

MAGI-BASED ELIGIBILITY VERIFICATION PLAN

(Insert Medicaid, CHIP, or Both)

Medicaid & CHIP

State:

Iowa

Last updated:

07/13/2016

Section A. Verification Procedures for Factors of Eligibility

Eligibility Factor	Self-Attestation Accepted without Additional Verification (Y/N)	Self-Attestation Accepted with Post-Eligibility Verification (Y/N)	Electronic Data Source Used (Y/N)	Reasonable Compatibility Standard Used	Specify Reasonable Compatibility Standard for Income	Ask for a Reasonable Explanation from the Individual (Y/N)	Paper Documentation Required from the Individual (Y/N)	Comments
Income*	NO	NO	YES	Both are above, at or below the applicable income standard. Percent Threshold	10%	YES	YES	The State will access IRS data from the federal hub and State electronic sources to verify the applicant's self-attested income reported at the time of application. If the self-attested amount and the data sources (IRS or State) are at or below the applicable standards, the self-attested amount will be mark as 'verified' and eligible for Medicaid. If the self-attested amount is higher than data sources income returned, the self-attested amount will be mark as 'verified' and will be referred to the marketplace. In order to resolve inconsistencies, we will ask for an explanation and income verification, if needed. • System will incorporate into the RCD logic the following state/federal sources: - IEVS : BEER (Self-employment), Bendex (SSA data) , IRS (winnings, interest, dividends, pension distributions, agricultural subsidies, savings bonds, royalties, prizes, etc)
Residency	YES	NO	NO	N/A	N/A	NO	NO	
Age (Date of Birth)	NO	NO	YES	N/A	N/A	YES	YES	Social Security Administration data through the HUB. Ask for additional information if there is an inconsistency with SSA data.
Social Security Number **	NO	NO	YES	N/A	N/A	N/A	YES	Social Security Administration data through the HUB. Ask for paper documentation if there is an inconsistency with SSA data.
Citizenship **	NO	NO	YES	N/A	N/A	N/A	YES	Social Security Administration data through the HUB, if electronic data is not available, paper documents would be used.
Immigration Status **	NO	NO	YES	N/A	N/A	N/A	YES	Iowa uses its web-based connection to the Department of Homeland Security's (DHS) SAVE program for immigration status verification.
Household Composition	YES	NO	NO	N/A	N/A	NO	NO	
Pregnancy ***	YES	NO	NO	N/A	N/A	NO	NO	
Caretaker Relative	YES	NO	NO	N/A	N/A	NO	NO	

Eligibility Factor	Self-Attestation Accepted without Additional Verification (Y/N)	Self-Attestation Accepted with Post-Eligibility Verification (Y/N)	Electronic Data Source Used (Y/N)	Reasonable Compatibility Standard Used	Specify Reasonable Compatibility Standard for Income	Ask for a Reasonable Explanation from the Individual (Y/N)	Paper Documentation Required from the Individual (Y/N)	Comments
Medicare	NO	NO	YES	N/A	N/A	YES	YES	Information through the HUB. Ask for additional information if there is an inconsistency with data from the hub and SSA.
Application for Other Benefits	YES	NO	NO	N/A	N/A	NO	NO	
Other: (Please describe any other eligibility factors in the space below)								
<p>* States must check electronic data sources determined useful to verify income in accordance with 42 CFR 435.948 but can be done post-enrollment. If the information obtained from electronic data sources and the information provided by or on behalf of the individual are both above, at or below the applicable income standard, the State must determine the applicant eligible or ineligible for Medicaid/CHIP. (NOTE: this option is prepopulated for the state and is not an option that can be changed).</p> <p>** States must follow statute, regulations, and guidance for verification of SSN, citizenship and immigration status including obtaining such information through the federal data services hub if available.</p> <p>*** States must accept self-attestation of pregnancy unless they have information that is not reasonably compatible with such attestation.</p>								

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 Last updated: 07/13/2016

Section B1. Use of Electronic Data Sources

Financial:

Electronic Data Source	Determined Useful (Y/N) ¹	Accuracy Considered (Y/N)	Timeliness Considered (Y/N)	Ability to Access Considered (Y/N)	Age of Data Considered (Y/N)	Comprehensive Considered (Y/N)	Other Criteria Used (Y/N) (Please Describe in Comments section)	Data Source Used at Application (Y/N)	Data Source Used at Renewal (Y/N)	Data Source Used Post-Enrollment (Y/N)	If Data Source Used for Post-Enrollment - Frequency Used (e.g. monthly, quarterly)	Comments
1. Internal Revenue Service (IRS)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Annually	Used at renewal, if consent provided, and if member reports a change in income.
2. Social Security Administration (SSA) (SSI, Title II)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Monthly	Iowa uses its IEVS connection with the Social Security Administration (SSA) via a batch process to get Title II information at application and renewal. Post-enrollment matches are done through states current match with SSA to identify changes or discrepancies. Changes in SSA data will be acted on.
3. State Wage Information Collection Agency (SWICA)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	Used at renewal and when the member reports a change in income. If the reported income change results in a lower premium, the change is acted on for CHIP. Income changes that fall under Continuous Eligibility policies for both Medicaid and CHIP will not be acted on for children
4. State Unemployment Compensation	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	Iowa uses State Unemployment Compensation at application, review and when changes occur.
5. State Administered Supplementary Payment Program	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	Other (specify in comments)	Iowa has found the data not useful.

Electronic Data Source	Determined Useful (Y/N) ¹	Accuracy Considered (Y/N)	Timeliness Considered (Y/N)	Ability to Access Considered (Y/N)	Age of Data Considered (Y/N)	Comprehensive Considered (Y/N)	Other Criteria Used (Y/N) (Please Describe in Comments section)	Data Source Used at Application (Y/N)	Data Source Used at Renewal (Y/N)	Data Source Used Post-Enrollment (Y/N)	If Data Source Used for Post-Enrollment - Frequency Used (e.g. monthly, quarterly)	Comments
6. State General Assistance Programs	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Iowa doesn't have a state general assistance program.
7. Supplemental Nutrition Assistance Program (SNAP)	YES	NO	NO	YES	NO	NO	NO	NO	NO	NO		Used for Express Lane Eligibility
8. Temporary Assistance for Needy Families (TANF)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Iowa doesn't consider TANF data relevant for Medicaid eligibility since Medicaid delinked itself from AFDC standards a few years ago for coverage for pregnant women and children. The New MAGI methodology has made TANF data even more irrelevant due to the MAGI conversion of the standards of needs.
9. Office of Child Support Enforcement (OCSE)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Iowa doesn't consider OCSE data useful at this point, under new MAGI rules child support income is not counted towards a Medicaid eligibility determination.
10. State Income Tax	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Iowa doesn't receive 'State Income Tax' data currently and we don't anticipate receiving this information in the future. 'State Income Tax' is not currently use to determine eligibility.
11. Commercial database: (Please describe any commercial databases in the space below)												
TALX/The Work Number	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO		Iowa is using TALX via the TAXL direct link web service. TALX is used in cases when additional information is needed from the applicant to resolve an inconsistency. Workers log into the TALX secure site and enter the applicant's SSN. If SSN matches with TALX database verification is received immediately. If the worker is able to obtain employment verification through TALX, the applicant will not be contacted to provide the employment information needed to process eligibility.
12. Other: (Please describe any additional electronic data sources in the space below)												
1. The state marked any criterion YES if they were considered in determining the usefulness of the electronic data source; however, the determination of whether the data source was useful/not useful did not rest solely on these criteria												

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Section B2. Use of Electronic Data Sources

Non-Financial:

