

MAGI-BASED ELIGIBILITY VERIFICATION PLAN

(Insert Medicaid, CHIP, or Both)

Medicaid & CHIP

State:

Kentucky

Date Submitted: (mm/dd/yyyy)

04/04/2016

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.	10%	YES	YES	If the individual attests to income below the income standard, and data sources indicate income above the standard, and the difference between the two is greater than 10%, a reasonable explanation and/or paper documentation will be requested. If the individual attests to income above the applicable standard, will take that attestation, determine ineligibility, and screen for APTC.
				Percent Threshold				
Residency	NO	YES	YES	N/A	N/A	YES	YES	Kentucky accepts self attestation with post eligibility verification. If the attestation is not consistent with internal data sources and the inconsistency would affect eligibility, the state will follow up with the individual. PARIS Interstate internal data sources used for verification, with TANF and SNAP as secondary sources used prior to requesting additional information.
Age (Date of Birth)	YES	NO	NO	N/A	N/A	NO	NO	Self-attestation is accepted in the majority of cases. However, if an inconsistency were to be identified in the course of other verifications or a notification of a change in circumstances that would affect eligibility, reasonable explanation and/or paper documentation may be required. The state's on-line birth certificates are used to resolve inconsistencies prior to requesting paper documentation.

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Social Security Number **	NO	NO	YES	N/A	N/A	N/A	YES	
Citizenship **	NO	NO	YES	N/A	N/A	N/A	YES	
Immigration Status ***	NO	NO	YES	N/A	N/A	N/A	YES	
Household Composition	YES	NO	NO	N/A	N/A	NO	NO	Self-attestation is accepted in the majority of cases. However, if an inconsistency were to be identified in the course of other verifications or a notification of a change in circumstances that would affect eligibility, reasonable explanation and/or paper documentation may be required. If so, IRS tax return data will be utilized to try to resolve inconsistencies.
Pregnancy ***	YES	NO	NO	N/A	N/A	NO	NO	If external sources indicate potential fraud, a reasonable explanation and/or paper documentation maybe required. External data sources might be MCO contractors or physicians reporting potential fraud.
Caretaker Relative	YES	NO	NO	N/A	N/A	NO	NO	
Medicare	NO	NO	YES	N/A	N/A	YES	YES	The Federal Data Services Hub is used at application and on demand to verify Other public Minimum Essential Coverage (MEC), including Medicare. The state supplements the Federal Data Services Hub information by running a post-eligibility review utilizing Medicare's Enrollment Data Base (EDB) and the Territories and States Batch Query (TBQ) data sources.
Application for Other Benefits	YES	NO	NO	N/A	N/A	NO	NO	
Other: (Please describe any other eligibility factors in the space below)								

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Incarceration	YES	NO	YES	N/A	N/A	YES	YES	The state implemented benefit suspensions for incarcerated individuals effective August 19, 2015. Incarcerated individuals will no longer have eligibility terminated. The state is also engaging with state partners for electronic incarceration dates.

* 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).

** 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.

*** States must accept self-attestation of pregnancy unless they have information that is not reasonably compatible with such attestation.

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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	NO	Other (specify in comments)	On demand through the Hub. The RRV sevice is used to access through the Hub at renewal. If notified of a reported change in income through existing data match with IRS post enrollment would verify. post enrollment to the extent consent is provided.
2. Social Security Administration (SSA) (SSI, Title II)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Monthly	Hub SSA composite service is used at application and the Hub RRV sevice used at renewal. Current data feed utilized post enrollment to identify any changes and/or program integrity.
3. State Wage Information Collection Agency (SWICA)	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO	Other (specify in comments)	Used to assist with passive renewal after IRS database. Used post enrollment on an ad hoc basis when reported change. Second to IRS.

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
4. State Unemployment Compensation	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO	Other (specify in comments)	used post enrollment on an ad hoc basis when reported change.
5. State Administered Supplementary Payment Program	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		Will be considered at a later date.
6. State General Assistance Programs	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		N/A. KY has none.
7. Supplemental Nutrition Assistance Program (SNAP)	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		N/A. No other consideration made. Data source unavailable.
8. Temporary Assistance for Needy Families (TANF)	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		N/A. No other consideration made. Data source unavailable.
9. Office of Child Support Enforcement (OCSE)	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		N/A. Data source unavailable.
10. State Income Tax	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		N/A. Data source unavailable.
11. Commercial database: (Please describe any commercial databases in the space below)												
THE WORK NUMBER	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES		Use a direct state connection. Plan to use through the Hub at a later date. Using post enrollment through current feed to identify any changes and/or program integrity purposes. Frequency ad-hoc.

