

## MAGI-BASED ELIGIBILITY VERIFICATION PLAN

(Insert Medicaid, CHIP, or Both)

Medicaid & CHIP

State:

Texas

Date Submitted: (mm/dd/yyyy)

07/22/2019

### 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.	N/A	NO	YES	When the individual attests to income below the applicable standard, and the data source indicates income above the applicable standard, the individual will be required to provide paper documentation of income. No percentage or dollar threshold will be used. When the individual attests to income above the applicable standard and data source indicates income below the standard. HHSC will take that attestation and make the person ineligible and screen for APTC.
Residency	YES	NO	YES	N/A	N/A	NO	YES	*Self attestation of residency is allowed for all children's Medicaid and CHIP. *Verification of residency is required for adult groups. For these groups, electronic sources will be used. If the client statement is not compatible with the information from the data sources and affects eligibility, the client will be required to provide paper documentation of residency.
Age (Date of Birth)	YES	NO	YES	N/A	N/A	NO	YES	*Self attestation of date of birth is allowed for children's Medicaid, CHIP, and the age of adults applying for Medicaid. *Verification of a child's date of birth is required for the purpose of verifying the adult's "caretaker relative" status. For these groups, electronic sources will be used. If the client statement is not compatible with the information from the data sources and affects eligibility, the client will be required to provide paper documentation of the child's date of birth.
Social Security Number **	NO	NO	YES	N/A	N/A	N/A	YES	State plans to use current real time SOLQI data feed for verification. In the case that an SSN is not verified with SOLQI, the SSN will be verified post-enrollment, if otherwise eligible, through a monthly batch process with the SSA using the Enumeration Verification System.
Citizenship **	NO	NO	YES	N/A	N/A	N/A	YES	State plans to use current SOLQI data feed for verification. In the event that SOLQI cannot verify citizenship, HHSC will attempt to verify citizenship with vital statistics. In the event that vital statistics information cannot verify citizenship, HHSC will provide applicants who are otherwise eligible with a 90-day period of reasonable opportunity to provide verification of citizenship. Updates to the SOLQI services to receive citizenship data in "realtime" are scheduled for implementation Jan. 1, 2014.
Immigration Status **	NO	NO	YES	N/A	N/A	N/A	YES	State plans to use current DHS SAVE data feed for verification. In the event that DHS SAVE cannot verify immigration status, HHSC will provide applicants who are otherwise eligible with a 90-day period of reasonable opportunity to provide verification of immigration status.
Household Composition	YES	NO	NO	N/A	N/A	NO	NO	
Pregnancy ***	YES	NO	NO	N/A	N/A	NO	NO	
Caretaker Relative	NO	NO	YES	N/A	N/A	NO	YES	*Age of the child and relationship to the child will be verified using SSA, the Texas Birth Verification Systems, and TANF or SNAP if data is available. *The domicile requirement cannot be verified electronically. Therefore, the client will be required to provide paper documentation of the child living in their home.

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
Medicare	<b>NO</b>	<b>NO</b>	<b>YES</b>	<b>N/A</b>	<b>N/A</b>	<b>NO</b>	<b>YES</b>	If an inconsistency is identified based on information that Texas has obtained from the data source, paper documentation will be required.
Application for Other Benefits	<b>NO</b>	<b>YES</b>	<b>YES</b>	<b>N/A</b>	<b>N/A</b>	<b>NO</b>	<b>YES</b>	If an inconsistency is identified based on information that Texas has obtained from the data source, paper documentation will be required.
Other: (Please describe any other eligibility factors in the space below)	N/A							

\* 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.

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**Section B1. Use of Electronic Data Sources**

**Financial:**

Electronic Data Source	Determined Useful (Y/N) <sup>1</sup>	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		Texas HHSC has determined that the income data available from the IRS via the Federal Data Services Hub is not timely and is not comprehensive. Therefore, Texas will-not use the data to determine eligibility for Medicaid or CHIP.
2. Social Security Administration (SSA) (SSI, Title II)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	Frequency - Monthly HHSC receives Title II income in real-time through the HHSC's direct interface with SSA (SOLQi).
3. State Wage Information Collection Agency (SWICA)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	Used post-enrollment to identify any changes. Frequency - Monthly
4. State Unemployment Compensation	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	Used post-enrollment to identify any changes. Frequency - Monthly
5. State Administered Supplementary Payment Program	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO	Other (specify in comments)	Texas does not administer a supplementary payment program available to MAGI groups.
6. State General Assistance Programs	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Texas does not administer a State General Assistance Program.
7. Supplemental Nutrition Assistance Program (SNAP)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	Texas operates an integrated system for eligibility determinations for assistance programs. The Texas Integrated Eligibility Redesign System (TIERS) allows eligibility workers to access an applicant's information from applications for other programs such as SNAP and TANF. Frequency - Any time an income change is reported.
8. Temporary Assistance for Needy Families (TANF)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	Texas operates an integrated system for eligibility determinations for assistance programs. The Texas Integrated Eligibility Redesign System (TIERS) allows eligibility workers to access an applicant's information from applications for other programs such as SNAP and TANF. Frequency - Any time an income change is reported.

