

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.  Other (Specify in Comments)	N/A	NO	YES	If attestation is above the applicable income standard, while verification is below the applicable income standard, the State will use the attested income value to screen for potential eligibility for APTC.  If attestation is below the applicable income standard, while the verification is above the applicable income standard, then paper documentation will be requested.
Residency	NO	NO	YES	N/A	N/A	NO	YES	CA will be using the California Healthcare Eligibility and Enrollment Retention System (CalHEERS) to verify residency. If residency can't be verified through CalHEERS, the State will access county-based eligibility systems to retrieve residency information before seeking paper documentation from individual.  The CalHEERS system will not be capable of supporting electronic verification of state residency by October 1, 2013. California will access county-based eligibility systems to retrieve residency verification information, if available for the individual, before seeking paper documentation. California anticipates interfacing with Employment Development Department by January 1, 2014 and interfacing with other state sources, such as Department of Motor Vehicles and Franchise Tax Board by April 1, 2014.

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
Age (Date of Birth)	NO	NO	YES	N/A	N/A	NO	YES	The State will verify this information with the federal Social Security Association (SSA) when verifying social security numbers. If the State finds an inconsistency with SSA data, then State will request paper documentation from individual.
Social Security Number **	NO	NO	YES	N/A	N/A	N/A	YES	
Citizenship **	NO	NO	YES	N/A	N/A	N/A	YES	
Immigration Status **	NO	NO	YES	N/A	N/A	N/A	YES	
Household Composition	YES	NO	NO	N/A	N/A	NO	NO	There is currently no data source which provides Household Composition data.
Pregnancy ***	YES	NO	NO	N/A	N/A	NO	NO	Self-attestation is accepted unless the State finds information that is conflicting and may require follow-up with a request for paper documentation.
Caretaker Relative	YES	NO	NO	N/A	N/A	NO	NO	Self-attestation is accepted for "caretakers" if the individual is providing care to a minor child; this is consistent with current policy.
Medicare	NO	NO	YES	N/A	N/A	NO	YES	
Application for Other Benefits	YES	NO	NO	N/A	N/A	NO	NO	
Other: (Please describe any other eligibility factors in the space below)								
Deceased	NO	NO	YES	N/A	N/A	YES	NO	In cases where the State receives an erroneous death letter from SSA, the State will follow-up with a request for a reasonable explanation.
American Indian/Alaska Native Exemptions	YES	NO	NO	N/A	N/A	NO	NO	Self-attestation is accepted unless the State finds information that is conflicting and may require follow-up with a request for 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
Former Foster Care and Medicaid Enrollment	NO	YES	YES	N/A	N/A	NO	YES	The State will accept self-attestation of an individuals enrollment in foster care and Medicaid upon obtaining age 18. Counties will verify this information post enrollment utilizing data from their county-based eligibility data systems or in the case of individuals attesting to enrollment in foster care outside of California, counties and or the California Department of Social Services will contact the other state to confirm foster care placement and Medicaid enrollment.

\* 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.

MAGI-BASED ELIGIBILITY VERIFICATION PLAN

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

State: California

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)	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO		IRS data through the Hub will be used at application and renewal.  The State understands that to use IRS data at renewal, individual must consent to use of that data. The application will have as a standard question if the individual wishes to provide such consent.
2. Social Security Administration (SSA) (SSI, Title II)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Monthly	SSA data through the Hub will be used at application and renewal. State will use their own system for post-enrollment checks. This information is provided monthly via Recipient IEVS reports which will also be leveraged by CalHEERS interfaces with DSH.
3. State Wage Information Collection Agency (SWICA)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Quarterly	This information is provided quarterly via Recipient IEVS reports which will also be leveraged by CalHEERS interfaces with EDD.

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
4. State Unemployment Compensation	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Monthly	This information is provided monthly via Recipient IEVS reports which will also be leveraged by CalHEERS interfaces with EDD.
5. State Administered Supplementary Payment Program	NO	NO	NO	NO	NO	NO	YES	NO	NO	NO		SSA administers this program for California
6. State General Assistance Programs	NO	YES	NO	NO	YES	YES	NO	NO	NO	NO		Useful if made available in real-time; today, the State does not have established interfaces with the General Assistance programs.
7. Supplemental Nutrition Assistance Program (SNAP)	NO	YES	NO	NO	YES	YES	NO	NO	NO	NO		Useful if made available in real-time; today, the State does not have any interfaces in real-time with SNAP.
8. Temporary Assistance for Needy Families (TANF)	NO	YES	NO	NO	YES	YES	NO	NO	NO	NO		Useful if made available in real-time; today, the State does not have any interfaces in real-time with TANF.
9. Office of Child Support Enforcement (OCSE)	NO	YES	NO	NO	YES	YES	NO	NO	NO	NO		Useful if made available in real-time; wage data is not stored, therefore, this data source would not be useful. Today, the State does not have any interfaces with OSCE.
10. State Income Tax	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO		State income tax data will be used at application and renewal.

