Local Commissioners Memorandum

Section 1

Transmittal:	10-LCM-11
To:	Commissioners, Temporary Assistance Directors, Food Stamp Directors, Medical Assistance Directors, Welfare Management System Coordinators, Home Energy Assistance Program Coordinators, Adult Services Directors, Child Care and Services Directors, and Child Support Directors
Issuing Division/Office:	Office of Temporary and Disability Assistance/Center for Employment and Economic Supports
Date:	July 7, 2010
Subject:	State On-Line Query (SOLQ) System: Policy Guidelines, Ongoing Audit Responsibilities, and Information Security
Contact Person(s):	SSI Questions – SSI Bureau (518) 473-0332 Audit Questions - Audit and Quality Improvement (518) 402-0136
Attachments:	Attachment 1: SOLQ Frequently Asked Questions
Attachment Available On – Line:	Yes

Section 2

I. Purpose

The purpose of this Local Commissioners Memorandum (LCM) is to remind local departments of social services (LDSSs) of the policy guidelines regarding access to and proper use of the State On-Line Query (SOLQ) system, their ongoing audit responsibilities, and the information security guidelines.

II. Background

The SOLQ system allows authorized users to conduct real time queries against the Social Security Administration (SSA)'s databases. A worker may obtain authoritative data on an individual's Social Security, Supplemental Security Income (SSI) and Medicare Parts A and B benefits. The worker may also validate a person's social security number (SSN). The application is available in all local districts via CentraPort.

Each local district entered into a State On-Line Query (SOLQ) Security Agreement with the New York State Office of Temporary and Disability Assistance (OTDA) and completed the initial SOLQ application training covering the sensitivity of the information, safeguards to be followed, and penalties for misuse of the system. By signing the SOLQ Security Agreement, local districts acknowledged and agreed to:

1. Abide by all laws, rules, and agreements applicable to security, privacy, confidentiality and proper use of data;
2. Abide by the security requirements and subsequent monthly management reviews established for the SOLQ system, comply with audits of security procedures, and maintain all documents from this process at the LDSS for a period of no less than three years;
3. Staff will only be granted access to the SOLQ system if the information provided by SOLQ is needed to perform their professional duties;
4. Staff will only use the SOLQ system for legitimate business purposes specifically, for purposes related to the proper administration of DSS programs; and
5. Staff is aware that all information provided by the SOLQ system is legally confidential information and inappropriate and/or unauthorized use or redisclosure of this information may result in administrative, civil, and/or criminal penalties.

Proper Use of SOLQ

Effective January 1, 2010, a renegotiated data exchange agreement between the SSA and OTDA took effect. Under the new agreement, OTDA and LDSSs may access the SOLQ system for eligibility determinations for the following programs:

- Temporary Assistance for Needy Families (TANF) (Title IV);
- Medicaid (MA) (Title XIX);
- Unemployment Insurance (UI) ;
- Food Stamps (FS); and
- SSI and SSI State supplementation programs (Title XVI).

SOLQ *may not* be used for programs such as:

- Adult Protective Services;
- Home Energy Assistance Program (HEAP);
- Child Welfare; or
- Child Support Enforcement.

In addition, SOLQ may not be used for law enforcement purposes for any program, including TANF, Medicaid, Unemployment Insurance, Food Stamps and SSI. Child Support workers can access SSA data from the Federal Parent Locator Service.

Contractors/Agents
Under the data exchange agreement with SSA, user agencies must maintain a listing of all contractors/agents with access to SSA data. This listing of contractors/agents must be made available upon the request of either SSA or OTDA. While entities under contract with local departments of social services may have access to SSA data through the Welfare Management System (WMS), no such contractor is authorized to have access to SOLQ. Specifically, LDSS staff must not:

- Print SOLQ screens for anyone not employed by the LDSS;

- Fax, mail, physically give, email, telephone, orally provide or otherwise disclose any such print or the results of any SOLQ inquiry by LDSS staff to non-LDSS personnel; and

- Allow non-LDSS personnel to observe and record results of SOLQ inquiries performed by LDSS staff.

III.   Program Implications

Access to and use of the SOLQ system by State and LDSS staff is strictly limited to authorized State or LDSS employees for authorized purposes only. All SOLQ inquiries made by users are monitored.

Federal and State program-specific confidentiality and information security rules prohibit unauthorized access and inappropriate dissemination of confidential information. These rules also limit the access and/or dissemination of confidential information to authorized users for legitimate business purposes.

