



Health Reform: **Beyond the Basics**

healthreformbeyondthebasics.org

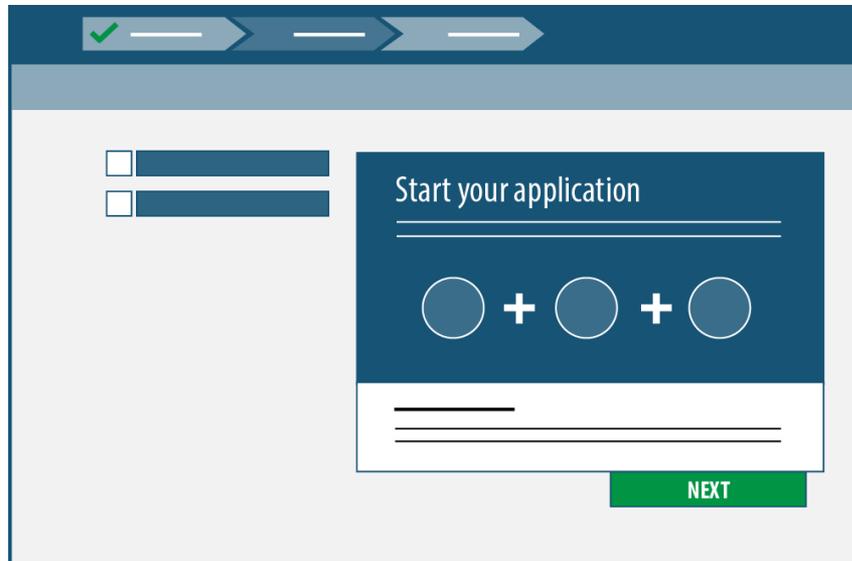
Preventing & Resolving Data-Matching Issues in the Federally-Facilitated Marketplace

Center on Budget and Policy Priorities

November 17, 2016

When consumers apply, they are asked to provide and attest to information regarding relevant eligibility factors:

- Some factors—such as state residency—are generally determined based on the applicant’s sworn attestation
- Attestations as to eligibility factors—such as citizenship, immigration status, or income—must be verified through electronic data matching or documents applicants provide



The screenshot displays a user interface for an application process. At the top, a dark blue header contains a progress indicator with a green checkmark and three right-pointing arrows. Below this, the main content area is light gray. On the left, there are two unchecked checkboxes. On the right, a dark blue box titled "Start your application" contains three white circles with plus signs between them, and a white box with two horizontal lines. A green "NEXT" button is positioned at the bottom right of the white box.

Healthcare.gov Uses the “Federal Hub” for Data Matches



- Data may not be available through the federal data hub to verify attestations for some applicants such as:
 - Applicants who haven't filed taxes in past years
 - Naturalized citizens
 - Recent graduates new to the workforce
- Or information in the hub may not be “reasonably compatible” with an applicant’s attestations in situations such as:
 - Changes in employment
 - Changes in household composition
- Information from Medicaid, Medicare or federal government employment records may show enrollment in other minimum essential coverage (MEC)

- When information can't be verified through data matching, there is a “data-matching issue” (DMI)
- The eligibility notice (EN) explains that the consumer needs to provide more information to verify one or more attestations on the application
- Consumers can temporarily enroll in a Marketplace plan based on the attestations they provided, and in most cases they can receive advance premium tax credits (APTC) and cost-sharing reductions (CSR) while they resolve the DMI
- Consumers have a 90 or 95 day period from the date of the EN to send in documents to resolve a DMI:
 - 95 days for citizenship and immigration status
 - 90 days for all other eligibility factors

- “My Account Page” lets consumers know when they have a DMI
- DMI language appears in red and says “temporary eligibility.”

We've successfully processed your application.

Step 1: View Your "Coverage Options at a Glance"

This section gives a quick snapshot of your eligibility. It's important to view your full "Eligibility Results" for more detailed information. Continue to Step 2.

Anna Carson	Eligible	For Medicaid
		For Marketplace health plans
		For up to \$534 in premium tax credits for your household
John Carson	Eligible	For lower copayments, coinsurance, and deductibles (cost-sharing reductions) on Silver plans
Suzanne Carson		

Temporary eligibility: You need to provide more information within the next 3 months to keep your coverage. View your "Eligibility Results" to learn how to submit this information.

