Preventing & Resolving Data-Matching Issues

Process in Healthcare.gov

Center on Budget and Policy Priorities

October 11, 2018

Eligibility Must Be Verified

Marketplace consumers attest to information regarding relevant eligibility factors:

- Some factors are generally determined based on the applicant's attestation
  - → Ex: State residency

- Certain eligibility factors must be verified through electronic data matching or through documents applicants provide
  - → Ex: Citizenship, immigration status, or income

Limitations to Electronic Data Matching

When Attestations Can't Be Verified Through Data Matching → A Data-Matching Issue (DMI) Occurs

- Data may not be available through the federal data hub to verify attestations for some applicants
  - → 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
  - → Changes in employment
  - → Changes in household composition

What Happens When There is a Data-Matching Issue

When a DMI occurs because information can't be verified through data matching:

- Eligibility determination notice explains that the applicant needs to provide more information to verify one or more attestations on the application

- Applicants can temporarily enroll in a marketplace plan based on the attestations they provided, and in most cases they can receive the advance premium tax credit (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

Notice of a Data-Matching Issue: Eligibility Results

- On-screen notice of DMI when application is submitted

> **Your eligibility is temporary:** By January 11, you must submit documents to confirm some information. See your eligibility notice for details and deadlines.

- Eligibility determination notice (EDN) will detail eligibility and next steps

Eligibility Results

Review the table below for the results of your application.

Family member(s)	Results
May Leon	• Eligible to purchase health coverage through the Marketplace, but more information is needed • Eligible 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.

SAMPLE NOTICE

Next steps

Important: You must send documents.
This notice includes deadlines and details.

- Choose a plan and pay your first month's premium.
- By January 11, 2018, send documents to confirm:
  - your household income
- By January 11, 2018, send documents to confirm:
  - Keeley Forrester's TRICARE coverage status

- You'll get information about when your coverage will begin and how to access health services from the Alabama Department of Public Health.

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For sample notices, see marketplace.cms.gov/applications-and-forms/notices.html

Multiple Notices Are Sent to Consumers With DMIs

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

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For sample notices, see marketplace.cms.gov/applications-and-forms/notices.html

Verification of Citizenship and Immigration Status

How the Marketplace Verifies Citizenship

- 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 they are 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 Jane Taxpayer a U.S. citizen or U.S. national?

Learn more about immigration status

◉ Yes
◯ No

Is Jane Taxpayer 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

- Wrong attestation

- 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)

!

Documents That Can Be Used to Prove U.S. Citizenship

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.

If None of the Previous Documents Are Available:

Submit ONE document from EACH column (total of TWO documents)	
One of the following documents:	**AND 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)	*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 "Alien" number (or USCIS number) or an I-94 number

- Marketplace tries to verify status through SAVE

    → Healthcare.gov will attempt a second verification with SAVE that may help additional people resolve a data-matching issue

Is Jane Taxpayer a U.S. citizen or U.S. national?

Learn more about immigration status

○ Yes

● No

☑ Check here if ▓▓▓▓ 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

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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

If Citizenship or Immigration Status DMI Is Not Resolved

- If an applicant is unable to prove their citizenship or immigration status within the 95-day DMI window, their coverage will be terminated

- If they submit documents after coverage has been terminated and resolve the DMI, they are eligible for a special enrollment period to reenroll in coverage
  - → SEP will begin the day their DMI is resolved: Will have 60 days from that date to reenroll in coverage

- Can choose to have coverage begin:
  - → Retroactively to the date of termination (will need to pay any retroactive premiums)
  - → Prospectively, after a plan is selected

