(Insert Medicaid, CHIP, or Both) State: Medicaid & CHIP
Pennsylvania
06/14/2016

Last updated: (mm/dd/yyyy)

Section A. <u>Verification Procedures for Factors of Eligibility</u>

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	If the individual attests to income below the applicable standard, and data source indicates income above the applicable income standard, and if the difference between the two is 5% or less, the state will consider that reasonably compatible. If the difference is greater than 5%, reasonable explanation and/or paper documentation will be required. When an individual attests income over the applicable standard and the data source indicates income below the standard, the state will require additional income documentation to see if the individual is really ineligible or eligible. Medicaid and CHIP - Paper documentation would be required if income cannot be obtained from data source or data source information is incompatible and the individual cannot give a reasonable explanation for the inconsistency. See section, D question 1.
Residency	YES	NO	NO		N/A	NO	NO	Medicaid and CHIP - Allow self-attestation. In exceptional cases, if it were to affect eligibility, if data source shows discrepancy when obtaining the information for other purposes or there is inconsistent information with the self-attested information and the individual cannot give a reasonable explanation for the inconsistency, then paper documentation would be required. See Section D, question 1.
Age (Date of Birth)	NO	NO	YES		N/A	YES	YES	Medicaid and CHIP - Date of birth is confirmed for applicants along with SSN and citizenship verification through a Social Security Administration match for US citizens and through a SAVE match for non-citizens. Department of Motor Vehicles and Vital Statistics (PA Department of Health) are also used as data sources in verifying date of birth. Paper documentation would be required if date of birth cannot be obtained from data source or data source information is incompatible and the individual cannot give a reasonable explanation for the inconsistency. See Section D, question 1.
Social Security Number **	NO	NO	YES	N/A	N/A	N/A	YES	Medicaid and CHIP - PA uses the Hub to verify the individual's SSN. Paper documentation would be required if information is inconsistent with the data source or cannot be obtained from a data source. See Section D, question 1.

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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
Citizenship **	NO	NO	YES	N/A	N/A	N/A	YES	Medicaid and CHIP - PA verifies citizenship through the Hub. Paper documentation would be required if information is inconsistent with the data source or cannot be obtained from a data source. See Section D, question 1.
Immigration Status **	NO	NO	YES	N/A	N/A	N/A	YES	Medicaid and CHIP - PA verifies immigration status through the Hub at step 1. For steps 2 and 3, PA has an indefinite Hub waiver to use its direct connection to SAVE. If step 2 fails, the state asks the applicant for additional documentation and the G845 is sent to DHS for evaluation.
Household Composition	YES	NO	NO	N/A	N/A	NO	NO	Medicaid and CHIP - PA allows self-attestation. In exceptional cases, if it were to affect eligibility, if data source shows discrepancy when obtaining the information for other purposes or there is inconsistent information with the self-attested information and the individual cannot give a reasonable explanation for the inconsistency, then paper documentation would be required. See Section D, question 1.
Pregnancy ***	YES	NO	NO	N/A	N/A	NO	NO	Medicaid and CHIP - PA accepts self attestation. Paper documentation required only if PA finds an inconsistency.
Caretaker Relative	YES	NO	NO	N/A	N/A	NO	NO	Medicaid - PA allows self-attestation. Paper documentation required only if PA finds an inconsistency. See Section D, question 1. CHIP N/A
Medicare	NO	YES	YES	N/A	N/A	YES	YES	Medicaid —If data source shows discrepancy then reasonable explanation/paper documentation would be required. See Section D, question 1. CHIP N/A
Application for Other Benefits	NO	YES	YES	N/A	N/A	YES	YES	Medicaid and CHIP - Reasonable explanation/paper documentation would be required if information is inconsistent with the data source or cannot be obtained from a data source. Public assistance benefits available through the PA Department of Public Welfare or benefits such as UC, SSD and SSI through an outside agency. See Section D, question 1. Uses SSA as a backup source for this criteria.

