

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	5%	YES	YES	State requires verification of income information and allowable deductions. IL does not accept self-attestation. If the electronic sources are more than 12 months old, 16 months for federal or state tax returns, the state will request current documentation from the individual if income is an eligibility factor. If the individual attests to income below the applicable standard but the electronic data source indicates income above the applicable standard and the difference between the two is greater than 5%, the state will first request a reasonable explanation from the individual and/or request paper documentation. If the difference between what the individual attests to and what the electronic data source finds is within 5% then the individual is deemed eligible. If an individual attests to income above the standard and data source is below, the individual will be determined ineligible and referred to the Marketplace.
Residency	NO	NO	YES	N/A	N/A	YES	YES	If electronic verification is not available or current (last updated), the State requests a reasonable explanation and/or paper documents to verify residency if the inconsistency would impact the individual's eligibility., State uses the Secretary of State database to establish Illinois residency.

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Age (Date of Birth)	NO	NO	YES	N/A	N/A	YES	YES	The state reviews the DOB data from SSA. If there is a discrepancy between applicant reported DOB and SSA, the state will request an explanation and/or paper documentation from the individual.
Social Security Number **	NO	NO	YES	N/A	N/A	N/A	YES	If electronic verification indicates a discrepancy, the state requests documents and resubmits to SSA as a post-eligibility verification.
Citizenship **	NO	NO	YES	N/A	N/A	N/A	YES	If electronic verification is not available, or there is an inconsistency between the attestation and the information from the data sources, the State requests documents to verify citizenship.
Immigration Status **	NO	NO	YES	N/A	N/A	N/A	YES	If electronic verification is not available, or there is an inconsistency between the attestation and the information from the data sources, the State requests documents to verify immigration status.
Household Composition	NO	NO	YES	N/A	N/A	YES	YES	Illinois' new integrated eligibility system (IES) will identify any instances where the same individual is reported as living in more than one household receiving medical, SNAP or cash benefits. If there is an inconsistency between attestation and the IES or other sources that has an impact on eligibility a reasonable explanation and/or paper documentation will be requested. No other source has been identified for verifying current household composition so the state will otherwise accept self-attestation.
Pregnancy ***	YES	NO	NO	N/A	N/A	NO	NO	

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Caretaker Relative	YES	NO	YES	N/A	N/A	NO	NO	No known electronic source is available for non-TANF applicants. Relationship to the 5th degree is accepted. Proof of such relationship would be unduly burdensome if not impossible to produce. No other source has been identified for verifying current caretaker relative so the state will otherwise accept self-attestation. However, if the State identifies a discrepancy through the IES or other sources then additional information may be requested from the individual.
Medicare	NO	NO	YES	N/A	N/A	YES	YES	Medicare status is obtained from SSA.
Application for Other Benefits	YES	NO	NO	N/A	N/A	NO	NO	State accepts self-attestation.
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.

MAGI-BASED ELIGIBILITY VERIFICATION PLAN

(Insert Medicaid, CHIP, or Both)

Medicaid & CHIP

State:

Illinois

Section B1. Use of Electronic Data Sources

Financial:

Electronic Data Source	Determined Useful (Y/N)	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	YES	NO	NO	NO		Illinois will not obtain federal tax information from the data services hub because IRS security requirements are extremely burdensome and severely limit the utility of this source, the tax data is not current or available quickly and data obtained from the IRS cannot be used for SNAP or cash determinations thus precluding integrated eligibility dispositions. When no other source of verification is available, tax returns can be requested to be provided by applicants or clients.
2. Social Security Administration (SSA) (SSI, Title II)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Monthly	State receives monthly feed through its current data match with SSA for program integrity or if notified of changes post-enrollment. State uses data obtained from the State On Line Query (SOLQ) real time connection to verify SSA Title II income at intake and again at renewal.
3. State Wage Information Collection Agency (SWICA)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Monthly	State receives monthly feed post-enrollment for program integrity or if notified of changes. Law was passed in IL requiring specific employers with certain number of employees to submit monthly wage information. This is being phased in (from quarterly). However, for other employer types, State is still requesting information quarterly.
4. State Unemployment Compensation	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Monthly	State receives monthly feed post-enrollment for program integrity or if notified of changes.

