

# MAGI-BASED ELIGIBILITY VERIFICATION PLAN

(Insert Medicaid, CHIP, or Both)

Medicaid & CHIP

State:

Washington

Last updated

10/07/2016

## 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*	<b>NO</b>	<b>YES</b>	<b>YES</b>	<b>Both are above, at or below the applicable income standard.</b>	<b>N/A (see comments)</b>	<b>YES</b>	<b>YES</b>	<p>Washington State Health Care Authority (WA HCA), the state Medicaid/CHIP agency responsible for the MAGI population, enrolls the individual based on the self-attested income. The state retrieves data from the Hub and SWICA and then runs a report within a week of enrollment to determine if there are any inconsistencies between the attested income and the information from the data sources which would affect eligibility. If there are, caseworkers will first try to resolve the inconsistency by looking at additional data sources, such as TALX, SNAP, TANF. If an inconsistency still remains, the state will call the individual for an explanation. If that still does not resolve the inconsistency the state will request paper documentation.</p> <p>When an individual attests to income higher than the Medicaid/CHIP standard we will take the person's attestation and screen for APTC.</p>
				<b>Other (Specify in Comments)</b>				

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
Residency	<b>YES</b>	<b>NO</b>	<b>NO</b>	<b>N/A</b>	<b>N/A</b>	<b>NO</b>	<b>NO</b>	Paper documentation of residency would only be requested if there was an impact to the individual's eligibility if it became questionable based on information received from a fraud complaint, or PARIS interface.
Age (Date of Birth)	<b>NO</b>	<b>YES</b>	<b>YES</b>	<b>N/A</b>	<b>N/A</b>	<b>YES</b>	<b>YES</b>	Age/DOB is part of SSN match with SSA through the Hub. Paper documentation of age/DOB would only be requested if there was an impact to the individual's eligibility if there is an inconsistency with the data sources or it became questionable based on information received from a fraud complaint. Resolution of any inconsistency will be done post-enrollment.
Social Security Number **	<b>NO</b>	<b>NO</b>	<b>YES</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>YES</b>	WA HCA uses the Hub to verify social security numbers. If verification cannot be obtained through the data match will need to require paper documentation
Citizenship **	<b>NO</b>	<b>NO</b>	<b>YES</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>YES</b>	WA HCA uses the Hub to verify citizenship. If verification cannot be obtained through the data match will need to require paper documentation

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
Immigration Status **	<b>NO</b>	<b>NO</b>	<b>YES</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>YES</b>	WA HCA uses SAVE through the Hub's VLP service to verify immigration status at SAVE steps 1 and 2. WA HCA then uses its web-based connection to SAVE for step 3. If verification cannot be obtained through the data match will need to require paper documentation
Household Composition	<b>YES</b>	<b>NO</b>	<b>NO</b>	<b>N/A</b>	<b>N/A</b>	<b>NO</b>	<b>NO</b>	
Pregnancy ***	<b>YES</b>	<b>NO</b>	<b>NO</b>	<b>N/A</b>	<b>N/A</b>	<b>NO</b>	<b>NO</b>	
Caretaker Relative	<b>YES</b>	<b>NO</b>	<b>NO</b>	<b>N/A</b>	<b>N/A</b>	<b>NO</b>	<b>NO</b>	
Medicare	<b>NO</b>	<b>YES</b>	<b>YES</b>	<b>N/A</b>	<b>N/A</b>	<b>NO</b>	<b>NO</b>	If Medicare entitlement not available through the Hub's SSA connection, WA HCA verifies Medicare through SOLQ in post review.
Application for Other Benefits	<b>YES</b>	<b>NO</b>	<b>NO</b>	<b>N/A</b>	<b>N/A</b>	<b>NO</b>	<b>NO</b>	
Other: (Please describe any other eligibility factors in the space below)								

