

Frequently Asked Questions: The Asset Verification Program (AVP)

February 14, 2018

What is the Asset Verification Program (AVP)?

The AVP is an electronic data source that will verify certain liquid assets such as checking and savings accounts and will be deemed a valid verification of these types of assets.

Why is the Department implementing the AVP?

Section 1940 of the Social Security Act set forth the requirement that all states implement a federally mandated electronic interface that will verify assets held in depository institutions, such as checking and savings accounts. This applies only to Non-MAGI programs for individuals who have a disability and/or are age 65 and older, that have an asset test.

Who is the contractor for the AVP?

The Department has contracted with Public Consulting Group (PCG) to manage the AVP.

What should happen if a member requests to rescind their authorization to use electronic data sources?

It should first be explained that in order to be determined eligible for Health First Colorado, Colorado's Medicaid Program, the authorization is required as part of the application. The acknowledgment of the release is in the Privacy Statement on every application and the authorization is granted by their signature.

Every effort should be made to educate the member to settle any fears or concerns about the use of these data sources and that they have been in place for a long time to verify income.

If they still wish to rescind their authorization, it is essentially an indication that they wish to withdraw from Medicaid. To do this, they will need to provide a written statement requesting their withdrawal. The standard process to terminate Medical Assistance in CBMS due to no longer requesting assistance should be followed.



Will the AVP records be automatically created in CBMS?

The responses returned by the AVP will interface into CBMS but they will not automatically create a record in the Liquid Asset Summary screen. To create a record in the Liquid Asset Summary screen, workers will need to evaluate existing records so the same account won't be duplicated.

Will programs administered by the Colorado Department of Human Services (CDHS), such as Food and Cash Assistance, use the AVP?

CDHS programs will not be able to initiate a call or automatically use the AVP if they are the only program on the case. However they will have the option to use the AVP record as a valid verification if there is Medical Assistance on the case.

What other assets will the AVP verify besides bank accounts?

The AVP will only verify liquid assets held in banks. Other liquid assets such as real property or life insurance with cash surrender value will **not** be verified with the AVP.

Will the system only look for open bank accounts, or does it look at closed accounts too?

The response will look at both open and closed bank accounts, and will have open and closed dates for the accounts.

Will the AVP be able to verify all liquid assets at financial institutions such as Money Market Accounts, CD's, and bank/savings accounts?

Yes.

Will this information be identified using the member's Social Security Number (SSN)?

Yes.

Did the Department consult with other states on their implementation of the AVP?

Yes. However, most states are still in the process of implementing the AVP and do not have a lot of historic information on its performance.

What if there is incorrect data, or if someone's identity has been stolen and balances are returned for accounts that the person does not own?

If the applicant is aware that there is an issue with identity theft or incorrect data, then

Our mission is to improve health care access and outcomes for the people we serve while demonstrating sound stewardship of financial resources.
www.colorado.gov/hcpf



they should make the eligibility worker aware, and provide proof of the issue.

If the applicant learns of an unknown account from the AVP response, then the applicant should take the appropriate steps to work with their financial institution to address it.

Will this apply to MAGI categories also?

No, the AVP will only be used for Non-MAGI programs that have an asset test.

Will we be able to get account information for trusts from the AVP?

We may get some information but most likely not the detail needed for trusts. Eligibility workers should continue to follow their existing process for trusts.

Will the AVP be used for redeterminations as well as initial applications?

The AVP will be called at initial application, again at redetermination, and when an asset test is required to move an eligible person from MAGI to Non-MAGI programs that have an asset test.

Will each eligibility worker have access to this or will it be limited?

The call to the AVP will be automatic. Anyone who processes Non-MAGI Medical Assistance cases will have access to the interface responses.

Will the interface be real time or will there be a delay while the AVP verifies the assets?

The majority of the AVP responses are expected to be returned within 3 to 5 days. However, there are some responses that could take up to 30 days.

Will the system be able verify out of state and country assets, i.e. bank accounts?

The responses will include out of state institutions but not out of country.

Does the AVP eliminate the need to turn in bank statements during application or renewal for Health First Colorado (Colorado's Medicaid Program)?

