

## Description of Process Between CARES, EDS and Call Center for Institutional Cases That Have Divested

### Background

Back in 2004, it came to the Call Center's attention that divestment periods on EDSNET were not matching what was on CARES. Every month, EDS receives a report of cases that have divested. This report is run the first Monday of the month, and usually includes cases that have been confirmed and have had divestment changes made the prior month. At that time, the instructions for EDS was to apply the divestment date the month following the month of the report. As a result, eligibility was put on file that the customer was not entitled to (usually in cases of applications and applications with backdates) and institutional care claims were paid for a recipient who was entitled to only card services. As a result, the following occurred:

- The divestment wasn't being applied for application months and for applications where the certification includes backdated months
- For ongoing cases that divested, the dates of divestment were incorrect. In these instances, although the divestment period began in the month it occurred (which could be at some time in the past), EDS applied the divestment period following adverse action logic (giving adverse action notice). If EDS used the report that was run at the beginning of the month, it was likely that one or several months of the divestment period that should have been applied were missed due to report timing issues. As a result, nursing home claims were being paid in error.

### Interim solution

As a compromise, the Call Center agreed to review this report every month, which includes researching CARES, case comments and the ECF to determine the following:

- The correct dates of the divestment period, following policy (ie: including backdated periods at application, following negative notice requirements on an ongoing case). The Call Center researches CARES to ensure that the divestment is correct, and that a negative notice has been provided. If there is not enough documentation to support the divestment that is showing on the report, the Call center will call the worker and ask if the divestment period is right and confirm that a negative notice was sent out. (ME H 4.7.5: Reminder: the divestment notices are inaccurate. Send a manual notice explaining eligibility for card services, the reason for service reduction, and the number of months in the penalty period when a case receives a divestment penalty. Include the legal citation [49.453 Wis. Stats.]).
- The Call Center notifies EDS of the correct divestment periods to put on a customer's file so that nursing home claims don't get paid during the divestment period, provided notice requirements, etc. are met (by policy).

- There are also times when a divestment period is entered, and eventually changed/deleted/ended and the divestment page is not updated. This continues to send the divestment info to EDS. When this happens, the Call Center will ask the worker to make the correct changes to the case and document in case comments and instruct EDS to correct the divestment period.

If there are changes to the divestment period after it has been imposed, the worker still needs to contact the divestment analyst at EDS to get that changed. (ME H: 4.7.5: The divestment report, CRM1403A, doesn't register divestment penalty changes. If it is necessary to remove a divestment penalty, update AAAT, run SFED, and confirm. Then contact EDS (608-221-4746, ext. 3103). Provide EDS with the date that the divestment penalty was removed. The level of care will then be revised. Also contact the appropriate individual at the client's nursing home to submit bills for the period that is now covered by institutional MA).

\*\*\*Reminder, when the divestment page is completed and a divestment period is calculated, this can be seen on EEAD, even though the MI S category is open and passing, the divestment period continues to be sent from CARES to MMIS. Sometimes, workers think that it isn't being imposed because MI S is passing, and sometimes they think when they correct a divestment period it gets automatically sent (since they see MI S passing). Again, changes made to the divestment period after it's been put on EDS' files have to be manually corrected by contacting the staff person at EDS.