Unauthorized access to, or release of, such data may result in civil liability and/or criminal prosecution. Individuals who access such information without authorization, or disclose it beyond authorized official purposes, may be subject to disciplinary actions and/or termination.

In lieu of SOLQ, LDSS workers may utilize the *SDX – SSI Individual Status* Screen on WMS to verify SSI income for determining eligibility and benefits for Medicaid, Food Stamps, Temporary Assistance, HEAP and other programs. This screen allows LDSS staff to access timely, authoritative information on a person's SSI status, including appeal and denial status. It also enables workers to quickly and easily access SSI information. On the local level, this appears to have improved service, decreased errors and reduced calls to SSA for SSI information.

Items posted to SSA's database are available on the SDX-SSI Individual Status screen within two business days and on SOLQ the next business day. When relying on the SDX-SSI Individual Status screen on WMS or SOLQ to verify compliance with applying and accepting SSI benefits, districts must account for the time lag that occurs from the time the individual applied to when the information is known to the electronic system. Districts have reported that in some areas of the State it may take a week or more for SSA staff to enter applications onto their systems. To prevent adverse case actions, it is important that district staff have an understanding of the timeframes commonly used by their SSA district office(s) in processing applications. Therefore, SOLQ and the SDX-SSI Individual Status screen should not be used to deny or discontinue benefits.

For more information on the *SDX – SSI Individual Status* screen, please refer to Local Commissioner Memorandum 07-LCM-04.   The field names and codes on the screen are taken from the State Data Exchange (SDX) Reference Guide. The SDX Reference Guide can be viewed at the OTDA intranet website at the Center for Employment and Economic Supports, under Manuals or at http://otda.state.nyenet/dta/Manuals/sdx.pdf. For more information about the SDX Reference Guide please refer to General Information System GIS 08 TA/DC014.

Meeting Security and Audit Responsibilities

To ensure compliance with the executed SOLQ Security Agreement, OTDA's Bureau of Audit & Quality Improvement (A&QI) will conduct periodic reviews of all user agencies. User agencies are reminded that they must comply with audits of security procedures.

On May 14, 2010, A&QI released SOLQ updates for the following:

- #10-01 Responsibilities of the User Agency;
- #10-02 Quality Assurance Plan – Updated Guidelines;
- #10-03 Contact Person Responsibilities;
- #10-04 Security Auditor Responsibilities; and
- #10-05 System Administrator Responsibilities.

All SOLQ updates can be viewed at http://otda.state.nyenet/psqi/aqc/SOLQ.asp .

Imaging/Enterprise Document Repository (I/EDR)

Any documents that are a part of the case, including SOLQ documents, can be sent for imaging. I/EDR replicates the security standards of a hard copy case file by interfacing with WMS and confirming the user's right to access imaged information. I/EDR user roles further define which users are allowed access. Since SOLQ documents come from a secure source, they should be treated as confidential and not be photocopied or shared with other agencies. Their use should be restricted to determining initial and ongoing eligibility.

For additional questions and answers about the proper use of SOLQ and which workers are authorized to have access to SOLQ, please see the attached *SOLQ Frequently Asked Questions* document.

Issued By
Name: Russell Sykes
Title: Deputy Commissioner
Division/Office: Center for Employment and Economic Supports

Frequently Asked Questions
State On-Line Query System (SOLQ)

1. **Q: What is SOLQ?**

    A: SOLQ is an acronym for the State On-Line Query System. It is a real time application that allows authorized users to validate/verify Social Security Numbers, obtain SSA Title II (RSDI) information, including Medicare Part A and B data, and Title XVI (SSI) data.

2. **Q: Who can access SOLQ, and how do local district workers obtain access?**

    A: Access to SOLQ is limited to authorized employees who require Social Security and SSI information to perform their jobs, and is strictly limited to legitimate business use. Authorized employees are those workers determining initial and ongoing eligibility for the following programs: TANF (Title IV), Medicaid (Title XIX), Unemployment Insurance benefits, Food Stamps, and SSI and state supplementation programs (Title XVI). Eligible local workers should ask their supervisor for SOLQ access. The supervisor would then request access through the county Systems Administrator.

3. **Q: Can child welfare workers, foster care and adoptive service workers, adult protective or protective services for adult workers access SOLQ?**

    A: No. SSA only permits access to SOLQ for those workers determining initial and ongoing eligibility for the following programs: TANF, MA, UI, FS and SSI.

