

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	YES	YES	Both are above, at or below the applicable income standard. Percent Threshold	10%	YES	YES	Attested income will be verified through IEVS via post-eligibility. Paper documentation will only be required if self attested income does not meet the standard for reasonable compatibility, AND if the attestation does not meet the standard for a reasonable explanation. The Department has chosen to set its reasonable compatibility threshold at 10% in order to align its policies with those of Connect for Health Colorado, to maintain comparable patterns in eligibility changes experienced under IEVS, and to achieve budget neutrality while remaining within its current legislative authority. If the individual attests to income below the applicable income standard, and the data source indicates income above the applicable standard, and the difference between the two is greater than 10% then a reasonable explanation or paper documentation will be requested. When an individual attests to income above the applicable standard and data source indicates income below the standard, the state will take the attestation and make the person ineligible and send to Connect for Health Colorado (exchange) for APTC. Additional information will not be requested. Verification of income will occur between 2-4months after a determination has been made. Further detail documented in Additional Comments. The Department also expects to continue to analyze the impact of different reasonable compatibility thresholds, and may work to increase the threshold as more data becomes available. The IEVS system is used to verify earned income, unearned income, and unemployment.
Residency	YES	NO	NO	N/A	N/A	NO	NO	
Age (Date of Birth)	YES	NO	NO	N/A	N/A	NO	NO	
Social Security Number **	NO	NO	YES	N/A	N/A	N/A	YES	Colorado plans to utilize their internal SSA feed (not the Hub) at application to verify SSN because it is real-time. If not verifiable by the electronic source or if questionable (i.e. duplicate SSN found within the system), paper documentation will be requested. Exception for an individual who is not eligible to receive a SSN or refuses to obtain a SSN because of a religious objection.
Citizenship **	NO	NO	YES	N/A	N/A	N/A	YES	If citizenship cannot be verified through internal SSA feed, individual will be enrolled within Medicaid or CHIP and be provided a 90 day reasonable opportunity to provide documentation. The reasonable opportunity period will be extended if individual is making a good faith effort to obtain documentation. If identity needs to be verified as part of citizenship the state can use electronic data from the DMV before asking for paper documentation.
Immigration Status **	NO	NO	YES	N/A	N/A	N/A	YES	Obtained through the Hub. Only request paper documentation if not verifiable by electronic source or if it is questionable, i.e. such as immigration number and another individual within the system has the same number.
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	
Medicare	YES	NO	NO	N/A	N/A	NO	NO	
Application for Other Benefits	YES	NO	NO	N/A	N/A	NO	NO	
Other: (Please describe any other eligibility factors in the space below)								

* 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.

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)	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		It is not Colorado's intention to use electronic FTI Oct 2013, will continue to utilize IEVS but may use the Hub in the future. IEVS system has earned / non earned income and unemployment. IEVS does not have IRS data that we will use. Colorado does not have an IRS IEVS agreement.
2. Social Security Administration (SSA) (SSI, Title II)	YES	YES	YES	YES	YES	YES	NO	NO	YES	YES	Other (specify in comments)	Internal data feed with SSA not the Hub - used post-enrollment on a monthly basis and is real-time. SSA will send updated files only when there is a change and they are run on a daily basis.
3. State Wage Information Collection Agency (SWICA)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Colorado has been utilizing the IEVS data since 2011. Due to time and resource constraints with connecting with this data source, we will continue to use IEVS data and not SWICA.
4. State Unemployment Compensation	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		Continue to utilize IEVS. Colorado has been utilizing the IEVS data since 2011. Due to time and resource constraints with connecting with this data source, we will continue to use IEVS data and not State Unemployment Compensation. The IEVS interface provides unemployment from Colorado Unemployment Insurance Benefits (UIB) from the Colorado Department of Labor and Employment (CDLE).
5. State Administered Supplementary Payment Program	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Continue to utilize SDX (SSA data feed). Colorado has been utilizing the SDX data for over four years. Due to time and resource constraints with connecting with this data source, we will continue to use SDX data.
6. State General Assistance Programs	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Due to time and resource constraints with connecting with this data source, we will continue to use other existing interfaces.
7. Supplemental Nutrition Assistance Program (SNAP)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	Data used upon any determination made by SNAP. Determination may be made during any time, either at SNAP's application (if applying at different time than Medicaid/CHIP), renewal, or any other period of time. Utilize at application and renewal for ELE population. Will only use raw data for SNAP and TANF. Will be using MAGI calculations for this group.

