(Insert Medicaid, CHIP, or Both) Medicaid & CHIP

State: Utah

last updated: 04/08/2016
Section A Verification Procedures for Factors of Fligibility

	Section A. Verific	cation 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.	Both are above, at or below the applicable income standard.	NO	YES	If the discrepancy does not effect enrollment, no action is taken. (Example both the attested amount and the verified levels are below or above the income standard). If eligibility is effected and if no electronic match or data is not reasonably compatible meaning that the individual attested to income below the applicable income limit and electronic data sources show income above, will request paper documentation. If the individual attested to income above the applicable income limit and electronic data sources show income below will request paper documentation.

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
Residency	NO	NO	YES	N/A	N/A	YES	YES	If the client attests that they have resolved the discrepancy with the other agency (for example DMV or SSA source of data) we will query the electronic data again before asking for documentation. After all electronic resources have been exhausted we would request paper documentation. This action is only taken if inconsistancy affects eligibility. Benefits would be pending until the client can explain the discrepancy or provide proof of residency. DMV data for residency is real time. SSA data is real time.
Age (Date of Birth)	NO	NO	YES	N/A	N/A	YES	YES	If the client attests that they have resolved the discrepancy with the other agency (SSA, vital stats source of data) we will query the electronic data again before asking for documentation. Eligibility will be determined using verified electronic data. If customer resolves the discrepancy the eligibility can be reassesed. If unable to resolve through electronic data sources, and inconsistancy affects eligibility, paper documentation will be requested.

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
Social Security Number **	NO	NO	YES	N/A	N/A	N/A		If the client attests that they have resolved the discrepancy with SSA we will query the electronic data again before asking for documentation. Any time a new household member is added by the system or worker (application, re-certification, or change) and the information is saved, a real time interface occurs for only the new member (not previously verified) to verify SSN, citizenship, and identity. If the real time verification returns as meeting the requirements, all these evidence types are considered verified and not requested from the applicant.
Citizenship **	NO	NO	YES	N/A	N/A	N/A		If the client attests that they have resolved the discrepancy with SSA we will query the electronic data again before asking for documentation. Any time a new household member is added by the system or worker (application, re-certification, or change) and the information is saved, a real time interface occurs for only the new member (not previously verified) to verify SSN, citizenship, and identity. If the real time verification returns as meeting the requirements, all these evidence types are considered verified and not requested from the applicant.

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
Immigration Status **	NO	NO	YES	N/A	N/A	N/A	YES	At time of application submission, when a customer provides an A#, a real time interface with SAVE occurs and the result is included and populated with the other application data. Utah uses an existing data source (eFIND) for all three steps of SAVE for immigration verification. Utah has been granted a full Hub waiver to use an existig SAVE match rather than using the Hub VLP Service.
Household Composition	YES	NO	NO	N/A	N/A	NO		In most cases the states accepts self-attestation with no additional verfication unless there is information in internal data sources or through the course of other verifications that indicates an inconsistency that would affect eligibility. We will accept client attestation for multiple child pregnancy which would impact household size.
Pregnancy ***	YES	NO	NO	N/A	N/A	NO	NO	We will accept client attestation for multiple child pregnancy. In rare cases, if there are discrepancies in attestation during the application process, or someone attests to being pregnant but we have information that indicates they are not, we may ask for additional documentation.

