

INTEGRATED HUMAN SERVICES APPLICATION ANALYSIS



June 2013

Overview

PROJECT RATIONALE

- Review rationale for conducting analysis

BACKGROUND

- Review project goals and approach

METHODOLOGY

- Provide overview of analysis and development of recommendations

RECOMMENDATIONS

- Review language and placement recommendations for inclusion in integration human services applications

Regulations



ACA requires that individuals be able to apply for an Insurance Affordability Programs (IAP) using a single, streamlined application.¹

IAP application serves as single point of entry for individuals to apply to and be determined eligible for Medicaid, CHIP, and APTC/CSR

OPTIONS FOR STATES

- **Application for IAPs must be either be:**
 - 1) The single streamlined application developed by the Secretary; or
 - 2) An alternative single streamlined application, which may be no more burdensome than the Secretary's model application and must be approved by the Secretary.²
 - States may also provide consumers the option to complete a MAGI-compliant integrated human services application.³
 - Integrated human services applications are used to screen for eligibility for multiple public benefit programs (e.g. SNAP, TANF, FPBP).
 - MAGI-compliant integrated human services applications must be approved by HHS and used in addition to, and not in lieu of, an IAP application.

¹ Patient Protection and Affordable Care Act, P.L. 111-48, § 1413.

² 42 CFR 435.907.

³ Medicaid Program; Eligibility Changes Under the Affordable Care Act of 2010, Federal Register 17163, Vol. 77, No. 57, (March 23, 2012).

Project Rationale

- Approximately 40 states take an integrated human services approach to ensure that individuals receive services for which they are eligible.
- While states' approaches to integrated human services applications vary, they are used to screen for health coverage for at least some populations.

- **Project grew out of this understanding as well as desire to:**
 - Ensure individuals eligible for health coverage and other benefits could receive them without completing multiple applications.
 - Reconcile fact that current integrated human services applications do not collect enough information to complete MAGI determinations.

Background



Project is a collaboration between CMS, Manatt Health Solutions, SIS, and Maximus

Goal is to provide states with recommendations for inclusion of required single streamlined application questions into existing integrated human services applications to support MAGI eligibility determinations

ENVIRONMENTAL SCAN

- Conducted environmental scan of ten states' applications

DATA ELEMENTS CROSSWALK

- Cross-walked the single streamlined application questions that would need to be added to states' integrated human services application to support a MAGI Medicaid determination

RECOMMENDATIONS

- Highlighted best practices and developed placement and language recommendations to ensure applications are streamlined and accessible

Methodology

Process for Analyzing Integrated Human Services and Single Streamlined Applications

REVIEWED STATES' PAPER APPLICATIONS

- Conducted environmental cross-walk of ten states integrated human services applications to assess compatibility with the single streamlined application questions
- Conducted a legal analysis to identify the Exchange and Medicaid regulatory basis for the single streamlined application questions

States Analyzed:

- Arizona
- Florida
- Georgia
- Iowa
- Louisiana
- Michigan
- Pennsylvania
- Tennessee
- Utah
- Washington

COMPILED & CATEGORIZED DATA ELEMENTS

- Conducted more detailed cross-walk to identify which data elements from the single streamlined application are the same, similar, or missing from the ten state integrated human services applications

PRIORITIZED & IDENTIFIED REQUIRED QUESTIONS

- Identified whether single streamlined application question must be included because it is necessary for determining MAGI eligibility, may be included as a best practice for administrative ease, or is already included.

Methodology Cont'd

Process for Developing Recommendations

DEVELOPED PAPER APPLICATION PLACEMENT RECOMENDATIONS

- Proposed for seamless inclusion into paper integrated human services applications

DEVELOPED ONLINE APPLICATION PLACEMENT RECOMENDATIONS

- Proposed for seamless inclusion into online integrated human services applications

DEVELOPED LANGUAGE RECOMENDATIONS

- Literacy expert reviewed "must include" questions and provided language recommendations to increase readability

Online analysis did not account for dynamic logic modeled in the federal "Single Streamlined Application for the Health Insurance Marketplace" online application.

Recommendations are high-level considerations of question placement and technological features.