Step 2 : View Your "Eligibility Results"

Your "Eligibility Results" contain important information about your Marketplace coverage, including your eligibility for coverage, costs, deadlines, and next steps. If you're eligible for coverage through a Marketplace plan, you'll continue to Step 3 to enroll in coverage after you review your results.

You're eligible for a Special Enrollment Period. Select "View Eligibility Results" to find out when you can select a plan or change plans. If you miss the deadline, you may not be able to enroll in a Marketplace plan until the next Open Enrollment, unless you qualify for another Special Enrollment Period.

[VIEW ELIGIBILITY RESULTS \(PDF\)](#)

Important: These are your **Eligibility Results** for Health Insurance Marketplace coverage.

ACTION REQUIRED. You could lose your eligibility for 2017 Marketplace coverage and/or help with costs. See information below under “What should I do next?” for information about sending documents the Marketplace requested.

The following **Eligibility Results** for 2017 coverage are only valid if your household submits documents that resolve the issue we need to verify.

Eligibility Results

Review the table below for the results of your application.

Family member(s)	Results	Next steps
May Leon	<ul style="list-style-type: none">Eligible to purchase health coverage through the Marketplace, but more information is neededEligible for a tax credit (\$355.00 each month, which is \$4,260.00 for the year, for your tax household), but we need more information from you. This calculation is based on the yearly household income of \$75,000.00. This is the amount that you provided on your Marketplace application or the amount that came from the most recent income data sources available.	<ul style="list-style-type: none">Send the Marketplace more information

Requests for documents:

- Warning Notices (written notices sent 90, 60 and 30 days before the DMI period ends)
- Emails and text message alerts
- 15-day warning telephone calls

Requests for additional documents:

- Insufficient Document Notice (written notice when documents are submitted but found insufficient)
- Telephone call

✘ **If DMI is not resolved:** Expiration notice sent

✔ **If DMI is resolved:** Notice sent

Verification of Citizenship and Immigration Status

- Applicant provides Social Security number (SSN)
- Applicant attests to being a U.S. citizen
- Healthcare.gov verifies citizenship through a data match with Social Security Administration (SSA) records

- If citizenship can't be verified with SSA, the applicant is asked if he is a naturalized or derived citizen and if so, is asked to provide:

- An alien number (also called USCIS number), and either a Naturalization Certificate number or a Certificate of Citizenship number
- Healthcare.gov then tries to verify citizenship through data match with Systematic Alien Verification for Entitlements (SAVE) program

You don't have to be a U.S. citizen or U.S. national to qualify for health coverage. Select "no" to view a list of other eligible immigration statuses, and choose the status that best describes yours.

Is [redacted] a U.S. citizen or U.S. national?

[Learn more about immigration status](#)

Yes

No

Is [redacted] a naturalized or derived citizen?

A naturalized citizen is a person who became a U.S. citizen after birth. A derived citizen may be someone who was adopted or born abroad to at least one U.S. citizen parent.

Yes

No

Document type

Select ▼

“Naturalized” citizen is used to describe individuals born outside of the U.S. who become U.S. citizens after completing certain requirements and the “naturalization” process. “Derived” citizen refers to U.S. citizens who obtain citizenship through U.S. citizen parents.

Reasons Data Matching May Be Unsuccessful

Verification of Citizenship

- Failure to provide SSN or other document numbers, or wrong number provided
- Name, date of birth and SSN provided on the application do not match what is in SSA or SAVE records:
 - Typos
 - Name changes
- Data matching limitations:
 - SSA can't verify citizenship for many citizens who were born outside of the U.S.
 - Some consumers may not have certificate numbers readily available (especially derived citizens)



Submit any one of the following documents to verify citizenship

U.S. Passport



Certificate of Citizenship



Certificate of Naturalization



State-issued enhanced driver's license (EDL)

- Currently available in Michigan, New York, Vermont and Washington



Document from a federally recognized Indian tribe that includes the individual's name, the name of the tribe, and shows membership, enrollment, or affiliation with the tribe

- A tribal enrollment card
- A Certificate of Degree of Indian Blood
- A tribal census document
- Documents on tribal letterhead signed by a tribal leader

NOTE: If a person does not have one of these documents, they will need two documents to prove citizenship.