Electronic Data Source	Determined Useful (Y/N) <sup>1</sup>	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
9. Office of Child Support Enforcement (OCSE)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Information obtained from the Office of Child Support Enforcement will not be used for MAGI-based eligibility because child support is not considered in the calculation of income using MAGI methodology.
10. State Income Tax	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Texas does not impose an individual income tax.
11. Commercial database: (Please describe any commercial databases in the space below)												
TALX / The Work Number	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO	Other (specify in comments)	Texas will use data from the State Wage Information Collection Agency (SWICA) as the primary electronic data source to verify income.
12. Other: (Please describe any additional electronic data sources in the space below)												
Office of Attorney General (OAG) Employee New Hire Data	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	HHSC receives new hire data daily from OAG. This data is used by centralized eligibility staff to identify changes in circumstances and is accessed by other eligibility staff for use at application and redetermination, and post enrollment to identify any changes.
Choices Information Transmittal	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	HHSC receives new employment and expected wages reported by Texas Workforce Commission to HHSC for TANF recipients when a local workforce agency assists the individual in getting a job. This data is transmitted daily. Used post-enrollment as received to identify any changes.
State Employee Benefits Data from the Employees Retirement System (ERS) and Teacher Retirement System (TRS)	YES	YES	YES	YES	YES	YES	NO	NO	YES	YES	Monthly	Income data from this source is currently matched monthly with active recipients.

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**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	YES	NO	YES	YES	YES	Monthly	<p>State plans to use current SOLQi data feed for verification. In the case that SOLQi is unavailable SSA information will be verified using a daily batched SSA verification service.</p> <p>In the case that an SSN is not verified with SOLQi or the daily batch service, the SSN will be verified post-enrollment, if otherwise eligible, through a monthly batch process with the SSA using the Enumeration Verification System.</p> <p>Updates to the SOLQi services to receive citizenship data in "real-time" are scheduled for implementation Jan. 1, 2014.</p> <p style="text-align: right;">Data source used at Renewal and Post Enrollment to identify any changes in Medicare or Application for Other Benefits.</p>
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)	Texas will be using current real-time matching with DHS-SAVE System. Utilized at renewal if 5-year bar is met or post-enrollment as individual reports a status change.
3. Vital Statistics	YES	NO	YES	NO	NO	YES	NO	NO	YES	NO	NO	YES	YES	NO	YES	Other (specify in comments)	<p>Texas HHSC receives date of death data daily to identify and disenroll deceased individuals.</p> <p>Real-time service with vital statistics agency is utilized at application to verify Caretaker Relative status and Date of Birth.</p>
4. Department of Motor Vehicles (DMV)	YES	NO	NO	NO	YES	YES	NO	NO	NO	NO	NO	YES	YES	NO	NO		Texas Department of Public Safety data can be used to verify identity when a Tier 2 citizenship source has been provided.

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
5. Temporary Assistance for Needy Families (TANF)	YES	YES	YES	YES	YES	YES	NO	NO	YES	YES	YES	NO	YES	YES	NO	Other (specify in comments)	Texas operates an integrated system for eligibility determinations for federal assistance programs. The Texas Integrated Eligibility Redesign System (TIERS) will allow eligibility workers to access an applicant's information from applications for other programs such as SNAP and TANF.  Only use for SSN if verified with SSA first. Only use for citizenship and immigration status if verified in accordance with Medicaid/CHIP rules.
6. Supplemental Nutrition Assistance Program (SNAP)	YES	YES	YES	YES	YES	YES	NO	NO	YES	YES	YES	NO	YES	YES	NO	Other (specify in comments)	Texas operates an integrated system for eligibility determinations for federal assistance programs. The Texas Integrated Eligibility Redesign System (TIERS) will allow eligibility workers to access an applicant's information from applications for other programs such as SNAP and TANF.  Only use for SSN if verified with SSA first. Only use for citizenship and immigration status if verified in accordance with Medicaid/CHIP rules.
7. Office of Child Support Enforcement	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	Other (specify in 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		

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
11. Commercial database: <i>(Please describe any commercial databases in the space below)</i>	N/A																
13. Other: <i>(Please describe additional electronic data sources in the space provided below)</i>																	
12. PARIS*	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO	NO	YES	Quarterly	Texas participates in the quarterly Interstate Match through the PARIS system to check for duplicate payments made to the same client in more than one state. Texas also participates in the PARIS Veteran's Administration Match.