Toolkit Products

SUMMARY CHART

- Provides a high-level summary of the “Must Include” IAP data elements and questions

SLIDE DECK

- Describes the analysis methodology and provides a detailed overview of the findings
- Provides placement and language recommendations for the inclusion of single streamlined application questions into paper and online integrated human services applications

LEGAL ANALYSIS

- Identifies legal basis for the single streamlined application questions
- Documents practical and programmatic considerations for inclusion (e.g. questions designed to avoid need for follow up and allow for real time eligibility determinations)

Single Streamlined Application Questions

Based on comparison against integrated human services applications, the single streamlined application questions fell into three categories



- **Must Include** questions were generally not present in the ten states' integrated human services applications and are integral to constructing a MAGI household and income



- **May want to include** as a best practice for administrative ease in order to: help verify information; minimize the need to follow-up with the applicant; or to provide additional assistance to the consumer



- **Currently included** in the majority of integrated human services applications that were reviewed and therefore do not need to be added

Findings

This categorization framework was used to assist in identifying the single streamlined application questions necessary for inclusion in an integrated human services application. This will enable the integrated human services application to be approved as an alternative application.



Summary of Findings

MUST INCLUDE

NEW QUESTIONS

- Federal Tax Filing Information
- Other Health Coverage and Offers of Employer Health Coverage
- Projected Annual Income
- Income: Deductions
- Ability to Use Tax Data during Renewal
- Preferred Method to Get Information
- CHIP Waiting Periods (if applicable)
- Navigator/Application Assistor (if applicable)

QUESTIONS LIKELY TO ALREADY BE INCLUDED BUT MAY REQUIRE REVISION

- | | |
|-------------------------------------|---------------------------------|
| • Yearly Income | • Absent Parent |
| • Applying for Health Insurance | • Language Spoken/Read |
| • Income: Other Income | • SSN Instructions |
| • Former Foster Care Child Category | • Pregnant |
| • Citizenship/Immigration Status | • Native American/Alaska Native |
| • Authorized Representative | • Self Employment |
| • Full Time Student | |
| • Non-MAGI Screening Question | |

MAY WANT TO INCLUDE

- Household Contact Information: Suffix
- No Fixed Address
- Recent Changes to Resolve Inconsistencies

ALREADY INCLUDED

- Household Contact Information: Name, Address...
- Age
- Relationship to Filer
- Gender
- SSN
- 3 Months Retroactive Coverage
- Absent Parent
- Employment Information: Name of Employer and Wages
- Rights and Responsibilities: Medicaid and Appeals

Must Include



- **Federal Tax Filing Information:**

- Does PERSON X plan to file a federal income tax return NEXT YEAR? (Yes/No)
- If yes: Will PERSON X file jointly with a spouse? (Yes/No)
 - If yes, name of spouse:
- Will PERSON X claim any dependents on his or her tax return? (Yes/No)
 - If yes, list name(s) of dependents:
- Will PERSON X be claimed as a dependent on someone's tax return? (Yes/No)
 - If yes, please list the name of the tax filer:
 - How is PERSON X related to the tax filer?



- **Access to Employer Health Coverage:**

- Is anyone listed on this application offered health coverage from a job? Check yes even if the coverage is from someone else's job, such as a parent or spouse. If yes, go to Appendix.
- Is this a state employee benefit plan?




- **Offers of Employer Health Coverage:**

All questions are required, including those that address:

- Employer health coverage contact information; Minimum value; State Affordability; Covered Household Members; Projected Coverage

Must Include



While most states ask about Medicaid, they now need to capture all IAP programs



- **Applying for Health Coverage:**
 - Does PERSON X need health coverage? (Yes/No)



- **Other Health Insurance:**
 - Is anyone enrolled in health coverage now from the following? (Yes/No) If yes, check the type of coverage and write the person(s) name(s) next to the coverage they have.
 - Medicaid; CHIP; Medicare; TRICARE (Don't check if you have direct care or Line of Duty); VA health care programs; Peace Corps
 - Employer insurance; Name of insurance ____; Policy number
 - Is this COBRA coverage (Yes/No)
 - Is this a retiree health plan? (Yes/No)
 - Other
 - Name of health insurance:
 - Policy number:
 - Is this a limited-benefit plan (like a school accident policy) (Yes/No)



- **Income: Yearly Income:**
 - Person X's total income this year: \$ ____



- **Income: Projected Annual:**
 - Person X's total income next year (if you think it will be different): \$ ____

Must Include



- **Income: Deductions:**

- If PERSON X pays for certain things that can be deducted on a federal income tax return, telling us about them could make the cost of health insurance a little lower. NOTE: You shouldn't include a cost that you already considered in your answer to net self-employment.
- Check all that apply, and give the amount and how often you get it: Alimony; Student loan interest; Other deductions



- **Other Income:**

Check all that apply, and give the amount and how often you get it.