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
Other: (Please describe any other eligibility factors in the space below)								
* 61-1								

^{*} States must check electronic data sources determined useful to verify income in accordance with 42 CFR 435.948 but can be done post-enrollment.

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State:
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Section B1. <u>Use of Electronic Data Sources</u>

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)	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	Monthly	Medicaid will use the existing IRS feed, which is separate and distinct from the Hub. Pennsylvania does batch runs monthly and annually for current IRS data received. This is accessed as needed, at application, renewal and post enrollment. Receive IRS unearned income file and Social Security Administration's (SSA) Earning Reference File which SSA obtains from the Internal Revenue Record. May need additional information (verification) for point in time income for pension, interest income or other income sources reported by the IRS that change. CHIP N/A
2. Social Security Administration (SSA) (SSI, Title II)	YES	YES	YES	YES	YES	YES	YES	YES	YES			Medicaid and CHIP - PA is using SSA data through the Hub at application and renewal. PA also uses its existing SSA feed post-enrollment to monitor changes. Agency receives COLA information annually. Other criteria may be used if a discrepancy exist or no information received back from SSA. CHIP - PA runs batches through the RRV services monthly

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
3. State Wage Information Collection Agency (SWICA)	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	Other (specify in comments)	Medicaid and CHIP - Batch runs daily from Labor and Industry New Hires. Quarterly for wage information. If information is different from what is reported by the household, this information may not be useful for verification of point in time income. Medicaid - Used at application and renewal to verify reported income. Real-time access to quarterly information available for real-time determinations. CHIP - Used for real-time determinations to verify reported income. Used at application to verify reported income. Accessed as needed postenrollment.
State Unemployment Compensation	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	Other (specify in comments)	Medicaid and CHIP- Batch runs daily and monthly. Accessed as needed post enrollment. May use other criteria if claim was just filed or not yet processed.
5. State Administered Supplementary Payment Program	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	Other (specify in comments)	Medicaid - PA has an integrated eligibility system. Accessed as needed and useful if individual is open for other public assistance benefits. Integrated eligibility system will show that an individual is open and eligible for SSP. May use other state data source (OnBase) for payment information. CHIP - N/A
6. State General Assistance Programs	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	Other (specify in comments)	Medicaid - Pennsylvania only has GA-related Medical Assistance. PA has an integrated eligibility system. Accessed as needed and useful if individual is open for other public assistance benefits. CHIP N/A
7. Supplemental Nutrition Assistance Program (SNAP)	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	Other (specify in comments)	Medicaid and CHIP - PA has an integrated eligibility system. Accessed as needed and useful if individual is open for other public assistance benefits. State will use raw income data (as a reference).

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	YES	YES	YES	YES	Other (specify in comments)	Medicaid and CHIP - PA has an integrated eligibility system. Accessed as needed and useful if individual is open for other public assistance benefits. State will use raw income data (as a reference).
9. Office of Child Support Enforcement (OCSE)	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	Other (specify in comments)	Medicaid and CHIP - Accessed as needed from state source (PACSES). Receive payment amounts and payment dates. Information may or may not be useful if reporting that support is voluntary.
10. State Income Tax	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Medicaid and CHIP - No current access to data source for State Income Tax.
11. Commercial database: (Pease describe any commercial databases in the space below)											•	
Work Number Express Service	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	Other (specify in comments)	Medicaid - Accessed for all applications and renewals via real-time interface through the HUB. If not available through the HUB due to insufficient information or technical issues, state data source attempted (Equifax). PA runs monthly batches through the RRV service. Other criteria may be used as this data source does not include all employers. Unable to obtain wage information for everyone through this data source. CHIP - Accessed for all real-time applications via real-time interface through the HUB. Accessed for all applications and renewals through the hub. Other criteria may be used as this data source does not include all employers. Unable to obtain wage information for everyone through this data source.