Submit ONE document from EACH column (total of TWO documents)

One of the following documents:

- U.S. public birth certificate
- Consular Report of Birth Abroad (FS-240, CRBA)
- Certification of Report of Birth (DS-1350)
- Certification of Birth Abroad (FS-545)
- U.S. Citizen Identification Card (I-197 or the prior version I-179)
- Northern Mariana Card (I-873)
- Final adoption decree showing the person's name and U.S. place of birth
- U.S. Civil Service Employment Record showing employment before June 1, 1976
- Military record showing a U.S. place of birth
- U.S. medical record from a clinic, hospital, physician, midwife or institution showing a U.S. place of birth
- U.S. life, health or other insurance record showing U.S. place of birth
- Religious record showing U.S. place of birth recorded in the U.S.
- School record showing the child's name and U.S. place of birth
- Federal or State census record showing U.S. citizenship or U.S. place of birth
- Documentation of a foreign-born adopted child who received automatic U.S. citizenship (IR3 or IH3)

AND one of the following documents:

- Document must have a photograph or other information, like name, age, race, height, weight, eye color, or address*
- Driver's license issued by a State or Territory or ID card issued by the Federal, state, or local government
- School identification card
- U.S. military card or draft record or Military dependent's identification card
- U.S. Coast Guard Merchant Mariner card
- Voter Registration Card
- A clinic, doctor, hospital, or school record, including preschool or day care records (for children under 19 years old)
- 2 documents containing consistent information that proves your identity, like employer IDs, high school and college diplomas, marriage certificates, divorce decrees, property deeds, or titles

How the Marketplace Verifies Immigration Status

- Applicants attest to having an “eligible immigration status”
- Applicants submit applicable document numbers, typically this will be an “A number” (or “USCIS number”) or an I-94 number
- Marketplace tries to verify status through SAVE

Is [redacted] a U.S. citizen or U.S. national?

[Learn more about immigration status](#)

Yes

No

Check here if [redacted] has eligible immigration status

If this person's immigration status isn't listed here, he or she may still be able to get help paying for emergency services, including for labor and delivery if they have a baby. In some states, pregnant women may also be able to get health care coverage.

Document type *(Select one)*

[Learn more about document types](#)

Select... ▼

- Select...
- Permanent Resident Card ("Green Card", I-551)
- Temporary I-551 Stamp (on passport or I-94, I-94A)
- Machine Readable Immigrant Visa (with temporary I-551 language)
- Employment Authorization Card (EAD, I-766)
- Arrival/Departure Record (I-94, I-94A)
- Arrival/Departure Record in foreign passport (I-94)
- Foreign passport
- Reentry Permit (I-327)
- Refugee Travel Document (I-571)
- Certificate of Eligibility for Nonimmigrant (F-1) Student Status (I-20)
- Certificate of Eligibility for Exchange Visitor (J-1) Status (DS2019)
- Notice of Action (I-797)
- Other documents or status types

CONTINUE

Reasons Data Matching May Be Unsuccessful

Verification of Immigration Status

- Failure to provide document numbers, or wrong number provided
- Name, date of birth and document numbers provided on the application do not match SAVE records:
 - Typos
 - Name changes
- Data matching limitations:
 - SAVE may not be able to verify immigration status instantly for some applicants





Document Type:	What to List for Document ID:
Permanent Resident Card (I-551)	<ul style="list-style-type: none"> ✓ Alien registration number ✓ Card number
Temporary I-551 stamp (on passport or I-94, I-94A)	<ul style="list-style-type: none"> ✓ Alien registration number
Machine Readable Immigrant Visa (with temporary I-551 language)	<ul style="list-style-type: none"> ✓ Alien registration number ✓ Passport number ✓ Country of issuance
Employment Authorization Card (I-766)	<ul style="list-style-type: none"> ✓ Alien registration number ✓ Card number ✓ Expiration date ✓ Category code
Arrival/Departure Record (I-94/I-94A)	<ul style="list-style-type: none"> ✓ I-94 number
Arrival/Departure Record in foreign passport (I-94)	<ul style="list-style-type: none"> ✓ I-94 number ✓ Passport number ✓ Expiration date ✓ Country of issuance
Foreign passport	<ul style="list-style-type: none"> ✓ Passport number ✓ Expiration date ✓ Country of issuance

