

MAGI-BASED ELIGIBILITY VERIFICATION PLAN

(Insert Medicaid, CHIP, or Both) Medicaid & CHIP
 State: VT
 Last updated: 2/28/2024

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
1. Income*	Yes	No	Yes	Both are at or below applicable income standard	See Comments	Yes	Yes	Vermont will accept self-attestation without additional verification if the self-attestation is above the Medicaid threshold. The individual will then be screened for QHP with credits. If the attestation is at or below the Medicaid threshold, Vermont uses IRS FTI to verify income. If IRS FTI fails, Vermont checks DOL quarterly wage data. In cases where DOL quarterly wage data is reasonably compatible with a beneficiary's total attested income, earned wages are verified with that data and attestation of any self-employment or other non-wage income types is accepted. If unable to verify using the DOL quarterly wage data, Vermont sends a verification notice to the beneficiary. Vermont allows the beneficiary to verify via a reasonable explanation, if one applies, and, if not, otherwise resolve the inconsistency, including via satisfactory documentation.
2. Residency	Yes	No	No	See Comments	N/A	Yes	Yes	Vermont accepts self-attestation. Vermont will not verify this eligibility element unless information from the individual is not reasonably compatible with other information provided or otherwise available to the State. In the event an inconsistency is exposed, Vermont may ask for a reasonable explanation and/or paper documentation. Vermont allows the beneficiary to verify via a reasonable explanation, if one applies, and, if not, to otherwise resolve the inconsistency, including via satisfactory documentation.
3. Age (DOB)	Yes	No	No	See Comments	N/A	Yes	Yes	Vermont accepts self-attestation. Vermont will not verify this eligibility element unless information from the individual is not reasonably compatible with other information provided or otherwise available to the State. In the event an inconsistency is exposed, Vermont may ask for a reasonable explanation and/or paper documentation. Vermont allows the beneficiary to verify via a reasonable explanation, if one applies, and, if not, to otherwise resolve the inconsistency, including via satisfactory documentation.
4. Social Security Number **	No	No	Yes	N/A	N/A	N/A	No	Vermont uses its connection to the Social Security Administration (SSA) through the Federal Data Services Hub (the Hub) to verify social security numbers (SSN). If the SSN is not verified through the Hub, Vermont attempts to verify SSNs through its legacy system - ACCESS. If the enrollee cannot be verified electronically, a notice is sent requesting additional documentation.

5. Citizenship **	No	No	Yes	N/A	N/A	N/A	Yes	Vermont uses its connection to SSA through the Hub to verify citizenship. If citizenship is not verified through the Hub, Vermont attempts to verify citizenship through ACCESS. If the enrollee cannot be verified electronically, a notice is sent requesting additional documentation. The applicant is granted benefits and is given a 90-day reasonable opportunity period post-enrollment, if otherwise eligible, to respond to the request for additional documentation concerning citizenship.
6. Immigration Status **	No	No	Yes	N/A	N/A	N/A	Yes	Vermont uses SAVE through the Hub's VLP service for step 1. Steps 2 and 3 are done through Vermont's web-based SAVE connection. As of 10/29/2020, Vermont has a permanent extension of the state's Hub waiver to forego using SAVE through the HUB's VLP service for steps 2 and 3. If additional documentation is needed for step 3, Vermont will request paper documentation at that time. If otherwise eligible, the enrollee is given a 90-day reasonable opportunity period to respond to the request for additional documentation to verify immigration status.
7. Household Composition	Yes	No	No	See Comments	N/A	Yes	Yes	Vermont accepts self-attestation. Vermont will not verify this eligibility element unless information from the individual is not reasonably compatible with other information provided or otherwise available to the State. In the event an inconsistency is exposed, Vermont may ask for a reasonable explanation and/or paper documentation. Vermont allows the beneficiary to verify via a reasonable explanation, if one applies, and, if not, to otherwise resolve the inconsistency, including via satisfactory documentation.
8. Pregnancy ***	Yes	No	No	See Comments	N/A	Yes	Yes	Vermont accepts self-attestation. Vermont will not verify this eligibility element unless information from the individual is not reasonably compatible with other information provided or otherwise available to the State. In the event an inconsistency is exposed, Vermont may ask for a reasonable explanation and/or paper documentation. Vermont allows the beneficiary to verify via a reasonable explanation, if one applies, and, if not, to otherwise resolve the inconsistency, including via satisfactory documentation.
9. Caretaker Relative	Yes	No	No	See Comments	N/A	Yes	Yes	Vermont accepts self-attestation. Vermont will not verify this eligibility element unless information from the individual is not reasonably compatible with other information provided or otherwise available to the State. In the event an inconsistency is exposed, Vermont may ask for a reasonable explanation and/or paper documentation. Vermont allows the beneficiary to verify via a reasonable explanation, if one applies, and, if not, to otherwise resolve the inconsistency, including via satisfactory documentation.
10. Medicare	Yes	No	No		N/A	No	No	
11. Application for Other Benefits	No	Yes	Yes	See Comments	N/A	Yes	Yes	Vermont uses its data connection with PARIS post-enrollment to verify that a beneficiary does not have services in other states.
12. Other: (Please describe any eligibility factors in the space below)								

