![pennsylvania DEPARTMENT OF HUMAN SERVICES]

DATE: March 13, 2018

OPERATIONS MEMORANDUM # 18-03-02

SUBJECT: Disability Advocacy Program (DAP) Changes

TO: Executive Directors

FROM: Inez Titus
Director
Bureau of Operations

PURPOSE

To inform County Assistance Offices (CAOs) of new procedures for Disability Advocacy Program (DAP), and to explain the accompanying changes to the electronic Client Information System (eCIS). These changes will be effective **March 18, 2018**.

BACKGROUND

The tracking database for DAP is currently housed within the Maintain, Prepare and Produce Executive Reports (MAPPER) system. The Department of Human Services (DHS) will be migrating the DAP tracking database into eCIS and Cognos Enterprise Data Warehouse (EDW) in preparation for the eventual decommission of MAPPER. The goal of this initiative is to increase efficiency and enhance user experience, as well as to streamline and standardize DAP procedures statewide.

DISCUSSION

Currently, when a DAP or Medical Review Team (MRT) referral is made, it is initiated by the eligibility worker with a DAP Referral Form (PA 731) and tracked in MAPPER by a DAP Advocate or an MRT worker. A non-DAP Advocate or MRT Income Maintenance Caseworker (IMCW) does not have access to view the status of the referral in MAPPER. With this initiative, the referral will now be sent automatically through the system and will be stored and updated in eCIS, allowing all IMCWs to view the progress of the Social Security Administration (SSA) application/appeal or the MRT referral. Key components of this initiative include the introduction of new alerts, forms, letters, and automation so the DAP/MRT process is more streamlined and efficient.

PROCEDURES

Changes to DAP/MRT referrals and the Disability Screen in eCIS

With this initiative, an IMCW will no longer use the PA 731 to refer an individual to DAP. An IMCW will now submit a DAP referral electronically in eCIS Case Processing (CP) via the Disability screen.

> **NOTE:** Prior to MA or Cash budget authorization, the PA 731 must still be signed by individuals who are required to apply for Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI) and have not yet started the application process. The form can be accessed through the Forms Generation module (located under the CM Action link under Case Management or under Quick Links) or through the Pending Verification Screen, and will pre-populate the selected individual's information.

The IMCW will need to decide whether the individual being referred to DAP should be referred to the SSA to pursue disability benefits, or if the individual should be referred to the MRT for certification of a disability. As a general rule:

- Individuals receiving Medical Assistance for Workers with Disabilities (MAWD) or Medical Assistance (MA) for Children with Special Needs (PH95) should be referred to MRT.
- Individuals receiving other MA benefits or Cash Assistance who have verified a permanent disability and are not currently receiving SSI or SSDI benefits should be referred to SSA.
- If an individual is clearly meeting substantial gainful activity (SGA), he or she should be referred to MRT. Workers should only refer cases to SSA that are close to or under SGA.

> **NOTE:** The SGA amount changes annually. For 2018, the monthly SGA amount for non-blind individuals is $1,180.00 and for blind individuals, the monthly SGA is $1,970.00.

For additional guidance, workers should refer to Supplemental Handbook Chapter 820.3.

On the Disability screen in CP, a new field titled "Type of Referral" will be present. To submit a DAP referral, the IMCW must mark the "Referred to DAP" field as "Yes," and select a referral type of "SSA Referral" or "MRT Only." The remainder of this screen should be completed using current procedure. After the IMCW executes eligibility and submits the case, the DAP referral will be automatically generated and submitted to the DAP Advocate. The new DAP module will be generated in real-time for all referrals. The MRT Only referral alerts will be sent to the DAP Advocate's Workload Dashboard in real-time, while the SSA Referral work items will be available on the DAP Advocate's Workload Dashboard the next day after an overnight batch process.

An IMCW will be able to view the progress of an individual's DAP record by clicking the "View DAP Functions" link on the Disability screen, or by going to the "DAP Functions" link located under Case Management. A non-DAP Advocate or MRT IMCW will have read-only access in the DAP Functions module.