Document Types and Needed Document Numbers

Document Type:	What to List for Document ID:
Permanent Resident Card (I-551)	✓ "Alien" registration number ✓ Card number
Temporary I-551 stamp (on passport or I-94, I-94A)	✓ "Alien" registration number
Machine Readable Immigrant Visa (with temporary I-551 language)	✓ Alien registration number ✓ Passport number ✓ Country of issuance
Employment Authorization Card (I-766)	✓ "Alien" registration number ✓ Card number ✓ Expiration date ✓ Category code
Arrival/Departure Record (I-94/I-94A)	✓ I-94 number
Arrival/Departure Record in foreign passport (I-94)	✓ I-94 number ✓ Passport number ✓ Expiration date ✓ Country of issuance
Foreign passport	✓ Passport number ✓ Expiration date ✓ Country of issuance

Document Types and Needed Document Numbers

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

Reference Guide: Documents Used to Verify Immigration Status

→ Walks through examples of the different immigration document types that can be used in Healthcare. gov and notes where different document numbers are located

→ Download at: *www.healthreformbeyondthebasics.org/reference-guide-to-immigration-documents*

Example: Immigration and Citizenship Verification

- 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.

Example: Immigration and Citizenship Verification

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 "Alien" number but not his card number

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Data Matching Results

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

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Eligibility Results

- 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 advance premium tax credits (APTC)

Applicant:		Eligible for:	Next steps:
Monica		• Marketplace plan with APTC	• Pick a plan and pay first month's premium • **Provide documentation to prove citizenship**
Roberto		• Marketplace plan with APTC	• Pick a plan and pay first month's premium • **Provide documentation to prove immigration status**
Miguel & Elena		• Marketplace plan with APTC	• Pick a plan and pay first month's premium

Ruiz Family Gets a Warning Notice

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

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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)
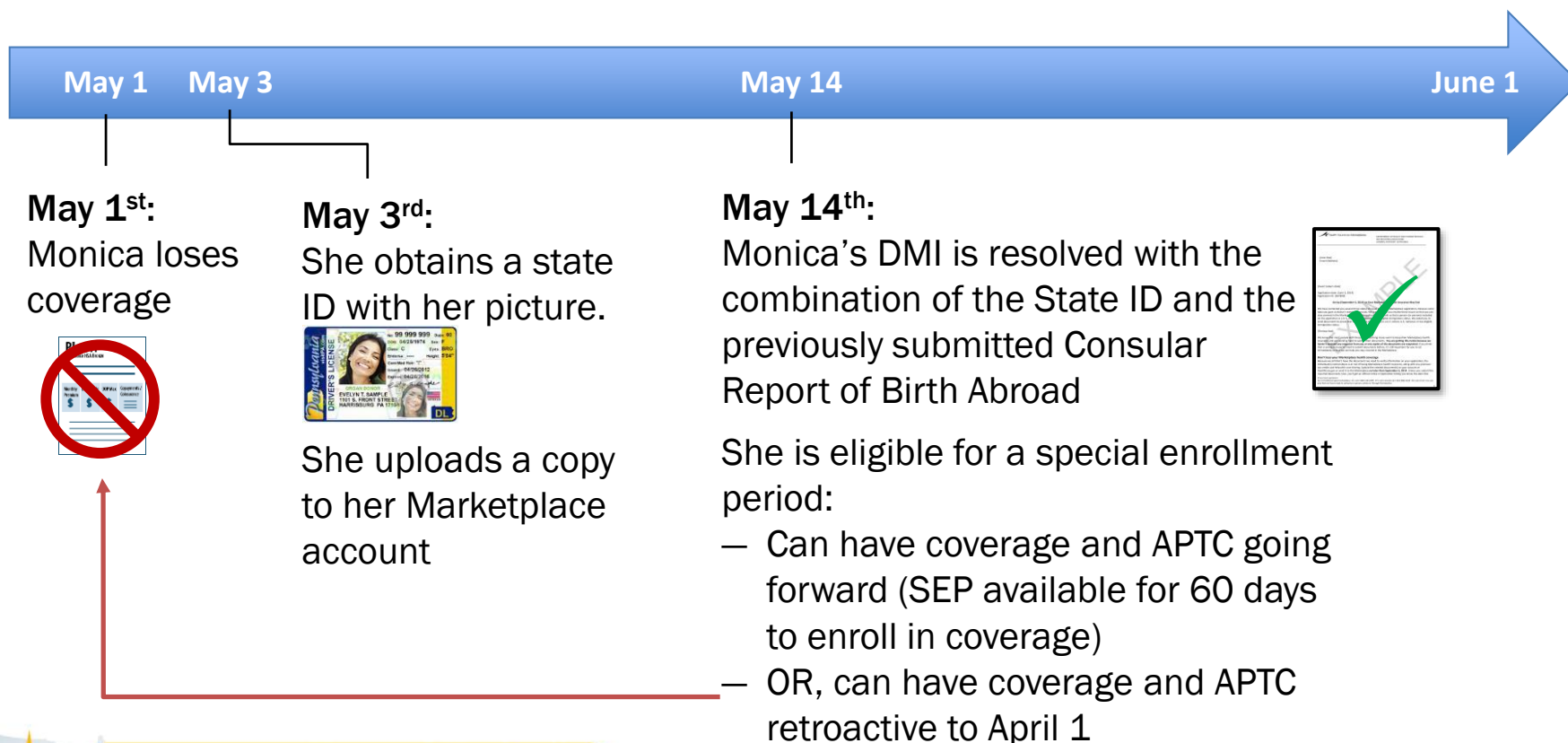
And one document from this list B:

- 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

How Monica Can Regain Coverage

- Monica can still regain coverage if she sends in necessary documents
- After resolving the DMI, she can re-enroll in a Marketplace plan prospectively or retroactively with a special enrollment period.

Timeline: May 1 — May 3 — May 14 — June 1

May 1st:
Monica loses coverage

May 3rd:
She obtains a state ID with her picture.

She uploads a copy to her Marketplace account

May 14th:
Monica's DMI is resolved with the combination of the State ID and the previously submitted Consular Report of Birth Abroad

She is eligible for a special enrollment period:
— Can have coverage and APTC going forward (SEP available for 60 days to enroll in coverage)
— OR, can have coverage and APTC retroactive to April 1

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Verification of Household Income

Application Process for Verification of 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

- Attestations on the application are matched with data in the federal hub

Does Jane Taxpayer currently get income from any of these places?

After you tell us your current income, we'll help you estimate income for all of 2017 so you can tell us if you expect changes.

Job	Retirement	Rental or royalty income
Self-employment	Pension	Farming or fishing income
Social Security benefits	Capital gains	Alimony received
Unemployment	Investment income	Other income

Enter all of your current income types.
Learn more about types of income

○ Yes

○ No

Verification of Income: General Rules

Threshold for Triggering a DMI: Attestation is different by more than 25% of the income in the data hub *and at least* a difference of $6,000

Attestation is Accepted ✓

- Income attestation is usually accepted if:
  - → The attestation is higher than the income in the data hub regardless of income difference (with some exceptions)
  - → The attestation is lower but doesn't trigger the threshold

DMI Triggered ❗

- Applicant is awarded subsidies based on income attestation but must provide documents to verify household income if:
  - → Attestation is 25% <u>and</u> $6,000 *lower than* the data available in the hub
  - → There is no income information in the data hub
  - → **NEW for 2019:** Attestation is above the poverty line but data sources suggest that income is below the poverty line (difference must be 25% and $6,000 *higher than* income in hub)

New DMI for Some with Income Near Poverty Line

Income DMI will be triggered if ALL of the following are true:

- An applicant attests to projected income between 100-400% FPL (and is otherwise eligible for PTC)

- But data from the data hub indicates income below 100% FPL

- *And* attested projected income is more than reasonable threshold (25% more than income in the data hub *and at least* a difference of $6,000)

Notes:

- In practice, this only impacts states that have not expanded Medicaid
- Will not apply to non-citizens who are lawfully present and ineligible for Medicaid due to immigration status
  - → This population is eligible for PTC below 100% FPL