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
8. Temporary Assistance for Needy Families (TANF)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	Data used upon any determination made by TANF. Determination may be made during any time, either at TANF's application (if applying at different time than Medicaid/CHIP), renewal, or any other period of time. Will only use raw data for SNAP and TANF. Utilize at application and renewal for ELE population. Will be using MAGI calculations for this group.
9. Office of Child Support Enforcement (OCSE)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Due to time and resource constraints with connecting with this data source, we will continue to use other existing interfaces.
10. State Income Tax	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Due to time and resource constraints with connecting with this data source, we will continue to use other existing interfaces.
11. Commercial database: (Please describe any commercial databases in the space below)												
TALX/The Work Number	NO	YES	YES	YES	YES	YES	YES	NO	NO	NO		Due to time and resource constraints with connecting with this data source, we will continue to use other existing interfaces. We are researching the possibility of using this source in the future.
12. Other: (Please describe any additional electronic data sources in the space below)												
Income Eligibility and Verification System (IEVS) providing income from Colorado Department of Labor and Employment (CDOLE)	YES	YES	YES	YES	YES	YES	NO	NO	YES	YES	Quarterly	Data is available to verify income but is not available until the quarter after the income is attested. Due to this delay, data is used for post-enrollment verification but not for application or renewal. The IEVS interface provides earned / non earned income and unemployment from Colorado Unemployment Insurance Benefits (UIB) from the Colorado Department of Labor and Employment (CDLE). Once a discrepancy is identified client will be requested to provide a reasonable explanation or provide documentation.

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.

MAGI-BASED ELIGIBILITY VERIFICATION PLAN

(Insert Medicaid, CHIP, or Both)

Medicaid & CHIP

State:

Colorado

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	NO	NO	NO	YES	NO	NO		State internal feed with SSA, not the Hub. If a discrepancy is identified for age/DOB, then SSA may be used as a backup. In 95% of the cases, they will not be actively looking for age/DOB in SSA data.
2. Department of Homeland Security (DHS) - SAVE	YES	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	NO	YES	NO	NO		Immigration status will be obtained through the Hub. The state is currently just using step 1 through the VLP service, and will add steps 2 and 3 on October 18, 2015.
3. Vital Statistics	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Explored using it but is cost prohibitive. Addressed in Section D, question 1
4. Department of Motor Vehicles (DMV)	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO	NO		Used to verify identity if needed as part of citizenship verification according to Deficit Reduction Act
5. Temporary Assistance for Needy Families (TANF)	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Since the systems are integrated, any information provided to TANF at application or a report in a change in circumstance reported to TANF related to residency, age/DOB, household composition, caretaker relative will be available to Medicaid and we will act on any information that could affect the individual's eligibility. Determination may be made during any time, either at TANF's application (if applying at different time than Medicaid/CHIP), renewal, or any other period of time.
6. Supplemental Nutrition Assistance Program (SNAP)	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Since the systems are integrated, any information provided to SNAP at application or a report in a change in circumstance reported to SNAP related to residency, age/DOB, household composition, caretaker relative will be available to Medicaid and we will act on any information that could affect the individual's eligibility. Determination may be made during any time, either at SNAP's application (if applying at different time than Medicaid/CHIP), renewal, or any other period of time.
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		
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>																	
15. Other: <i>(Please describe additional electronic data sources in the space provided below)</i>																	
PARIS*	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	NO	NO	YES	Quarterly	Used to identify if individual has benefits in other states.

* 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.

