PROCESSES WHEN DOD INFORMATION IS REFUTED

Workers can perform the following actions when a member with a DOD indication is reported alive.

Action	Steps
Remove the DOD	If the applicant or member is not deceased, workers must take the following actions: 1. On the Household Members page in CWW, update the SSA verification from "X – EXCLUDED BY SYSTEM" to "C – COMPLETED REQUIREMENTS." If the worker attempts to delete the DOD prior to updating the SSA verification code to C, a red banner will display the following warning: "Before deleting the date of death, navigate to the Household Members page and update the SSA Verification field for this member to a non-excluded value." 2. Delete the DOD. 3. Instruct the member or member's representative to contact their local SSA office to have the DOD information corrected. If no action is taken by the member or the member's representative to correct the DOD information with SSA, the member will be coded as deceased in the next benefit month when the monthly data exchange is run.
Determine FoodShare eligibility	If the applicant or member contacts the agency within the month of the refutation period, the worker will be able to follow the process above and determine eligibility. The following process is only required when all food unit members are deceased. The applicant or member contacts the agency anytime following the month of refutation. Note that the notification of reactivation must be sent from DHSFSEBT. Workers should do the following if the applicant or member refutes the DOD following the month of the refutation: 1. Send a high-priority email to DHSFSEBT@dhs.wisconsin.gov 2. The email subject line should read "Remove Date of Death." 3. The following details must be included in the email: • Deceased individual's case number • Last four digits of the individual's SSN • First and Last name of "deceased" individual • Worker's name and direct contact phone number 4. **Only after receiving notification from DHSFSEBT** indicating that the EBT account has been reactivated, confirm eligibility 5. Inform the member that any FoodShare benefits that were in his or her EBT account will be restored and any new benefits will be added to the EBT account. FIS will send the member a new QUEST card by mail, which the member will need to activate by following the normal activation process. **Note:** Confirming eligibility before FIS reactivates the case will result in the member not receiving FoodShare benefits or a new QUEST card. There is no notification if the worker confirms eligibility before FIS reactivates the case, so it is critical that workers receive notification from DHSFSEBT prior to confirming eligibility. Workers can follow up by checking the EBT Summary page to confirm that the card was issued. If confirmation of benefits occurred before FIS reactivated

Action	Steps
	the case, no card or benefits will have been issued. The worker must create and issue a benefit supplement in this instance. Failure to issue the correct supplement will result in a quality control error. Whether the applicant or member submits a new application (30 day or expedited) or the break-in-service policy is applied, workers will follow the process described above to remove the DOD. **Note**: If the applicant or member contacts the agency within 62 days following the end of the month the DOD was verified, any remaining benefits will be made available to the member in addition to any newly confirmed benefits. If the applicant or member contacts the agency 63 days following the end of the month in which the DOD was verified, only newly confirmed benefits will be made available. All other existing FoodShare benefits will have been expired. Expired benefits cannot be recovered and the member is no longer entitled to them.
Respond to DOD received more than once	Social Security will attempt to correct the DOD information within 30 days of the individual contacting them to correct the information. Due to the timing of the actions that must be taken by the member, SSA, and data exchanges, it is possible that the individual will be indicated as deceased for up to three months. Eligibility is not to be reestablished if the DOD is populated for a third consecutive month. If the member is reported deceased in a third consecutive month, verification from SSA indicating that they are aware of the misinformation and that they are working to resolve the issue is required before workers can redetermine eligibility. The agency should refer the case for fraud when there is a concern of trafficking, misuse, or identity theft.

WORKER PROCESS WHEN A CASE IS IN PENDING INTAKE MODE AND THE DOD CANNOT BE VERIFIED

A worker processing a case will be warned by a message prior to confirming eligibility if a DOD is received for an applicant during intake mode. This message will display on the Confirm Eligibility page. Workers will not be prevented from confirming eligibility while there is an unverified DOD, but the warning message will instruct them to verify the DOD (by confirming its validity or removing it) prior to confirming the eligibility results.

POTENTIAL FOODSHARE EBT FRAUD

If a one-person food unit member is reported deceased by SSA, EBT usage within the refutation period is not necessarily an indicator of fraud. Once that individual is verified deceased, any new EBT purchase transactions should be referred for a fraud investigation.