Example: Prior Year Income Under the Poverty Line

- Walt is a graduate student in St. Louis, MO

- Since 2017, he has worked part-time (20 hours a week) as a bookkeeper making $11/hour
  - → His annual earnings: $11,400
  - → This is just under the poverty line making him ineligible for PTC and ineligible for Medicaid due to his state not expanding coverage

- In late 2018, he gets a raise to $13/hour starting January 1
  - → He plans to work more hours in 2019 (25 hours a week) and projects earning $16,900 in 2019 (139% FPL)

- **His projected income exceeds his prior income by more than 25% but there is less than a $6,000 difference → No income DMI is triggered**

Example: Prior Year Income Under the Poverty Line

- Walt is a graduate student in St. Louis, MO

- Since 2017, he has worked part-time (20 hours a week, 40 weeks a year) as a bookkeeper making $11/hour
  - → His annual earnings: $8,800
  - → This is under the poverty line making him ineligible for PTC and ineligible for Medicaid due to his state not expanding coverage

- In late 2018, he gets a raise to $13/hour starting January 1
  - → He plans to work more hours in 2019 (25 hours a week all year) and projects earning $16,900 in 2019 (139% FPL)

- **His projected income exceeds his prior income by more than 25% and $6,000 → Income DMI is triggered**

Example: Prior Year Income Under the Poverty Line

What happens now?

- Walt can still enroll in coverage with APTC and CSR, but he must submit documents to prove his attested income within 90 days

- To prove his new income, Walt can submit:
  → A letter from his employer with the increase in wages
  → A paystub or check paid to him as wages showing the pay raise and increased hours once he gets the raise

- In January, Walt submits a paystub with his higher hourly wage and increased hours with a letter explaining his new hours and expected annual projection
  → His DMI is resolved February 1 and his coverage continues without interruption

Reasons Data Matching May Not Verify 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 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 household information and explanation for income projection

Primary Household Contact:	Kala Mehta
Other Household Members:	None
Application ID:	1770370348
State of Application:	Virginia
Phone Number:	513-423-1229
Today's Date:	11/15/2018
Projected Annual Income for 2019 as Stated on Application:	$21,000

Explanation for income projection:
I will be starting school in the fall and will be quitting my job in August. My current job pays $15/hour and I work 40 hours a week. By the time I quit at the end of August, I should make around $21,000. I expect to have no income from September through the end of the year.

Notice of DMI and Next Steps

- If there is a DMI, applicant receives instructions on next steps in eligibility notice

- 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).

2017 SAMPLE NOTICE

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Source: CMS sample notice marketplace.cms.gov/applications-and-forms/notices.html

Documents That Can Be Used to Verify Income

If income listed on application includes...	Acceptable forms of proof include...
Wages (income an employer pays you)	• 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	• 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	• 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	• 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	• Federal 1040 tax return or state tax return • Most recent 1099 for Retirement/Pension source • Retirement/Pension documents
Withdrawal of taxable savings	• 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	• Federal 1040 tax return or state tax return • A lease agreement that shows income from rental property. • Most recent 1099-MISC

For more information on documents to send to resolve a DMI, see
www.healthcare.gov/help/how-do-i-resolve-an-inconsistency

Guide for Annual Household Income DMIs

- Guide from the Marketplace to help consumers understand and resolve income DMIs

- Includes list of example documentation to help resolve an income DMI

- Includes worksheet to help collect the documents needed to verify household income

Consumer Guide for Annual Household Income Data Matching Issues: marketplace.cms.gov/outreach-and-education/household-income-data-matching-issues.pdf

Your household's expected income

Use the table below to add up the 2017 income expected for each member of your household.