> **NOTE:** An open DAP record will automatically close 90 days after an eCIS case closes. If an eCIS case is re-opened in that 90-day window and the IMCW creates a new Disability screen associated with an individual that was referred to DAP, the "View DAP Functions" link will be present. The IMCW should review the DAP record before completing the Disability screen.

A new alert, "DAP 250 - Review and Run Eligibility," will be generated for an IMCW when the DAP process is ending for any budget that cannot be automated or that fails automation. This alert will have a due date of ten days. Instructions on how to clear the alert will be included in the notes section of the alert.

Changes to the MRT Process

All IMCWs who handle MRT referrals will be assigned a new role in eCIS and will be granted write-access to the MRT fields of the DAP record in the new DAP Functions module.

> **NOTE:** Using current procedures, these roles must be set up in Workload Dashboard (WLD). When a new MRT worker is established, these roles must be set up immediately to avoid any new referrals defaulting to "not assigned" and being sent to the 91/3 dashboard.

New referrals to MRT will be initiated from the Disability screen in CP, and will be assigned in real-time in a round-robin fashion to an IMCW who handles MRT in that CAO. New MRT referrals will be received as an alert "DAP 251 - Send Records to MRT" on the WLD. The initial alert will have a due date of 30 days.

When a new referral is received, the MRT worker should first determine if the individual has already provided sufficient medical records for review by MRT. If records are needed, a new system-generated letter, MRT Letter (CM 584), will be available for MRT workers to request medical records from the individual. A worker can generate this letter from the Forms Generation module and can choose for it to be mailed centrally or locally.

After sufficient medical records have been collected for the individual, the MRT worker will send the case to MRT with an MRT Transmittal (PA 749). The form can be accessed through the Forms Generation module, and will pre-populate the selected individual's demographic information. The worker will be required to data enter the name of the referring advocate and type of referral. There will also be an option to indicate retroactive requests, and the retroactive date will be mandatory if the retroactive request is selected. The PA 749 will only be able to be printed locally.

IMPORTANT: An MRT worker should not send a case to MRT until they have made reasonable efforts to collect required medical records.

Once the case has been sent to MRT, the MRT worker must access the DAP Functions module and update the "MRT Referral Date" field with the date information was mailed to MRT. This will clear the "DAP 251 - Send Records to MRT" alert from the MRT worker's WLD. A second alert, "DAP 252 - MRT Certification Decision Not Received," will be generated. This alert will have a due date of 90 days.

MRT Responses

When MRT returns the PA 749, the form and its accompanying letter will be scanned into Imaging and the MRT worker will be notified. Once notified, the MRT worker will access the DAP record through the DAP Functions module and update the "MRT Decision" field. The MRT worker will enter a date in the "Final MRT Decision Date" field if the decision is "Certified" or "Not Certified."

NOTE: The "Final SSI Decision Code" and "Final SSI Decision Code Date" fields are no longer necessary to close MRT only referrals in the DAP Functions module.

If the MRT decision is:

- **More information needed**: The MRT worker will access the DAP record through the DAP Functions module and data enter the MRT Decision. The MRT worker will then reach out to the individual to request additional information by sending a new CM 584 along with a copy of MRT's letter. The "DAP 252 - MRT Certification Decision Not Received" alert will remain active on the MRT worker's WLD during this time. The MRT worker will not need to update the open DAP record with the date a case is re-sent to MRT.

    NOTE: As long as the individual is cooperating in obtaining the required records, a case can continue to be re-sent to MRT. The MRT worker must enter a case comment each time a case is sent to MRT.

