

MAGI-BASED ELIGIBILITY VERIFICATION PLAN

(Insert Medicaid, CHIP, or Both)

Medicaid & CHIP

State:

Vermont

Last updated:

11/21/2016

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	NO	YES	Both are at or below the applicable	See Comments	YES	YES	<p>Vermont previously received 1902(e)(14) authority to allow the state to engage in post enrollment verification. As a temporary mitigation strategy until the end of April 2017, Vermont will continue to verify individuals who were enrolled with inconsistencies prior to June 2016.</p> <p>Vermont will accept self-attestation without additional verification if the self-attestation is above the Medicaid threshold. The individual will then be screened for QHP with credits.</p> <p>If the self-attestation is at or below the Medicaid threshold, Vermont uses IRS FTI to verify income. If there is an inconsistency, Vermont electronically checks the DOL Quarterly Wage data source and then if there still remains an inconsistency Vermont manually uses quarterly wage data from its legacy system. Additional information will then be requested should an</p>

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Residency	YES	NO	NO	See Comments	N/A	NO	NO	Vermont accepts self attestation. Vermont will not verify this eligibility element unless information from the individual is not reasonably compatible with other information provided or otherwise available to the State. In the event an inconsistency is exposed, Vermont may ask for a reasonable explanation and/or paper documentation.
Age (Date of Birth)	YES	NO	NO	See Comments	N/A	NO	NO	Vermont accepts self attestation. Vermont will not verify this eligibility element unless information from the individual is not reasonably compatible with other information provided or otherwise available to the State. In the event an inconsistency is exposed, Vermont may ask for a reasonable explanation and/or paper documentation.
Social Security Number **	NO	YES	YES	N/A	N/A	N/A	NO	Vermont uses its connection to the Social Security Administration (SSA) through the Federal Data Services Hub (the Hub) to verify social security numbers (SSN). If the SSN is not verified through the Hub, Vermont attempts to verify SSNs through its legacy system - ACCESS. If the enrollee cannot be verified electronically, a notice is sent requesting additional documentation.
Citizenship **	NO	Yes	YES	N/A	N/A	N/A	YES	Vermont uses its connection to SSA through the Hub to verify citizenship. If citizenship is not verified through the Hub, Vermont attempts to verify citizenship through ACCESS. If the enrollee cannot be verified electronically, a notice is sent requesting additional documentation. The applicant is granted benefits and is given a 90-day reasonable opportunity period post-enrollment to respond to the request for additional documentation concerning

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Immigration Status **	NO	Yes	YES	N/A	N/A	N/A	YES	Vermont uses SAVE through the Hub's VLP service for step 1. Steps 2 and 3 are done through Vermont's web-based SAVE connection. Vermont has a Hub waiver to forego using SAVE through the HUB's VLP service for steps 2 and 3. If additional documentation is needed for step 3, Vermont will request paper documentation at that time. The enrollee is given a 90-day reasonable opportunity period to respond to the request for
Household Composition	YES	NO	NO	See Comments	N/A	NO	NO	Vermonts accepts self attestation. Vermont will not verify this eligibility element unless information from the individual is not reasonably compatible with other information provided or otherwise available to the State. In the event an inconsistency is exposed, Vermont may ask for a reasonable explanation and/or paper documentation.
Pregnancy ***	YES	NO	NO	See Comments	N/A	NO	NO	Vermonts accepts self attestation. Vermont will not verify this eligibility element unless information from the individual is not reasonably compatible with other information provided or otherwise available to the State. In the event an inconsistency is exposed, Vermont may ask for a reasonable explanation and/or 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
Caretaker Relative	YES	NO	NO	See Comments	N/A	NO	NO	Vermont accepts self attestation. Vermont will not verify this eligibility element unless information from the individual is not reasonably compatible with other information provided or otherwise available to the State. In the event an inconsistency is exposed, Vermont may ask for a reasonable explanation and/or paper documentation.
Medicare	YES	NO	NO		N/A	NO	NO	
Application for Other Benefits	NO	YES	YES	See Comments	N/A	YES	NO	Vermont uses its data connection with PARIS post-enrollment to verify that a beneficiary does not have services in other states.
Other: (Please describe any other eligibility factors in the space below)								

* 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

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
<p>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).</p> <p>** 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.</p> <p>*** States must accept self-attestation of pregnancy unless they have information that is not reasonably compatible with such attestation.</p>								

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Section B1. Use of Electronic Data Sources

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	NO	YES	YES	NO		The State of Vermont has identified that the IRS data is useful and began to use IRS FTI data to verify income for Medicaid/CHIP in August 2015.