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
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		California is still researching the use of TALX/The Work Number as a potential data source to verify income. A final policy decision has not been made. In the event California policy determines to make use of TALX, California will update the verification plan as necessary.
12. Other: (Please describe any additional electronic data sources in the space below)												
PARIS	YES	YES	YES	YES	YES	YES	NO	NO	NO	YES		To identify federal income and shares this information with the counties, who then compare the federal income identified by PARIS to the reported income of beneficiaries to assess for unreported income.

1. The state marked any criterion YES if it was considered as a reason the data source was determined useful/not useful.

MAGI-BASED ELIGIBILITY VERIFICATION PLAN

(Insert Medicaid, CHIP, or Both)

Medicaid & CHIP

State:

California

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	NO	NO	YES	NO	NO		
2. Department of Homeland Security (DHS) - SAVE	YES	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO		DHS data is used at renewal if the individual's status is subject to change or if the 5-year bar is met.

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	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		<p>The California Department of Public Health (CDPH) vital statistics interface with the Medi-Cal Eligibility Data System (MEDS) cannot be used as a backup data source to verify citizenship. Proposed rule 435.407 requires evidence of identity along with birth data provided by CDPH data in order to verify citizenship.</p> <p>California currently does not have an interface with Department of Motor Vehicles (DMV) to provide electronic verification of identity. Once established, California could potentially use the CDPH interface along with DMV identity data to verify citizenship. In the event California wishes to do so in the future, we will update the verification plan as necessary.</p>
4. Department of Motor Vehicles (DMV)	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	YES	YES	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
5. Temporary Assistance for Needy Families (TANF)	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO		This is a manual process whereby county eligibility workers use data contained in their eligibility systems to verify residency, then update CalHEERS electronically through the SAWS to CalHEERS interface informing CalHEERS that residency has been verified.
6. Supplemental Nutrition Assistance Program (SNAP)	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO		This is a manual process whereby county eligibility workers use data contained in their eligibility systems to verify residency, then update CalHEERS electronically through the SAWS to CalHEERS interface informing CalHEERS that residency has been verified.
7. Office of Child Support Enforcement	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
8. State General Assistance Programs	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO		This is a manual process whereby county eligibility workers use data contained in their eligibility systems to verify residency, then update CalHEERS electronically through the SAWS to CalHEERS interface informing CalHEERS that residency has been verified.

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
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	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO		
11. Commercial database: <i>(Please describe any commercial databases in the space below)</i>																	
13. Other: <i>(Please describe additional electronic data sources in the space provided below)</i>																	
12. PARIS*	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	YES	NO	NO	YES	Quarterly	See Section D for further detail. Residency verification is performed post-enrollment to identify inconsistencies.

\* 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.

MAGI-BASED ELIGIBILITY VERIFICATION PLAN

(Insert Medicaid, CHIP, or Both)

Medicaid & CHIP

State:

California

Section C . Additional Factors of Eligibility for Separate CHIP

Eligibility Factor	Self-Attestation Accepted without Additional Verification	Self-Attestation Accepted with Post-Enrollment Verification	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	For the majority of cases, the State will accept self-attestation. If the State finds an inconsistency with Social Security Administration (SSA) data or MEDS data during client indexing, then the State will reach out for a reasonable explanation and/or request paper documentation from individual. This process will be utilized to determine eligibility for California's Title XXI Expansion coverage group.
2. Applicant does not have access to affordable ESI	YES	NO	NO	NO		For the majority of cases, the State will accept self-attestation. If the State finds an inconsistency with Social Security Administration (SSA) data or MEDS data during client indexing, then the State will reach out for a reasonable explanation and/or request paper documentation from individual.
3. When child has had coverage (as applicable to states' waiting period)	YES	NO	NO	NO		
4. Access to public employee coverage	YES	NO	NO	NO		
5a. Waiting period exception #1 (describe):	YES	NO	NO	NO		Description: Loss of employment due to factors other than voluntary termination
5b. Waiting period exception #2 (describe):	YES	NO	NO	NO		Description: Change to a new employer that does not provide an option for dependent coverage

Eligibility Factor	Self-Attestation Accepted without Additional Verification	Self-Attestation Accepted with Post-Enrollment Verification	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
5c. Waiting period exception #3 (describe):	YES	NO	NO	NO		Description: Change of address so that no employer sponsored covered is available
5d. Waiting period exception #4 (describe):	YES	NO	NO	NO		Description: Discontinuance of health benefits to all employees of the applicant's employer
5e. Waiting period exception #5 (describe):	YES	NO	NO	NO		Description: Expiration of COBRA coverage period
5f. Waiting period exception #6 (describe):	YES	NO	NO	NO		Description: Coverage provided pursuant to an exemption authorized under subdivision (l) of Section 1367 of the Health and Safety Code
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>					N/A	