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
12 Others (Blesse describe and												
12. Other: (Please describe any additional electronic data sources in the space below)												
OnBase (SSP data base)	YES	YES	YES	YES	YES	NO	YES	NO	NO	YES	Other (specify in comments)	Medicaid - Accessed as needed. Real time state database for State Supplementary Payments. SSA used as other criteria. Using post-enrollment to monitor changes. This database is separate and distinct from our integrated eligibility system.

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 c

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Section B2. <u>Use of Electronic Data Sources</u>

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	YES	NO	YES	YES	YES	Other (specify in comments)	Medicaid and CHIP - Used upon request for updated information and accessed as needed by the agency or when there is a change by SSA. Used at request for verification of the receipt of Medicare or updates or case changes. State also has this data source available to use for residency and caretaker/relative if needed for discrepancies. Used for Medicare/Application for Other Benefits postenrollment and renewal through current internal feed.
2. Department of Homeland Security (DHS) - SAVE	YES	NO	YES	YES	NO	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO		Medicaid and CHIP - Only used immigration status verification at renewal if there is a change in immigration status or 5 yr bar is met. PA verifies immigration status through the Hub's VLP service for step 1. An existing direct connection with SAVE is used for steps 2 and 3.
3. Vital Statistics	YES	NO	YES	NO	NO	YES	NO	NO	NO	NO	NO	NO	YES	NO	YES	Other (specify in comments)	Medicaid - Accessed as needed if discrepancy in information from other data sources and what is reported by the individual. Used as a backup for Citizenship. State also has this data source available to use for caretaker/relative if needed for discrepancies. CHIP N/A
4. Department of Motor Vehicles (DMV)	YES	NO	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	YES	YES	NO		Medicaid - Accessed as needed if discrepancy in information from other data sources and what is reported by the individual. State also has this data source available to use for residency if needed for discrepancies. Utilized on an as needed basis post-enrollment. CHIP N/A
5. Temporary Assistance for Needy Families (TANF)	YES	YES	YES	YES	NO	NO	NO	NO	NO	YES	YES	NO	YES	YES	NO		Medicaid and CHIP - PA has an integrated eligibility system. Accessed as needed and useful if individual is open for other public assistance benefits. Only use for SSN if verified with SSA first. Only use for citizenship and immigration status if verified in accordance with Medicaid/CHIP rules. State also has this data source available to use for residency, age/DOB, household composition and caretaker/relative if needed for discrepancies it is made aware of. Utilized on an as needed basis post-enrollment.

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
6. Supplemental Nutrition Assistance Program (SNAP)	YES	YES	YES	YES	NO	NO	NO	NO	NO	YES	YES	NO	YES	YES	NO		Medicaid and CHIP - PA has an integrated eligibility system. Accessed as needed and useful if individual is open for other public assistance benefits. Only use for SSN if verified with SSA first. Only use for citizenship and immigration status if verified in accordance with Medicaid/CHIP rules. State also has this data source available to use for residency, age/DOB, household composition and caretaker/relative if needed for discrepancies it is made aware of. Utilized on an as needed basis post-enrollment.
7. Office of Child Support Enforcement	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO		Medicaid and CHIP - Accessed as needed. For Medical support see Additional Comments (B2). May or may not be useful for Medical support information. State also has this data source available to use for residency, age/DOB, household composition and caretaker/relative if needed for discrepancies. Utilized on an as needed basis post-enrollment.
8. State General Assistance Programs	YES	YES	YES	YES	NO	NO	NO	NO	NO	YES	YES	NO	YES	YES	NO		Medicaid - Pennsylvania only has GA-related Medical Assistance. PA has an integrated eligibility system. Accessed as needed and useful if individual is open for other public assistance benefits. Only use for SSN if verified with SSA first. Only use for citizenship and immigration status if verified in accordance with Medicaid/CHIP rules. State also has this data source available to use for residency, age/DOB, household composition and caretaker/relative if needed for discrepancies. Utilized on an as needed basis postenrollment. CHIP N/A
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	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)						•	•									,	
Health Management Systems	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO	NO		CHIP - Currently used at application for select categories of CHIP to identify enrollment in other insurance. To be expanded to include entire CHIP population at application and recurring at a interval. Medicaid N/A

