

MAGI-BASED ELIGIBILITY VERIFICATION PLAN

(Insert Medicaid, CHIP, or Both)

State:

Last update

Medicaid & CHIP

Connecticut

11/08/2016

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	YES	YES	YES	Both are above, at or below the applicable income standard. Percent & Dollar Threshold	The greater amount of 10% or \$100	YES	YES	The state has implemented the use of state wage and unemployment income information from the CT. Department of Labor as the initial review of self attested income. The reasonable compatibility standard of 10% or \$100 is used (whichever is greater). Self-attested income may then be compared to IRS and Social Security income from the FDSH. Self-attested income is reasonably compatible if within the greater of 10% or \$100. Connecticut received a waiver from CMS under section 1902(e)(14) of the Act to allow the state to determine eligibility based on self-attested amounts and provide a 90-day Reasonable Opportunity Period for the household to resolve inconsistencies on an interim basis. In the future, CT plans to implement earnings from the Work Number as an electronic data source. Self-attestation is accepted without verification when no electronic source is available (eg. alimony and self-employment income for non-filers). There is no estimated time of completion regarding the implementation of the Work Number. This has been removed from scope for 2015. Implementation of the Work Number has not yet been prioritized for 2016.
Residency	YES	NO	NO	N/A	N/A	YES	YES	Paper documentation required only when reasonable explanation does not clarify discrepancy that would impact eligibility.

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Age (Date of Birth)	NO	YES	YES	N/A	N/A	YES	YES	Paper documentation required only when reasonable explanation does not clarify discrepancy that would impact eligibility.
Social Security Number **	NO	NO	YES	N/A	N/A	N/A	YES	Paper documentation is requested if data source is not compatible with what the individual documents on the application.

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Citizenship **	NO	NO	YES	N/A	N/A	N/A	YES	Paper documentation is requested if data source is not compatible with what the individual attests on the application.
Immigration Status **	NO	NO	YES	N/A	N/A	N/A	YES	Paper documentation is requested if data source is not compatible with what the individual attests on the application.
Household Composition	YES	NO	NO	N/A	N/A	YES	YES	For pregnant individuals, paper documentation is requested when individual attests to expecting greater than 3 children. Paper documentation required only when reasonable explanation does not clarify discrepancy that would impact eligibility.
Pregnancy ***	YES	NO	NO	N/A	N/A	NO	NO	
Caretaker Relative	YES	NO	NO	N/A	N/A	YES	YES	Paper documentation required only when reasonable explanation does not clarify discrepancy that would impact eligibility.
Medicare	NO	YES	YES	N/A	N/A	YES	YES	Paper documentation required only when reasonable explanation does not clarify discrepancy.
Application for Other Benefits	NO	YES	YES	N/A	N/A	YES	YES	Paper documentation required only when reasonable explanation does not clarify discrepancy that would impact eligibility.
Other: (Please describe any other eligibility factors in the space below)								

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* 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)	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	YES	Monthly	CT receives IRS data through the Hub at application. For post-enrollment verification, the State computer system interfaces with the IRS computer system to indicate potential income sources. Federal tax information (FTI) available through the IEVS Disclosure of Information to Federal, State and Local Agencies (DIFSLA) and Beneficiary Exchange Earnings Records (BEER). The state understands security requirements in establishing a match with IRS for verification purposes The state is accessing IRS data at renewal through the RRV Hub service.
2. Social Security Administration (SSA) (SSI, Title II)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	The State computer system interfaces with the Social Security computer system via the Hub at application and uses existing direct data matches with SSA, on a daily basis, to indicate potential income sources post-enrollment. The state gets title II income at renewal through the RRV service. The state uses the Hub at application for Title II information.
3. State Wage Information Collection Agency (SWICA)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	The State computer system interfaces with the SWICA computer system, on a daily basis, to indicate potential income sources.

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
4. State Unemployment Compensation	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	The State computer system interfaces with the Department of Labor computer system, on a daily basis, to indicate potential income sources.
5. State Administered Supplementary Payment Program	YES	YES	YES	YES	YES	YES	YES	NO	NO	YES	Other (specify in comments)	Information is available on a daily basis to obtain information while the state Eligibility Verification System (EMS) is on-line. Utilized for income data (distinct from MAGI calculation).
6. State General Assistance Programs	YES	YES	YES	YES	YES	YES	YES	NO	NO	YES	Other (specify in comments)	Information is available on a daily basis to obtain information while the state Eligibility Verification System (EMS) is on-line. Utilized for income data (distinct from MAGI calculation).
7. Supplemental Nutrition Assistance Program (SNAP)	YES	YES	YES	YES	YES	YES	NO	NO	NO	YES	Other (specify in comments)	Information is available on a daily basis to obtain information while the state Eligibility Verification System (EMS) is on-line. Utilized for income data (distinct from MAGI calculation)
8. Temporary Assistance for Needy Families (TANF)	YES	YES	YES	YES	YES	YES	NO	NO	NO	YES	Other (specify in comments)	Information is available on a daily basis to obtain information while the state Eligibility Verification System (EMS) is on-line. Utilized for income data (distinct from MAGI calculation).
9. Office of Child Support Enforcement (OCSE)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		This information is not available electronically.
10. State Income Tax	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		This information is not available electronically.
11. Commercial database: (Please describe any commercial databases in the space below)												