CWW ENHANCEMENTS

PERMANENT DEMOGRAPHICS PAGE

The "Individual Details" section of the Permanent Demographics page will include a new non-selectable Source value "? – AWAITING REFUTATION" and a new Refutation Due Date field. The value "? – AWAITING REFUTATION" indicates that DOD information was received from a data exchange.

The Refutation Due Date is the date after which CARES changes the source to "DX – System Generated Update" if no response has been received from the member. "DX – System Generated Update" indicates that the DOD information is verified and the member is deceased.

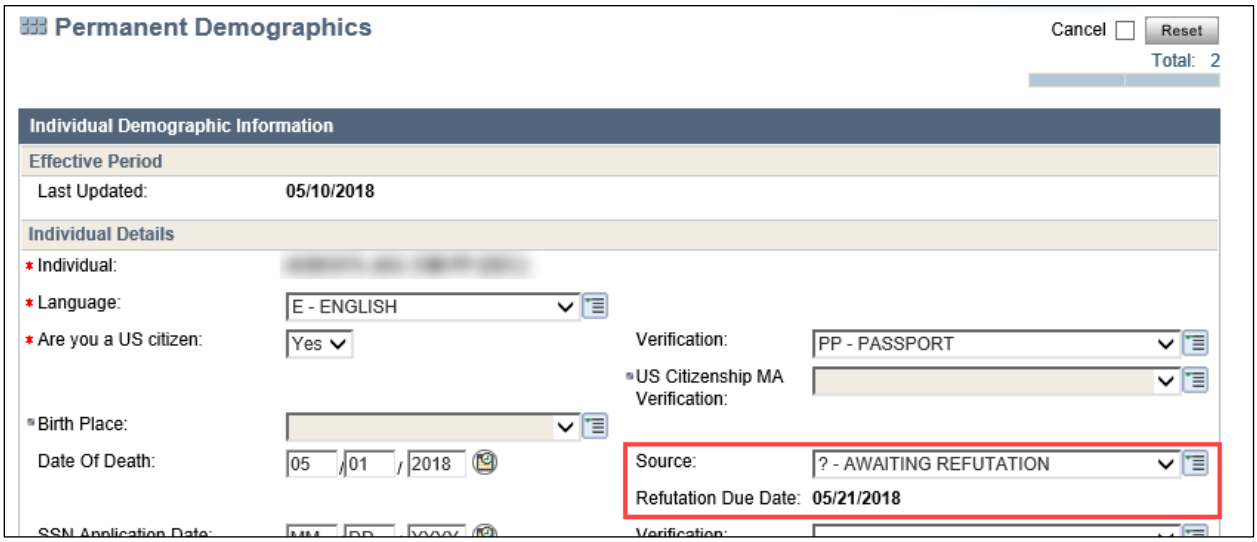


Figure 1 Individual Demographic Information Section of the Permanent Demographics Page

If a worker attempts to use "DX – System Generated Update," an error message will display stating the code cannot be entered by a worker. The worker will need to enter another value from the drop-down menu or wait for the system to populate the code.

Figure 2 Error Message When a Worker Enters DX as a DOD Source

HOUSEHOLD MEMBERS PAGE

Workers will no longer be able select the "X – EXCLUDED" option in the SSA Verification field. The "X – EXCLUDED BY SYSTEM" option will be used when a DOD has been reported by SSA and the case is automatically updated. This value will continue to exclude individuals from CARES data exchanges except for the citizenship verification exchange through State Children's Health Insurance Program – Internet (SCHIP-I). (Refer to Process Help, Section 44.2.2.2 Social Security/SSI Income Queries.)

