

MAGI-BASED ELIGIBILITY VERIFICATION PLAN

(Insert Medicaid, CHIP, or Both)

State

Last updated:

Medicaid & CHIP

Wisconsin

04/08/2016

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*	NO	NO	YES	Both are above, at or below the applicable income standard.	No additional threshold is applied	NO	YES	Wisconsin will verify income using electronic data sources. If there is not a reliable electronic data exchange available, or if there is an inconsistency between the data source and the attested information, i.e. if individual attests to below the applicable income standard and the data source indicates income above the standard, paper documentation will be required.
				Other (Specify in Comments)				
Residency	YES	NO	NO	N/A	N/A	NO	NO	Wisconsin is developing a data exchange that will allow the state to identify on a post-enrollment basis any discrepancies in address for a subset of our Medicaid population. This data exchange, which is planned for implementation in early 2016, will focus specifically on identifying individuals who report Wisconsin residency but live in another state. Wisconsin plans to continue its current practice of accepting self-attestation for Wisconsin residency, but requesting paper documentation as needed if a discrepancy is identified.
Age (Date of Birth)	NO	NO	YES		N/A	NO	YES	Wisconsin receives Age/DOB as part of the data exchange with the Social Security Administration. State will not be using the Hub, and has established a data exchange with SOLQI that will be used for this verification. If there is a discrepancy between the application information and the information received from the data source, Wisconsin will require additional documentation.
Social Security Number**	NO	NO	YES	N/A	N/A	N/A	YES	Wisconsin will verify the individual's SSN through its direct data exchange with the Social Security Administration (SSA), and not utilize the Hub for this verification. If SSN cannot be verified through the data exchange, the worker will follow-up with the applicant to reconcile the discrepancy.

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	Wisconsin will verify the individual's citizenship through a data exchange with the Social Security Administration (SSA). If citizenship cannot be established through the data exchange, the worker will ask for appropriate documentation to reconcile the discrepancy. In August 2015, Wisconsin began verifying citizenship through SCHIP-I. Not utilizing the Hub for this verification.
Immigration Status **	NO	NO	YES	N/A	N/A	N/A	YES	If immigration status cannot be established through the data exchange, the worker will request documentation to reconcile the discrepancy. In June 2015, Wisconsin began using the hub for Step 1 of the verification process. Workers will continue to use SAVE to complete Steps 2 and 3 when needed.
Household Composition	YES	NO	YES	N/A	N/A	NO	YES	Wisconsin will accept self-attestation for household composition without further verification for individuals not enrolled in SNAP/TANF, unless the information provided is questionable (i.e. if individual provides information that contradicts information collected by other programs). If the attestation is questionable, the worker will ask for appropriate documentation. For individuals enrolled in SNAP/TANF, State will utilize the electronic data source from the integrated system. If State were to identify a discrepancy with information collected for SNAP/TANF, the State would request paper documentation at that time.
Pregnancy ***	YES	NO	NO	N/A	N/A	NO	NO	Wisconsin will accept self-attestation without further verification unless the information provided is questionable (i.e. if individual provides information that contradicts information collected by other programs). If the attestation is questionable, the worker will ask for appropriate documentation.
Caretaker Relative	YES	NO	YES	N/A	N/A	NO	YES	Wisconsin will accept self-attestation without further verification for individuals not enrolled in SNAP/TANF unless the information provided is questionable (i.e. if individual provides information that contradicts information collected by other programs). If the attestation is questionable, the worker will ask for appropriate documentation. For individuals enrolled in SNAP/TANF, State will utilize the electronic data source from the integrated system. If the worker identifies a discrepancy between the information in the integrated system and self-attested information, the worker will ask for appropriate 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

* 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)	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	YES	NO	NO	NO		The IRS safeguard requirements are burdensome to the establishment of a data exchange with the IRS, especially for those States with integrated eligibility systems. Please see additional comments in Section D.
2. Social Security Administration (SSA) (SSI, Title II)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	Wisconsin has an approved waiver to use an existing data exchange with SSA and does not use the Hub. Certain actions on a case, such as an application, review, person add, or program add, will trigger a real-time data exchange to obtain SSA information. Data is also received from SSA through a daily, weekly, and twice-monthly batch. At minimum, data from SSA is used annually for everyone, but case changes will trigger the data exchange on an ad hoc basis throughout the year.
3. State Wage Information Collection Agency (SWICA)	YES	YES	YES	YES	YES	YES	NO	<u>YES</u>	<u>YES</u>	YES	Other (specify in comments)	Wisconsin has established a real-time data exchange with SWICA, which is used to verify earnings at application and renewal, as well as when a member reports a change in income. If there is an inconsistency between the data source and the attested information, i.e. if individual attests to below the applicable income standard and the data source indicates income above the standard, paper documentation will be required. In addition, Wisconsin will continue to use a quarterly SWICA wage match to identify discrepancies and notify workers of these discrepancies post-enrollment.
4. State Unemployment Compensation	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	Wisconsin receives state unemployment compensation information in real-time at application and renewal, and we also receive updates in a monthly batch process to identify any changes in unemployment compensation post-enrollment.