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
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	NO	NO	NO	NO	YES	NO	YES	YES	NO	YES	Monthly	KY uses the SSA composit Service through the Hub. This data source can be utilized if needed for Age/DOB. Used post enrollment for incarceration and Medicare through existing match.
2. Department of Homeland Security (DHS) - SAVE	YES	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	NO	YES	NO	YES	Other (specify in comments)	Kentucky uses SAVE through the Hub's VLP service for all 3 steps. Used at post enrollment to verify changes in status and/or 5yr bar.

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
3. Vital Statistics	YES	NO	YES	NO	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO	YES	Other (specify in comments)	Used for death matches and notice of newborns. Can be used at post enrollment, if needed. Data source can be utilized if needed for Age/DOB.
4. Department of Motor Vehicles (DMV)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Do not utilize DMV for MAGI population. For Non-MAGI population, use for resource eligibility.
5. Temporary Assistance for Needy Families (TANF)	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	YES	YES	YES	Other (specify in comments)	Used if inconsistent data received from PARIS related to residency post enrollment. If needed, can be utilized to verify household comp.
6. Supplemental Nutrition Assistance Program (SNAP)	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	Other (specify in comments)	Used if inconsistent data received from PARIS related to residency post enrollment. If needed, can be utilized to verify household comp.

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
7. Office of Child Support Enforcement	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	NO	NO	YES	Other (specify in comments)	Frequency on demand. Non cooperation with medical support. Once individual does cooperate, State received notification from Child Support Enforcement.
8. State General Assistance Programs	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
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>																	
12. PARIS*	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	YES	NO	NO	YES	Monthly	Used to verify residency and benefits in other states. Kentucky has been notified that PARIS will be available monthly.

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
13. Other: <i>(Please describe additional electronic data sources in the space provided below)</i>																	
Medicare Enrollemnt Data Base	YES	NO	NO	NO	NO	NO	NO	NO	NO	YES	NO	NO	NO	NO	YES	Other (specify in comments)	Immediately after eligibility determination.
Territories and State Batch Query	YES	NO	NO	NO	NO	NO	NO	NO	NO	YES	NO	NO	NO	NO	YES	Other (specify in comments)	Immediately after eligibility determination.

* 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	YES	YES	NO	Must be Applied	Electronic verification through TPL Vendor. If a discrepancy is identified, State will reach out to individual for reasonable explanation. Same procedures also applies to Medicaid expansion program.
2. Applicant does not have access to affordable ESI	NO	YES	YES	NO		Electronic verification through TPL Vendor. If a discrepancy is identified, State will reach out to individual for reasonable explanation.
3. When child has had coverage (as applicable to states' waiting period)	NO	YES	YES	NO		Electronic verification through TPL Vendor. If a discrepancy is identified, State will reach out to individual for reasonable explanation.
4. Access to public employee coverage	YES	NO	NO	NO		
5a. Waiting period exception #1 (describe):	NO	YES	YES	YES		Kentucky applied a 6 month waiting period. Documentation only if inconsistent data received.
5b. Waiting period exception #2 (describe):	YES	NO	NO	NO		Divorce.
5c. Waiting period exception #3 (describe):	YES	NO	NO	NO		Loss of Employment.
5d. Waiting period exception #4 (describe):	YES	NO	NO	NO		Employer no longer offers health insurance.
5e. Waiting period exception #5 (describe):					N/A	

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5f. Waiting period exception #6 (describe):					N/A	
5g. Waiting period exception #7 (describe):					N/A	
5h. Waiting period exception #8 (describe):					N/A	
5i. Waiting period exception #9 (describe):					N/A	
5j. Waiting period exception #10 (describe):					N/A	
6. Other eligibility factors or exceptions to eligibility factors: <i>(Please describe in the space provided below)</i>						

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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>Some information will not be available by electronic means: example: new self-employment verification, recent marriage/divorce/birth of child which could impact the household composition - existing verification will not reflect those life changes.</p> <p>The state accepts self-attestation without additional verification for many factors of eligibility. All other eligibility factors are verified through electronic data source and/or self attestation. Reasonable explanation/paper documentation will only be requested if unable to verify through source or inconsistency with attestation and data source.</p> <p>State also uses various back-up data sources; <i>i.e.</i> Vital Statistics for verification of Citizenship.</p>
2	Please describe how the state uses PARIS?	KY plans on using the PARIS information in multiple ways: potential dual receipt (residency) and for the TPL issue (VA and Federal file). When the appropriate paperwork is received, KY plans to partner with KY Veterans Affairs to share information from the VA and Federal Interface files for outreach efforts by Veterans Affairs.
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

	Question	Response
	<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. 	
4	<p>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.</p>	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. 	
5	<p>Describe any additional MAGI-based eligibility verification policies and procedures that have not been covered in this verification plan (optional):</p>	

Section A. Additional Comments

Section B1. Additional Comments

Section B2. Additional Comments

Section C. Additional Comments