Document Type:	What to List for Document ID:
Reentry Permit (I-327)	✓ Alien registration number
Refugee Travel Document (I-571)	✓ Alien registration number
Certificate of Eligibility for Nonimmigrant Student Status (I-20)	✓ Student and Exchange Visitor Information System (SEVIS) ID
Certificate of Eligibility for Exchange Visitor Status (DS2019)	✓ SEVIS ID
Notice of Action (I-797)	✓ Alien registration number or an I-94 number ✓ Description of the type or name of the document
Other documents	✓ Alien registration number or an I-94 number ✓ Description of the type or name of the document

Examples of Document Types

Permanent Resident Card (“Green card”, I-551)



Alien Registration #
(may be referred to as USCIS #)

Tips:

- Older cards
- If the A# does not have 9 digits, add one or two zeros before the A# so that you can input nine digits
- These cards do NOT have card numbers
 - Enter “AAA00000000000” as the card number



Examples of Document Types

Employment Authorization Card (I-776)

U.S. DEPARTMENT OF HOMELAND SECURITY, U. S. Citizenship and Immigration Services

EMPLOYMENT AUTHORIZATION CARD

The person identified is authorized to work in the U.S. for the validity of this card.

NAME **SPECIALE, TESS V**
Tess V. Speciale

A# 750-097-303

CARD # LIN1044750079

Birthdate: **08/14/58** Category: **C09** Sex: **F**

Country of Birth: **Democratic Republic of Congo**

Terms and Conditions: **None**

NOT VALID FOR REENTRY TO U.S.

CARD VALID FROM 04/01/06 EXPIRES 04/02/10

Alien Registration #
(may be referred to as USCIS #)

Card #

Category Code

Expiration Date

UNITED STATES OF AMERICA

EMPLOYMENT AUTHORIZATION CARD

Surname: **SPECIMEN**
Given Name: **TEST V**

USCIS# **000-000-773** Category: **C09** Card# **SRC0000000773**

Country of Birth: **Ethiopia**

Terms and Conditions: **None**

Date of Birth: **01 JAN 1920** Sex: **M**

Valid From: **01/01/80**
Card Expires: **05/10/11**

NOT VALID FOR REENTRY TO U.S.

- Roberto and Monica are married and have two children, Miguel and Elena
- Monica was born in Germany and is a derived U.S. citizen
- Roberto has been a lawful permanent resident (LPR) for 7 years
- Miguel and Elena were born in the U.S.



On the Application:

- All family members provide SSNs on the application
- Monica, Miguel and Elena attest to being U.S. citizens
 - Monica is asked if she is a naturalized or derived citizen and she answers “yes”
 - Monica does not have a Certificate of Citizenship, so she skips the questions asking for document numbers
- Roberto attests to having an eligible immigration status
 - He provides his “A-number” but not his card number





Applicant:	Data Match: SSA	Data Match: SAVE
Monica 	No match	No match
Roberto 	N/A	No match
Miguel & Elena 	Match	N/A

Your Eligibility Results

Review the table below for the results of your application

Family Member(s)	Results	Next Steps
Monica Ruiz	<ul style="list-style-type: none"> Eligible to purchase health coverage through the Marketplace Can choose a health plan with lower copayments, coinsurance, and deductibles Eligible for a tax credit (\$534 each month, which is \$6,408 for the year, for your tax household). This calculation is based on the yearly household income of \$50,925. This is the amount that you provided on your Marketplace application or the amount that came from the most recent income data sources available. 	<ul style="list-style-type: none"> Send the Marketplace more information
Roberto Ruiz	<ul style="list-style-type: none"> Eligible to purchase health coverage through the Marketplace Can choose a health plan with lower copayments, coinsurance, and deductibles Eligible for a tax credit (\$534 each month, which is \$6,408 for the year, for your tax household). This calculation is based on the yearly household income of \$50,925. This is the amount that you provided on your Marketplace application or the amount that came from the most recent income data sources available. 	<ul style="list-style-type: none"> Send the Marketplace more information
Elena Ruiz Miguel Ruiz	<ul style="list-style-type: none"> Eligible to purchase health coverage through the Marketplace Can choose a health plan with lower copayments, coinsurance, and deductibles Eligible for a tax credit (\$534 each month, which is \$6,408 for the year, for your tax household). This calculation is based on the yearly household income of \$50,925. This is the amount that you provided on your Marketplace application or the amount that came from the most recent income data sources available. 	<ul style="list-style-type: none"> Choose a health plan and make first month's payment