Electronic Data Source	To Be Used (Y/N)	Social Security Number	Citizenship	Immigration Status	Residency	Age/DOB	Pregnancy	Household Composition	Caretaker Relative	Medicare	Application for other Benefits	Other	Data Source Used at Application (Y/N)	Data Source Used at Renewal (Y/N)	Data Source Used Post-Enrollment (Y/N)	If Used for Post-Enrollment Frequency Used (i.e. monthly, quarterly)	Comments
1. Social Security Administration (SSA)	YES	YES	YES	NO	NO	YES	NO	NO	NO	YES	NO	NO	YES	YES	YES	Other (specify in comments)	Data source can be used to resolve discrepancies for application for other benefits. Used at renewal and post-enrollment for Medicare and application for other benefits. Changes will be acted upon.
2. Department of Homeland Security (DHS) - SAVE	YES	NO	YES	YES	NO	NO	NO	NO	NO	NO	NO	NO	YES	YES	YES	Other (specify in comments)	Iowa uses its web-based connection to the Department of Homeland Security's (DHS') SAVE program for immigration status verification. Used at renewal and post-enrollment for statuses subject to change and for 5-year bar.
3. Vital Statistics	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
4. Department of Motor Vehicles (DMV)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
5. Temporary Assistance for Needy Families (TANF)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
6. Supplemental Nutrition Assistance Program (SNAP)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
7. Office of Child Support Enforcement	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		

Electronic Data Source	To Be Used (Y/N)	Social Security Number	Citizenship	Immigration Status	Residency	Age/DOB	Pregnancy	Household Composition	Caretaker Relative	Medicare	Application for other Benefits	Other	Data Source Used at Application (Y/N)	Data Source Used at Renewal (Y/N)	Data Source Used Post-Enrollment (Y/N)	If Used for Post-Enrollment Frequency Used (i.e. monthly, quarterly)	Comments
8. State General Assistance Programs	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		

Electronic Data Source	To Be Used (Y/N)	Social Security Number	Citizenship	Immigration Status	Residency	Age/DOB	Pregnancy	Household Composition	Caretaker Relative	Medicare	Application for other Benefits	Other	Data Source Used at Application (Y/N)	Data Source Used at Renewal (Y/N)	Data Source Used Post-Enrollment (Y/N)	If Used for Post-Enrollment Frequency Used (i.e. monthly, quarterly)	Comments
9. Women, Infants and Children Program (WIC)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
10. State Income Tax	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
11. Commercial database: <i>(Please describe any commercial databases in the space below)</i>																	
13. Other: <i>(Please describe additional electronic data sources in the space provided below)</i>																	
12. PARIS*	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	NO	NO	YES	Quarterly	Information is acted upon if relevant for eligibility. Used to identify if individual is enrolled in benefits in another state.
Death Matches	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	NO	NO	YES	Monthly	Iowa Department of Public Health, changes will be acted on.
Prisoner Matches	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	NO	NO	YES	Monthly	Iowa Department of Corrections and county jail, incarceration will be acted on. Can be used to resolve inconsistencies with residency.
* Under 42 CFR 435.945(d), all State Medicaid eligibility systems must conduct a match with PARIS for Interstate benefit information. If used for other purposes, please indicate in Section D.																	

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Section C . Additional Factors of Eligibility for Separate CHIP

Eligibility Factor	Self-Attestation Accepted without Additional Verification	Self-Attestation Accepted with Post-Enrollment Verification (Y/N)	Electronic Data Source Used (Y/N) <i>If Yes, please describe in comments</i>	Paper Documentation Required from the Individual (Y/N)	Non-Applicable (N/A)	Comments
1. Applicant does not have other coverage	NO	NO	YES	YES	Must be Applied	Health Management System (a contracted service to find other insurance) The process for verifying other health insurance on the Medicaid expansion side occurs on the back end after eligibility for Medicaid has been determined for the child. The data match is conducted through HMS (same vendor that we use for hawk-i verifications of other health insurance) and is also used for TPL purposes on the Medicaid side. Our eligibility system assumes that the child has no health insurance at the time of application so we claim TXXI funding, once health insurance status is verified thru the data match with Health Management Systems (HMS) and is established that the child does have other health insurance we claim TXIX funding. If a match is found and the family states there is no insurance, the family must submit a certificate of coverage or a statement by the employer that the coverage has ended.
2. Applicant does not have access to affordable ESI	NO	NO	NO	NO	N/A	
3. When child has had coverage (as applicable to states' waiting period)	NO	NO	YES	YES		Health Management System (a contracted service to find other insurance). If a match is found and the family states there is no insurance, the family must submit a certificate of coverage or a statement by the employer that the coverage has ended.
4. Access to public employee coverage	YES	NO	NO	NO		
5a. Waiting period exception #1 (describe):	NO	NO	YES	NO		1st Exception: The child is moving from Medicaid to hawk-i., The data source is the Medicaid Eligibility System.
5b. Waiting period exception #2 (describe):	NO	YES	NO	YES		2nd Exception: The child's parent is determined eligible for advance payment of the premium tax credit for enrollment in a QHP through the Marketplace because the ESI in which the family was enrolled in is determined unaffordable in accordance with 26CFR 1.36B-2(c)(3)(v).
5c. Waiting period exception #3 (describe):	NO	NO	NO	YES		3rd Exception: The cost of health insurance coverage for the child exceeds 5% of the household's gross income. No electronic source available.