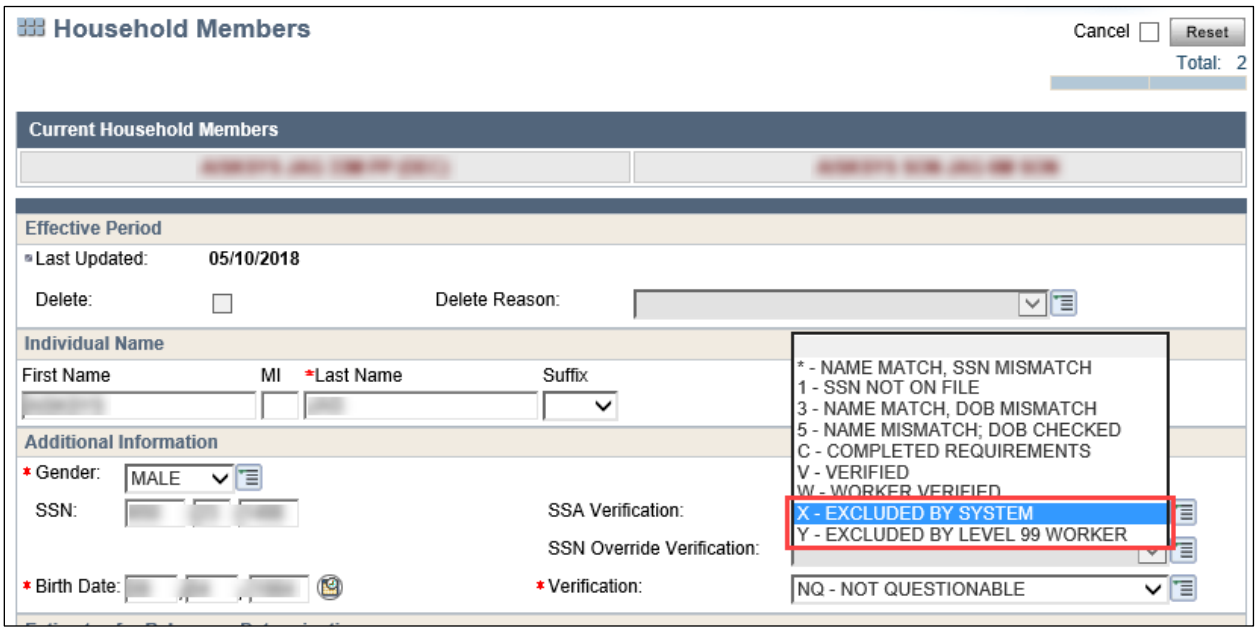


Figure 3 Additional Information Section of the Household Members Page

Only level 99 workers (DHS CARES Call Center staff) can exclude members from an SSA verification data exchange. An error message will be displayed if a worker who is not a level 99 worker selects "Y – EXCLUDED BY LEVEL 99 WORKER," or any user selects "X – EXCLUDED BY SYSTEM."

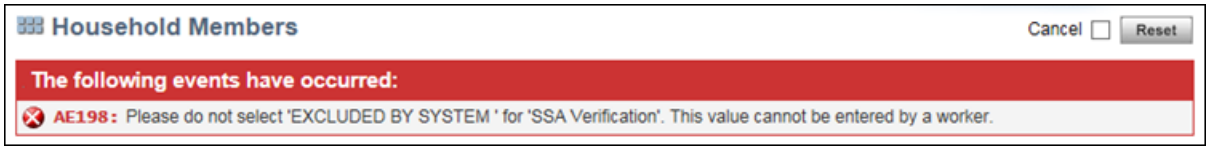


Figure 4 Error Message When X – Excluded by System or Y – Excluded by Level 99 Worker Is Selected

If an IM worker believes that a member should be excluded from data exchanges, the IM worker will need to send the request to have the verification code changed along with an explanation for the request to the CARES Call Center, which will review the request for appropriateness.

CASE SUMMARY PAGE

A warning message will be displayed on the Case Summary page to indicate when at least one member on the case is in a DOD refutation period. Workers can ask the applicant or member about the information displayed for the deceased individual and verify or correct the information.