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Work Number	YES	YES	YES	YES	YES	YES	NO	NO	NO	YES	Other (specify in comments)	The Work Number is a user-paid, verification of employment, data base. The Work number allows requestors to receive immediate confirmation of an individual's employment and salary for verification purposes. The information on the Work Number is updated whenever an employer updates their payroll information. FDSH TALX/Work Number is considered as a future option for incorporation into the Exchange intake process but it has not yet been prioritized on a systems schedule. Connecticut plans to continue using their existing implementation for periodic post-enrollment data matching. During the replacement of EMS, Connecticut plans to examine each electronic interface and data match in light of the capabilities of the FDSH but also considering the multi-program needs of the Department of Social Services i.e., solutions not limited to MAGI Medicaid.
12. Other: (Please describe any additional electronic data sources in the space below)												
State Department of Labor (DOL) New Hires Match	YES	YES	YES	YES	YES	YES	NO	NO	NO	YES	Other (specify in comments)	The New Hires Match is a biweekly report that matches applicants and recipients against DOL newly hired employment data.

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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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	YES	NO	YES	YES	YES	Other (specify in comments)	Daily matches used post enrollment to identify any changes related to Medicare, and application for other benefits. Only used at renewal for these specific factors as well. SSN, citizenship and age/DOB will not be reverified after application. Can also be used to resolve inconsistencies related to residency
2. Department of Homeland Security (DHS) - SAVE	YES	NO	NO	YES	NO	YES	NO	NO	NO	NO	NO	NO	YES	YES	YES	Other (specify in comments)	Connecticut uses the Hub for step 1. After Step 1 fails we automatically trigger a notice for additional documentation and start a 90-day reasonable opportunity period. Utilized at renewal and post-enrollment - if individual has met the 5-year bar or if immigration status is subject to change or expire.
3. Vital Statistics	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		The Department of Vital Statistics information is not available for matches.

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
4. Department of Motor Vehicles (DMV)	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	Other (specify in comments)	The information may be used to assist in verifying residency if need be. The information contained in this data file may be accessed on an "as needed" basis
5. Temporary Assistance for Needy Families (TANF)	YES	NO	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	NO	YES	Other (specify in comments)	TANF information may be accessed at anytime to assist in clarifying questionable information, including household composition and caretaker relative status. If discrepancy identified, TANF can be used to verify pregnancy status.
6. Supplemental Nutrition Assistance Program (SNAP)	YES	NO	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	NO	YES	Other (specify in comments)	SNAP information may be accessed at anytime to assist in clarifying questionable information, including residency and household composition..
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	YES	NO	NO	NO	NO	NO	NO	NO	NO	YES	Other (specify in comments)	This information may be accessed at anytime to assist in clarifying questionable information, including residency and household composition.
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>																	

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13. Other: (Please describe additional electronic data sources in the space provided below)																	
12. PARIS*	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	NO	NO	YES	Quarterly	Connecticut receives a quarterly PARIS report indicating individuals that are receiving Medicaid benefits in other states. An evaluation is done and a determination is made to establish if an individual will maintain eligibility for Medicaid benefits in Connecticut. Can be used for residency verification if need be.
State Department of Corrections (DOC) Match	YES	NO	NO	NO	NO	NO	NO	YES	NO	NO	NO	YES	NO	NO	YES	Monthly	This is a electronic data match of convicted Connecticut residents that are in state correctional facilities. Connecticut's legacy eligibility system does not support Medicaid suspensions. As Connecticut must rely on our legacy system during the initial implementation of the Affordable Care Act, we must advise incarcerated individuals that they are not eligible for Medicaid. We understand that incarceration does not preclude medicaid eligibility for an individual--it only prohibits federal reimbursement for most services. Although our legacy eligibility system does not support Medicaid suspension, Connecticut has administrative processes that support the prompt provision of Medicaid coverage for individuals leaving public institutions, as well as to grant Medicaid for in-patient admissions, and process to provide long-term care benefits to DOC individuals being placed in a dedicated long-term care facility . It is our intent to continue this process until we are able to refine our current process, and will access our ability to support Medicaid suspensions with the development of our new integrated eligibility system.

* 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	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	NO	NO	Must be Applied	Self-attestation is being accepted at time of application. Post eligibility periodic data matches are being used at other times. CT is planning to use a third party liability/other insurance contractor to identify enrollment in health insurance. Post enrollment verification is scheduled to be implemented in our ImpaCT system. Pilot is scheduled for October 2016. Statewide rollout is anticipated by Spring 2017.
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)					N/A	State no longer has a waiting period.
4. Access to public employee coverage	YES	NO	NO	NO	N/A	State does not cover children of state employees with title XXI funds.
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	
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	

Eligibility Factor	Self-Attestation Accepted without Additional Verification	Self-Attestation Accepted with Post-Enrollment Verification	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
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):	State plans to use multiple backup data sources before requesting documentation when information from data sources are inconsistent with the individual's attestation.
2	Please describe how the state uses PARIS?	Connecticut receives a quarterly PARIS report indicating individuals that are receiving Medicaid benefits in other states. An evaluation is done and a determination is made to establish if an individual will maintain eligibility for Medicaid benefits in Connecticut, as well as other State and federal benefit programs.
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>	<p>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. 	<p>CT has been granted a waiver to forego using SAVE through the Hub's VLP.</p>
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