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
2. Social Security Administration (SSA) (SSI, Title II)	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO	Other (specify in comments)	Vermont uses the SSA connection through the Hub to verify the receipt and amount of cash benefits provided under Title II of the Social Security Act. If there is an inconsistency, Vermont will use ACCESS for known applicants. If Title II cannot be verified electronically, a notice is sent requesting additional documentation.
3. State Wage Information Collection Agency (SWICA)	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO	Monthly	Vermont uses its loaded data from the State Department of Labor (DOL) to verify income.
4. State Unemployment Compensation	YES	YES	YES	YES	YES	YES	NO	NO	NO	NO	Monthly	This data is not currently in scope for VHC development in 2016, but is being discussed as a part of Integrated Eligibility. Vermont believes this data can be useful, but does not use state unemployment compensation data at this time.

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
5. State Administered Supplementary Payment Program	YES	YES	YES	YES	YES	YES	NO	NO	NO	NO		This data is not currently in scope for VHC development in 2016, but is being discussed as a part of Integrated Eligibility. Vermont believes this data can be useful, but does not use supplementary payment program data at this time.
6. State General Assistance Programs	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		Vermont does not utilize General Assistance Program Data to verify financial eligibility.
7. Supplemental Nutrition Assistance Program (SNAP)	YES	YES	YES	YES	YES	YES	NO	NO	NO	NO		Vermont does not currently utilize SNAP data to verify financial eligibility, but this is being considered as part of Integrated Eligibility. Vermont believes this data can be useful, but does not use SNAP data at this time.
8. Temporary Assistance for Needy Families (TANF)	YES	YES	YES	YES	YES	YES	NO	NO	NO	NO		Vermont does not utilize TANF data to verify financial eligibility. Vermont believes this data can be useful, but does not use TANF data at this time.

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
9. Office of Child Support Enforcement (OCSE)	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		Vermont does not utilize Office of Child Support Enforcement data to verify financial eligibility.
10. State Income Tax	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		Vermont does not utilize State income Tax data to verify financial eligibility.
11. Commercial database: (Please describe any commercial databases in the space below)												
TALX/Work Number	NO	YES	YES	YES	YES	YES	YES	NO	NO	NO		Vermont does not use TALX/Work Number data to verify financial eligibility.
12. Other: (Please describe any additional electronic data sources in the space below)												

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
<p>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.</p>												

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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	NO	NO	NO	NO	NO	NO	NO	YES	NO	NO	Other (specify in comments)	Vermont uses its connection to SSA through the Hub to verify SSN. If the SSN is not verified through the Hub, Vermont attempts to verify the SSN through its legacy system - ACCESS. If the enrollee cannot be verified electronically, a notice is sent requesting additional documentation.

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
2. Department of Homeland Security (DHS) SAVE	YES	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO	Other (specify in comments)	Vermont uses SAVE through the Hub's VLP service for step 1. Steps 2 and 3 are done through Vermont's web-based SAVE connection. Vermont has a Hub waiver to forego using SAVE through the HUB's VLP service for steps 2 and 3. If additional documentation is needed for step 3, Vermont will request paper documentation at that time. The enrollee is given a 90-day reasonable opportunity period to respond to the request for additional documentation to verify immigration status.
3. Vital Statistics	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Vermont does not utilize vital statistics data.
4. Department of Motor Vehicles	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Vermont does not utilize DMV data.
5. Temporary Assistance for Needy Families (TANF)	YES	YES	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	NO	NO		In cases where the Hub match is unsuccessful, Vermont utilizes SSN and citizenship data through a manual lookup in ACCESS for SSNs that may have been verified for TANF eligibility purposes.

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: <i>(Please describe additional electronic data sources in the space)</i>																		
12. PARIS*	Yes	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	NO	NO	NO	YES	Quarterly	Vermont uses its data connection with PARIS post-enrollment to verify that a beneficiary does not have services in other states.	
VT Dept of Corrections	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	Other (specify in comments)	Vermont receives incarceration data through the HUB and does not obtain this through VT Department of Corrections.	
* 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	CHIP follows Medicaid rules and procedures. If an inconsistency is identified through other means, paper documentation may be required.
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	
4. Access to public employee coverage					N/A	
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	

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
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	
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):	Vermont does use data sources before requiring paper documentation from the individual. If there is an inconsistency identified from the data sources, paper documentation may be required.
2	Please describe how the state uses PARIS?	Vermont uses its data connection with PARIS post-enrollment to verify that a beneficiary does not have services in other states.
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.	N/A

	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.	Vermont has a Hub waiver to forego using SAVE steps 2 and 3 through the Hub's VLP service for immigration status and naturalized citizenship verification.
5	Describe any additional MAGI-based eligibility verification policies and procedures that have not been covered in this verification plan (optional):	Vermont previously received 1902(e)(14) authority to allow the state to engage in post enrollment verification. As a temporary mitigation strategy until the end of April 2017, Vermont will continue to verify individuals who were enrolled with inconsistencies prior to June 2016.

Section A. Additional Comments
Section B1. Additional Comments
Section B2. Additional Comments
Section C. Additional Comments