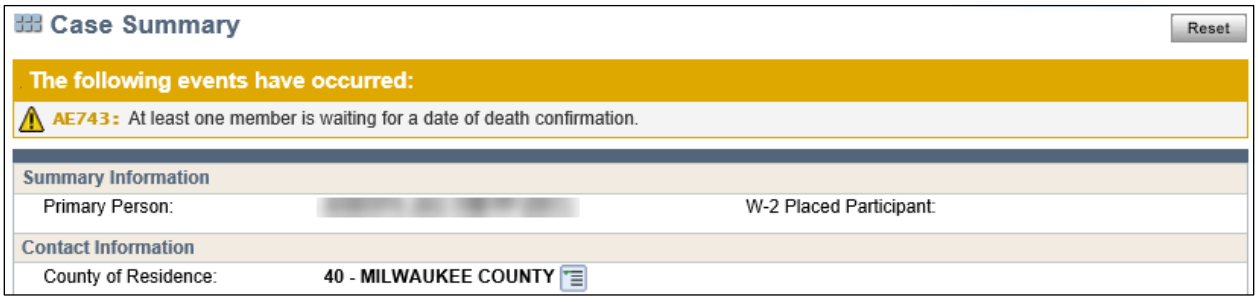


Figure 5 Case Summary Page Showing Warning Message

CONFIRM ELIGIBILITY PAGE

A warning message will be displayed on the Confirm Eligibility page during a health care, FoodShare, or Caretaker Supplement application or renewal if "? – AWAITING REFUTATION" is the value in the Source field on the Permanent Demographics page. This message will notify workers that DOD information has been received from a data exchange and that it should be verified before confirming eligibility.

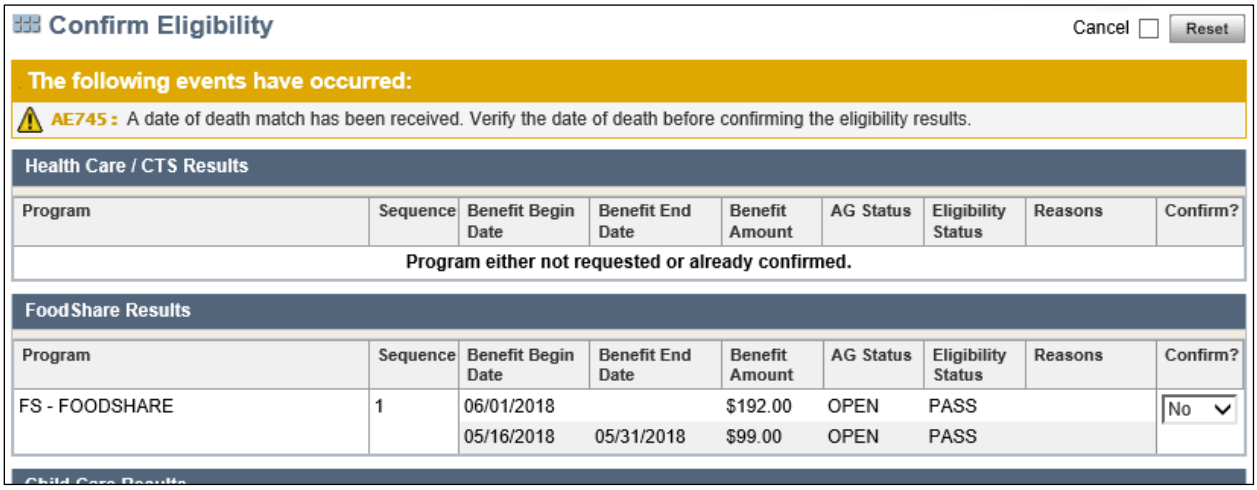


Figure 6 Confirm Eligibility Page Showing Warning Message

QUEST CARD DEACTIVATION AND BENEFITS EXPIRED

FIS will deactive all QUEST cards when a verified DOD is received. QUEST cards held by authorized buyers and alternate payees will also be deactivated. On day 63 following the month in which a DOD was verified, the FoodShare benefits will be expired from the account.

EBT Summary Page

- Account Status will read Deactivated.
- Balance will show $0.
- Card Status will read Inactive - Deceased.