Electronic Data Source	Determined Useful (Y/N)	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
5. State Administered Supplementary Payment Program	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Monthly	State receives monthly feed post-enrollment for program integrity or if notified of changes.
6. State General Assistance Programs	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO		The State General Assistance program has been discontinued in Illinois.
7. Supplemental Nutrition Assistance Program (SNAP)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Monthly	State receives monthly feed post-enrollment for program integrity or if notified of changes. State uses this data source for raw income data (distinct from the MAGI calculation).
8. Temporary Assistance for Needy Families (TANF)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Monthly	State receives monthly feed post-enrollment for program integrity or if notified of changes. State uses this data source for raw income data (distinct from the MAGI calculation).
9. Office of Child Support Enforcement (OCSE)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Monthly	State receives monthly feed post-enrollment for program integrity or if notified of changes.
10. State Income Tax	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO		State law mandates use of State Income Tax data. Age of this data may not be within the state's definition of timeliness for usage in its eligibility determination. Not used post-enrollment due to the fact that the State doesn't receive data feeds.
11. Commercial database: (Please describe any commercial databases in the space below)												

Electronic Data Source	Determined Useful (Y/N)	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
The Work Number	YES	YES	YES	YES	YES	NO	NO	YES	YES	YES		<p>The state finds the Work Number useful and current for those individuals whose employers report.</p> <p>The state will access the Work Number information provided through individual state contract rather than through the Hub.</p> <p>State checks post-enrollment for program integrity purposes or if notified of changes as needed.</p>
12. Other: (Please describe any additional electronic data sources in the space below)												
PARIS	YES	YES	YES	YES	YES	YES	NO	NO	YES	YES	Quarterly	Veterans income information and potential TPL is investigated at redetermination or if high unreported income is identified.

* Footnote Option 2 - The state marked any criterion YES if it was considered as a reason the data source was determined useful/not useful.

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	Monthly	The state reviews the DOB data from SSA. If there is a discrepancy between applicant reported DOB and SSA, the state will request an explanation and/or paper documentation from the individual. Utilized at renewal and post-enrollment for Medicare verification.
2. Department of Homeland Security (DHS) - SAVE	YES	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	NO	YES	YES	YES	Other (specify in comments)	The state uses information from the federal HUB for Step 1 of the process. If the status is not confirmed, the state uses existing SAVE data matches (manual process) to complete Steps 2 and 3.

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	YES	NO	NO	NO	NO	NO	NO	YES	NO	NO	Other (specify in comments)	Vital records may be used for citizenship and Age/DOB verification at the secondary level if the electronic interface with SSA fails to confirm. Data source may be used to verify Caretaker Relative if discrepancy is identified.
4. Department of Motor Vehicles (DMV)	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO		
5. Temporary Assistance for Needy Families (TANF)	YES	NO	NO	NO	YES	NO	NO	YES	NO	NO	NO	NO	YES	YES	NO		Forthose known through the TANF program, the state will use the IES system to verify caretaker relative status
6. Supplemental Nutrition Assistance Program (SNAP)	YES	NO	NO	NO	YES	NO	NO	YES	NO	NO	NO	NO	YES	YES	NO		Forthose known through the SNAP program, the state will use the IES system to verify caretaker relative status
7. Office of Child Support Enforcement	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Does not provide relevant non-financial information.
8. State General Assistance Programs	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		The State General Assistance program has been discontinued in Illinois.
9. Women, Infants and Children Program (WIC)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		The Illinois WIC program verifies against Medicaid data rather than vice-versa.

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
10. State Income Tax	YES	YES	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	YES	NO	NO		<p>The state income tax data will be used for verifying residency and SSN at a secondary level. This data is requested as frequently as necessary to determine eligibility. Only use for SSN if verified with SSA first.</p> <p>State currently does not utilize State Income Tax at renewal or post-enrollment. However, this may be subject to change.</p>
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	YES	NO	NO	NO	NO	NO	NO	YES	NO	YES	YES	Quarterly	PARIS involves matching people who are already enrolled to verify if applicant has coverage in another State and as a back-up for Residency. It is not useful for making initial eligibility determinations.