Yes it does eliminate the need for bank statements in certain situations. If the bank statements can be verified through the AVP, the applicant/member would not need to submit them as well. However, the system will only verify the existence of the account and the balance. For example, the AVP will not indicate when a balance is reduced



within the month or how a resource was disposed of, even though it could impact eligibility. In these types of situations, a statement with more detailed information may need to be submitted.

Will there be any type of indicator that an account is closed?

Yes, the response for the AVP will have open and close dates for the accounts. These will be posted on the AVP Interface page in CBMS. It will be up to the worker to dispose of the record in the CBMS case for the member if the AVP returned a response for a closed account.

Will the AVP help expedite eligibility determinations?

The Department hopes this new interface will help reduce the overall eligibility determination time.

How will ABLE accounts be verified with this new system?

ABLE accounts are held in financial institutions. However, how these will be identified is yet to be determined.

Will unreported income be identified using AVP?

This is an asset verification system. It will not verify income. The AVP will only return account balances.

Some accounts accrue interest - will this interface be used as verification for that income?

No the interface cannot be used for verification of income. The details of the balance will not be provided.

How current will the information be?

The most current balances will be reported based on the balance on the first day of the month that the AVP is called.

Will the AVP apply the logic of applying the full balance to the recipient if the account is owned 50/50?

The AVP will not identify the ownership percentage, but it will list all the owners on the account. Eligibility workers should continue to follow the existing processes in place to request additional verification as necessary.

Will the AVP return full bank statements where it gives a list of all

Our mission is to improve health care access and outcomes for the people we serve while demonstrating sound stewardship of financial resources.
www.colorado.gov/hcpf



transactions, etc., instead of just balances?

No, a whole bank statement will not be provided, only the balance will be returned.

Is there also any way to get an interface such as Defense Finance Accounting Services, Veterans Administration, Direct Express and Railroad incomes?

No, these interfaces are not part of the AVP.

Why is the AVP looking at bank accounts going back 5 years?

The minimum requirement to account for the lookback period for transferring assets without fair consideration is 5 years.

If there is nothing left at the end of the month, will it matter what is in account during the month?

There will not be a daily transaction report. If a transaction during the month will have an effect on the eligibility determination, a bank statement may be requested by or provided to the eligibility worker.

Will the interface be able to verify accounts such as PayPal or Go Fund Me accounts?

No. The AVP will not have access to these type of accounts.

If income is not identified in the AVP (not verify but determine it is there), then how will the amount be determined to be excluded as current month's income? Especially if that deposit is in the form of a check and not a direct deposit.

Income verifications will still need to be provided and evaluated. Eligibility workers should continue to follow the existing processes in place to request additional verification as necessary.

Since the response only has the balance, how will this help when additional details are needed?

More complicated cases will still need physical verifications. Eligibility workers should continue to follow the existing processes in place to request additional verification as necessary.

What about other situations where members have other responsibilities, like being a treasurer or director of a non-profit, where they have to give their Social Security Number for bank accounts?

Our mission is to improve health care access and outcomes for the people we serve while demonstrating sound stewardship of financial resources.
www.colorado.gov/hcpf



The AVP will not be able to differentiate between these and other bank accounts in the member's name. Additional verifications may need to be provided to evaluate these situations.

What will happen to co-mingled accounts?

Co-mingled accounts are countable at 100% for each owner. The co-mingled funds would be available for many things, including estate recovery, so a non-Medicaid eligible person's comingled funds could be recovered along with the client's. Eligibility workers should continue to follow the existing processes in place to request additional verification as necessary.

Will looking back 5 years on closed accounts be part of the annual determination every time?

On initial applications we will get 5 years of responses from the AVP, and then at each subsequent redetermination it will fill in the missing months. If it is indicated that the person needs long term services and supports, then the prior responses should be evaluated to see if a possible transfer without fair consideration has taken place. For the cases that do not involve long term services and supports, there is no need to look at the 5 years of responses.

Will the asset limit increase?

No. The AVP will not impact the asset limit. The asset limit is tied to SSI and set by federal regulation.

For more information contact

Medicaid.Eligibility@hcpf.state.co.us