- Monica and Roberto are instructed to provide documents to prove their status within 95 days
- All family members are approved to buy a Marketplace plan and are awarded APTC and CSR

Monica and Roberto get warning notices and emails explaining their coverage will end if sufficient documents are not submitted

- Monica and Roberto submitted documents, but they were not sufficient:
 - Monica sent in her Consular Report of Birth Abroad, but she also needs to send in a document that includes a photo or other identifying information
 - Roberto sent in his foreign passport, which in some cases may be used to prove lawful permanent residence, but in his case the passport did not contain the necessary information

Monica Gets an DMI Expiration Notice

- Roberto then sends in a copy of his LPR document (“Green Card”)
- Monica does not have a document from the list of options provided on her eligibility notice so she does not send in additional documents



- She later gets a **data-matching expiration notice** explaining that her coverage will end because she did not provide documentation to prove her citizenship

If you're a citizen, you only need one document from the first list below to prove U.S. citizenship or nationality:

- U.S. passport
- Certificate of Naturalization (N-550/N-570)
- Certificate of Citizenship (N-560/N-561)
- State-issued Enhanced Driver's License (available in Michigan, New York, Vermont and Washington)
- Document from a Federally recognized Indian Tribe that includes the person's name, the name of the Federally recognized Indian Tribe that issued the document, and shows the person's membership, enrollment or affiliation with the Tribe. Documents you can provide include:
 - A Tribal enrollment card
 - A Certificate of Degree of Indian Blood
 - A Tribal census document
 - Documents on Tribal letterhead signed by a Tribal official

If you are a U.S. citizen or national but you don't have any of the documents listed above, you need to send in two documents: one from each of the lists below:

Send in one document from this list A:

- U.S. public birth certificate
- Consular Report of Birth Abroad (FS-240, CRBA)
- Certification of Report of Birth (DS-1350)
- Certification of Birth Abroad (FS-545)
- U.S. Citizen Identification Card (I-197 or the prior version I-179)
- Northern Mariana Card (I-873)
- Final adoption decree showing the person's name and U.S. place of birth
- U.S. Civil Service Employment Record showing employment before June 1, 1976
- Military record showing a U.S. place of birth
- U.S. medical record from a clinic, hospital, physician, midwife or institution showing a U.S. place of birth
- U.S. life, health or other insurance record showing U.S. place of birth
- Religious record showing U.S. place of birth recorded in the U.S.
- School record showing the child's name and U.S. place of birth
- Federal or State census record showing U.S. citizenship or U.S. place of birth
- Documentation of a foreign-born adopted child who received automatic U.S. citizenship (IR3 or IH3)

And one document from this list B:

- Driver's license issued by a State or Territory or Identification card issued by the Federal, State, or local government
- School identification card
- U.S. military card or draft record or Military dependent's identification card
- U.S. Coast Guard Merchant Mariner card
- Voter Registration Card
- For children under 19, a clinic, doctor, hospital, or school record, including preschool or day care records

A consumer can also provide the following in combination with one document from list A:

- Two documents containing consistent information about an applicant's identity, such as employer IDs, high school and college diplomas, marriage certificates, divorce decrees, property deeds or titles

Verification of Household Income

- Applicants are asked to provide information on the source and amount of income for each individual in the household
 - Applicants must submit income information for everyone in the household with income even if they're not applying for coverage
- The attestations on the application are matched with data in the federal hub

The screenshot shows a web application interface for adding income for Jane Taxpayer. The main window is titled "Add income for Jane Taxpayer" and contains a dropdown menu for selecting the type of income. The dropdown menu is open, showing a list of options: Job, Retirement, Rental or royalty income, Self-employment, Pension, Farming or fishing income, Social Security benefits, Capital gains, Alimony received, Unemployment, Investment income, and Other income. The "Job" option is currently selected. Below the dropdown menu, there is a text input field for the amount of income before taxes are taken out, and a checkbox for "Does Jane Taxpayer get this amount?". The interface also includes a "CANCEL" button and a "SAVE" button.

