Department of Human Resources 311 West Saratoga Street Baltimore MD 21201	**Family Investment Administration** **ACTION TRANSMITTAL**
Control Number: #11-16	**Effective Date: November 20, 2010** **Issuance Date: January 5, 2011**

TO: DIRECTORS, LOCAL DEPARTMENTS OF SOCIAL SERVICES
DEPUTY/ASSISTANT DIRECTORS FOR FAMILY INVESTMENT
DEPUTY/ASSISTANT DIRECTORS FOR FINANCE
FAMILY INVESTMENT SUPERVISORS AND ELIGIBILITY STAFF
LOCAL DEPARTMENT FINANCE OFFICERS AND STAFF

FROM: KEVIN M. MCGUIRE, EXECUTIVE DIRECTOR, FIA
STAFFORD CHIPUNGU, DIRECTOR,
OFFICE OF BUDGET AND FINANCE, BUDGET MANAGEMENT

RE: E-GOV/E-IAR CHANGE IN ACCESSING INTERIM REIMBURSEMENT

PROGRAM AFFECTED: TEMPORARY CASH ASSISTANCE (TCA), TEMPORARY DISABILITY ASSISTANCE PROGRAM (TDAP), MEDICAL ASSISTANCE (MA), PUBLIC ASSISTANCE TO ADULTS (PAA)

ORIGINATING OFFICE: OFFICE OF PROGRAMS

SUMMARY:

The Social Security Administration (SSA) advised us that they implemented the next phase of e-GOV and the Interim Assistance Reimbursement (E-IAR) process on November 20, 2010. We were also told that this phase affects only the actual reimbursement portion of the process. SSA, Finance and those FIA staff who process IAR reimbursements will begin processing the reimbursements electronically.

With this action transmittal (AT), we are providing information on the new E-IAR reimbursement process and reviewing the IAR process in general. We are also including information about the DHR/FIA 340 form to ensure accurate processing of interim reimbursement funds.

We will send out security access registration forms to FIA local department Assistant Directors (ADs) shortly. They are to be completed identifying staff who need E-IAR access and then sent to SSA. We will provide you with the procedures at that time.

SSA created a training PowerPoint to help states through the new IAR process. Because of the number of slides in the training, we placed it on FIPNET under “Training.”

In the future, information will not be available in the State Data Exchange (SDX) and local department FIA case managers will access E-IAR for information. We will issue procedures when this is effective.

POLICY REVIEW:

A disabled cash assistance customer with a medical disability that exceeds 12 months or is expected to result in death must apply for Supplemental Security Income (SSI). In return for receiving benefits, the customer must sign the Interim Assistance Reimbursement (IAR) agreement form (DHR/FIA 340). By signing the IAR agreement, the customer agrees to repay the State for assistance received while the customer is waiting for the SSI determination and payment. Payments taken from the retroactive SSI lump sum repay the interim assistance received.

Parents sign the 340 form for their disabled children. The parent is agreeing to reimburse the State for the child's portion of the TCA benefit from the child's SSI, when the SSI is approved,

Case records must contain an appropriately signed paper IAR form (DHR/FIA 340) for SSA audit purposes. Successful transmission of IAR information to SSA and retention of the correct amount of reimbursement are the goals.

E-IAR Internet Application Process

E-IAR allows State agencies to:

- View and acknowledge SSA communications
- Request IAR reimbursement
- Query cases

Individuals must have a user ID and password to access E-IAR. SSA limits the number of users.

There are three types of State E-IAR users:

1. Designated local department staff can:

- Log on to the E-IAR system and acknowledge receipt of SSA communications
  - While the system will allow FIA case managers to acknowledge SSA communications, **CASE MANAGERS MUST NOT ACKNOWLEDGE COMMUNICATIONS AT THIS TIME.**
  - FIA acknowledging SSA communications may prevent Fiscal staff from receiving timely communications regarding approved SSI cases and subsequently delay the reporting of interim assistance payments to SSA.

- Query IAR cases within their local department

- Use section 5.0 of the Internet User's Guide for specific information which is located on the e-GOV website at http://ssa.gov/gso. Log into the site with your assigned ID and password then click on Interim Reimbursement. The right side of the screen lists the User's Guide, the User's handbook and the IAR Tutorial. All three provide helpful information.