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
Caretaker Relative	YES	NO	NO	N/A	N/A	NO	NO	In most cases the states accepts self-attestation unless there is information in internal data sources or through the course of other verifications that indicates an inconsistency that would affect eligibility. For example, an individual claims themselves as a relative and the state has conflicting information.
Medicare	NO	NO	YES	N/A	N/A	YES	VES	If the client attests that they have resolved the discrepancy with SSA or CMS (source of data) we will query the electronic data again before asking for documentation.
Application for Other Benefits	NO	NO	YES	N/A	N/A	YES		If the client attests that they have resolved the discrepancy with the other agency (SSA, PARIS, unemployment source of data) we will query the electronic data again before asking for documentation.
Other: (Please describe any other eligibility factors in the space below)								

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
Student Status	YES	NO	NO	N/A	N/A	NO	NO	We will accept self-attestation without additional verification, unless there is information in internal data sources or through the course of other verifications that indicates an inconsistency that would affect eligibility, then we will ask for paper documentation.
Medical Support Enforcement	NO	YES	YES	N/A	N/A	YES	YES	If the client attests that they have resolved the discrepancy with ORS (ORSIS data system) we will query the electronic data again before asking for documentation. We use ORS data to verify cooperation with identifying the absent parent. If the person is not cooperating with ORS, the adult may be sanctioned while the kids remain.
Third Party Liability	NO	NO	YES	N/A	N/A	YES	YES	If the client attests that they have resolved the discrepancy with ORS (ORSIS data system) we will query the electronic data again before asking for documentation. For CHIP only, at application we verify TPL before we approve the case. At renewal we verify post eligibility.

^{*} 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

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						
the federal da	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.

(Insert Medicaid, CHIP, or Both) Medicaid & CHIP

State:

Utah

last updated: 04/08/2016

Section B1. Use of Electronic Data Sources

nancial:													
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)	NO	YES	NO	YES	YES	YES	NO	NO	NO	NO		Utah receives a yearly batch of IRS data that is not considered useful. We do not connect to the hub for FTI.	
2. Social Security Administration (SSA) (SSI, Title II)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	Used post enrollment when notified of a change by the client, another agency, or electronic data source. Has an automatic update from SSA daily. If there is a change in circumstance that would affect eligibility will act on the information. State will not access this data through the Hub. State will access real time through SOLQI	
3. State Wage Information Collection Agency (SWICA)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	Has an automatic daily feed of new employment for an individual. If there is a change in circumstance that would affect eligibility will act on the information.	
4. State Unemployment Compensation	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	Has an automatic daily feed of new employment for an individual. If there is a change in circumstance that would affect eligibility will act on the information.	
5. State Administered Supplementary Payment Program	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO		May also use this data source post-enrollment to resolve inconsistencies with other data sources or to verify reported changes in income.	
6. State General Assistance Programs	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		The state General Assistance financial eligibility is handled by the same eligibility computer system as Medicaid.	
7. Supplemental Nutrition Assistance Program (SNAP)	NO	YES	YES	YES	YES	YES YES N		NO	NO	NO		SNAP eligibility is handled by the same eligibility computer system as Medicaid.	

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)	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		TANF financial assistance eligibility is handled by the same eligibility computer system as Medicaid.
Office of Child Support Enforcement (OCSE)	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO		May also use this data source post-enrollment to resolve inconsistencies with other data sources or to verify reported changes in income.
10. State Income Tax	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		Utah discontinued using state income tax info for MAGI determinations in 2014. Utah only used tax info for CHIP renewals prior to 2014. We no longer have an ELE option.
11. Commercial database: (Pease describe any commercial databases in the space below)		l	•									
The Work Number	YES	NO	YES	YES	YES	YES	NO	YES	YES	NO		Data is incomplete because it does not include overtime or tips or all employers. May use this data source post-enrollment to verify reported changes in income. State does not plan to use the Hub. As an integrated model, Utah will evaluate when and if to connect for additional services.
12. Other: (Please describe any additional electronic data sources in the space below)												
PARIS	YES	YES	NO	YES	NO	YES	NO	NO	YES	YES	Other (specify in comments)	Used to verify federal wages at renewal and when we are notified of a change by the client or other electronic data sources.
1. The state marked any criterion YES if it w	as considered as a	reason t	the data	source w	as deter	mined u	seful/not use	eful.	1	ı		