- None; Unemployment; Pensions; Social Security; Retirement Accounts; Alimony Received; Net Farming/Fishing; Net Rental/Royalty; Other Income



- **Self Employment:**

If self-employed, please answer the following questions:

- Type of Work:
- How much net income (profits once business expenses are paid) will PERSON X get from this self-employment this month? \$ ____

Must Include



- **Ability to Use Tax Data during Renewal:**

- **Renewal of coverage:** To make it easier to determine my eligibility for help paying for health coverage in future years, I agree to allow the Marketplace to use income data, including information from tax returns. The Marketplace will send me a notice, let me make any changes, and I can opt out at any time.



- **CHIP Waiting Periods:**

Please answer the following questions if PERSON X is 19 or younger:

- Did PERSON X have insurance through a job and lose it within the past 3 months? (Yes/No)
- If yes, end date:
- Reason the insurance ended:



- **Former Foster Care Child Category:**

- Was PERSON X in foster care at age 18 or older? (Yes/No)

Must Include

May want to include an instructions sheet with a list of eligible statuses and/or document types.



- **Citizenship/Immigration Status:**
 - Is PERSON X a U.S. citizen or U.S. national?
 - If PERSON X isn't a U.S. citizen or U.S. national, do they have eligible immigration status?
Yes. Fill in their document type and ID number below.
 - Document Type:
 - Document ID Number:
 - Has PERSON X lived in the U.S. since 1996?
 - Is PERSON X or their spouse or parent a veteran or an active-duty member of the U.S. military?



- **Authorized Representative:**
 - All applications ask, but not to the same degree



- **Full-Time Student:**
Please answer the following question If PERSON X is 22 or younger:
 - Is PERSON X a full-time student (Yes/No)

Must Include



- **Absent Parent:**
 - Does any child on this application have a parent living outside of the home? (Yes/No)



- **Preferred method to get information:**
 - Do you want to get information about this application by email? (Yes/No)
 - Email Address: _____



- **Language Spoken/Read:**
 - Preferred spoken or written language (if not English)



- **SSN Instructions:**
 - We need this if you want health coverage and have a SSN. Providing your SSN can be helpful if you don't want health coverage too since it can speed up the application process. We use SSNs to check income and other information to see who's eligible for help with health coverage costs. If someone wants help getting an SSN, call 1-800-772-1213 or visit socialsecurity.gov. TTY users should call 1-800-325-0778.

Must Include



- **Pregnant:**
 - Are you pregnant? (Yes/No)
 - If yes, how many babies are expected during pregnancy? __



- **Non-MAGI Screening Questions:**
 - Does Person X have a physical, mental or emotional health condition that causes limitations in activities (like bathing, dressing, daily chores, etc) or live in a medical facility or nursing home?



- **American Indian/Alaska Native:**
 - All American Indian/Alaska Native questions are required, including:
 - Federally Recognized Tribe; Indian Health Service; Tribal Land Use Income



- **Navigator/Application Assistor Information:**
 - Application start date; Counselor First Name, Middle Name, Last Name, & Suffix ; Organization name; ID Number (if applicable)

Contingent upon a state's utilization of application assistors

May Want to Include

May want to include as a best practice for administrative ease in order to: help verify information; minimize the need to follow-up with the applicants; or to provide additional assistance to the consumers



- Household Contact Information:
 - Suffix



- Recent Change in Circumstances (explanation of discrepancies):
 - In the past year, did PERSON X:
 - Change jobs
 - Stop working
 - Start working fewer hours
 - None of these

Recommendations

Language and placement recommendations were developed for the seamless incorporation of “Must Include” and “May Include” single streamlined application questions into states’ existing integrated human services applications



Overall Recommendations

- Several of the “must include” questions should be asked of applicants only (e.g. citizenship/immigration and non-MAGI disability questions).
- The online considerations do not account for the dynamic logic of the online questionnaire. However, the analysis indicates which of the questions are program-specific and therefore only triggered/displayed when applicants appear eligible for such programs.
- States should also:
 - Consider state-specific policies for questions related to CHIP waiting periods and income databases for questions related to reasonable explanation for change in circumstances.
 - Ensure that questions have level of specificity necessary to get the federally-required information. For example, most states ask about self-employment but few consider business expenses as part of self-employment income.