1	2	3	4	5	6
Name of household member	Type of income	Document you'll send to verify this income	Gross income amount in document	How often does this person get this amount?	Annual Total
EXAMPLE: John Doe	Job income	Paystub	$2,000	Every two weeks (26 times a year)	$52,000 ($2,000*26)
EXAMPLE: John Doe	Rental income	Rental agreement	$1,000	Every month (12 times a year)	$24,000 ($1,000*12)
				$	$
				$	$
			Expected Total Household Income		$
		My household's expected income in 2017 on my Marketplace application			$

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Self-employment chart

| 1	2	3	4	5	6	7
Name of household member	Self-employment business name/type of work	Gross income each month (average)	Expenses each month (average)	Monthly average net income (average)	# of months each year you get this income	Annual total
EXAMPLE: John Doe	Real Estate			$1,000	12	$12,000
				$	$	
				$	$	
		Expected total household income from self-employment				$

Your household's income from self-employment

You can upload or mail a "Self-employment chart" to verify each type of income that a household member gets from self-employment. You'll also need to upload or mail documents to verify each income source from self-employment in 2017. This income should also be included in "Your household's expected income" above. To learn more, visit HealthCare.gov/self-employed/income/.

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# Example: Household Income Goes Down

- Jaylen is self-employed and Mia works part-time at a bookstore

- On the family's 2017 tax return:
  - → Jaylen reported self-employment income of $50,000
  - → Mia earned $25,000 at her job
  - → Total: $75,000

- Jaylen lost his best customer in late 2018 and he expects his income will be only $25,000 in 2019 (after allowable deductions)

- When applying for 2019 coverage:
  - → The family attests to projected annual income of $50,000 for 2019 ($25,000 from Jaylen and $25,000 from Mia)
  - → The attestation is more than 25% and $6,000 below what their 2017 tax return shows

Verification of Income

- The family attests to projected annual income of $50,000 for 2019 (199% FPL) → DMI is triggered
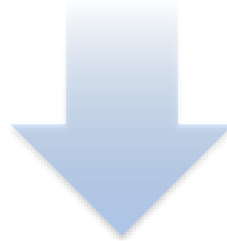
- The Marketplace provides APTC based on the attestation, and gives the family 90 days to submit documentation of their income
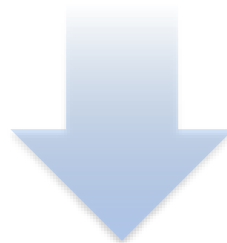
- If they fail to submit documentation, the Marketplace will use their 2017 tax return as the basis for determining their premium tax credits

Possible Ways to Prove Household Income

Documents family can submit:

- Ledger showing current income and expenses

- A statement explaining that Jaylen lost a client from 2017 and does not expect to replace the lost income with new business

- Mia's most recent pay stub

What's the math behind the documentation?

$50,000 Total projected income	=	**$28,000** Jaylen's projected income (ledger plus explanation of lost client)
		- $3,000 Jaylen's projected expenses (ledger)
		+ $25,000 Mia's projected income (pay stubs)

Example: Recent College Graduate

- John has never filed taxes and has a new job starting in mid-January

- He attests to annual projected income of $22,000 for 2019

- Because no electronic data are available, John has to submit documents to verify his 2019 income within 90 days

- During the 90-day period, John will receive APTC 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

Example: Early Retirement

- 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% and $6,000 below her 2017 tax data

- Diane receives APTC 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

  → Note: If available information shows income under the poverty line or over 400 percent of the poverty line, subsidies are terminated

- If income information is <u>not</u> available to the Marketplace, subsidies are terminated

- Enrollee 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 enrollee does not pay the full premium, grace period begins

? For more info on grace period rules, see *Health Reform: Beyond the Basics* Key Facts on Premium Payments and Grace Periods

How People Can Restore Subsidies

- A person can resolve the DMI and get subsidies restored prospectively through an appeal.

  → If the appeal is successful can obtain a retroactive premium tax credit

  → If a person doesn't appeal or the appeal is unsuccessful, the premium tax credit for gap months may still be available on the tax return, as long as the person was enrolled in a Marketplace plan and she paid the premium for those months

John Fails to Resolve His DMI

- John attested to annual projected income of $22,000 for 2019
  - → 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.