4. **Q: Can OTDA and Local District Fraud Investigators have access to SOLQ?**

    A: Yes. OTDA and DSS fraud investigators who need SOLQ access to perform their official duties in connection with the administration of TANF, Medicaid, and/or Food Stamps may have access to SOLQ, provided all security measures in the SOLQ Agreement are met. However, SOLQ is not allowed to be used for law enforcement purposes. Law enforcement personnel (including Inspector General Staff) must not be provided with direct access to SOLQ and SOLQ screens cannot be shared with law enforcement personnel.

5. **Q: Can workers access SOLQ for non-TANF cases such as Safety Net-only cases?**

    A: No. However, SOLQ can be accessed if the Safety Net recipient is applying for or is in receipt of Medicaid and/or Food Stamps to determine or redetermine Medicaid and/or Food Stamp eligibility.

6. **Q: Can SOLQ be accessed for HEAP-only cases?**

    A: No. However, SOLQ can be accessed if the HEAP recipient is also applying for or is in receipt

of TANF, Medicaid, Food Stamps or SSI to determine or redetermine eligibility for TANF, Medicaid, Food Stamps or SSI.

7. **Q: How can SOLQ help with eligibility determinations?**

    A: SOLQ provides a quick and easy way to obtain verification of current SSA data. This makes it easier for the worker to make eligibility determinations in a timely manner, while also reducing the burden on the applicant/recipient, and avoids the need to call SSA to verify the information.

8. **Q: Where is the SOLQ application located?**

    A: Once access is granted to a local worker, the worker may access SOLQ from CentraPort, under the applications area of the main screen.

9. **Q: What information must a worker have before filling in the inquiry screen?**

    A: Required fields include Social Security Number, First and Last Name, Date of Birth, Reason for Inquiry, Case Number and Case Name. Although there is an optional method of searching by both the Claim Account Number (CAN) and the Beneficiary Identification Code (BIC) instead of Social Security Numbers, local social services districts, should only need to search by Social Security Number.

10. **Q: What if the worker does not have a case number or an Application-Registration (App-Reg) number?**

    A: In most cases, the worker will have the case number or an App–Reg number. If the worker does not have to register the application or obtain a case number (for example, with Child Health Plus-B), the worker will need to select a common identifier (such as CHP-B) to avoid having the inquiry flagged as potentially fraudulent.

11. **Q: How do local districts determine which of the Reason Choices to select?**

    A: It is important to select the appropriate reason for the inquiry the local worker is performing to avoid having the inquiry flagged as potentially fraudulent. The *SOLQ Inquiry Screen Reason Choice Definitions Desk Aid* is a comprehensive Desk Aid that details the possible selections for each inquiry type. The Desk Aid is available on CentraPort under Desk Guides.

12. **Q: How do local district workers fill in the inquiry screen for a Legally/Financially responsible relative (for example, a husband who is not a part of the household or application)?**

    A: In this case, the worker should select the Relative Inquiry reason choice. The name of the person for whom you are seeking information will be displayed in the name field, and the household name must be entered in the Case Name / Case Number field.

13. Q: Does SOLQ provide SSI past payment history?

A: Yes, SOLQ provides the five most recent changes to the recipient's SSI benefit amounts. If additional history is needed, the local district should contact SSA.

14. Q: How soon can a local worker see if someone has actually applied for benefits with SSA?

A: There may be up to a 24 hour lag from the time SSA enters application information onto their electronic system before it is available on SOLQ. It is important to note that in some areas of the State, districts have reported that SSA staff have taken a week or more to enter applications onto their system.

15. Q: When the direct deposit field indicates that benefits are being deposited to a bank account; can local district workers also see bank information and the actual bank balance as of that date?

A: This application shows the amount of the Social Security/SSI benefits deposited and the existence of a bank account, which serves as an additional alert for the worker to verify this information with the applicant. The local district worker will not be able to see the name of the bank or the bank balance.

16. Q: Why is security so important?

A: As with all applications and systems that provide access to personal information about an individual, it is essential to maintain client confidentiality at all times. It is especially important when it comes to Social Security Numbers, because once verified, they are valuable and provide access to personal information that can lead to identity theft if not properly safeguarded.

17. Q: Are there any penalties for misuse of SOLQ?

A: Yes. Inappropriate use of the SOLQ application may result in administrative, civil, and/or criminal penalties.