- ✓ If the attestation is higher than the income in the data hub, the attestation is usually (but not always) accepted
- ✓ If the attestation is lower than the income in the data hub, it is accepted if it is within 25% or \$6,000 of the income in the hub
- ! If the attestation is 25% or \$6,000 *lower than* the data available in the hub — or it is not otherwise “reasonably compatible” or no data are available — the applicant is awarded APTC and CSR based on the attestation but must provide documents to verify household income

- Change in a job or hours of employment
- Change in household (divorce, separation, marriage)
- Retirement (losing wages and gaining retirement or Social Security benefits)
- Irregular freelance or self-employment income
- One-time income, such as an IRA withdrawal or a death benefit (could be in previous tax year or future coverage year)
- No tax data available because didn't file taxes in prior years



What Consumers Are Told about Sending in Documents

- If there is a DMI, the consumer receives instructions on next steps in their eligibility notice (EN)
- It includes a list of documents that can be used to verify income

- May Leon - Send more information by [date]. The Marketplace needs proof of your household's annual income, including income earned by every member of your household, whether or not they are seeking health coverage. If you don't send proof by this date, you may have to pay more for coverage and covered services, because your help for your premiums and other costs (if applicable) will change or end. Listed below are examples of several types of documents you can submit. You may need to submit more than one document depending on your household's situation (for example, you'll submit multiple documents if more than one person has income in the household).

The document you send should reflect the income amount you attested to on your Marketplace application.

Examples of documents you can send include:

- 1040 tax return (federal or state versions) - Must contain first name, last name, income amount, and year.
- W2s and/or 1099s (includes 1099 MISC, 1099G, 1099R, 1099SSA, 1099DIV, 1099S, 1099INT) - Must contain first name, last name, income amount, year, and employer name (if applicable).
- Pay stub - Must contain first name, last name, income amount, and pay period or frequency of pay with date of payment. If a pay stub includes overtime, indicate average overtime amount per paycheck.
- Self-employment documentation (includes 1040 Schedule C, most recent quarterly or year-to-date profit and loss statement, or self-employment ledger) - Must contain first name, last name, company name, and income amount. If submitting a self-employment ledger, include dates covered by the ledger, and the net income from profit/loss.
- Social Security Administration statements (Social Security Benefits Letter) - Must contain first name, last name, benefit amount, and frequency of pay.
- Unemployment benefits (unemployment benefits letter) - Must contain first name, last name, source/agency, benefit amount, and duration (start and end date, if applicable).



If income listed on application includes...	Acceptable forms of proof include...
Wages (income an employer pays you)	<ul style="list-style-type: none"> • Most recent 1040 tax return or state tax return • Most recent W-2 • A recent pay stub • A letter from your employer • A copy of a check paid to you as wages • Signed time sheets
Self-employment income	<ul style="list-style-type: none"> • Federal 1040 Schedule C/F • Most recent 1099-MISC • Bookkeeping records or a self-prepared ledger that shows income and deductible expenses • Bank statements that show deposits and expenses from your business
Social Security	<ul style="list-style-type: none"> • Federal 1040 tax return or state tax return • Form SSA-1099 Social Security benefits statement • Any correspondence from the Social Security Administration that shows your benefit amount, including a Cost of Living Adjustment letter • A bank statement that shows the monthly Social Security amount deposited into your bank account
Unemployment compensation	<ul style="list-style-type: none"> • Most recent 1040 tax return or state tax return • Most recent 1099-G showing unemployment compensation • An Unemployment Insurance Benefit Wage Statement that shows the weekly and total benefit you will receive
Retirement income	<ul style="list-style-type: none"> • Federal 1040 tax return or state tax return • Most recent 1099 for Retirement/Pension source • Retirement/Pension documents
Withdrawal of taxable savings	<ul style="list-style-type: none"> • Bank or investment fund statement • A statement of your intent to withdraw funds from an IRA or other retirement fund. Include the amount you expect to withdraw and when. Do not include non-taxable withdrawals, such as those from a bank savings account.
Rental income	<ul style="list-style-type: none"> • Federal 1040 tax return or state tax return • A lease agreement that shows income from rental property. • Most recent 1099-MISC

Consumer Guide for Annual Household Income Data-Matching Issues

- Guide from the Marketplace to help consumers understand and resolve income DMIs
- Includes worksheet to help collect the documents needed to verify household income

List of Income from Documents Provided

Put information from your proof of income documents into the table below. List the gross amount from your document in column 4, then choose the pay period type and put that number in column 5. To get your total expected income, add together the amounts in column 6.