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Tips to Resolve Income DMIs

- If applicants 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, people should change their attestations

For more information on documents to send to resolve a DMI, see
www.healthcare.gov/help/how-do-i-resolve-an-inconsistency

Verification of Other Minimum Essential Coverage

Minimum Essential Coverage DMIs

- Electronic match with Medicaid agencies, Medicare, or Office of Personnel Management may show that applicant 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

- Can enroll in coverage with APTC based on attestation, but will need to submit documentation that they are not enrolled in other coverage

- Can submit a letter from insurer showing coverage termination date, notice from Medicaid or CHIP agency, or other proof from the other source of coverage

- If not resolved in 90 days, lose eligibility for APTC

Note: Throughout the coverage year, the marketplace will periodically check enrollment in Medicaid or CHIP. If a person is found to be enrolled in both Medicaid or CHIP AND coverage with APTC, will receive a "periodic data matching (PDM) notice" and will have 30 days to respond. This is different than a DMI and submission of documents in not needed → PDM notices require a person to either update their marketplace application or end their marketplace coverage. **Click here** for more information.

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For more information on documents to send to resolve an MEC DMI, see
www.healthcare.gov/help/how-do-i-resolve-an-inconsistency

Identity Proofing for Healthcare.gov

Importance of ID Proofing

Though ID proofing is NOT an eligibility requirement, a person can't have full access to an online Marketplace account until ID proofing is complete

→ This means a person can't complete many tasks online like:

- ✘ Submitting an application,
- ✘ Selecting a plan, or
- ✘ Reporting changes

Healthcare.gov Process for ID Proofing

Online ID proofing:

- Experian tries to provide customized questions based on available credit history (and other electronic data) for the person completing the application
- Not everyone will have enough information to generate questions

Telephonic ID proofing:

- Some people will be instructed to call Experian to complete ID proofing
- They will be provided a unique reference code → Must call Experian to proceed with ID proofing if asked to complete this step

Providing documents for ID proofing:

- Consumers who can't complete the ID process online or over the phone can submit copies of certain documents to prove their identity
- **Important!** They can continue with their application via phone or paper while documents are being processed

Consumers Can Prove Identity By Mailing or Uploading

One of these:	Alternatively, two of these:
• Driver's license issued by state or territory	• Birth certificate
• School identification card	• Social Security card
• Voter identification card	• Marriage certificate
• U.S. military draft card or draft record	• Divorce decree
• Identification card issued by the federal, state, or local government	• Employer identification card
• U.S. passport or U.S. passport card	• High school or college diploma (including high school equivalency diplomas)
• Certificate of Naturalization (Form N-550 or N-570) or Certificate of U.S. Citizenship (Form N-560 or N-561)	• Property deed or title
• Permanent Resident Card or Alien Registration Receipt Card (Form I-551)	
• Employment Authorization Document that contains a photograph (Form I-766)	
• Military dependent's identification card	
• Native American tribal document	
• U.S. Coast Guard Merchant Mariner card	
• Foreign passport or identification card issued by a foreign embassy or consulate that contains a photograph	

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People Unable to Complete Identity Proofing

- Use Healthcare.gov's [See Plans and Prices](#) tool to browse plans online

- Complete the application using a paper form or over the telephone

- Select a plan through the call center

- Request paper notices

- Report changes and complete renewals through the call center

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General Tips to Prevent and Resolve DMIs

Tips to Prevent 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 *optional*	Last name	Suffix *optional*
Kellyann		Johnson	Select... ▼

Tips to Resolve DMIs

- 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

Resources

- Reference Guide: <u>Documents Used to Verify Immigration Status</u>

Healthcare.gov resources:

- <u>Tips on sending documents to resolve a DMI</u>

- <u>How to Resolve a DMI: Acceptable document list</u>

- <u>Consumer Guide for Annual Household Income DMIs (PDF)</u>

- Sample notices: <u>marketplace.cms.gov/applications-and-forms/notices.html</u>

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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

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