

Reasonable Compatibility Scenarios

The following scenarios provide some examples of the options available to states for determining reasonable compatibility with respect to income:

Scenario 1: Charles Individual self-attestation of income is below the Medicaid MAGI eligibility level Data match shows that Charles' income is below the Medicaid MAGI eligibility level

- Eligibility level = 133% FPL
- Self-attested current income = 115% FPL (only reports income from work)
- IRS data = 130% FPL
- Quarterly Wage report (past 3 months) = 125% FPL

<u>Determination</u>: Charles is determined eligible for Medicaid because the information received from the electronic data sources and the self-attested information is all below the Medicaid eligibility level.

Scenario 2: Betty Individual self-attestation of income is above the Medicaid MAGI eligibility level Data match shows that the Betty's income is above the Medicaid MAGI eligibility

- Eligibility level = 133% FPL
- Self-attested current income = 160% FPL
- IRS data = 180% FPL
- Quarterly Wage report (past 3 months) = 165% FPL

<u>Determination</u>: The self-attested income and the information from the data sources are allabove the Medicaid eligibility level, so Betty is determined ineligible for Medicaid and screened for eligibility for CHIP (if applicable) and APTC/CSR through the Exchange.

Scenario 3: Sophie

Individual self-attestation of income is below the Medicaid MAGI eligibility level Data match shows that Sophie's income is above the Medicaid MAGI eligibility level

- Eligibility level = 133% FPL
- Self-attested current income = 125% FPL
- IRS data = 160% FPL
- Quarterly Wage report (past 3 months) = 140% FPL

Determination: Data is not consistent so state should apply its reasonable compatibility standard.

Options:

- 1. Determine Sophie eligible for Medicaid based on her attested income and resolve the inconsistency post-enrollment.
- 2. Use a reasonable compatibility standard based on a based on a percentage or dollar amount threshold. For example, if the difference between self-attested income and the data source income is less than 10% the State can determine that the data is reasonably compatible and determine Sophie eligible for Medicaid. If not reasonably compatible, the state may move to option 3 or 4.
- 3. Request an explanation of the discrepancy. If reasonable, for example Sophie recently had her hours cut, determine her eligible for Medicaid. If not reasonable, require further verification, including documentation if no other data sources are available.
- 4. Request documentation from Sophie if no other data sources are available.

Scenario 4: James

Individual self-attestation of income is above the Medicaid MAGI eligibility level Data match shows that James' income is below the Medicaid MAGI eligibility level.

- Eligibility level = 133% FPL
- Self-attested current income = 160% FPL
- IRS data = 140% FPL
- Quarterly Wage report (past 3 months) = 125% FPL

<u>Determination</u>: Self attested data is above the Medicaid limit but the current income data source is below.

Options:

- 1. Determine James ineligible for Medicaid based on his attested income and screen him for CHIP and APTC/CSR through the Exchange.
- 2. Inform James of the discrepancy and ask him to confirm his attestation or request an explanation of the discrepancy before determining him ineligible for Medicaid and screening him for CHIP and APTC/CSR through the Exchange.