

**STATE OF RHODE ISLAND
EXECUTIVE OFFICE OF HEALTH AND HUMAN SERVICES**

**9/6/2018 PUBLIC NOTICE OF PROPOSED AMENDMENT TO RHODE ISLAND
MEDICAID STATE PLAN**

In accordance Rhode Island General Laws 42-35, notice is hereby given that the Executive Office of Health and Human Services (EOHHS) proposes to make the following amendment to the Rhode Island State Plan under Title XIX of the Social Security Act:

Electronic Asset Verification System

EOHHS is seeking federal authority to update the timeline for the implementation of the electronic Asset Verification System (AVS) for eligibility. The AVS system will bring the state into full compliance with section 1940(a) of the Act. The AVS will be implemented November 1, 2018. There is no fiscal impact associated with the change in the implementation date. However, implementation of the AVS is estimated to cost \$528,200 all funds in federal fiscal year (FFY) 2019 and \$194,400 annually thereafter.

This proposed amendment is accessible on the EOHHS website (www.eohhs.ri.gov) or available in hard copy upon request (401-462-6348 or RI Relay, dial 711). Interested persons should submit data, views, or written comments by October 6, 2018 to Melody Lawrence, Executive Office of Health and Human Services, 3 West Rd, Cranston, RI, 02920, or melody.lawrence@ohhs.ri.gov.

In accordance with the Rhode Island General Laws 42-35-3, an oral hearing will be granted on the proposed State Plan Amendment if requested by twenty-five (25) persons, an agency, or by an association having at least twenty-five (25) members. A request for an oral hearing must be made within thirty (30) days of this notice.

The Executive Office of Health and Human Services does not discriminate against individuals based on race, color, national origin, sex, gender identity or expression, sexual orientation, religious belief, political belief, or handicap in acceptance for or provision of services or employment in its programs or activities.

STATE PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT

State: Rhode Island

ASSET VERIFICATION SYSTEM

1940(a) of the Act 1. The agency will provide for the verification of assets for purposes of determining or re-determining Medicaid eligibility for aged, blind and disabled Medicaid applicants and recipients using an Asset Verification System (AVS) that meets the following minimum requirements.

A. The request and response system must be electronic:

- (1) Verification inquiries must be sent electronically via the internet or similar means from the agency to the financial institution (FI).
(2) The system cannot be based on mailing paper-based requests.
(3) The system must have the capability to accept responses electronically.

B. The system must be secure, based on a recognized industry standard of security (e.g., as defined by the U.S. Commerce Department's National Institute of Standards and Technology, or NIST).

C. The system must establish and maintain a database of FIs that participate in the agency's AVS.

D. Verification requests also must be sent to FIs other than those identified by applicants and recipients, based on some logic such as geographic proximity to the applicant's home address, or other reasonable factors whenever the agency determines that such requests are needed to determine or re-determine the individual's eligibility.

E. The verification requests must include a request for information on both open and closed accounts, going back up to 5 years as determined by the State.

2. System Development

_____ A. The agency itself will develop an AVS.

In 3 below, provide any additional information the agency wants to include.

X B. The agency will hire a contractor to develop an AVS.

In 3 below provide any additional information the agency wants to include.

_____ C. The agency will be joining a consortium to develop an AVS.

STATE PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT

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ASSET VERIFICATION SYSTEM

In 3 below, identify the States participating in the consortium. Also, provide any other information the agency wants to include pertaining to how the consortium will implement the AVS requirements.

_____ D. The agency already has a system in place that meets the requirements for an acceptable AVS.

In 3 below, describe how the existing system meets the requirements in Section 1.

_____ E. Other alternative not included in A. – D. above.

In 3 below, describe this alternative approach and how it will meet the requirements in Section 1.

3. Provide the AVS implementation information requested for the implementation approach checked in Section 2, and any other information the agency may want to include.

OVERVIEW

The State of Rhode Island will be contracting with New England States Consortium Systems Organization (NESCSCO) to implement an electronic Asset Verification Service (e-AVS). NESCSCO has entered into contract with Public Consulting Group, INC (PCG) for the purposes of providing e-AVS services. The contract allows for multi-state buy-in as participating states, allowing for expedited implementation.

NESCSCO pursued this initiative with the sole purpose of facilitating State access to e-AVS and other tools. These services are ideal candidates for multi-State procurements for several reasons. The services support relatively straight-forward processes, not requiring significant customization. There are only a few vendors offering these services. Lastly, the costs are primarily volume-based, providing an opportunity for cost-savings that would not be available to States with individual contracts. Participation in this effort will enable a State to implement e-AVS within 60 – 90 days. Rhode Island plans to implement by November 1, 2018.

PCG has mapped a comprehensive project management plan for states entering into the existing contract. The contract would reflect state-specific deliverables as an attachment. Rhode Island will submit requests for asset verification through the Accuity Asset Verification Services, Inc. stand-alone web based portal. Electronic Asset Verification Services will enable the State to automate the manual process of sending requests to banks or applicants for information regarding their assets including national and local financial institution account data such as checking, savings, CDs, Christmas clubs, IRAs, money markets, etc. Responses are displayed through the web-based portal. It is anticipated that 85% of the results will be returned in five (5) days, and 90% will be returned in ten (10) days. This implementation requires no modifications to the current eligibility system.

STATE PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT

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ASSET VERIFICATION SYSTEM

IMPLEMENTATION TIMELINE

EOHHS proposes a two-phase approach for implementation to ensure timely compliance.

Phase I

Requests for asset verification will be submitted through a stand-alone web based portal. Responses are displayed through the web-based portal. It is anticipated that 85% of the results will be returned in five (5) days, and 90% will be returned in ten (10) days. This implementation requires no modifications to the current eligibility system.

The project set up phase will begin immediately, with coordination with PCG to define the project requirements. During this period, reports will be defined, and a reporting schedule created. The implementation phase will include a communication plan, training of staff, as well as the development of the related business processes.

A 30-day period will focus on configuring the portal to meet Rhode Island rules and regulations, as well as testing in the UAT environment. A stakeholder meeting schedule will be established.

Following successful testing, training materials will be developed by PCG and submitted to the State for approval. A training schedule will be developed, and training of staff will be conducted. At go-live, support will be provided on-site as needed, and remotely for the duration of the project.

The targeted implementation date for Phase I is November 1, 2018.

Phase II

This phase would allow field workers to flag applicants that require asset verifications, which in turn would be included in a batch request. The batch would then be sent to the web-based portal. This will require one or two data interfaces with the existing eligibility system and therefore will be implemented at a future date.