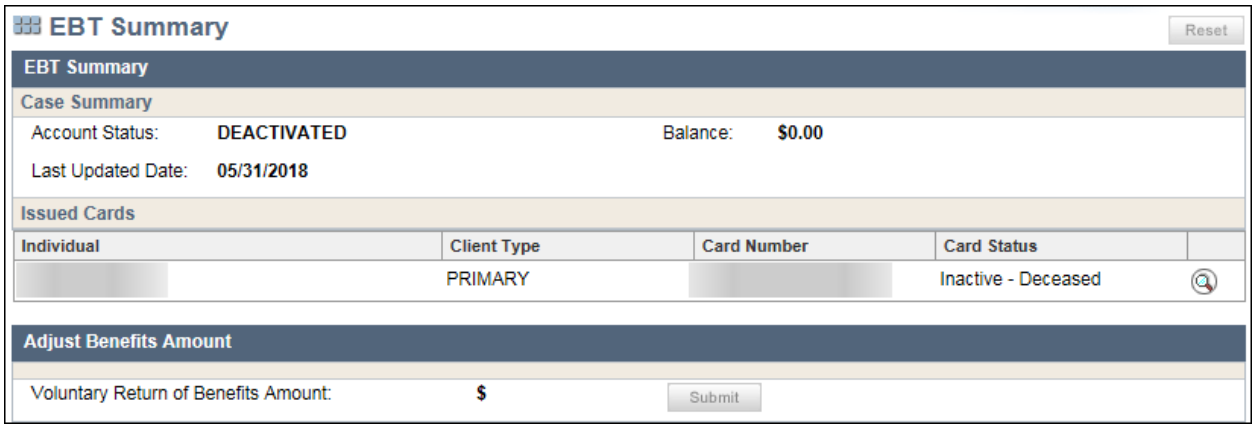
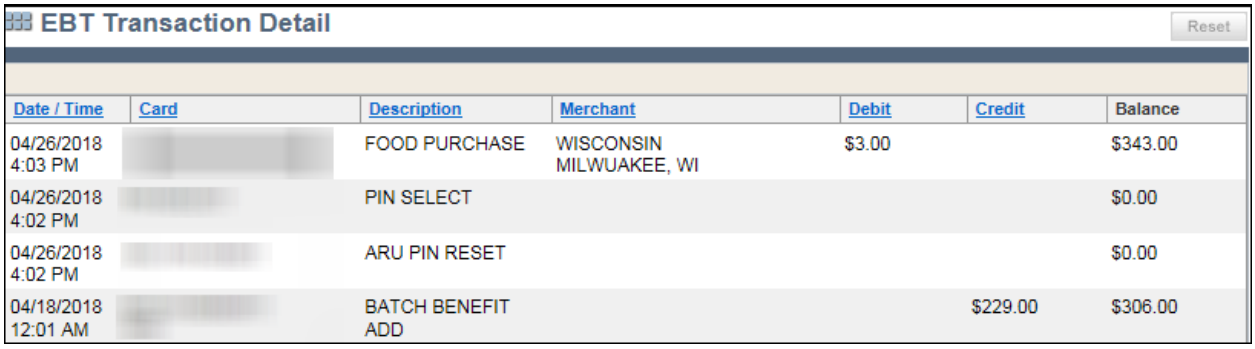


Figure 7 EBT Summary Page Showing a Deactivated QUEST Card

EBT Transaction Detail Page

A worker will be able to see if the member still has benefits in his or her account or if the benefits have been expired by reviewing the EBT Summary, Transaction Details, and the Benefit Issuance History pages.

- For up to 62 days following the month in which the DOD was verified, any benefits still in the account will display in the balance column.
- All benefits are expired on day 63 following the month in which the DOD was verified, the balance will display $0.