Eligibility Factor	Self-Attestation Accepted without Additional Verification	Self-Attestation Accepted with Post-Enrollment Verification (Y/N)	Electronic Data Source Used (Y/N) <i>If Yes, please describe in comments</i>	Paper Documentation Required from the Individual (Y/N)	Non-Applicable (N/A)	Comments
5d. Waiting period exception #4 (describe):	NO	NO	NO	YES		4th Exception: The health insurance was provided through an individual plan. No electronic source available.
5e. Waiting period exception #5 (describe):	NO	NO	NO	YES		5th Exception: The cost of family coverage that includes the child exceeded 9.5 percent of the household income. .
5f. Waiting period exception #6 (describe):	NO	NO	NO	YES		6th Exception: The employer stopped offering coverage of dependents (or any coverage) under an employer-sponsored health insurance plan.
5g. Waiting period exception #7 (describe):	NO	NO	NO	YES		7th Exception. If a match is found and the family states there is no insurance, the family must submit a certificate of coverage or a statement by the employer that the coverage has ended. A change in employment, including involuntary separation, resulted in the child's loss of employer-sponsored insurance (other than through full payment of the premium by the parent under COBRA).
5h. Waiting period exception #8 (describe):	NO	NO	NO	YES		8th Exception. The child has special health care needs. Phone verification is also accepted.
5i. Waiting period exception #9 (describe):	NO	NO	NO	YES		9th Exception. The child lost coverage due to the death or divorce of a parent.
5j. Waiting period exception #10 (describe):	NO	NO	NO	YES		10th Exception. The child's health insurance coverage was lost due to domestic violence.
5K. Waiting period exception #11 (describe):	NO	NO	NO	YES		11th Exception. The child's health insurance coverage was lost due to utilization of the maximum lifetime coverage amount.
5L. Waiting period exception #12 (describe):	NO	NO	NO	YES		12th Exception. The child's health insurance coverage was lost due to expiration of coverage under COBRA.
5M. Waiting period exception #13 (describe):	NO	NO	NO	YES		13th Exception: The child's health insurance coverage was lost due to a reason beyond the control of the parent, such as serious illness of the parent, fire, flood or natural disaster.
6. Other eligibility factors or exceptions to eligibility factors: <i>(Please describe in the space provided below)</i>						
Children who lose Medicaid Coverage as a direct result of MAGI conversion	NO	NO	YES	NO		The data source is the Medicaid Eligibility System

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Section D. Additional Verification Questions