Question Wording Recommendations

To make complex questions easier to read and understand:

Use complete sentences and the active voice.

Use common words, and provide definitions or simpler forms where necessary. For example, "eligible immigration status" becomes "satisfactory immigration status," since readers may not know what makes a person "eligible" but may know that their status is "satisfactory."

Include examples to help applicants understand terminology that may not be familiar, such as 'suffix'.

Use state terminology for health insurance coverage to be consistent within your state. States should specify that health coverage means Medicaid/CHIP/APTC/CSR.

* * Read questions out loud to yourself. You'll know immediately what questions are likely to be clear for most adults.

Placement: Paper

Sections that are likely to be new for integrated human services applications should be grouped together and placed near questions of a similar topic. For example, MEC questions can be placed near employment or income.

Single streamlined application structures all questions to be completed using a person-centered approach (few exceptions: AI/AN, Authorized Representative, and coverage questions).

In contrast, majority of integrated human services applications structure applications so that filer is completing on behalf of household, often without need to specify individual to whom question applies (exception: household composition)

Summary of Options for Reconciling Household Structure:

- **Goal: Ensure that appropriate questions are asked of the correct household members**
 - **Option 1:** Reorganize all questions to address each individual household member to align with the single streamlined application.
 - **Option 2:** Reorganize select questions (e.g., income specific questions) to mirror the single streamlined application that organize and repeat questions for each individual household member
 - **Option 3:** Ask applicant to list household members to whom question/answer applies.

Placement: Paper

States can ask questions where they fit naturally or create a supplemental page. Alternatively, they can:

REORGANIZE ALL QUESTIONS

Reorganize all questions to address each individual household member to align with the single streamlined application.

- Considered most usable format for consumers based on consumer testing and literacy review
- Restructuring to this degree may not be realistic for Oct 1, 2013
- May add to application length

REORGANIZE SOME QUESTIONS

Reorganize select questions (e.g., income specific questions) to mirror the single streamlined application that organize and repeat questions for each individual household member.

- Would capture all of the information asked in the single streamlined application
- Requires overhaul of only a few discrete questions in a state's integrated human services application
- May confuse applicants and add to application length

LIST HOUSEHOLD MEMBERS TO WHOM QUESTION/ANSWER APPLIES

Ask applicant to list household members to whom question/answer applies.

- Does not add significant length and does not require significant overhaul to existing structure
- May be more complicated to understand; requires filer to have sophisticated understanding of representing to whom the question applies

Conditional Questions

AGE-SPECIFIC QUESTIONS

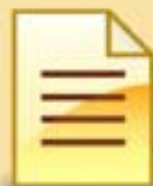
States have several options for placement of age-specific questions:

- **Option 1:** Group questions together and set a maximum threshold for applicable age, as modeled in the single streamlined application (e.g. applicants under 22 should answer full-time student, absent parent, etc.)
- **Option 2:** Do not group questions together and set individual thresholds for applicable age.
 - The individual thresholds for the “Must Include” single streamlined application questions are :
 - *CHIP Waiting Periods:* Ages 19 and under
 - *Absent Parent:* Ages 21 and under
 - *Full Time Student:* Ages 22 and under

APPLICABILITY OF QUESTIONS

- Throughout the single streamlined application, applicants will be told to skip questions that are not applicable to them.
 - For example, If Person X does not plan to file a federal income tax return, they are told to skip the filer questions and answer only whether they will be claimed as a dependent on someone else’s tax return.
- While this crosswalk analysis included all of the single streamlined applications questions, the ability to skip will make the application significantly shorter for many applicants.