- **Certified**: The MRT worker will access the DAP record through the DAP Functions module and data enter the MRT Decision and Final MRT Decision Date. The DAP record will close and the "DAP 252 - MRT Certification Decision Not Received" alert will clear. The certification and certification date that were data-entered in the DAP Functions module will be automatically updated on the Disability screen in CP. If the open budgets can be automated, the system will update the following fields on the Disability screen, if appropriate:

    o The "Food Stamp Disability" field will update to "12 – Receives disability related MA or Certified disabled by state MRT."
    o The "MAWD Request" field will update to "1 - MA for Workers with Disability (PW-MAWD)."
    o The "MAWD Eligibility begins next month" field will update to "No."

The system will automatically run eligibility, commit the case, send notices, and create an auto-case comment.

If the open budgets on the case cannot be automated or the case fails automation for any reason, a "DAP 250 - Review and Run Eligibility" alert will be generated and assigned to the IMCW maintaining the case.

- **Not certified**: The MRT worker will access the DAP record through the DAP Functions module and data enter the MRT Decision and Final MRT Decision Date. The DAP record will close and the "DAP 252 - MRT Certification Decision Not Received" alert will clear. The "Not Certified" decision and Decision Date that were data-entered in the DAP Functions module will be automatically updated on the Disability screen in CP. If the open budgets have been identified for automation, the system will update the following fields on the Disability screen, if appropriate:

    o The Disability End Date will match the Decision Date.
    o The "MAWD Request" field will update to "4 – Not Requesting MAWD."

The system will automatically run eligibility and review for other MA, commit the case, send notices, and create an auto-case comment.

If the open budgets on the case cannot be automated or if the case fails automation for any reason, a "DAP 250 - Review and Run Eligibility" alert will be generated and assigned to the IMCW maintaining the case.

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Changes to the DAP Process

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All DAP Advocates will be assigned a new role in eCIS granting access to update and edit all fields in the new DAP Functions module.

> **NOTE**: Using current procedures, these roles must be set up in WLD. If a new DAP Advocate is established, these roles must be set up immediately to avoid any new referrals defaulting to "not assigned" and being sent to the 91/3 dashboard.

DAP referrals for individuals being referred to SSA will also be initiated via the Disability screen in CP and appear on the WLD as Work Items (similar to applications, renewals, and semi-annual reports). Each step of the SSA disability application process will be tracked as an activity within the work item. All new letters referenced in this section will be available in the Forms Generation module to be mailed centrally or locally.

> **NOTE:** Any time a DAP Advocate manually data enters dates into the DAP Functions module, any corresponding letters or forms will also have to be sent by the DAP Advocate from the Forms Generation module. The system will only automatically send letters or forms when the DAP Functions module is automatically updated with information received from the automated batch process.

When a new referral to DAP is submitted via the Disability screen in CP, the system will reach out to Exchange 6 in the overnight batch to see if there is any information available about the individual's SSI application. If Exchange 6 shows an application with a denial date that is over 60 days old and no appeal date, this will be considered not current. If Exchange 6 has no information about a current application, a File for SSA Benefits Letter (CM 587) will be automatically generated and mailed to the individual explaining he or she must apply for SSI/SSDI benefits. The new DAP Work Item will be assigned in a round-robin fashion to a DAP Advocate, and will be set to "Facilitate SSI/SSDI Application Submission." This activity has a due date of 60 days.

The system will continue to receive updates on a case from Exchange 6. For a typical SSI application, when an application date is entered on Exchange 6, this information will automatically populate on the DAP record in the DAP Functions module. The Work Item Activity "Facilitate SSI/SSDI Application Submission" will be marked as complete by the system and will move to the next stage.

SSI/SSDI Application Approvals

If Exchange 6 is updated with an application approval at any point during the application process, the Final SSI/SSDI Result Code field will be automatically updated to "Approved at Initial Application," "Approved at Administrative Law Judge (ALJ)," "Approved at Appeals Council Review," or "Approved at Federal District Court" and the "Final Disposition Date" field will be updated with the current system date. The DAP record will be automatically closed without DAP Advocate interaction. From there, current processes will take place and either SSI will auto-open or the IMCW will receive an Exchange 6 hit. If the DAP record is not receiving updates from Exchange 6, the DAP Advocate can manually close the DAP record in the DAP Functions module after receiving proper verification that the individual's disability has been approved.