Electronic Data Source	Determined Useful (Y/N)	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	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	This match is conducted on a weekly basis and cases are updated automatically with any changes in payment information.
6. State General Assistance Programs	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		The State of Wisconsin does not operate such a program.
7. Supplemental Nutrition Assistance Program (SNAP)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	Wisconsin maintains an integrated eligibility system, CARES, which determines eligibility and issues benefits for EBD Medicaid, Family Medicaid, SNAP, TANF, CTS, and the Buy-In programs. When information is updated in one program, information is updated or flagged for all programs for which the individual is eligible. While it is not a primary data exchange, data from this program is available. The State does not request that members re-verify income reported for SNAP, if the information is still current. Post-enrollment performed for program integrity and/or to identify any changes. Using this for raw income data (this is distinct from the MAGI calculation).
8. Temporary Assistance for Needy Families (TANF)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	Wisconsin maintains an integrated eligibility system, CARES, which determines eligibility and issues benefits for EBD Medicaid, Family Medicaid, SNAP, TANF, CTS, and the Buy In programs. When information is updated in one program, information is updated or flagged for all programs for which the individual is eligible. While it is not a primary data exchange, data from this program is available. The State does not request that members re-verify income reported for TANF, if the information is still current. Post-enrollment performed for program integrity and/or to identify any changes. Using this for raw income data (this is distinct from the MAGI calculation).
9. Office of Child Support Enforcement (OCSE)	NO	YES	YES	YES	YES	YES	YES	NO	NO	NO		The only financial information that Wisconsin receives from its Department of Children and Families is child support payment information, which is no longer applicable under MAGI Medicaid rules.

Electronic Data Source	Determined Useful (Y/N)	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
10. State Income Tax	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Does not currently have a data exchange with state income tax
11. Commercial database: (Please describe any commercial databases in the space below)												
TALX / The Work Number	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	Connecting directly with this data source is not cost-effective, as it does not include a comprehensive enough set of employers. In June 2015, Wisconsin established a connection to the federal data services hub in order to start using Equifax data to verify earned income at application, renewal, and when income changes are reported.
12. Other: (Please describe any additional electronic data sources in the space below)												

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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	YES	YES	YES	YES	Other (specify in comments)	<p>State received a waiver to use our current data exchange with SSA and not the Hub.</p> <p>At application, the State uses SOLQI to verify SSN and SCHIP-I (which started in August 2015) to verify citizenship. Once verified, these items are not re-verified. The State uses SOLQI to verify Medicare information at application and renewal.</p> <p>The frequency with which SSA is used as a post-enrollment data source for non-financial information depends on the type of data:</p> <ul style="list-style-type: none"> - We receive Medicare enrollment updates on a bi-weekly basis. - We receive prisoner matches on a monthly basis. - We receive dates of death on a real-time basis.
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)	<p>In June 2015, Wisconsin began using the hub for Step 1 of the verification process. Workers will continue to use SAVE to complete Steps 2 and 3 when as needed. State will use DHS data at renewal and post-enrollment for immigration status if individuals notify them of changes, for statuses that are subject to change or to check if the individual has met the 5-year bar.</p> <p>Manual process in place at renewal to review immigration status. Workers use this process to look up information for anyone whose status is about to change, expire or identify those for whom the five year bar has been met.</p>
3. Vital Statistics	YES	NO	YES	NO	NO	YES	NO	NO	NO	NO	NO	NO	YES	NO	NO		The worker performs a real-time query with Vital Statistics when there is an inconsistency with SSA data.

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
4. Department of Motor Vehicles (DMV)	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		DMV can be used post-enrollment at any time, or at application if proof of identity is needed. DMV can be used to resolve discrepancies with residency.
5. Temporary Assistance for Needy Families (TANF)	YES	NO	NO	NO	NO	YES	NO	YES	YES	YES	YES	YES	YES	YES	YES	Other (specify in comments)	Wisconsin maintains an integrated eligibility system, CARES, which determines eligibility and issues benefits for EBD Medicaid, Family Medicaid, SNAP, TANF, CTS, and the Buy In programs. When information is updated in one program, information is updated or flagged for all programs for which the individual is eligible. While it is not a primary data exchange, data from this program is available. TANF information will not be used to "check" the first four data elements due to differences in verification requirements across public assistance programs. New data from this program is obtained every six months at minimum, and may be available more frequently depending on how often the individual's circumstances change. If an individual is known to the system (through TANF or SNAP) State may use this data at application and renewal to verify household composition and/or caretaker relative status.
6. Supplemental Nutrition Assistance Program (SNAP)	YES	NO	NO	NO	NO	YES	NO	YES	YES	YES	YES	YES	YES	YES	YES	Other (specify in comments)	Wisconsin maintains an integrated eligibility system, CARES, which determines eligibility and issues benefits for EBD Medicaid, Family Medicaid, SNAP, TANF, CTS, and the Buy In programs. When information is updated in one program, information is updated or flagged for all programs for which the individual is eligible. While it is not a primary data exchange, data from this program is available. SNAP information will not be used to "check" the first four data elements due to differences in verification requirements across public assistance programs. New data from this program is obtained every six months at minimum, and may be available more frequently depending on how often the individual's circumstances change. If an individual is known to the system (through TANF or SNAP) State may use this data at application and renewal to verify household composition and/or caretaker relative status.