Placement: Online



Logic behind the rules engine driving a state's integrated human services application will likely drive the placement of new single streamlined application questions

- **As a best practice, collect basic demographic and income data for the household and screen household members for all programs before allowing applicants to opt out of individual programs. However, if a state allows an applicant to select only health coverage up front, the application can serve as a single streamlined application.**
- **Utilize a series of technological features to enhance user experience and processing. These include:**
 - Present questions to applicants only as needed, based on answers to previous questions and program eligibility rules
 - Pre-populate fields if the information is already collected as part of account creation
 - Drop down menus to allow applicants to select from a set of provided choices
- **Leverage online data verification sources where possible**
 - Including federal and state data sources (as applicable)
 - Where possible, present data from those sources to applicants for confirmation or modification
 - Identify and address inconsistencies in real-time

Delaware's Experience

- Delaware conducted an analysis of the single streamlined application to determine how best to integrate the questions into its existing online integrated human services application (ASSIST)

Single Streamlined Application Challenges

Current CMS Guidance:

- Individuals must be able to apply for MA through the “Single Streamlined Application”.
- States have the option to collect additional information, but this must be via a “Supplemental Form”.
- CMS is aware that several States use integrated application systems and acknowledges the desire of States to leverage their existing systems.

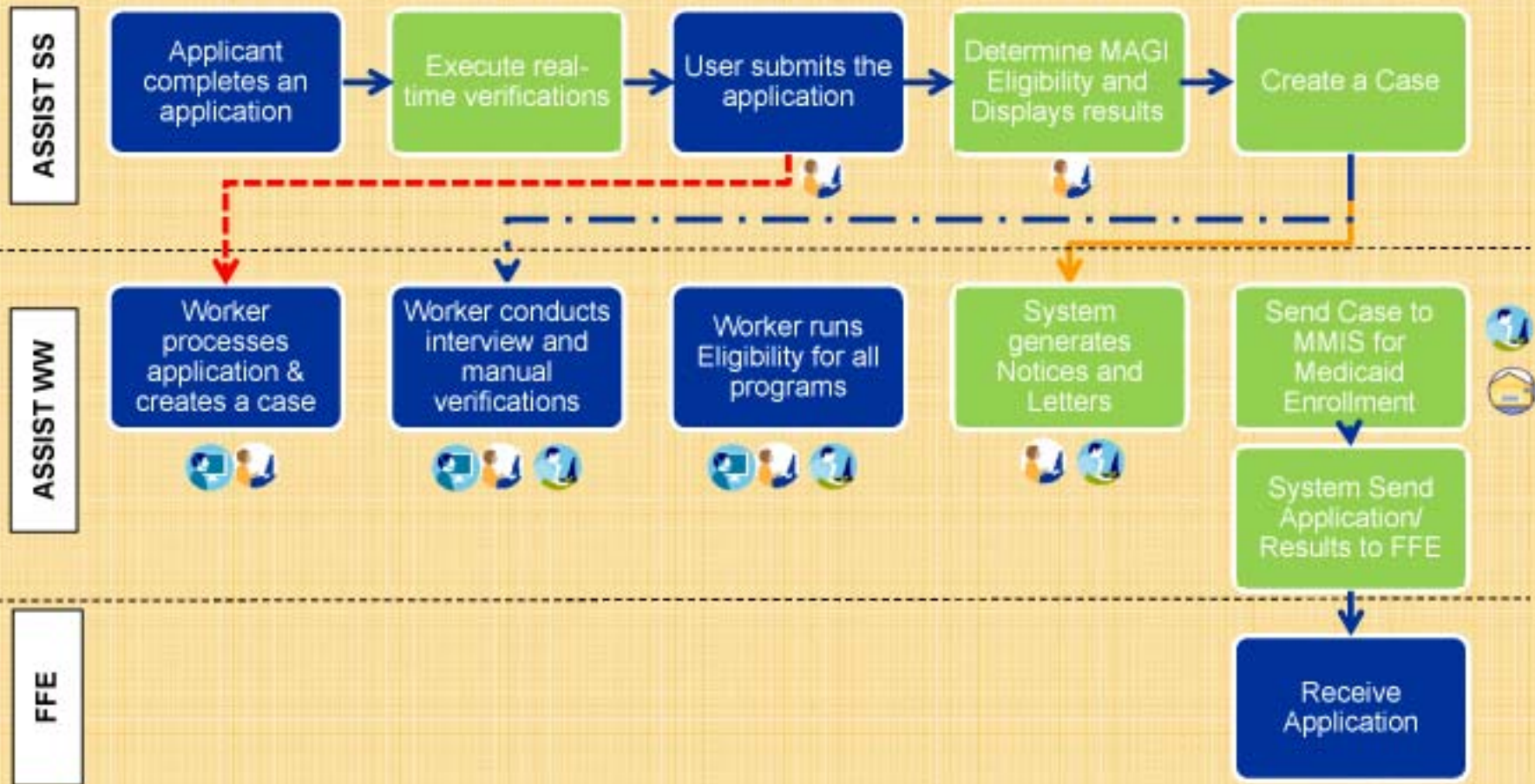
Ease of Use Concerns

- Duplication of data entry questions
- Supplemental form / multiple application confusion
- User frustration (applicant and worker)

Technical Concerns

- Associating multiple applications
- Data integrity between applications
- Application summary (PDF) management
- Leveraging existing platform

Proposed Application Flow – ASSIST Self Service



- Applicant can use the Self Service portal to check the status of their applications.
- Applicant can use the Self Service portal to log into My Account and view their benefits and notices.
- A Worker interaction might be required to process the case, in case of system errors or discrepancies.
- Medicaid Cards are mailed out by the MMIS System to the enrollees.

- Automated Processes
- Worker or User Driven processes.
- MAGI Only / No worker interaction needed
- Cannot run Real time eligibility.

Single Streamlined Application Analysis

Category	Section	Sub	Item	Question	Req?	Question Type	Scheduling Logic	Match?	Analysis