MAGI-BASED ELIGIBILITY VERIFICATION PLAN

(Insert Medicaid, CHIP, or Both)

State:

Medicaid & CHIP

Colorado

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	NO	NO	NO	Must be Applied	State asks applicants if they are covered by other coverage. Information is accepted through self-attestation and individual is deemed ineligible for CHP+ if they have other coverage. This process is the same for our title XXI Medicaid Expansion.
2. Applicant does not have access to affordable ESI					N/A	
3. When child has had coverage (as applicable to states' waiting period)	NO	NO	NO	NO		Colorado's waiting period has been eliminated and SPA was approved as of early August 2013.
4. Access to public employee coverage					N/A	
5a. Waiting period exception #1 (describe):					N/A	
5b. Waiting period exception #2 (describe):					N/A	
5c. Waiting period exception #3 (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
5d. Waiting period exception #4 (describe):					N/A	
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>						

Section D. Additional Verification Questions

	Question	Response
1	<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>Colorado accepts self-attestation without additional verification for many factors of eligibility. Colorado will only request paper documentation for individuals or households whose income is not reasonably compatible between self attestation and the data source and who cannot provide a reasonable explanation, or if inconsistencies are found that cannot be resolved through all available data sources.</p> <p>Vital Statistics is not used to verify citizenship due to the cost and due to the high accuracy rate from using the data we receive from SSA/SVES data.</p>
2	<p>Please describe how the state uses PARIS?</p>	<p>Currently Colorado is using PARIS to identify improper payments (such as receiving benefits from another state). The PARIS report is worked manually by eligibility workers. A manual contact is made by the eligibility worker to the other state that identified the client to verify information. If contact is not made, additional verification is requested from the client.</p>

	Question	Response
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.	
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

	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. 	<p>State submitted letter to the Secretary on July 10, 2013 requesting to not use the Hub for SSA citizenship, SSN and income data, which was approved on February 5, 2015. The state also submitted Hub waiver on March 19, 2014 to not use steps 2 and 3 through the Hub VLP service until September 2015, which was approved on April 17, 2015. The state is not able to meet the 4 requirements below pertaining to the alternative mechanism to verify immigration status, as we do not have an existing SAVE match; however, this is an agreed upon mitigation until the state makes the system change to access this data through the Hub in October 2015.</p> <ol style="list-style-type: none"> 1) The administrative costs for the State have been met by using already established interfaces. Additional costs are mitigated by not connecting to the hub. Administrative burden for the client has been mitigated by accepting self-attestation of information and conducting post-enrollment verification of income therefore eliminating the need for the client to obtain copies of documentation unnecessarily. 2) The established interfaces are real-time (occur within minutes) which minimizes any delays. The interfaces are established with credible sources therefore maximizing accuracy of eligibility determinations. 3) Agreements have been executed with the agencies from which information is verified and information is kept confidential 4) Real-time interfaces allow for information to be received quicker and submitted to other insurance affordability programs if the applicant is ineligible for Medicaid or CHP+.
5	Describe any additional MAGI-based eligibility verification policies and procedures that have not been covered in this verification plan (optional):	N/A

Section A. Additional Comments

“Colorado only has one data source for verification of earned income and unemployment income. This source is the Income and Eligibility Verification System (IEVS). The IEVS is not currently available real-time; therefore we cannot verify income at application, only post-determination. The verification occurs automatically on a quarterly basis. If there is an inconsistency because the data source shows income outside the state's reasonable compatibility standard, a letter will be sent to the client asking for either a reasonable explanation or income documentation. If the individual provides a reasonable explanation or documentation showing income below the applicable standard, the individual will remain enrolled. If the information provided shows income above the applicable standard and outside the state's reasonable compatibility standard, the individual will be disenrolled. When relevant, SSA income is also utilized on a monthly basis.

Beginning in October 2014, IEVS will continue to run every quarter to verify earned income. If an inconsistency arises during the periodic post-enrollment check, the state will act on it. The state will follow the procedures described above to get further information from the beneficiary and take appropriate action.

Section B2. Additional Comments

Section C. Additional Comments

