

Medicaid MAGI-BASED ELIGIBILITY VERIFICATION PLAN

State: California

Date Submitted: 3-26-2013

In addition to the electronic data sources, the state uses the following procedures to complete the verification process:

A. Verification Procedures for Factors of Eligibility

Eligibility Factor	Self-Attestation Accepted without Additional Verification (Y/N)	Self-attestation accepted with post-enrollment verification (Y/N)	Electronic Data Source Used (Y/N)	Reasonable Compatibility Standard Used	Ask for a Reasonable Explanation from the Individual (Y/N)	Paper Documentation Required from the Individual (Y/N)	Comments
Income*	NO	NO	YES	<input checked="" type="radio"/> Both are below or at/above the applicable income standard	NO	YES	
				<input type="radio"/> Percentage Threshold (<i>Specific Threshold Percentage</i>) _____%			
				<input type="radio"/> Dollar Threshold (<i>Specific Dollar Threshold</i>) \$_____			
				<input checked="" type="radio"/> Other (<i>Specify</i>) Attestation above verification below			
Residency #	NO	NO	Yes	If the electronic data source is inconsistent with self-attestation, data is not reasonably compatible	NO	YES	See note next page
Age (Date of Birth)	NO	NO	YES	If the electronic data source is inconsistent with self-attestation, data is not reasonably compatible.	NO	YES	
Social Security Number **			YES			YES	
Citizenship **			YES			YES	
Immigration Status **			YES			YES	
Household Composition	NO	NO	YES	If the electronic data source is inconsistent with self-attestation, data is not reasonably compatible.	NO	YES	
Pregnancy	YES ***	NO	NO	Unless the information available to the state is contrary to self-attestation, attested pregnancy is reasonably compatible.	NO	YES	
Caretaker Relative	YES	NO	NO	N/A	NO	NO	
Medicare	NO	NO	YES	If the electronic data source is inconsistent with self-attestation, data is not reasonably compatible.	NO	YES	
Application for Other Benefits	NO	NO	NO	N/A	NO	NO	Need CMS to clarify
Other: Deceased	NO	NO	YES	If the electronic data source is inconsistent with self-attestation, data is not reasonably compatible	NO	YES	
Other: Deprivation	NO	NO	YES	When using income to determine deprivation, if the electronic data source is inconsistent with self-attestation, data is not reasonably compatible	NO	YES	

- * States must check electronic data sources determined useful to verify income in accordance with 42 CFR 435.948 but can be done post-enrollment.
- ** 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.
- # California is researching the feasibility of using electronic data sources, including but not limited to, the Department of Motor Vehicles, Employment Development Department and Franchise Tax Board as potential state sources to electronically verify state residency. Paper-based verification would be utilized in instances where the Department could not successfully electronically verify state residency using one or more of these data sources.

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In accordance with 42 CFR 435.940-965, the state sets forth the following policies and procedures for verification:

B-1. Use of Electronic Data Sources

Financial:												
Electronic Data Source	Determined Useful (Y/N)	Criteria Used to Determine Useful or not Useful (check all that apply for Y or N)						Data Source Usage				Comments
		Accuracy	Timeliness	Ability to Access	Age of Data	Comprehensive	Other (Please Describe)	Used at Application (Y/N)	Used at Renewal (Y/N)	Used Post-Enrollment (Y/N)	If Used for Post-Enrollment, Frequency Used (e.g. monthly, quarterly)	
1. Internal Revenue Service (IRS)	YES	X	X	X	X	X		YES	YES	YES	Quarterly/ Semi-Annual	More analysis needed on frequency of verification
2. Social Security Administration (SSA) (SSI, Title II)	YES	X	X	X	X	X		YES	YES	YES	Quarterly/ Semi-Annual	More analysis needed on frequency of verification
3. State Wage Information Collection Agency (SWICA)	YES	X	X	X	X	X		YES	YES	YES	Quarterly/ Semi-Annual	EDD data; More analysis needed on frequency of verification
4. State Unemployment Compensation	YES	X	X	X	X	X		YES	YES	YES	Quarterly/ Semi-Annual	EDD data; More analysis needed on frequency of verification
5. State Administered Supplementary Payment Program	NO							NO	NO	NO	N/A	SSA administers this program
6. State General Assistance Programs	NO			X				NO	NO	NO	N/A	Useful if made available in real-time
7. Supplemental Nutrition Assistance Program (SNAP)	NO			X				NO	NO	NO	N/A	Useful if made available in real-time
8. Temporary Assistance for Needy Families (TANF)	NO			X				NO	NO	NO	N/A	Useful if made available in real-time
9. Office of Child Support Enforcement (OCSE)	NO			X				NO	NO	NO	N/A	Useful if made available in real-time
10. State Income Tax	YES	X	X	X	X	X		YES	YES	YES	Quarterly/ Semi-Annual	More analysis needed on frequency of verification
11. Commercial database:	N/A							N/A	N/A	N/A	N/A	
12. Other:	N/A							N/A	N/A	N/A	N/A	