\* 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 (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	Data provided by claims administrator is used to verify insurance at the end of the child eligibility period. This process only applies to individuals for which the data is available.
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)	YES	NO	NO	NO		
4. Access to public employee coverage					N/A	
5a. Waiting period exception #1 (describe):	YES	NO	NO	NO		A parent's employment was terminated due to layoff, reduction in force or the closure of a business
5b. Waiting period exception #2 (describe):	YES	NO	NO	NO		The loss of Medicaid eligibility (due to income, resources or the child ages out of Medicaid)
5c. Waiting period exception #3 (describe):	YES	NO	NO	NO		Dependent coverage was terminated by an employer
5d. Waiting period exception #4 (describe):	YES	NO	NO	NO		A parent's insurance benefit under the Consolidated Omnibus Budget Reconciliation Act of 1984 was terminated
5e. Waiting period exception #5 (describe):	YES	NO	NO	NO		A parent's marital status has changed resulting in the loss of coverage
5f. Waiting period exception #6 (describe):	YES	NO	NO	NO		The child is no longer covered by the Texas Employee Retirement System
5g. Waiting period exception #7 (describe):	YES	NO	NO	NO		A loss of CHIP eligibility from another state
5h. Waiting period exception #8 (describe):	YES	NO	NO	NO		The health insurance coverage costs 10% or more of the family's net income
5i. Waiting period exception #9 (describe):	YES	NO	NO	NO		Other circumstances similar to those described that result in an involuntary loss of insurance coverage
5j. Waiting period exception #10 (describe):	YES	NO	NO	NO		The Health and Human Services Commission (HHSC) determines that good cause exists based on information provided by the applicant or information otherwise obtained by HHSC.
6. Other eligibility factors or exceptions to eligibility factors: <i>(Please describe in the space provided below)</i>					N/A	

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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):	Texas accepts self-attestation without additional verification for many factors of eligibility. For the eligibility criteria for which Texas requires verification, HHSC currently leverages an extensive number of electronic data sources wherever they exist, including using vital statistics as a back up for citizenship. States must make major systems changes to implement ACA eligibility requirements. Determining whether additional data sources exist, and then establishing interfaces with those sources would result in substantial administrative burden and costs. As a result, Texas will continue to require paper documentation of certain eligibility factors when electronic data is not available or inconsistent with the individual's attestation, when affecting eligibility, in order to protect the integrity of the Medicaid and CHIP programs.
2	Please describe how the state uses PARIS?	The Texas Office of the Inspector General (OIG) administers a quarterly data match with the Public Assistance Reporting Information System (PARIS). OIG provides Texas client enrollment information for the following programs: Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), and Medicaid. This information is then matched with client enrollment information from other states. This process is referred to as the Interstate Match. The resulting matches are used to validate client reported circumstances and identify possible candidates for erroneous payments. Texas also participates in the PARIS Veteran's Administration Match. This process provides data on active HHSC SNAP, TANF and Medicaid recipients to the Defense Manpower Data Center (DMDC) for PARIS Matching. The return file is sent back to HHSC who provides the information to the Texas Veteran's Commission (TVC).
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).	<b>NO</b>

	<b>Question</b>	<b>Response</b>
	<p>If (YES), please submit a letter to CMS requesting such approval describing how the the state meets the following requirements:</p> <ul style="list-style-type: none"> <li>1) Reduces administrative costs and burdens on both individuals and the State,</li> <li>2) Maximizes accuracy and minimizes delay,</li> <li>3) Meets the requirements related to confidentiality, disclosure, maintenance and use of information,</li> </ul> <p>and</p> <ul style="list-style-type: none"> <li>4) Promotes coordination with other insurance affordability programs.</li> </ul>	<p><b>N/A</b></p>
<b>4</b>	<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><b>YES</b></p>
	<p>If (YES), please submit a letter to CMS requesting such approval describing how the the state meets the following requirements:</p> <ul style="list-style-type: none"> <li>1) Reduces administrative costs and burdens on both individuals and the State,</li> <li>2) Maximizes accuracy and minimizes delay,</li> <li>3) Meets the requirements related to confidentiality, disclosure, maintenance and use of information,</li> </ul> <p>and</p> <ul style="list-style-type: none"> <li>4) Promotes coordination with other insurance affordability programs.</li> </ul>	<p>Letter submitted to CMS.</p>
<b>5</b>	<p>Describe any additional MAGI-based eligibility verification policies and procedures that have not been covered in this verification plan (optional):</p>	<p>N/A</p>

<b>Section A. Additional Comments</b>
<b>Section B1. Additional Comments</b>
<b>Section B2. Additional Comments</b>
<b>Section C. Additional Comments</b>