	Question	Response
1	If paper documentation is required when a data source is not available or the information obtained from a data source is not reasonably compatible with the information provided by or on behalf of the individual, briefly describe how the state determined that establishing and using an electronic data source was not effective, considering such factors as cost and program integrity in accordance with 42 CFR 435.952(c):	<p>The state is accepting self-attestation for many factors of eligibility so there is only a need for paper documentation in rare cases when the state is made aware of inconsistencies. For those factors that are verified, all available electronic sources are used, and reasonable explanations are asked for before requiring paper documentation.</p> <p>State determined not to use vital statistics for a back-up for citizenship because you have to provide information the state does not readily know, such as maiden name of mother, county where they were born, and it is a manual process not fully automated.</p>
2	Please describe how the state uses PARIS?	Quarterly data match reports are acted upon as received. Used to determine potential duplicate or improper payments due to the individual being eligible in another state.
3	Please indicate (YES) or (NO) if the State intends to request Secretarial approval to solely use alternative data sources for financial verification other than those listed in 42 CFR 435.948 (Numbers 1-8 in Section B-1).	NO
	<p>If (YES), please submit a letter to CMS requesting such approval describing how the the state meets the following requirements:</p> <ol style="list-style-type: none"> 1) Reduces administrative costs and burdens on both individuals and the State, 2) Maximizes accuracy and minimizes delay, 3) Meets the requirements related to confidentiality, disclosure, maintenance and use of information, and 4) Promotes coordination with other insurance affordability programs. 	

	Question	Response
4	Please indicate (YES) or (NO) if the State intends to request Secretarial approval to use a mechanism other than the federal data services hub for information that is available through the hub.	YES
	If (YES), please submit a letter to CMS requesting such approval describing how the the state meets the following requirements: 1) Reduces administrative costs and burdens on both individuals and the State, 2) Maximizes accuracy and minimizes delay, 3) Meets the requirements related to confidentiality, disclosure, maintenance and use of information, and 4) Promotes coordination with other insurance affordability programs.	Iowa has a Hub waiver approved May 26, 2016. The Hub waiver gives Iowa the authority to forego using the Hub to verify the receipt and amount of cash benefits provided under Title II of the Social Security Act (Act) as well as to access the Department of Homeland Security's Systematic Alien Verification for Entitlements (SAVE) system through the Hub's VLP service until September 30, 2016.
5	Describe any additional MAGI-based eligibility verification policies and procedures that have not been covered in this verification plan (optional):	

Section A. Additional Comments

SWICA web service was implemented on March 27, 2014.

The following are the system functionality/enhancements that are going to be implemented for Reasonable Compatibility Determination (RCD):

October 26th, 2014 release:

- Reasonable compatibility tests for State Sources:

- Test 1: Is the Self-Attested Income and State Sources Income within the same income limit for coverage group? If the Self Attested Income is within the same income range as the State Income returned from State sources, then the system will verify all MAGI countable incomes for the person.

- Test 2: Self-Attested Higher than State sources Income? If the Self Attested Income is above State Income returned from the State sources, then the system will verify all MAGI countable income for the person.

- Test 3: Self-Attested Within 10% of IRS Income? If the Self Attested Income is within the Reasonable Compatibility Percentage, 10 %, of the State Income returned from the State sources, then the system will verify all MAGI countable incomes for the person.

- Household composition for tax filer and non-filer households

- Identification of Title II income.

- The State is unable to obtain Title II income thru the hub due to system limitations. Accenture Product is building the web service to obtain Title II income thru the hub but this web service will not be implemented until 2015. In order to use Social Security for RCD, the system is going to “exclude” Title II income from being verified by RCD, the worker then will manually look-up this information via Bendex and use the data to determine RCD.

December 21st, 2014 release:

- System will incorporate into the RCD logic the following state/federal sources:

- IEVS : BEER (Self-employment), Bendex (SSA data) , IRS (winnings, interest, dividends, pension distributions, agricultural subsidies, savings bonds, royalties, prizes, etc)

- Rules Enhancement for RCD based on CMS clarifications:

- If the person’s self-attested falls at or below the Medicaid level but the State source is at the CHIP level the system will enroll the child in CHIP and provide the family the opportunity to provide information proving they have lower income and then move them to Medicaid if such information is provided. The notice will clearly lay out that they are being enrolled in CHIP based on the information the state has but are being provided an opportunity to prove their income is what they attested to.

- The system must determine eligibility for the best coverage group for the individual.

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Section B1. Additional Comments

Section B2. Additional Comments
Section C. Additional Comments