1	2	3	4	5		6
Person Name	Income Type	Document	Gross** Amount	Pay Period (choose one)		Annual Total
				Weekly: x52	Monthly: x12	
				Twice per month: x24	Quarterly: x4	
				Every two weeks: x26	Annually: x1	
Expected Total Household Income						= \$

Self-Employment Chart

If you're self-employed, you can send a self-employment ledger to the Marketplace as proof of income. Report your **net** self-employment income that you make, on average, each month. Your "net" income is the amount of income left **after** you subtract any business expenses or losses from income.

Self-Employment business name/type of work	Net income each month	X # of months each year you get this income	Total Annual Income
Total self-employment-income			= \$

What if Documents Aren't Available?

- In some cases, such as when income is expected to change mid-year and proof isn't available, a signed statement may be accepted
- This statement should include:

Part 1: Household Information

Household Contact:	Lydia Green
Other Household Members:	None
Application ID:	0000123456
State of Application:	FL
Phone Number:	555-423-1229
Today's Date:	7/23/2015

My household's projected annual income for 2015 as stated on my application is: **\$16,000**

Part 2: Written Explanation

Is your household income as stated on your application close to the documented income provided above? If not, a written explanation may be needed to help verify your income. Are you working more, working less, got a raise, lost your job, retired, started getting unemployment, lost or added an income-producing member of the tax household?

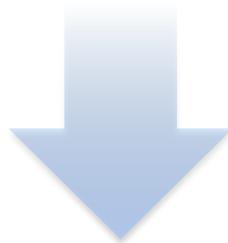
Explanation for income change

I was employed cleaning houses until May 1, 2015 and made about \$3,500 for the year. I lost my job and I'm now unsure of how much money I will make for the rest of the year.

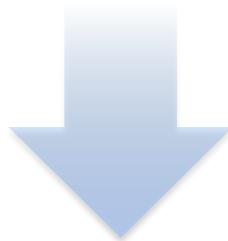
- Roberto is self-employed and Monica works part-time at a bookstore
- On the family's 2015 tax return:
 - Roberto reported self-employment income of \$50,000
 - Monica earned \$25,000 at her part-time job
- Roberto lost his best customer in late 2016 and he expects his income will be only \$25,000 in 2017 (after allowable deductions)
- When applying for 2017 coverage:
 - The family attests to projected annual income of \$50,000 for 2017 (\$25,000 from Roberto and \$25,000 from Monica)
 - The attestation is more than 25% below what their 2015 tax return shows



- The Ruiz family attests to projected annual income of \$50,000 for 2017
→ DMI is triggered



- The Marketplace provides APTC based on the attestation, and gives the Ruiz family 90 days to submit documentation of their income



- If they fail to submit documentation, the Marketplace will use their 2015 tax return as the basis for determining their premium tax credits

- Ledger from 2015 showing the income from the client he no longer has
- A letter from the client explaining he is no longer contracting with Roberto's business
- A statement from Roberto explaining that he lost the client and does not expect to replace the lost income with new business
- Monica's most recent pay stub



- John has never filed taxes and has a new job starting in February
 - He attests to annual projected income of \$22,000 for 2017
- ↓
- Because no electronic data are available, John has to submit documents to verify his 2017 income within 90 days
 - During the 90-day period, John will receive APTC and CSR based on his attestation of income
- ↓
- John can submit a letter from his employer, a hire letter or other proof showing his start date and income



- Diane plans to retire in February and will start receiving Social Security benefits
 - She also plans to withdraw \$5,000 from her retirement account
- ↓
- Her income attestation is more than 25% below her 2015 tax data
 - Diane receives APTC and CSR based on her attestation
- ↓
- Diane can submit a letter or other proof of her last day of employment, her Social Security award letter or statement of benefits and a statement regarding her intent to withdraw funds from her retirement account

If Income DMIs Are Not Resolved

- If income information is available to the Marketplace through the data hub, subsidies are changed to an amount based on the information in the hub
 - If available information shows income under the poverty line or over 400 percent of the poverty line, subsidies are terminated
- If income information is not available to the Marketplace, subsidies are terminated
- Consumer may have to pay a higher share or the entire premium
- New premium amount may be withdrawn from consumer's bank account if they have authorized automatic payments
- If consumers do not pay the full premium, 90-day grace period begins



- Can resolve the DMI and get subsidies restored prospectively
- Can appeal and if appeal is successful can obtain retroactive premium tax credits
- If don't appeal or appeal is unsuccessful, premium tax credits for gap months may still be available when file taxes, as long as consumer was enrolled in a Marketplace plan in months APTC weren't paid and consumer paid the premiums for those months.