*State 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 information provided by or on behalf of the individual are both above, or at below the applicable income standard, the State must determine the applicant eligible 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.

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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 (Please describe in comments section) (Y/N)	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		Vermont has identified that the IRS data is useful and began to use IRS FTI data to verify income for Medicaid/CHIP in August 2015.
2. Social Security Administration (SSA) (SSI, Title II)	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	No	Other (specify in comments)	Vermont uses the SSA connection through the Hub to verify the receipt and amount of cash benefits provided under Title II of the Social Security Act. If there is an inconsistency, Vermont will use ACCESS for known applicants. If Title II cannot be verified electronically, a notice is sent requesting additional documentation.
3. State Wage Information Collection Agency (SWICA)	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	No	Monthly	Vermont uses its loaded data from the State Department of Labor (DOL) to verify income.
4. State Unemployment Compensation	No	Yes	Yes	Yes	Yes	Yes	No	No	No	No	Monthly	Vermont does not use state unemployment compensation data currently. Vermont will explore integration of this data as part of continued eligibility system modernization efforts.
5. State Administered Supplementary Payment Program	No	Yes	Yes	Yes	Yes	Yes	No	No	No	No		Vermont does not use state administered supplementary payment program data at this time. Vermont will explore integration of this data as part of continued eligibility system modernization efforts.
6. State General Assistance Programs	No	Yes	Yes	Yes	Yes	Yes	No	No	No	No		Vermont does not utilize General Assistance Program Data to verify financial eligibility.

7. Supplemental Nutrition Assistance Program (SNAP)	No	Yes	Yes	Yes	Yes	Yes	No	No	No	No		Vermont does not use state SNAP data currently. Vermont will explore integration of this data as part of continued eligibility system modernization efforts.
8. Temporary Assistance for Needy Families (TANF)	No	Yes	Yes	Yes	Yes	Yes	No	No	No	No		Vermont does not use state TANF data currently. Vermont will explore integration of this data as part of continued eligibility system modernization efforts.
9. Office of Child Support Enforcement (OCSF)	No	Yes	Yes	Yes	Yes	Yes	No	No	No	No		Vermont does not utilize Office of Child Support Enforcement data to verify financial eligibility.
10. State Income Tax	No	Yes	Yes	Yes	Yes	Yes	No	No	No	No		Vermont does not utilize State income Tax data to verify financial eligibility.
11. Commercial database: (Please describe any commercial databases in the space below)												
TALX/ Work Number	No	Yes	Yes	Yes	Yes	Yes	Yes	No	No	No		Vermont does not use TALX/Work Number data to verify financial 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 (Y/N)	Citizenship (Y/N)	Immigration Status (Y/N)	Residency (Y/N)	Age/DOB (Y/N)	Pregnancy (Y/N)	Household Composition (Y/N)	Caretake Relative (Y/N)	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	Yes	Yes	Yes	No	No	No	No	No	No	No	No	Yes	No	No	Other (specify in comments)	Vermont uses its connection to SSA through the Hub to verify SSN. If the SSN is not verified through the Hub, Vermont attempts to verify the SSN through its legacy system - ACCESS. If the enrollee cannot be verified electronically, a notice is sent requesting additional documentation.