(Insert Medicaid, CHIP, or Both) Medicaid & CHIP

State: Utah

last updated: 04/08/2016

Section B2. Use of Electronic Data Sources

Non-Financial:

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	If Used for Post- Enrollment Frequency Used (i.e. monthly, quarterly)	Comments
1. Social Security Administration (SSA)	YES	YES	YES	NO	YES	YES	NO	NO	NO	YES	YES	YES	YES	YES	NO		May use this data source post-enrollment to resolve inconsistencies with other data sources or to verify reported changes related to residency. Used to verify buy-in accretion and Medicare eligibility. Will not be used to re-verify SSN and citizenship at renewal. State will not access this data through the Hub. State will access real time through SOLQI
2. Department of Homeland Security (DHS) - SAVE	YES	NO	YES	YES	NO	YES	NO	NO	NO	NO	NO	NO	YES	YES	NO		At application, state will not access this data through the Hub. State will access real time through it's e-FIND system (an online, real-time, web-based eligibility portal). SAVE will not be used for citizenship at renewal and will only renew immigration status if subject to change or expiration.

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		May use this data source at review, or change report to verify reported changes related to caretaker relative, birth of a child, to verify relationship. Will be used as a back-up to verify citizenship and age if cannot be verified through SSA.
4. Department of Motor Vehicles (DMV)	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	YES	NO	NO		
5. Temporary Assistance for Needy Families (TANF)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		TANF financial assistance eligibility is handled by the same eligibility computer system as Medicaid.
6. Supplemental Nutrition Assistance Program (SNAP)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		SNAP eligibility is handled by the same eligibility computer system as Medicaid.
7. Office of Child Support Enforcement	YES	NO	NO	NO	YES	YES	NO	NO	NO	NO	NO	YES	NO	YES	YES	Other (specify in comments)	While it is an available data source it is not used for verification purposes unless the state feels it is necessary, i.e. discrepancies from other data sources or when notified of a change in circumstances for residency, age, household composition (if needed), caretaker relative (if needed). We use this data source to verify cooperation with medical support enforcement.

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)	
8. State General Assistance Programs	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		The state General Assistance financial eligibility is handled by the same eligibility computer system as Medicaid.
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: (Please describe any commercial databases in the space below)																	
13. Other: (Please describe additional electronic data sources in the space provided below)																	

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	If Used for Post- Enrollment Frequency Used (i.e. monthly, quarterly)	
12. PARIS*	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	YES	YES			Used to identify Medicaid benefits in other states. PARIS is pulled at each application and reviewed with our data brokering system. If information is inconsistent with the client statement, we would seek to clarify that info. Utah is entering into an agreement with Utah's Veteran's Administration to share the names of Medicaid applicants who have been identified as eligible for, but not receiving, VA benefits.

^{*} 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.

(Insert Medicaid, CHIP, or Both) Medicaid & CHIP

State: Utah

last updated: 04/08/2016

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
1. Applicant does not have other coverage	NO	NO	YES	YES	Must be Applied	Customer statement is accepted. However, if our electronic interface from Office of Recovery Services (ORS) shows that the customer has an insurance, this discrepancy must be addressed. An email is sent to ORS to verify if the customer still has the insurance; if the customer does not have the insurance, the TPL is removed in our system. If the ORS verifies that the customer has insurance, but the customer still states that they do not, the customer can provide additional documentation to provide to ORS.
2. Applicant does not have access to affordable ESI	NO	NO	NO	YES		Utah has a an Employer's Health Insurance Information Form that we require customer's employer or human resource personnel to complete to verify if the customer has available health insurance. At application and review we verify before we approve the case.
3. When child has had coverage (as applicable to states' waiting period)	NO	NO	YES	YES		If the customer has had the information known to ORS, we send an email to ORS to verify the termination of the insurance. If the customer is not known to ORS, a certificate of coverage or other documentation to show the termination of the insurance is requested from the customer.
4. Access to public employee coverage	NO	YES	YES	YES		We gather this information at application through self-attestation. If the electronic data source shows a discrepancy with client attestation then we request additional information from the customer.