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
7. Office of Child Support Enforcement	YES	NO	NO	NO	NO	NO	NO	YES	NO	NO	NO	YES	YES	YES	YES	Other (specify in comments)	This exchange occurs weekly. State uses OCSE on a daily basis to check if paternity has been established. State may use OCSE data as a backup to resolve discrepancies with residency.
8. State General Assistance Programs	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		The State of Wisconsin does not operate such a program.
9. Women, Infants and Children Program (WIC)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Does not currently have a data exchange with WIC
10. State Income Tax	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Does not currently have a data exchange with state income tax
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	NO	YES	NO	NO	YES	Quarterly	Wisconsin will use PARIS during post-enrollment to verify enrollment in other States' benefit programs.

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
EVHI (Employer Verification of Health Insurance)	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	YES	YES	YES	Other (specify in comments)	This data exchange is also run when a member reports a job change or a person-add.

* 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	NO	NO	YES	NO	Must be Applied	Access to health insurance through an employer is verified through a data exchange with Wisconsin's EVHI system. Coverage is verified through EVHI (ESI) and Wisconsin's MMIS system. At the time of application and when an individual reports a new job, the EVHI database is checked for employer health insurance information. If information is not available through EVHI, the system sends a request for relevant information to the employer. The eligibility worker does not reach out to the applicant or member for this information. The EVHI check is daily. Coverage is verified through Wisconsin's check with insurers covering Wisconsin residents as part of our daily TPL process.
2. Applicant does not have access to affordable ESI	NO	NO	YES	NO		Access to health insurance through an employer is verified through a data exchange with Wisconsin's EVHI system. At the time of application and when an individual reports a new job, the EVHI database is checked for employer health insurance information. If information is not available through EVHI, the system sends a request for relevant information to the employer. The eligibility worker does not reach out to the applicant or member for this information. The EVHI check is daily.
3. When child has had coverage (as applicable to states' waiting period)					N/A	
4. Access to public employee coverage	NO	NO	YES	NO		Access to health insurance through an employer is verified through a data exchange with Wisconsin's EVHI system. At the time of application and when an individual reports a new job, the EVHI database is checked for employer health insurance information. If information is not available through EVHI, the system sends a request for relevant information to the employer. The eligibility worker does not reach out to the applicant or member for this information. The EVHI check is daily.
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) <i>If Yes, please describe in comments</i>	Paper Documentation Required from the Individual (Y/N)	Non-Applicable (N/A)	Comments
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):	WI accepts self-attestation without additional verification for some non-financial factors of eligibilty. For the non-financial factors that it doesn't it will ulitilize all available data sources prior to requesting paper documentation, multiple backup data sources (i.e. Vital Statistics for citizenship, DMV and OCSE for residency, TANF and SNAP for age/DOB). Under Section B1 and B2, Wisconsin determined the usefulness of the following data sources: 1) IRS - Wisconsin believes this information will be out-of-date for most individuals who enroll in Medicaid due to the employment characteristics of the population. Wisconsin also believes the IRS safeguard requirements are burdensome to the establishment of a data exchange with the IRS, especially for those States with integrated eligibility systems. 2) State Income Tax - Wisconsin does not currently have such a data exchange, and the State believes it would not be cost-effective to establish one. 5) WIC - Wisconsin does not currently have such a data exchange. Information that could be obtained from WIC is accessible through other exchanges.	
2	Please describe how the state uses PARIS?	Wisconsin runs a quarterly match with PARIS to receive information about benefits recipients may be receiving 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: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.	In 2013, the state submitted a letter to CMS requesting not to use the Hub for verification of income, SSN, citizenship and immigration status for an indefinite period of time. With the revision of this verification plan in January 2015, the State is submitting a letter to CMS requesting not to use the hub for Steps 2 and 3 of the immigration verification process. Once all necessary information was recieved from the state, CMS approved the Hub waiver for all elements requested in July 2015.	
5	Describe any additional MAGI-based eligibility verification policies and procedures that have not been covered in this verification plan (optional):	N/A	

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