My Account - Create an account	I	A	2a	First Name	Y			Yes	The information is not carried over from IAM to ASSIST SS. The user has to re-enter.
My Account - Create an account	I	A	2b	Middle Name				Partial Match	CMS collects Middle Name while ASSIST SS only collects Middle Initial.
My Account - Create an account	I	A	2c	Last Name				Yes	The information is not carried over from IAM to ASSIST SS. The user has to re-enter.
My Account - Create an account	I	A	2d	Suffix		Dropdown menu with options: Jr. Sr. III IV		Partial Match	ASSIST SS suffix drop down has additional values of "The First", "The Second", "The Fifth", "The Sixth" and "The Seventh"

- Gap Analysis of Single Streamlined Application vs. ASSIST Self-Service (Provided Handout)
- Items are categorized three ways: 100% match in ASSIST, Not Present in ASSIST or Partially Present in ASSIST (Transformation Required)
- High Likelihood of significant modification to ASSIST still exists
- Major Gaps: APTC, IRS Data, Authorized Representative, Tax Household, AIAN
- Key takeaways: final guidance expected April/May (incl. alternate app definition); no significant application changes likely in final SSLA; submit State gap analysis through SOTA channels asap

Discussion



STATE DISCUSSION

- To what extent are states planning to use integrated human services applications that include health coverage?
- To what extent are states considering using paper versus online integrated human services applications?
- What is the volume of integrated human services applications states anticipate processing?
- What are the formatting and placement challenges and solutions that states have encountered as they conform their integrated human services applications to be MAGI-compliant?

Next Steps

Questions/Comments:

- Email alam@manatt.com

Appendix

Questions already included in the majority of states' integrated human services applications reviewed

Already Included



- **Household Contact Information**
 - Name, Home address, Mailing Address, Phone number/Other Phone Number



- **Age:**
 - Date of birth (mm/dd/yyyy)



- **Household Composition:**
 - Relationship to you



- **Gender:**
 - Sex: Male/Female



- **Social Security Number:**
 - SSN (Optional)

Already Included



- **3 Months Retroactive Coverage:**
 - Does PERSON X want help paying for medical bills from the last 3 months? (Yes/No)



- **Parent/Caretaker Relative:**
 - Does PERSON X live with at least one child under the age of 19 and are they the main person taking care of this child? (Yes/No)



- **Employment and Income Information:**
 - Employer name and address
 - Wages/tips (before taxes): Hourly; Weekly; Every 2 weeks; Monthly; Yearly \$_____
 - Average hours worked each WEEK



- **Rights and Responsibilities:**
 - Medicaid Rights and Responsibilities
 - Appeals information