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

\* 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) <sup>1</sup>	Accuracy Considered (Y/N)	Timeliness Considered (Y/N)	Ability to Access Considered (Y/N)	Age of Data Considered (Y/N)	Comprehensiveness 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	NO	YES	YES	NO	NO	NO	NO	YES	YES		WA HCA uses federal tax information (FTI) from the IRS at renewal if the beneficiary consents to use of his or her FTI.
2. Social Security Administration (SSA) (SSI, Title II)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	WA HCA uses its existing real-time data connection to SOLQ through the Social Security Administration (SSA) for SSA data at application and renewal. We use the current SSA data feed through the RRV service in post enrollment "on demand," when it appears a substantial change has occurred.
3. State Wage Information Collection Agency (SWICA)	YES	YES	YES	YES	NO	YES	NO	NO	YES	YES	Other (specify in comments)	Within a week of enrollment, WA HCA checks to see if there are any inconsistencies between the attested income and the SWICA data. In addition, one quarter after application we will sample applicants who were approved based on a previous quarters state wage data to see if the wage data from the quarter of their application confirms eligibility.
4. State Unemployment Compensation	YES	YES	YES	YES	YES	YES	NO	NO	YES	YES	Other (specify in comments)	For post-enrollment verification, WA HCA may perform on an ad hoc basis as needed.
5. State Administered Supplementary Payment Program	YES	YES	YES	YES	YES	YES	NO	NO	YES	YES	Other (specify in comments)	WA HCA has an automated system that updates this information daily.
6. State General Assistance Programs	YES	YES	YES	YES	YES	YES	NO	NO	YES	YES		WA HCA uses this data source to resolve any discrepancies with other data sources prior to requesting paper documentation.
7. Supplemental Nutrition Assistance Program (SNAP)	YES	YES	YES	YES	YES	YES	NO	NO	YES	YES		WA HCA uses this data source to resolve any discrepancies with other data sources prior to requesting paper documentation.
8. Temporary Assistance for Needy Families (TANF)	YES	YES	YES	YES	YES	YES	NO	NO	YES	YES		WA HCA uses this data source to resolve any discrepancies with other data sources prior to requesting paper documentation.
9. Office of Child Support Enforcement (OCSE)	NO	NO	NO	NO	NO	YES	NO	NO	NO	NO		OCSE may not share other income source information.
10. State Income Tax	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		WA does not have state income tax.
11. Commercial database: (Please describe any commercial databases in the space below)												
TALX	YES	YES	YES	YES	YES	YES	NO	NO	YES	YES	Other (specify in comments)	WA HCA may use TALX to verify income in post eligibility if other data match sources do not already confirm income. We would use this source on an "as needed" basis only.  WA HCA will not utilize the Hub for this service, as this option was not available at the time of system design. We will consider using this HUB data in a future enhancement of the system.
12. Other: (Please describe any additional electronic data sources in the space below)												

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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	Carer/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)	SSA data will be used at application if available through the federal hub. It will also be used at renewal and post-eligibility through current SSA data feed on an "as needed" basis to confirm Medicare eligibility.
2. Department of Homeland Security (DHS) - SAVE	YES	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO	Other (specify in comments)	WA HCA uses SAVE through the Hub's VLP service to verify immigration status at SAVE steps 1 and 2. WA HCA then uses its web-based connection to SAVE for step 3.  At renewal, WA HCA verifies immigration statuses subject to change.
3. Vital Statistics	YES	NO	YES	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	NO	YES	Other (specify in comments)	Vital records look up may be used on an "as needed" basis during the reasonable opportunity period to confirm citizenship or age if these are not verified by the federal hub.
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)	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES		If a discrepancy were to be identified for any factors of eligibility, State may use this data source for verification on an ad hoc basis.  Only use for SSN if verified with SSA first. Only use for citizenship and immigration status if verified in accordance with Medicaid/CHIP rules.
6. Supplemental Nutrition Assistance Program (SNAP)	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES		If a discrepancy were to be identified for any factors of eligibility, State may use this data source for verification on an ad hoc basis.  Only use for SSN if verified with SSA first. Only use for citizenship and immigration status if verified in accordance with Medicaid/CHIP rules.
7. Office of Child Support Enforcement	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
8. State General Assistance Programs	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES		If a discrepancy were to be identified for any factors of eligibility, State may use this data source for verification on an ad hoc basis.
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: (Please describe any commercial databases in the space below)																	
12. PARIS*	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	YES	YES	NO	NO	YES	Quarterly	WA HCA uses PARIS to verify if the individual has coverage in other states. WA HCA also uses PARIS to identify eligibility for, receipt and amount of cash benefits from the VA, including those received in another state.
13. Other: (Please describe additional electronic data sources in the space provided below)																	
EVVE (Electronic Verification of Vital Events)	YES	NO	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	Other (specify in comments)	Will be used on "as needed" basis where citizenship is not verified via the federal hub.

