



Health Reform: **Beyond the Basics**

healthreformbeyondthebasics.org

Preventing & Resolving Data-Matching Issues (in FFM)

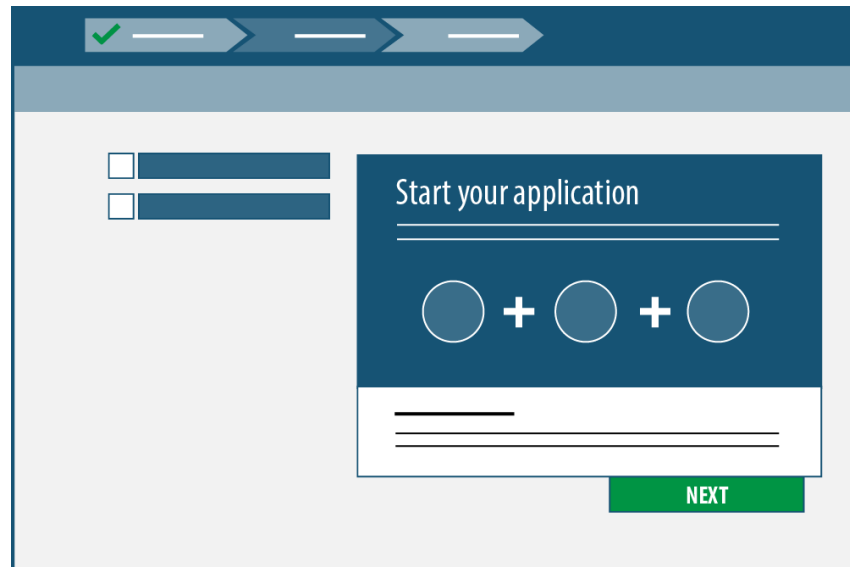
Coverage Year 2018

Center on Budget and Policy Priorities

October 18, 2017

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 attestation
- Certain eligibility factors—such as citizenship, immigration status, or income—must be verified through electronic data matching or documents applicants provide



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

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- 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)
- Eligibility notice (EN) 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 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

Notice of a Data-Matching Issue: Eligibility Results

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- 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 notice will detail eligibility and next steps

Eligibility Results
Review the table below for the results of your application.

Family member(s)	Results
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.

! NEW FOR 2018
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.

2017 SAMPLE NOTICE

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.

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)



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:

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

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

The screenshot shows a web form for verifying immigration status. At the top, it asks, "Is [redacted] a U.S. citizen or U.S. national?" with a link to "Learn more about immigration status". There are two radio buttons: "Yes" and "No", with "No" selected. Below this is a checked checkbox that says "Check here if [redacted] has eligible immigration status". A light blue informational box contains text about emergency services and health care coverage. Underneath is a section for "Document type (Select one)" with a link to "Learn more about document types". A dropdown menu is open, showing a list of document types: "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)", and "Other documents or status types". To the right of the dropdown is a green "CONTINUE" button.

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 #)

Card Number

Tips:

- 2010 revision
- Document/card number on the back and contains 13 characters:
 - Begins with three letters
 - Followed by ten numbers



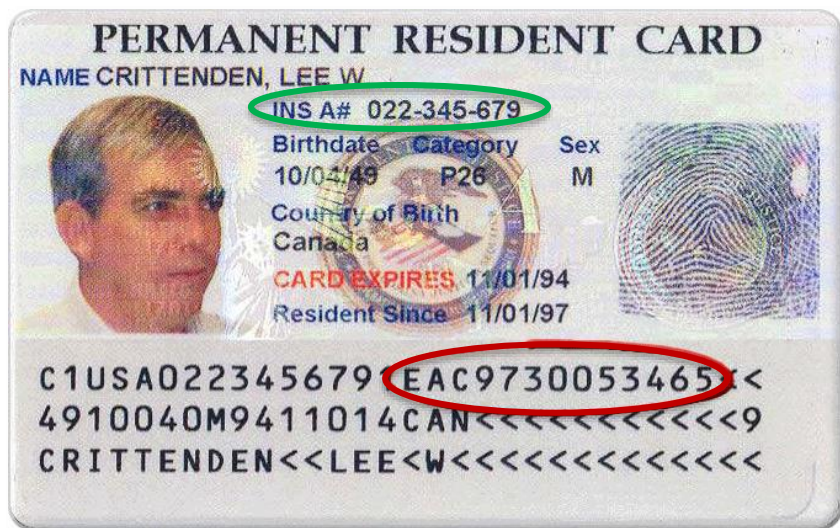
Examples of Document Types

Permanent Resident Card ("Green card", I-551)



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

Card Number



Tips:

- 1997 and 2004 revision
- Document/card number on the front
 - Same letter/number scheme

Examples of Document Types

Permanent Resident Card ("Green card", I-551)



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

Tips:

- Older cards
- If the "alien" number 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)