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
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	YES	NO	NO	YES	YES	Quarterly	Medicaid - Batch runs annually for VA matches and quarterly for interstate matches. Exception is that New Jersey interstate match is done semi-annually. Accessed as needed. CHIP currently not permitted to use PARIS information. State also has this data source available to use for residency if needed for discrepancies it is made aware of.

^{*} Under 42 CFR 435.945(d), all State Medicaid eligibility systems must conduct a match with PARIS for Interstate benefit information.

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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) If Yes, please describe in comments	Paper Documentation Required from the Individual (Y/N)	Non- Applicable (N/A)	Comments
Applicant does not have other coverage	NO	NO	YES	YES	Must be Applied	CHIP does cross matches with Medicaid, internal with the CHIP insurer, with the state health benefits carrier and Health Management Systems in an effort to ensure the applicant/beneficiary does not have other coverage.
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	Eliminated the waiting period requirement in October 2013.
Access to public employee coverage	NO	YES	YES	YES		We do not do a check with the state health benefits carrier at application, but conduct quarterly matches, so best fits post enrollment verification.
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	
5i. Waiting period exception #9 (describe):					N/A	
5j. Waiting period exception #10 (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) If Yes, please describe in comments	Paper Documentation Required from the Individual (Y/N)	Non- Applicable (N/A)	Comments
6. Other eligibility factors or exceptions to eligibility factors: (Please describe in the space provided below)						
Creditable Health Insurance	NO	NO	YES	YES		CHIP - crosshatch performed prior to enrollment with a third party liability contractor and internal cross match with the contracted insurer to ensure no creditable health insurance. Medicaid - not an eligibility factor
State Government employee	NO	YES	YES	YES		CHIP - cross match run to ensure that all CHIP enrollees are not eligible for benefits from a state/public agency. Medicaid - not an eligibility factor

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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):	Medicaid and CHIP - For those factors that the state does not accept self-attestation without additional verification, paper documentation or other 3rd party verification would be required if information from the data source is incompatible to what the individual or household is reporting. Additional verification would be required in almost any of the eligibility factors when information is not reasonably compatible or information cannot be obtained from a data source.
		State also uses multiple sources as a backup prior to requesting paper documentation. Examples include Vital Statistics, SNAP, TANF, State General Assistance Programs as backups for citizenship and SSA, SNAP, TANF, State General Assistance Programs as backups for Application for Other Benefits.
2	Please describe how the state uses PARIS?	Medicaid - Pennsylvania has agreements with Department of Veteran Affairs and Administration for Children and Families. An annual match of Veteran Administration records is ran against PA client database. Pennsylvania participates in quarterly interstate matches with the goal to stop duplicate benefits. A semi-annual interstate match is done with New Jersey. PARIS information is not considered verified upon receipt but must be acted upon through client contact for further verification. CHIP is currently not allowed to use PARIS information.
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
	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.	
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.	PA has been granted an indefinite Hub waiver to use an existing SAVE match for steps 2 & 3 rather than using the Hub's VLP Service for this steps.
5	Describe any additional MAGI-based eligibility verification policies and procedures that have not been covered in this verification plan (optional):	

Section A. Additional Comments

Section B1. Additional Comments

Section B2. Additional Comments

Medical Support and Payments: Individuals can attest on their application that they agree to cooperate with the state in establishing paternity and obtaining medical support payments. If information is received (post-authorization) that the individual is not cooperating, the agency would take action to terminate the parent's eligibility, however good cause would be researched prior to taking an adverse action. Currently in Pennsylvania, the non-cooperation of a parent does not impact a child's Medicaid eligibility.

Section C. Additional Comments