MAGI-BASED ELIGIBILITY VERIFICATION PLAN

(Insert Medicaid, CHIP, or Both)

State:

Medicaid & CHIP

California

Section D. Additional Verification Questions

	Question	Response
1	<p>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):</p>	<p>California accepts self-attestation for select application data elements. For those application data elements where California does not accept self-attestation, California will use an electronic data source to verify, to the extent that there is a comprehensive, timely, accurate, cost effective date source readily available. If an electronic data source is not available or electronic verification is not reasonably compatible with self-attestation, then California will initiate administrative verification process which will include a search of the databases of the local county consorita systems, the use of paper documentation. All available electronic/online data sources will be used prior to requesting paper documentation from the individual. California plans to use multiple backup data sources (i.e. DMV, SNAP, TANF, State Income Tax, and PARIS can be used to verify residency).</p> <p>The California Department of Public Health (CDPH) vital statistics interface with the Medi-Cal Eligibility Data System (MEDS) cannot be used as a backup data source to verify citizenship. Proposed rule 435.407 requires evidence of identity along with birth data provided by CDPH data in order to verify citizenship.</p>

	Question	Response
2	Please describe how the state uses PARIS?	<p>a) PARIS Interstate - The PARIS Interstate match allows states to compare their beneficiary information with other states. California has participated in twelve quarterly PARIS data matching cycles to date. California started a PARIS Interstate program in October 2009 as a pilot program in three counties and has since expanded to a total of thirty counties. Upon identification of California Medicaid beneficiaries who are eligible for Medicaid in another state, a letter is sent to the beneficiaries and if the letter is not responded to or indicates they live in a different state, the beneficiaries are discontinued from California's Medicaid program.</p> <p>b) PARIS Veterans – The PARIS Veterans match started in July 2009 with three counties and has since expanded to ten counties. Using the PARIS Veterans data match, California identifies individuals that are eligible or likely to be eligible for veteran's health care benefits. In coordination with local county offices, outreach is performed to encourage the identified individuals to utilize VA health benefits instead of Medicaid, resulting in a cost avoidance savings to the state.</p> <p>c) PARIS Federal – The PARIS Federal match started in May 2009, and as of May 2011, is a statewide program. Using the PARIS federal data match California identifies federal income and shares this information with the counties, who then compare the federal income identified by PARIS to the reported income of beneficiaries to assess for unreported income. In addition, California uses data from the PARIS Federal data match to identify Medicaid beneficiaries with private health coverage and codes the eligibility database accordingly which may result in cost avoidance savings for the state.</p>
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

	Question	Response
	<p>If (YES), please submit a letter to CMS requesting such approval describing how the the state meets the following requirements:</p> <ol 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, and</li> <li>4) Promotes coordination with other insurance affordability programs.</li> </ol>	
4	<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>	NO
	<p>If (YES), please submit a letter to CMS requesting such approval describing how the the state meets the following requirements:</p> <ol 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, and</li> <li>4) Promotes coordination with other insurance affordability programs.</li> </ol>	
5	<p>Describe any additional MAGI-based eligibility verification policies and procedures that have not been covered in this verification plan (optional):</p>	<p>California is not implementing additional MAGI-based eligibility verification policies and procedures.</p>

Section A. Additional Comments

The verification process is virtually the same for all consumers regardless of the modality in which the application is received. One exception relates to the verification of state residency. In the event that a consumer presents in person at a county office and brings with them paper-based verification of state residency, SAWS will verify the authenticity of the consumer's paper verification and if the paper-based verification document is acceptable to verify state residency, SAWS set the state residency electronic verification by-pass flag logic to inform CalHEERS that state residency has been verified. Eligibility results for MAGI-Based MC will be determined in CalHEERS via the Business Rules Engine (BRE). Data verified via the Federal Hub, or other electronic data sources will be flagged as verified data when it goes to SAWS. Any verification documentation that the consumer provides to CalHEERS will be sent, via electronic Health Information Transfer (eHIT) to SAWS. If the individual is referred to SAWS for a full Medi-Cal determination, any verifications and/or documentation provided in CalHEERS will be sent to SAWS via eHIT.

Due to transition to HUB verification and new verification standards, for satisfactory immigration status, CA will allow the same standard that is currently using for immigration status until January 1, 2014. This current standard allows for a 30 day reasonable opportunity period. With the implementation of ACA, CA will use the 90 day reasonable opportunity period for both citizenship and immigration status Starting January 1, 2014.

Section B1. Additional Comments

Post enrollment data verification frequency will be correlated with the post enrollment data verification frequency used by CalHEERS pursuant to their verification plan which is semi-annually.

Section B2. Additional Comments

Post enrollment data verification frequency will be correlated with the post enrollment data verification frequency used by CalHEERS pursuant to their verification plan which is semi-annually.

Section C. Additional Comments