B-2. Use of Electronic Data Sources

Non-Financial:																	
Electronic Data Source	To Be Used (Y/N)	Factor of Eligibility						Other Factors					Data Source Usage				Comments
		Social Security Number	Citizenship	Immigration Status	Residency	Age/DOB	Pregnancy	Household Composition	Caretaker Relative	Medicare	Application for other Benefits	Other: (describe)	Used at Application (Y/N)	Used at Renewal (Y/N)	Used for Post-Enrollment (Y/N)	If Used for Post-Enrollment, Frequency Used (i.e. monthly, quarterly)	
1. Social Security Administration (SSA)	YES	Y	Y	N	N	Y	N	N	N	Y	N	N	YES	NO	NO	N/A	
2. Department of Homeland Security (DHS) - SAVE	YES	N	N	Y	N	N	N	N	N	N	N	N	YES	YES	NO	N/A	
3. Vital Statistics	NO	N	N	N	N	N	N	N	N	N	N	N	NO	NO	NO	N/A	
4. Department of Motor Vehicles (DMV)	YES	N	N	N	Y	N	N	N	N	N	N	N	YES	YES	YES	Quarterly/ Semi-Annual	More analysis needed on frequency of verification
5. Temporary Assistance for Needy Families (TANF)	NO	N	N	N	N	N	N	N	N	N	N	N	NO	NO	NO	N/A	
6. Supplemental Nutrition Assistance Program (SNAP)	NO	N	N	N	N	N	N	N	N	N	N	N	NO	NO	NO	N/A	
7. Office of Child Support Enforcement	NO	N	N	N	N	N	N	N	N	N	N	N	NO	NO	NO	N/A	
8. State General Assistance Programs	NO	N	N	N	N	N	N	N	N	N	N	N	NO	NO	NO	N/A	
9. Women, Infants and Children Program (WIC)	NO	N	N	N	N	N	N	N	N	N	N	N	NO	NO	NO	N/A	
10. State Income Tax and UI/DI	YES	N	N	N	Y	N	N	N	N	N	N	N	YES	YES	YES	Quarterly/ Semi-Annual	More analysis needed on frequency of verification
11. Commercial database: (please describe)	NO	N	N	N	N	N	N	N	N	N	N	N	NO	NO	NO	N/A	
12. PARIS	Y*	N	N	N	N	N	N	N	N	N	N	Y	NO	YES	YES	Quarterly	
13. Other: Internal Revenue Service	YES	N	N	N	N	N	N	Y	N	N	N	N	YES	YES	YES	Quarterly/ Semi-Annual	More analysis needed on frequency of verification

*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 C.

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Please note effective January 1, 2013, CA began the transition of CHIP eligible children to the Medi-Cal program pursuant to Assembly Bill 1494 (Chapter 28, Statutes of 2012) and federal approval (received December 31, 2012) as an amendment to the section 1115 Demonstration, California Bridge to Reform Demonstration (11-W-00193/9) to transition these children to the Medi-Cal program.

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C. Additional Factors of Eligibility for Separate CHIP

Eligibility Criteria	Self-Attestation Accepted without Additional Verification (Y/N)	Self-Attestation Accepted with Post-Enrollment Verification (Y/N)	Electronic Data Source Used (Y/N) If Yes, please describe	Paper Documentation Required from the Individual (Y/N)	Non-Applicable (N/A)
1. Applicant does not have other coverage	N/A	N/A	N/A	N/A	
2. Applicant does not have access to affordable ESI	N/A	N/A	N/A	N/A	N/A
3. When child last had coverage (as applicable to states' waiting period)	N/A	N/A	N/A	N/A	N/A
Waiting period exception #1 (describe):	N/A	N/A	N/A	N/A	N/A
Waiting period exception # 2 (describe):	N/A	N/A	N/A	N/A	N/A
Waiting period exception #3 (describe):	N/A	N/A	N/A	N/A	N/A
Waiting period exception #4 (describe):	N/A	N/A	N/A	N/A	N/A
Waiting period exception #5 (describe):	N/A	N/A	N/A	N/A	N/A
Waiting period exception #6 (describe):	N/A	N/A	N/A	N/A	N/A
Waiting period exception #7 (describe)	N/A	N/A	N/A	N/A	N/A
Waiting period exception #8 (describe):	N/A	N/A	N/A	N/A	N/A
Waiting period exception #9 (describe):	N/A	N/A	N/A	N/A	N/A
Waiting period exception #10 (describe):	N/A	N/A	N/A	N/A	N/A
4. Access to public employee coverage	N/A	N/A	N/A	N/A	N/A
5. Other Eligibility criteria or exceptions to eligibility criteria (please describe):	N/A	N/A	N/A	N/A	N/A

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D. Additional Verification Questions

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):

California will use an electronic data source to the extent that there is a comprehensive, timely, accurate, cost effective data source readily available; if one is not found, then paper documentation as verification for state residency prior to granting Medicaid eligibility will be required. California has assessed various electronic data sources and concluded that none were sufficiently comprehensive, timely, accurate, cost effective and readily available to use by January 1, 2014. For example, California's state-based Exchange does not currently have an interface with the Department of Motor Vehicles or SNAP and to develop such an interface would take well beyond January 1, 2014 and will have a significant cost. However, California is researching the potential use of state tax address data along with address data received from the State Employment Development Department as a potential electronic verification source for state residency, although, verification of state residency would need to remain paper based for those who cannot be verified by these sources.

2. Please describe how the state uses PARIS.

California uses PARIS Interstate, Federal and Veteran's for cost avoidance purposes. The following is a brief description of how California uses each component of the PARIS data matching system:

- 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.
- 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.
- 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.

3. Please indicate if the state is requesting 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), and if so, what sources:

California is not requesting Secretary approval to solely use an alternative electronic data source to verify financial information.

4. Please indicate if the state is requesting Secretarial approval to use a mechanism other than the federal data services hub, and if so what mechanism:

California is not requesting Secretary approval to use a mechanism other than the federal data services hub.

5. Describe any additional MAGI-based eligibility verification policies and procedures that have not been covered in this verification plan (optional):

California is not implementing additional MAGI-based eligibility verification policies and procedures.