> **NOTE:** When an individual's SSI/SSDI application or appeal is in pending status, the WLD Activity will be assigned to the system and will not display on the DAP Advocate's WLD because there is no action to be taken. There are some DAP cases that are not able to be systematically updated by Exchange 6 as discussed above. In these situations, DAP Advocates will need to utilize the new EDW reports to track any DAP cases that do not display on their WLD.

SSI/SSDI Application Denials

- **Denied due to disability**: If Exchange 6 is updated showing that the individual's SSI application has been denied due to disability, the system will automatically update the DAP record with the denial date and denial reason code, and automatically mail the Denied Application Letter (CM 586) to the individual explaining they are required to appeal SSA's decision within 60 days of the denial date. Paired with this will be the Attorney Letter (CM 585), explaining the individual's option to obtain an attorney as well as a list of attorneys unique to each county. The DAP activity will be set to Work Item "Facilitate ALJ Appeal Request" and will be due 60 days from the denial date. If the DAP Advocate manually updates the DAP record with the denial information, they will have to manually send the CM 586 and CM 585 from the Forms Generation module.

o If Exchange 6 is updated with an appeal date, the "Facilitate ALJ Appeal Request" work item will be cleared, and the DAP record will be automatically updated. If attorney information has not yet been entered, the DAP work item activity will update to "Update Attorney Information for the Appeal." This has a due date of 180 days beyond the initial denial date. If the information is still not entered 90 days from the initial denial date, a second CM 585 will be mailed. The DAP Advocate must update the attorney information in the DAP record in the DAP Functions module to clear this work item.

o If Exchange 6 updates the appeal as denied, the denial date and reason code will be systematically populated in the DAP record. The DAP activity will be updated to "Review for Appeals Council Appeal Request." The DAP Advocate must then reach out to the individual to find out if he or she will continue the appeal process by sending the SSI/SSDI Status Letter (CM 588). If the individual continues the appeal process, the DAP Advocate will continue to monitor the appeal and update the DAP record manually.

- **Denied due to citizenship:** If Exchange 6 shows that the initial SSI application was denied due to citizenship status, the DAP record will be automatically updated with the Final Result Code of "Denied Due to Citizenship Status" and the Final Disposition Date will be updated with the system date. The DAP record will close. For cases that can be automated, the system will run maintenance on the case in CP, update the Disability screen to generate an MRT only referral, run eligibility, commit the case, and assign the MRT only referral alert in a round-robin fashion to the DAP Advocate or MRT worker. The CM 584 will be automatically mailed.

- **Denied due to income or resources**: If Exchange 6 shows that the initial SSI application was denied due to income or resources, the "SSI Application Denied Date" and "Initial Denial Reason Code" fields will be updated. The DAP record will remain open. The CM 584 will be mailed automatically to obtain MRT certification, and the "DAP 251 - Send Records to MRT" alert will generate for the DAP Advocate who was assigned the original DAP record. At the same time, the DAP Advocate will also be required to follow up with SSDI benefits. The system will check the "SSDI Benefits" checkbox field in the DAP record, and this will open access to SSDI fields. The DAP Activity Work Item will be updated to "Track for SSDI Benefits." This work item will have a due date of 180 days. The DAP Advocate will track the SSDI application process manually using the CM 588.