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
5a. Waiting period						Exception 1: Voluntary termination of COBRA coverage. We take customer statement on the
exception #1 (describe):	YES	NO	NO	NO		voluntary termination of coverage reason.
5b. Waiting period						Exception 2: Voluntary termination of HIP Utah (Health Insurance Pool) coverage. We take
exception #2 (describe):	YES	NO	NO	NO		customer statement on the voluntary termination of coverage reason.
5c. Waiting period						Exception 3: Voluntary termination of coverage by non-custodial parent. We take customer
exception #3 (describe):	YES	NO	NO	NO		statement on the voluntary termination of coverage reason.
5d. Waiting period exception #4 (describe):	NO	NO	YES	NO		Exception 4: Voluntary termination of UPP reimbursed employer-sponsored coverage. We verify the end date for UPP in our eREP eligibility system. Paper documentation would never be necessary, as the eRep eligibility system is the primary
						source of information.
5e. Waiting period exception #5 (describe):	NO	NO	NO	YES		Exception 5: Voluntary termination of insurance that does not provide coverage in Utah. We obtain verification from the customer to verify that the coverage is not provided in Utah and when it ended.
5f. Waiting period						Exception 6: Voluntary termination of limited health insurance plan. We take the customer
exception #6 (describe):	YES	NO	NO	NO		statement on the voluntary termination.
5g. Waiting period exception #7 (describe):	NO	NO	YES	NO		Exception 7: ORS forces enrollment under NMSN (National Medical Support Notice). Then, because the cost of insurance exceeds 5% of the gross monthly income, ORS reverses the forced enrollment and the child is terminated from the TPL of the custodial parent. We verify this with ORS.

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
5h. Waiting period exception #8 (describe):						
5i. Waiting period exception #9 (describe):						
5j. Waiting period exception #10 (describe):						
6. Other eligibility factors or exceptions to eligibility factors: (Please describe in the space provided below)					l	

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	ASED ELIGIBILITY VERIFICATION PLAN 1edicaid, CHIP, or Both)	Medicaid & CHIP						
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State.	last updated:	04/08/2016						
	Section D. Additional Verification Questions							
	Question	Response						
1	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	For factors that we do not accept self-attestation without additional verification, we will only ask for paper documentation when there is no electronic data available or when the electronic data is not reasonably compatible with client attestation and we have exhausted all other electronic data sources and information from other agencies. Agency also uses multiple back-up data sources for verification, prior to reaching out to individual for paper.						
2	Please describe how the state uses PARIS?	PARIS is accessed by eligibility workers at application and renewal. It is a data source in our eFind system. Workers sort through the old data and if we find inconsistencies with the data we have on file the customer is asked to explain. PARIS is also used to verify current federal wages.						
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						
	If (YES), please submit a letter to CMS requesting such approval describing how the 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.							

	Question	Response
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 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.	Utah has been granted a full indefinite Hub waiver to use an existig SAVE match to verify immigration status and to use SOLQ directly with SSA to verify SSN, citizenship and Title II income.
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

When income data from the State and Federal sources are incompatible such that one is above the applicable income standard and one is below the applicable income standard, the State will use the State income verifications to compare with client attestation of income to determine if they are reasonably compatible.

State has a local data hub that is used that has access to local data sources known as e-Find.

At time of application and re-certification, a real time interface with quarterly wage data (QWD) occurs. The customer attests that there has not been a change in employer, no recent raise or change of hours occurred, they are not self-employed, and their current income is compatible with the most recent QWD available. If those questions are appropriately answered, the wage matched income is used to determine the person's eligibility. If the wage match income would make the person ineligible, more information is requested to properly deny the case as over income.

Section B1. Additional Comments

Section B2. Additional Comments

Section C. Additional Comments