- John attested to annual projected income of \$22,000 for 2017
 - No tax information was available to verify his projection
 - John moved shortly after he enrolled and never got the reminder notice to submit documents to resolve his inconsistency
 - His subsidies were terminated after 90 days
-
- **John can submit documents now.** If he verifies his income, he can restore his subsidy for future months.
 - **John can appeal.** If his appeal is successful, he can get retroactive PTC.
 - **If possible, John should pay the premium and maintain coverage.** If John stays in his plan and pays the premium, he can claim the PTC on his tax return for all months in which he was eligible. If he fails to pay the premium and his coverage lapses, he may need to wait for the next open enrollment period.

- If consumers don't have sufficient documents to verify their income, they should submit a written explanation that explains their attestation and why they can't provide proof
- If the attestation provided in the application is no longer accurate, consumers should change their attestations

Verification of Other Minimum Essential Coverage

- Electronic match with Medicaid agencies, Medicare, or Office of Personnel Management may show that consumer is enrolled in or eligible for other MEC
- In that case they will have to prove they are not eligible and/or enrolled in MEC



- Will generally need letter, notice or other proof from the other source of coverage



- If not resolved in 90 days, lose premium tax credits and cost-sharing subsidies

General Tips to Prevent and Resolve DMIs

- Answer as many questions in the application as possible
- Double check that name, birth date, SSN and immigrant/citizenship document numbers have been provided accurately
- Provide SSNs for everyone in the household who has one, even if some members are not applying for coverage
- If the name the applicant is using in the application does not match what is on his SSN card or immigrant/citizenship document, then use option to provide that information

Is Kelly Johnson the same name that appears on her document?

Yes

No

Enter the same name as shown Kelly Johnson's document.

First name	Middle <i>optional</i>	Last name	Suffix <i>optional</i>
<input type="text" value="Kellyann"/>	<input type="text"/>	<input type="text" value="Johnson"/>	<input type="text" value="Select..."/>

- Check information on the application for accuracy and report changes if needed:
 - Income projections and citizenship/immigration status attestations
 - If name has changed from what is in the document, report a change and use option to provide name on document

Tips to Resolve DMIs

- Uploading documents to the marketplace is faster than mail
 - It must be a .pdf, .jpeg, .jpg, .gif, .xml, .png, .tiff, or .bmp
 - It can't be bigger than 10 MB
 - The file name can't include a colon, semicolon, asterisk, or any other special character. Here are a few examples of special characters that can't be in the file name: / \ : * ? " < > |
 - If the upload menu does not include the document type the consumer is trying to upload, the consumers can select "other"
- If mailing documents, provide information needed to match to application
 - Include the page in the notice that includes a bar code if available
 - If bar code is not available, write the name, state and application ID number on the each of the documents being submitted
 - Mail all documents together at one time
 - Keep record of date and what was mailed, including a certified mail receipt if possible

- CMS *Consumer Guide for Annual Household Income DMIs*:
marketplace.cms.gov/outreach-and-education/household-income-data-matching-issues.pdf
- Healthcare.gov resources on data-matching issues:
www.healthcare.gov/verify-information/send-more-info
www.healthcare.gov/help/how-do-i-resolve-an-inconsistency
- CMS sample notices: marketplace.cms.gov/applications-and-forms/notices.html

Other Resources



- Families USA **Public Policy Toolkit for Enrollment Assisters:** familiesusa.org/sites/default/files/enrollment-assister-toolkit/docs/NAV_Enrollment%20Assisters%20Toolkit_web_full.pdf
- Families USA **Collecting Consumers' Health Care Stories: What Enrollment Assistance Organizations Need to Know:** familiesusa.org/product/collecting-consumers-health-care-stories-what-enrollment-assistance-organizations-need-know

- Judy Solomon, solomon@cbpp.org, Twitter: @JudyCBPP
- Shelby Gonzales, gonzales@cbpp.org
- Halley Cloud, cloud@cbpp.org
- For general inquiries, beyondthebasics@cbpp.org

For more information and resources, please visit:

www.healthreformbeyondthebasics.org

This is a project of the Center on Budget and Policy Priorities, www.cbpp.org