\* 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	YES	YES	YES	NO	Must be Applied	In post eligibility Washington conducts a monthly data match with group health insurance and state data bases to see if the child has coverage. Cases where unreported health care coverage existed at application are closed off of CHIP, and eligibility for other insurance affordability programs will be determined.
2. Applicant does not have access to affordable ESI	YES	NO	NO	NO		
3. When child has had coverage (as applicable to states' waiting period)	YES	NO	NO	NO		
4. Access to public employee coverage	YES	NO	NO	NO		The children of public employees are not eligible for CHIP. If identified in post eligibility as a child of a public employee, as a result of the monthly data match, they will be disenrolled.
5a. Waiting period exception #1 (describe):					N/A	
5b. Waiting period exception #2 (describe):					N/A	
5c. Waiting period exception #3 (describe):					N/A	
5d. Waiting period exception #4 (describe):					N/A	

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
5e. Waiting period exception #5 (describe):					N/A	
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>						

Question	Response
<p>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>	<p>The state accepts self-attestation without additional verification for many factors of eligibility and for those it doesn't, the State plans to use all available data sources (e.g. Vital Statistics for citizenship) prior to reaching out to the individual for paper documentation.</p> <p>Our automated system will continue to "re-ping" the federal data hub if the hub is down during the application process. Even in post-eligibility we will attempt to use commercially available electronic data bases (e.g. TALX) or other data sources such as TANF or SNAP records before requiring paper verification.</p>
<p>Please describe how the state uses PARIS?</p>	<p>We will use PARIS in post-eligibility to verify income, residency, out of state benefits, and veterans benefits.</p>
<p>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).</p>	<p><b>NO</b></p>
<p>If (YES), please submit a letter to CMS requesting such approval describing how the state meets the following requirements:</p> <ol style="list-style-type: none"> <li>1) Reduces administrative costs and burdens on both individuals and the State,</li> <li>2) Maximizes accuracy and minimizes delay,</li> <li>3) Meets the requirements related to confidentiality, disclosure, maintenance and use of information, and</li> <li>4) Promotes coordination with other insurance affordability programs.</li> </ol>	
<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>	<p><b>YES</b></p>

**Section A. Additional Comments**

As a general rule only citizenship and immigration status will require paper documentation when an electronic data source is not available, or the information is not verified via an electronic data source. However, we may require paper documentation of any eligibility element that is questionable and not reasonably verified by an electronic data source or collateral contact.

WA HCA retains oversight and responsibility (and final authority) for all Medicaid services in its organizational SPA. Even for those programs for which designated administrative duties may be assigned to the marketplace for MAGI and Washington State Department of Social and Health Services (DSHS) for non-MAGI.

**Section B1. Additional Comments**

**Section B2. Additional Comments**

Washington plans to complete a systems change request to implement SAVE Step 3. The requirement to take this action has been communicated to all stakeholders. In the interim, HCA staff will use a web-based connection to SAVE.

**Section C. Additional Comments**