EBT Transaction Detail

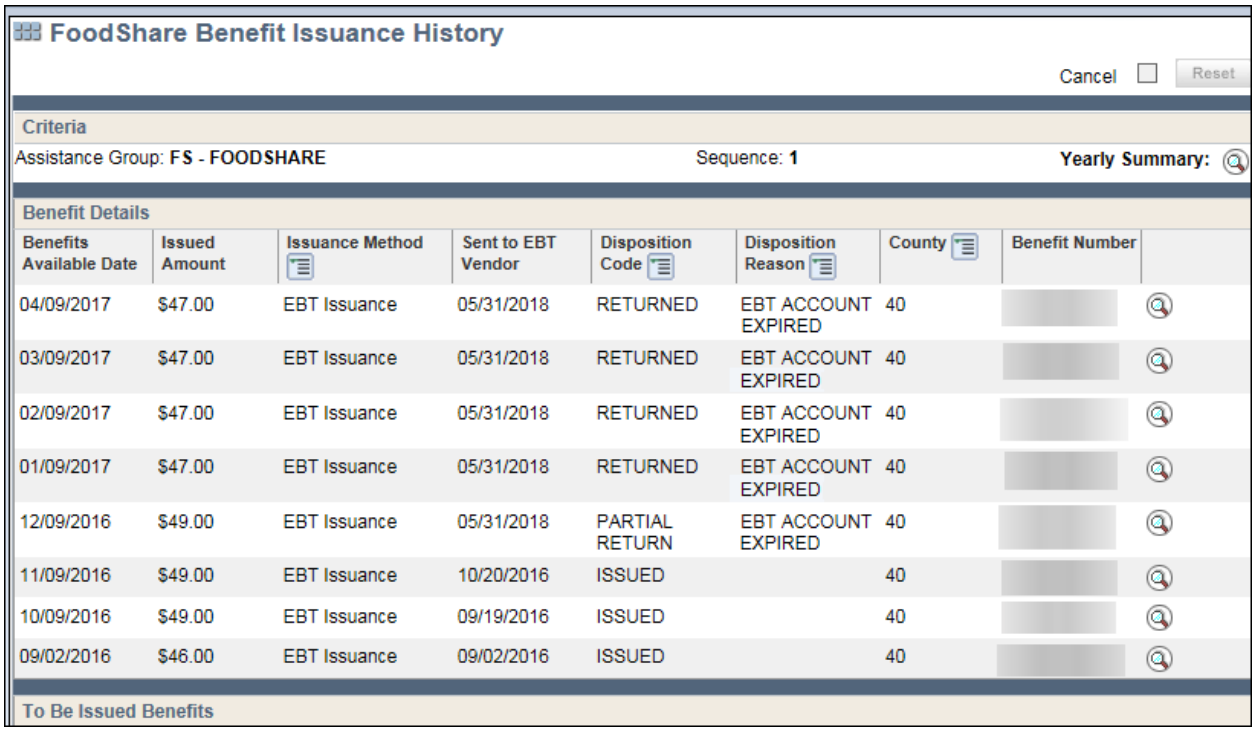
Reset

Date / Time	Card	Description	Merchant	Debit	Credit	Balance
04/26/2018 4:03 PM	[redacted]	FOOD PURCHASE	WISCONSIN MILWUAKEE, WI	$3.00		$343.00
04/26/2018 4:02 PM	[redacted]	PIN SELECT				$0.00
04/26/2018 4:02 PM	[redacted]	ARU PIN RESET				$0.00
04/18/2018 12:01 AM	[redacted]	BATCH BENEFIT ADD			$229.00	$306.00

Figure 8 EBT Transaction Detail Page Showing QUEST Cards With Unexpired Balance

FoodShare Benefit Issuance History Page

On day 63, the benefit disposition code will be set to Returned and the disposition reason will set to EBT Account Expired.



FoodShare Benefit Issuance History

Cancel Reset

Criteria

Assistance Group: **FS - FOODSHARE** Sequence: **1** **Yearly Summary:**

Benefit Details

Benefits Available Date	Issued Amount	Issuance Method	Sent to EBT Vendor	Disposition Code	Disposition Reason	County	Benefit Number
04/09/2017	$47.00	EBT Issuance	05/31/2018	RETURNED	EBT ACCOUNT EXPIRED	40	[redacted]
03/09/2017	$47.00	EBT Issuance	05/31/2018	RETURNED	EBT ACCOUNT EXPIRED	40	[redacted]
02/09/2017	$47.00	EBT Issuance	05/31/2018	RETURNED	EBT ACCOUNT EXPIRED	40	[redacted]
01/09/2017	$47.00	EBT Issuance	05/31/2018	RETURNED	EBT ACCOUNT EXPIRED	40	[redacted]
12/09/2016	$49.00	EBT Issuance	05/31/2018	PARTIAL RETURN	EBT ACCOUNT EXPIRED	40	[redacted]
11/09/2016	$49.00	EBT Issuance	10/20/2016	ISSUED		40	[redacted]
10/09/2016	$49.00	EBT Issuance	09/19/2016	ISSUED		40	[redacted]
09/02/2016	$46.00	EBT Issuance	09/02/2016	ISSUED		40	[redacted]

To Be Issued Benefits

Figure 9 FoodShare Benefit Issuance History Page Showing Expired FoodShare Benefits

CORRESPONDENCE

As described in the CARES section, a letter will be sent to the primary person on the case to inform the assistance group or food unit of the reported DOD and to provide an opportunity for the information to be corrected. See the Attachment to this memo for a sample of the letter.

CONTACTS

BEPS CARES Information and Problem Resolution Center

DHS/DMS/BEPS/JT