2. State Accounting staff (FINANCE):

- Can request IAR reimbursement for cases within their local jurisdiction
- Have the same access as case managers, plus they can report IAR payment amounts to SSA
- Certify and submit IAR payments to SSA for reimbursement

3. State Oversight - LDSS Finance Officers, Assistant Directors, Central FIA and Fiscal staff have:

- State-wide access
- Query access, statewide or by jurisdiction
- Additional query functions

Local Department Case Manager Responsibilities

At application, the case manager:

1. Has the customer sign the Authorization for Reimbursement of Interim Assistance (DHR/FIA 340) form during the interview or when the customer's or customer's child's verified impairment equals or exceeds 12 months or the 402b shows the disability is expected to result in the customer's death.
   a. Gives the **Goldenrod** copy to the customer;
   b. Sends the **Yellow** copy to the **LDSS finance office**;
   c. Retains the **Pink** and **White** copy in the **permanent** section of the case record
      - The 340 must not be retired, unless the SSI payment has been made.
2. Enters the IAR date (the date the customer signed the form) in the CARES IAR field on the customer's DEM2 screen.
   - The 340 information is transmitted to SSA in an overnight transmission from CARES.
3. Refers the customer to SSA to apply for SSI and SSDI (customers must apply for all potential benefits).
4. Follows up on the SSI/SSDI application and the IAR acceptance at SSA.

<u>At redetermination or interim change:</u> The case manager must review the SSI application status and IAR status to ensure:

1. The customer filed for SSI;

   The SSI application has not been denied or found unfavorable, and the customer has not withdrawn the application;

2. The customer is not receiving SSI or SSDI;
3. That If denied or there is an unfavorable decision, the customer filed an appeal (we use the term appeal to cover all of the steps in the SSA process);
4. The IAR is active at SSA; and
5. The TDAP case is closed or appropriate action taken on a TCA case (conciliation and sanction) if the customer has not complied with policy requirements.

<u>Local Finance Department Responsibilities (or FIA Staff with IAR Reimbursement Responsibilities)</u>

1. Maintain a file (in the Finance office) of yellow signed copies of the DHR/FIA 340 forms pending SSA decision.
2. Receive an e-mail from SSA to 'acknowledge IAR communications'.
3. Access E-IAR and acknowledges the communications.
4. Ensure there is a signed DHR/FIA 340 in the Finance file or obtain a copy from the Local Department FIA case manager.
   - **Note:** No SSI reimbursement can be kept without a signed 340 in the file.
5. Report interim assistance payments in E-IAR for approved SSI cases when requested by SSA communications.
6. <u>Verify</u> reported interim assistance payments and electronically submit IAR information to SSA.
7. Receive confirmation of IAR payments submitted to SSA and print the confirmation receipt from E-IAR.
8. Forward a copy of the confirmation receipt to the designated FIA person.
9. Receive SSA communication of IAR reimbursements paid and deposited electronically to Local Assistance accounts.
10. Record reimbursed Interim Assistance in CARES using the current policy and procedures.
11. Reimburse CARES Fiscal monthly for IAR receipts entered into CARES using existing policy and procedure.
12. On a monthly basis, reconcile bank deposits to the CARES Receipts Received Report for Interim Assistance reimbursed and recorded in CARES.

<u>Things to remember</u>

- Maryland pays State funds to long term disabled TCA and is eligible for IAR for both TCA and TDAP.

- TDAP benefits are never prorated. TCA is usually prorated in the first month. **An IAR reimbursement can not be paid in any month that both SSI and TCA are prorated. Contact Michael DeJesus, SSI Program Analyst at 215- 597-2459 for questions on processing interim assistance reimbursement requests for prorated TCA cases.**

ACTION DUE: November 20, 2010.

INQUIRIES: Please direct all TCA inquiries to Marilyn Lorenzo at 410-767-7333 or mlorenzo@dhr.state.md.us or Gretchen Simpson at 410-767-7937 or gsimpson@dhr.state.md.us. Direct all Budget and Management inquiries to Bridgette Palmer at bpalmer@dhr.state.md.us or Dawit Gebregiorgis at dgebregi@dhr.state.md.us or 410-767-7489.

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