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
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* 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.

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	HFS takes all reasonable measures to ascertain the legal liability of third party payers via the cross match of eligible recipients/clients with Illinois health insurance carriers as required by Section 6035 of the Deficit Reduction Act of 2005. These same policies apply to IL's Medicaid Expansion applicants as well. (Similarly, for IL's Medicaid Expansion population, questions 2-6 are N/A).
2. Applicant does not have access to affordable ESI					N/A	Illinois' Title XXI State Plan Amendment #8 has been approved. This criteria is applied at renewal to cases with income in excess of 200% FPL.
3. When child has had coverage (as applicable to states' waiting period)	YES	NO	NO	NO		A waiting period applies for cases with income in excess of 200% FPL who lost health insurance fewer than 12 months prior to application for coverage.
4. Access to public employee coverage					N/A	Illinois covers children with access to public employee coverage at state expense.
5a. Waiting period exception #1 (describe):	YES	NO	NO	NO		For cases with income in excess of 200% FPL, the child lost employer-sponsored health insurance when the child's parent's job ended.
5b. Waiting period exception #2 (describe):	YES	NO	NO	NO		For cases with income in excess of 200% FPL, the child has no health insurance and is less than one year old in the month of application.
5c. Waiting period exception #3 (describe):	NO	NO	NO	YES		For cases with income in excess of 200% FPL, the child has exhausted the life-time benefit limit of his or her health insurance.
5d. Waiting period exception #4 (describe):	YES	NO	NO	NO		For cases with income in excess of 200% FPL, the child's health insurance is purchased under the provisions of Consolidated Omnibus Budget Reconciliation Act (COBRA)

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):	NO	NO	YES	NO		For cases with income in excess of 200% FPL, the child was disenrolled from another Illinois means-tested health benefit program within one year prior to applying under this Part as determined within Illinois' integrated eligibility system.
5f. Waiting period exception #6 (describe):	YES	NO	NO	NO		For cases with income in excess of 200% FPL, the child has health insurance provided by the child's noncustodial parent and the child's custodian is unable to access such health insurance benefits for the child.
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>We have already determined that the security regulations, timeliness elements, and other administrative complexities make using the IRS data for FTI unduly burdensome. Additionally the data may not be used for other programs,(SNAP, Cash) rendering this program less useful for our integrated eligibility system. However we use electronic data that is necessary to determine initial eligibility and redeterminations , both financial and non-financial, when it is available and provides the information required in an acceptable timeframe, as evidenced by the numerous sources we cited in our earlier responses in this document. Paper documentation is requested from the applicant/ recipient when we do not accept self-attestation and there is no accessible electronic source, or if there is a discrepancy that cannot be resolved with the information we have available.</p> <p>State intends to utilize multiple backup data sources such as Vital Records for citizenship, prior to requesting paper documentation.</p>
2	<p>Please describe how the state uses PARIS?</p>	<p>PARIS Interstate file is used to identify individuals potentially living in another state while receiving IL medical assistance. Contact by mail is made with the household to determine current IL residence. IL has not had a case on the Federal file for a number of years. The Veterans file is used to identify unbudgeted VA benefits and to work with veterans to identify enhanced benefits available from all sources. Veterans income information and potential TPL is investigated at redetermination or if high unreported income is identified. Interstate receipt of benefits are reviewed when identified on PARIS match.</p>
3	<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>NO</p>

	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>	<p style="text-align: center;">YES</p>
	<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

The state reserves the right to investigate any identified discrepancy between what an individual reports and any other source of information concerning an eligibility factor. If electronic verification is not available or current, the state requests documentation to verify eligibility.

Section B1. Additional Comments

The state reserves the right to investigate any identified discrepancy between what an individual reports and any other source of information concerning an eligibility factor. If electronic verification is not available or current, the state requests documentation to verify eligibility.

Section B2. Additional Comments

The state reserves the right to investigate any identified discrepancy between what an individual reports and any other source of information concerning an eligibility factor. If electronic verification is not available or current, the state requests documentation to verify eligibility.

Section C. Additional Comments