Policy Clarification 2020-12-01

Title: Reasonable Compatibility, Pending Timeframes for Review Forms, and SSA Income at Review

Date: December 23, 2020

From: Policy Managers

Program(s) Impacted: All Medical Programs

The purpose of this document is to provide clarification to reconcile existing policies regarding Reasonable Compatibility, pending timeframes for manually sent review forms, and SSA income at review. These clarifications should have little to no impact on current processing and are effective upon release.

Reasonable Compatibility Percentage

Reasonable compatibility is the income verification standard that is used to determine if wages reported by the consumer are generally consistent with information received through a recognized data exchange or other source, also referred to as a data source or interface. Reported information is considered reasonably compatible under three different circumstances, one of which being that the amount of earnings reported by the customer is within 20% of the amount received from one data source for the applicable timeframe.

Effective with this clarification, the acceptable reasonable compatibility percentage of difference is defined as follows: The difference between the self-attested amount and one data source is no greater than 20% of the self-attested amount.

As stated above, this change in the definition of the percentage related to reasonable compatibility does not affect current processes or procedures for staff. KEES determines reasonable compatibility using a percentage of the self-attestation, and staff will continue to utilize and rely upon the Reasonable Compatibility Detail screen in KEES for this information. In rare instances, the manual Reasonable Compatibility Tool is required, and this tool also uses a percentage of the self-attestation.

All other policy relating to Reasonable Compatibility remains the same at this time.

Pending Timeframes for Manually Sent Reviews

In some situations, a review may be ‘skipped,’ meaning it fails to go through the automated review process in KEES and does not receive a passive or pre-populated review form. When
staff run across these, they are to place the case on hold and send the consumer the program-appropriate Pre-populated Review Form in KEES, along with a general correspondence indicating a due date for the requested form. Per Reviews Processing Memo 2017-02-01, fifteen (15) days would be provided to return the review form. This was based on the pending timeframe for requested information at that time and was not specific to review forms only.

Per PM2017-07-01, the pending timeframe for requested information was formally updated to twelve (12) days. This clarification serves as formal clarification that the pending timeframe for requested information is applicable to a manually sent review form. This should have little to no impact on processing as staff have been instructed to provide the consumer the standard amount of time for verification requests when sending a manual review.

SSA Income Verification at Review

When a case is passively reviewed, information known to the agency is used to make a new eligibility determination through an automated process with no manual worker involvement. PM2017-02-01 Reviews Processing Memo originally defined the criteria for a case to proceed through the KEES passive review process.

With the implementation of PM2018-07-01, beginning with reviews due September 2018 and ongoing, additional verifications were added as part of the automated review batch to allow more cases to proceed through passive review as opposed to generating a pre-populated review form for the consumer to complete. Among these was Social Security Verification which allowed Social Security income to be checked as part of the automated review process. The batch process executed through KEES compared the amount of Social Security income budgeted in KEES with the amount found in a trusted data source. If the budgeted amount of income did not match for each program member, a pre-populated review would be generated.

With the April 2019 KEES Release, the amount of discrepancy allowed between the budgeted SSA income amount and the amount found in the data source was updated to five dollars ($5.00), meaning that as long as the difference between the two amounts does not exceed five dollars, the case may still meet the parameters for passive review. This document formally clarifies this part of the passive review criteria and process.

For questions or concerns related to this document, please contact one of the KDHE Medical Policy Staff below.

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