

Ohio Treasurer of State
Request for Proposal - Ohio ABLE Service Provider
Respondent Questions and Treasurer’s Office Answers
August 19, 2015

Respondent Question	Treasurer’s Office Answer
<p>[Section 3.7, page 17] Regarding eligibility verification and the annual recertification, will the State allow self-certification of the aforementioned rules? Specifically, will the State allow the designated beneficiary to (at the point of enrollment) to certify that they meet the eligibility requirements without submitting paperwork?</p>	<p>The Treasurer’s Office envisions requiring Eligible Individuals (EI) to document eligibility in one of two eligibility tracks, specifically:</p> <ul style="list-style-type: none"> • <u>Track 1- Eligibility Certification:</u> EIs who are entitled to benefits based on blindness or disability under Title II or XVI of the Social Security Act. The Treasurer’s Office envisions EIs will provide certification under the penalties of perjury the disability occurred prior to the attainment of age 26 as well as other documentary evidence. It is hoped the documentary evidence requirement will be met through an information exchange between Ohio ABLE/Service Provider and the Social Security Administration (SSA), or failing that as a certification option available to Ohio ABLE, the EI will be required to provide a SSA Benefit Verification Letter dated within 12 months. • <u>Track 2 - Eligibility Certification:</u> Non-Track 1 EIs will complete an Ohio ABLE Eligibility Certification Form (“Form”) where the EI will document required qualifying disability information and certify the qualifying disability occurred prior to the EI attaining the age of 26. The Form will be signed under the penalties of perjury. There must be an accompanying diagnosis signed by a licensed physician. <ul style="list-style-type: none"> ○ Additionally, under consideration and discussion for only Track 2 – Eligibility Certification is the potential need of a heightened eligibility verification workflow step. If an additional eligibility

	<p>verification safeguard is determined to be necessary, the Service Provider will securely workflow the enrollment documents to a secondary reviewing entity (“Reviewer”) that has been separately designated by the Treasurer’s Office. The Reviewer would be a separate entity than the Ohio ABLE Service Provider RFP Respondent(s).</p> <ul style="list-style-type: none"> • <u>Track 1- Annual Recertification:</u> It is envisioned, but not yet finalized, that Track 1 annual recertification will occur through: 1) defined permanent disability types; or 2) an information exchange with the SSA (if available); or 3) a SSA Benefit Eligibility Letter dated within 12 months. • <u>Track 2 – Annual Recertification</u> - It is envisioned, but not yet finalized, that Track 2 annual recertification will occur through: 1) defined permanent disability types; or 2) an attestation by the Designated Beneficiary of continued eligibility.
<p>[Section 39, page 17] Can recertification occur without affirmative notice from the designated beneficiary? Will the State require communication with or from the account owner on an annual basis regarding recertification?</p>	<p>In certain select cases, recertification can occur without affirmative notice from the Designated Beneficiary, but not in all cases.</p> <p>The Treasurer’s Office is currently under the assumption that the annual recertification will be met as follows:</p> <ul style="list-style-type: none"> • <u>Track 1- Annual Recertification:</u> It is envisioned, but not yet finalized, that Track 1 annual recertification will occur through: 1) defined permanent disability types; or 2) an information exchange with the SSA (if available); or 3) a SSA Benefit Eligibility Letter dated within 12 months. • <u>Track 2 – Annual Recertification</u> - It is envisioned, but not yet finalized, that Track 2 annual recertification will occur through: 1) defined permanent disability types; or 2)

	<p>an attestation by the Designated Beneficiary of continued eligibility.</p> <p>The Treasurer’s Office will instruct the Service Provider on disability types that have been determined as permanent. Permanent disabilities will be deemed to have met the annual recertification requirement.</p>
<p>[Section 3.13, page 18] Would the State consider that the requirement of “identifying” will be expected of the deceased beneficiary’s estate and not the Service Provider? Could this be handled in a 529 convention where the instructions of disbursement come from the deceased beneficiary’s estate and not the service provider?</p>	<p>The Treasurer’s Office would consider allowing notification to occur from the deceased beneficiary’s estate. The Service Provider will ensure processes and controls exist allowing for State of Ohio Medicaid claims. This will require procedures and controls to be developed and confirmed with the Ohio Department of Medicaid.</p>
<p>[Section 3.18, page 19] Is the State comfortable with an approach whereby the Service Provider will reject all contributions that would allow the account to exceed the annual maximum contribution limit and never collect social security numbers/TIN from the contributor?</p>	<p>No, the Treasurer’s Office will require the gathering and reporting of a contributor’s social security number/TIN.</p>
<p>[Section 3.22, page 20] If ABLE is sold directly to consumers, how is a Service Provider expected to “provide Beneficiary investment advisory services”? For 529 plans, this is explicitly avoided for direct sold plans.</p>	<p>The Treasurer’s Office does not expect the Service Provider to provide investment advisor services other than make documented investment option information available.</p>
<p>[3.24, page 21] What is envisioned by the State in requesting accommodations and “heightened interactive support” while providing customer service functions?</p>	<p>The Treasurer’s Office expects certain Designated Beneficiaries will require additional interactive support both in the Call Center and website. The Treasurer’s Office expects to work in partnership with the Service Provider and disability groups to determine and make available reasonable heightened interactive support accommodations.</p>
<p>[3.32, page 23] What does the state envision in referencing “Ohio ABLE credit card processes”?</p>	<p>The Treasurer’s Office envisions the Service Provider will be able to take contributions/gifts via credit card payment. The Treasurer’s Office also envisions the potential use of pre-paid/stored value cards as a distribution method.</p>
<p>Will the State allow ABLE account owners to “check a box” to certify that a distribution is qualified or non-qualified, without requiring any additional proof/paperwork?</p>	<p>Yes, the Treasurer’s Office envisions distributions will be made upon self-certification the expense is a qualified or non-qualified disability expense. The Service</p>

	<p>Provider will also need to have capabilities allowing ABLE account owners to specify if the distribution is for housing/shelter in order to meet the Social Security Administration reporting requirements.</p>
<p>[Section 4.1, Question 14] which stated: “Are you willing to assist the Treasurer’s Office in requesting, obtaining, maintaining, and displaying a valid control number assigned by the U.S. Office of Management and Budget for Ohio ABLE?” Does the Ohio Treasurer have more detailed information that they can provide of what type of information the provider may be asked to deliver to help obtain a valid control number?</p>	<p>Respondents will not be involved in securing or maintaining a control number. Respondents are instructed to respond as follows:</p> <ul style="list-style-type: none"> • [RFP page 11; Section 2 – Service Provider Offering and Response; RFP Section Number 3.3]: <ul style="list-style-type: none"> ○ Respondent Offering Response = “None” • [RFP Section 4.1; Question 14]: <ul style="list-style-type: none"> ○ Respondent Question Response = “Not Applicable”