18. Q: When there is a change to the user agency's SOLQ team (i.e. Contact Person, Security Auditor, System Administrator), whom should the user agency notify?

A: The designated Contact Person is responsible for notifying OTDA's Bureau of Audit & Quality Improvement, via e-mail, when a change is made to the user agency's SOLQ team information. Notification of change must include name(s), user ID(s), phone number (s), and effective date(s).

19. Q: Can a legitimate inquiry show up as an exception on the Exception Report?

A: Yes. New applications that are pending longer than 45 days will be reported as SOLQ exceptions because the SSN is not in WMS or WRTS at the time of the match.

20. **Q: As the SOLQ system is set up today, is there a way for a batch-load of names to be run monthly?**

    A: No. Each and every query is tracked and verified individually which is not possible with batch-loading.

21. **Q: Can workers print SOLQ screens?**

    A: Yes. By signing the SOLQ Security Agreement, local districts acknowledge and agree to abide by the security, privacy, confidentiality and appropriate use of the data. As long as SOLQ is used for legitimate business purposes related to the proper administration of DSS programs, printing SOLQ screens for inclusion in a case record is acceptable. However, the case records must be retained or filed in a secured area. Please note that LDSSs are prohibited from printing SOLQ screens for anyone not employed by the LDSS, including entities under contract with the LDSS.

22. **Q: Can SOLQ screens be shared with contractors?**

    A: No. Do not print or provide information on any SOLQ screen to anyone not employed by the LDSS. Further, do not allow non-DSS staff to observe and record results of SOLQ inquiries performed by LDSS staff.

23. **Q: Can districts send SOLQ documents for imaging?**

    A. Yes. Any documents that are part of the case, including SOLQ documents, may be sent for imaging. I/EDR replicates the security standards of a hard copy case file by interfacing with WMS and confirming the user's right to access imaged information. I/EDR user roles further define which users are allowed access. Since SOLQ documents come from a secure source, they should be treated as confidential and not be photocopied and shared with other agencies. Their use should be restricted to determining initial and ongoing eligibility.

24. **Q: Can SOLQ screen prints be used at a Fair Hearing?**

    A: Yes. OTDA may provide Fair Hearings with SOLQ screen prints restricted to their use with respect to eligibility determinations for TANF, MA, and FS.

25: **Q: When an individual is receiving benefits through the use of more than one SSN, why does the system give a "cross reference entitlement number" and not let the search continue?**

    A: The Cross-Reference Entitlement Number (XREF) could be the SSN of the beneficiary, beneficiary's parent, and/or beneficiary's spouse. Depending on the situation, an individual could be

eligible to receive RSDI benefits under more than one SSN but the person will actually receive RSDI only under the account that provides the highest benefit.

26: Q: What exactly is the Disability Onset Date (DDO) on the Title II screen in SOLQ?

A: The date of disability onset alleged by the applicant is retained on the Supplemental Security Record (SSR) (Title XVI) during the period in which the case is pending a medical determination, or in the case of a medical denial. Therefore, a date in the DDO field does not mean that the client is in fact disabled unless the person has been found eligible for benefits based on disability. The full definition for Onset Date of Disability/Blindness is on page 22 of the SOLQ Reference Guide.

27: Q: Is there another field aside from the DDO that indicates whether or not the client is disabled under Title II?

A: Yes. The Health Insurance Claim Number (HICN) on page 2 of the Title II screen indicates this. The HICN is actually the Claim Account Number (CAN) followed by the Beneficiary Identification Code (BIC). The CAN portion of the claim number is the SSN of the wage earner on whose record benefits are being paid. The CAN is followed by the three digit BIC value. If the BIC begins with "W" then the individual is disabled. The BIC Code Values can be found in Appendix D, pages 47-50 of the SOLQ Reference Guide.   An additional field under Title II that identifies whether an individual is disabled is the Category of Assistance Code. If the Category of Assistance Code is "D" then the client is disabled. Under Title II and Title XVI, the Type of Recipient code indicates the type of recipient or other individual involved in the record. If a recipient is initially disabled, this code will not change at age 65. The codes are Disabled Child (DC), Disabled Individual (DI) or Disabled Spouse (DS).

28.   Q: What resources are available to help me?

A: The SOLQ Reference Guide provides field and code definitions. It is available in hard copy and online through CentraPort under the Resources link. The SDX manual is also available through CentraPort.