Closing the DAP Record

When the DAP process is ending due to an inter-county transfer or because the individual is no longer pursuing SSI/SSDI, the DAP Advocate will manually close the DAP record using the "Final SSI/SSDI Result Code" and "Final Disposition Date" fields. If the Final

SSI/SSDI Result Code is "Not Pursuing," the "Reason for Non-Pursuit" drop-down menu will be unlocked to explain why. This drop-down menu includes:

1. Attorney advised client not to appeal
2. Client claims to be no longer disabled
3. Client did not cooperate
4. Client died
5. Client moved out of state
6. Client denied at Federal District Court
7. Other

The first three options will trigger the following automated case actions once the DAP Advocate has committed the DAP record closure by clicking "Save:"

- If the reason for non-pursuit was "Attorney advised client not to appeal" or "Client claims to be no longer disabled" the same action will occur:

  For cases that can be automated, the system will update the Disability End Date on the Disability screen in CP and run eligibility to review the individual for other MA benefits. The case will be committed and all applicable notices will be sent. An auto-case comment will be generated. If the budget cannot be automated, the "DAP 250-Review and Run Eligibility" alert will be assigned to the IMCW maintaining the case record.

- If the reason for non-pursuit was "Client did not cooperate," the system will update the Disability Benefit Status to "Refused to apply" on the Disability screen in CP. The system will run eligibility automatically and send applicable notices. An auto-case comment will be generated. If the budget cannot be automated, the "DAP 250-Review and Run Eligibility" alert will be assigned to the IMCW maintaining the case record.

After the DAP Record has been closed

A new alert, "DAP 253-Exchange Update for Closed DAP Record," will generate and be assigned to the DAP Advocate any time an Exchange 6 update is received for an individual whose DAP record was closed within the past 60 days. The alert will have a due date of 60 days and will be worker cleared. This alert will help notify a DAP Advocate if the individual is now cooperating with their requirement to pursue SSI/SSDI benefits if they have been closed due to non-cooperation.

Data Reporting and Purging

To assist CAOs and headquarters staff in effectively tracking DAP referrals, five new reports will be available on a weekly basis in the EDW. DAP Advocates and CAOs will primarily use the DAP Advocate Case Management Report. Users will have the ability to sort and filter the report data as needed. DAP Advocates and/or identified CAO representatives will be granted access to EDW to access these reports.

All DAP records will remain available in the search function for seven years after the associated case record or associated individual has been in closed status.

Conversion of DAP Records from MAPPER to eCIS

When DAP records currently housed in MAPPER are transitioned into the eCIS DAP Functions module during the weekend of conversion, each record will be assigned using their Advocate Code. This will ensure that any DAP cases currently in progress will be maintained by the same worker. DAP records that have been closed within the last seven years will also run through conversion so that a closed DAP record is stored in eCIS.

At conversion, the system will match the MAPPER record with an individual based on existing best match logic. If a match is found, the DAP record will be created and all information existing in MAPPER will be populated in the eCIS DAP record. The system will then review information in Exchange 6 and overwrite or add missing data to the DAP record.

At conversion, the system will not automatically generate any letters, so all required letters that were not sent prior to conversion will need to be sent through the Forms Generation module.

> **Example:** If the DAP record was at the step in which the initial SSI application was denied due to disability, the system will not automatically send the CM 586 and CM 585. These will need to be sent by the DAP Advocate from the Forms Generation module.

Additionally, if the individual's SSI was approved prior to conversion but the DAP record was still open in MAPPER, eCIS will only be able to close DAP records of individuals who were approved at initial application or federal court. Individuals approved at ALJ or Appeals Council will need to be manually reviewed and closed.

If a DAP record in MAPPER cannot be matched to an active case in eCIS, it will exception out of conversion and be provided in a one-time exception report. Active DAP records will need to be researched. When an appropriate case record is found, the DAP record will need to be manually re-referred to DAP via the disability screen.

NEXT STEPS

1. Share and review this information with appropriate staff members.

2. Please contact your area manager if you have questions regarding this Operations Memorandum.

3. This Operations Memorandum will become obsolete when this information is incorporated into the Supplemental Handbook.

Attachments (8):

DAP Referral Form (PA 731)
MRT Transmittal Form (PA 749)
MRT Letter (CM 584)
Attorney Letter (CM 585)
Denied Application Letter (CM 586)
File for SSA Benefits Letter (CM 587)
SSI/SSDI Status Letter (CM 588)
MAPPER DAP Transition: For DAP Advocates