2. Department of Homeland Security (DHS) – SAVE	Yes	No	No	Yes	No	No	No	No	No	No	No	Yes	Yes	No	Other (specify in comments)	Vermont uses SAVE through the Hub's VLP service for step 1. Steps 2 and 3 are done through Vermont's web-based SAVE connection. As of 10/29/2020, Vermont has a permanent extension of the state's Hub waiver to forego using SAVE through the HUB's VLP service for steps 2 and 3. If additional documentation is needed for step 3, Vermont will request paper documentation at that time. If otherwise eligible, the enrollee is given a 90-day reasonable opportunity period to respond to the request for additional documentation to verify immigration status.
3. Vital Statistics	No	No	No	No	No	No	No	No	No	No	No	No	No	No		Vermont does not utilize vital statistics data.
4. Department of Motor Vehicles (DMV)	No	No	No	No	No	No	No	No	No	No	No	No	No	No		Vermont does not utilize DMV data.
5. Temporary Assistance for Needy Families (TANF)	Yes	Yes	Yes	No	No	No	No	No	No	No	No	Yes	No	No		In cases where the Hub match is unsuccessful, Vermont utilizes SSN and citizenship data through a manual lookup in ACCESS for SSNs that may have been verified for TANF eligibility purposes. TANF data is only used when the eligibility item includes codes that document the item was verified with procedures that meet Medicaid verification requirements.

6. Supplemental Nutrition Assistance Program (SNAP)	Yes	Yes	Yes	No	No	No	No	No	No	No	No	No	Yes	No	No	In cases where the Hub match is unsuccessful, Vermont utilizes SSN and citizenship data through a manual lookup in ACCESS for SSNs that may have been verified for SNAP eligibility purposes. SNAP data is only used when the eligibility item includes codes that document the item was verified with procedures that meet Medicaid verification requirements.
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	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: (Please describe any commercial databases in the space below)																
12. Other: (Please describe the additional electronic data sources in the space provided below)																

PARIS*	Yes	No	No	No	No	No	No	No	No	Yes	No	No	No	Yes	Quarterly	Vermont uses its data connection with PARIS to show if a member is enrolled in coverage in another state which could be an indication of a potential change in residency post-enrollment. VT also utilizes the VA and Federal (Champus, TriCare, and Federal Insurance benefits) matches.
VT Dept of Corrections	No	No	No	No	No	No	No	No	No	No	No	No	No	No	Other (specify in comments)	Vermont receives incarceration data through the HUB and does not obtain this through VT Department of Corrections.

* 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 (Y/N)	Self-Attestation Accepted with Post-Enrollment Verification (Y/N)	Electronic Data Source Used (Y/N)	Paper Documentation Required from the Individual (Y/N)	Non-Applicable (N/A)	Comments
1. Applicant does not have other coverage	Yes	No	No	No	Must be Applied	CHIP follows Medicaid rules and procedures. If an inconsistency is identified through other means, paper documentation may be required.
2. Applicant does not have access to affordable ESI					N/A	
3. When child has had coverage (as applicable to states' waiting period)					N/A	
4. Access to public employee coverage					N/A	
5a. Waiting period exception #1					N/A	
5b. Waiting period exception #2					N/A	
5c. Waiting period exception #3					N/A	
5d. Waiting period for exception #4					N/A	
5e. Waiting period for exception #5					N/A	
5f. Waiting period for exception #6					N/A	

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

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Section A. Additional Comments
The effective date of Section A is 10/21/2022.
Section B1. Additional Comments
The effective date of Section A is 10/21/2022.
Section B2. Additional Comments
The effective date of Section A is 10/21/2022.
Section C. Additional Comments
The effective date of Section A is 11/21/2016.
Section D. Additional Comments
The effective date of Section A is 10/21/2022.

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Section D. Additional Verification Questions

Number	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):	Vermont does use data sources before requiring paper documentation from the individual. If there is an inconsistency identified from the data sources, paper documentation may be required.
2	Please describe how the state uses PARIS?	Vermont uses its data connection with PARIS to show if a member is enrolled in coverage in another state which could be an indication of a potential change in residency post-enrollment. VT also utilizes the VA and Federal (Champva, TriCare, and Federal Insurance benefits) matches.
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
	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.	N/A
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 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.	Vermont uses SAVE through the Hub's VLP service for step 1. As of 10/29/2020, Vermont has a permanent extension of the state's Hub waiver to forego using SAVE steps 2 and 3 through the Hub's VLP service for immigration status and naturalized citizenship verification.
5	Describe any additional MAGI-based eligibility verification policies and procedures that have not been covered in this verification plan (optional):	N/A