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Re: State of Connecticut Department of Social Services (DSS) Asset Verification System (AVS)

Dear (Financial Institution Name):

It is our pleasure to inform you that The State of Connecticut Department of Social Services (DSS) has joined the New England States Consortium Systems Organization (NESCSO) and is launching an electronic asset verification program to help ensure accuracy of eligibility determinations related to Medicaid coverage for people who are age 65 and older, blind, or have a disability. Connecticut will begin using the Asset Verification System (AVS) on February 3, 2020 in accordance with the Supplemental Appropriations Act of 2008 (Public Law 110-252), Section 1940 of the Social Security Act/42 U.S.C. Section 1396w.

What is an electronic asset verification system?

The AVS is a program integrity tool for providing the Medicaid agencies with an electronic mechanism to contact financial institutions to determine if an applicant has, or had, an account. This system provides the State with independent data on the financial accounts of an applicant, which can be used to assess assets at the time of application and later at their annual Medicaid eligibility renewal.

Congress passed legislation which requires States to implement electronic asset verification services to ensure accuracy by verifying accounts held in financial institutions by anyone applying for Medicaid who is age 65 or older, blind or who has a disability (and anyone whose assets are counted in determining eligibility for the individual).

AVS in Connecticut

DSS's AVS is delivered through a partnership with the New England States Consortium Systems Organization (NESCSO), Public Consulting Group, Inc. (PCG) and Accuity Asset Verification Services, Inc. More information on these organizations is included below.

- **New England States Consortium Systems Organization (NESCSO)** is a non-profit organization governed by the New England State health and human Services agencies and the University of Massachusetts Medical School. NESCSO regularly facilitates information exchanges with national and state representatives of government and private agencies to identify collaborative opportunities and provides conference planning and discussion support on topics of general interest. To learn more, visit <https://nescso.org/>.
- **Public Consulting Group, Inc. (PCG)** is a leading public sector management consulting and operations improvement firm that collaborates with health, education, and human services agencies to improve lives. Founded in 1986 and headquartered in Boston, Massachusetts, PCG has over 2,000 professionals in more than 50 offices around the US, in Canada and in Europe. PCG's Health practice offers in-depth programmatic knowledge and regulatory expertise to help state and municipal health agencies respond to regulatory change, improve



access to health care, maximize program revenue, improve business processes, and achieve regulatory compliance. Using industry best practices, PCG's Health team helps organizations deliver quality services with constrained resources to promote improved client outcomes. To learn more, visit <http://www.publicconsultinggroup.com/health/>.

- **Accuity Asset Verification Services, Inc.** has served as the American Bankers Association Registrar since 1911 and is a leading provider of global payment routing data, Anti-Money Laundering screening data, software, and professional services that allow organizations across multiple industries to maximize efficiency and facilitate compliance of their transactions. Accuity maintains authoritative and comprehensive databases globally with a reputation built on the accuracy and quality of its data, products and services. For more than 175 years, Accuity has been providing industry-leading solutions to clients worldwide. Accuity works with over 17,000 financial customers globally who rely on their predictive financial data, software and consulting solutions. To learn more, visit <https://accuity.com/>.

How does a financial institution cooperate with requests made pursuant to this statute?

1. Upon receipt of an electronic and/or written request through the AVS, a financial institution will perform a match with the Social Security numbers provided.
2. After completing a search, a financial institution will respond with the following information, if available to the financial institution through its matching procedure, for each account identified:
 - a. The full name, and address of the individual;
 - b. The Social Security number of the individual;
 - c. The individual's account number; and
 - d. The first minute of the month balance for each account held by the searched individual for the requested number of months.

Note that Financial Institutions are required to respond to AVS requests even if no accounts are found.

3. A financial institution will send the information to Accuity either electronically or in written form when electronic submission is not possible.
4. A financial institution will consider an account a match if the Social Security number and any other validation required by the financial institution also matches.
5. The information provided by the AVS to a financial institution under this section will be confidential and will only be used for the purpose of carrying out the requirements of this request.

Have applicants authorized DSS and its vendor to access their bank account information?

DSS obtains written authorization from applicants in order to retrieve this account information on their behalf through the AVS. This authorization is considered to meet the requirements of the federal Right to Financial Privacy Act and does not need to be furnished directly to the financial institution. 42 U.S.C. § 1396w(d). The authorization also meets the exception for allowable disclosures in state law, which provides that a government authority may have access to financial records where the customer has authorized the disclosure. Conn. Gen. Stat. Section 36a-42.



What options are available to expedite and/or automate the tasks associated with providing this information?

Accuity offers all financial institutions full automation (data exchange) at no charge to allow them to securely and efficiently respond to AVS requests. The two automation options are batch and web service connections, which provide financial institutions a seamless way to answer AVS requests. Alternatively, a financial institution can use a web-based portal. Even if banks do not elect a fully automated approach, AVS eliminates the need for time-consuming manual record duplication, faxing, and/or physical mailings.

To enroll in any of these timesaving services, please contact Accuity at:

- Email: avs.support@accuity.com
- Telephone: 1-855-807-9822
- Fax: 847-763-1960

Will this data be protected in accordance with state and federal law?

Yes. DSS maintains a HIPAA Business Associate Agreement with PCG, which has been extended through a subcontract, to include Accuity. Both firms maintain the highest industry standard of administrative, technical and physical safeguards and controls consistent with NIST Special Publication 800-53, Federal Information Processing Standards Publication 200, Privacy Act of 1974, The Computer Security Act of 1987, OMB Circular A-130, The Financial Modernization Act of 1999, Right to Financial Privacy Act of 1978, Health Insurance Portability and Accountability Act of 1996, and the Federal Information Security Management Act. Additionally, both firms are SOC II Type 2 accredited and all data is encrypted both in transit and at rest via AES-256 or better.

Whom should I contact if I have questions?

Project Inquiries

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