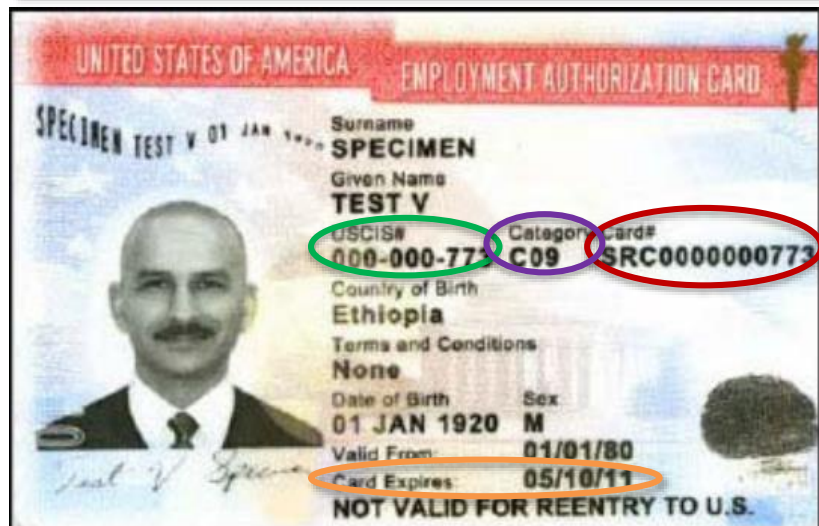


“Alien” Registration #
(may be referred to as USCIS #)

Card #

Category Code

Expiration Date



Refugee Travel Document (I-571)

**“Alien” Registration #
(may be referred to as USCIS #)**




- 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 “Alien” 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

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

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

- 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)

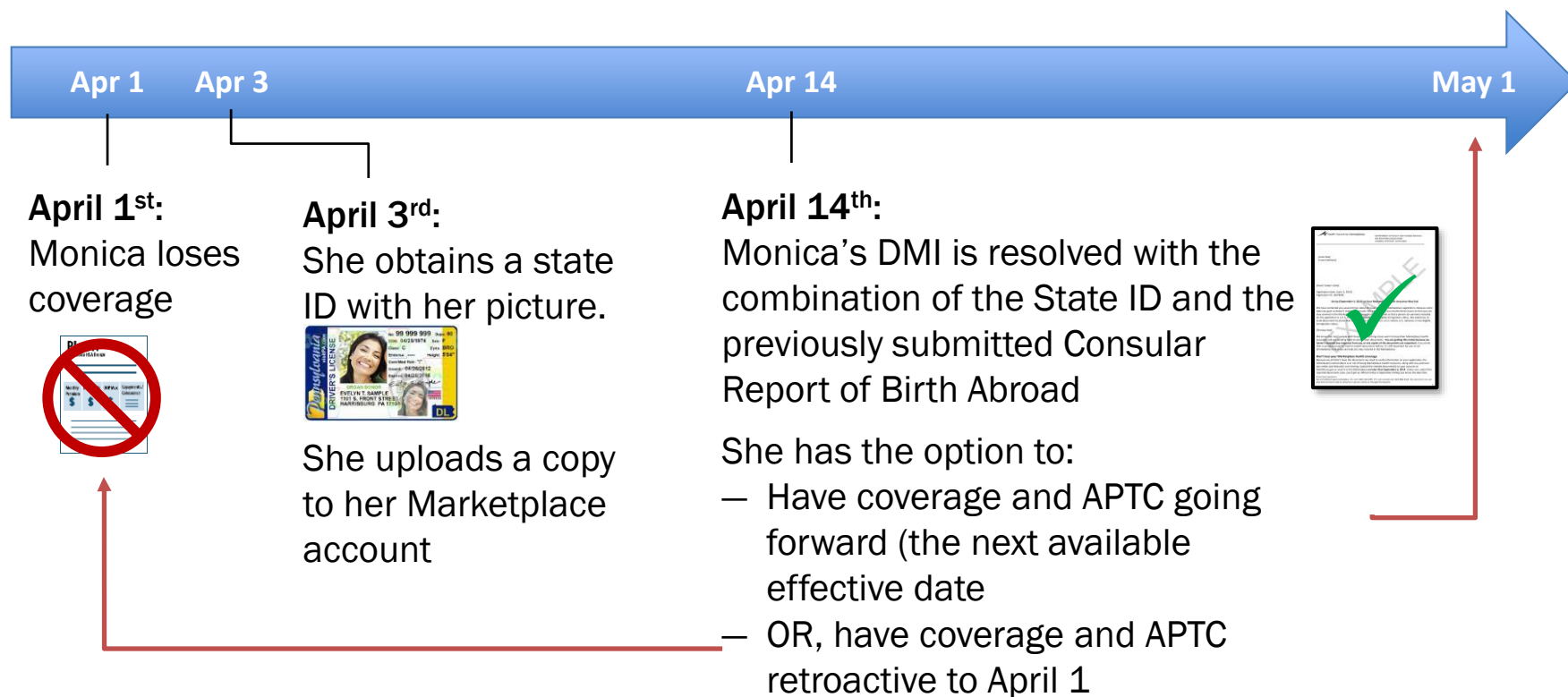
And one document from this list B:

- 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

- 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.





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
- 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

- ✓ 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 subsidies 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



- 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

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)	<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

- 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/.

- 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

Marketplace Income Verification Worksheet Example #3: Changes that have impacted your 2017 income (providing written explanation):

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:	7/23/2017
My household's projected annual income for 2017 as stated on my application is: \$16,000	

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?

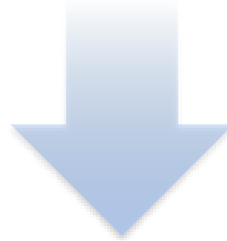
Explanation for income change

I was employed cleaning houses until May 1, 2017 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.

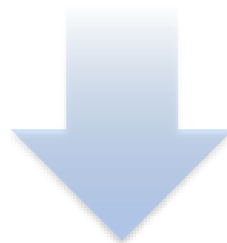
- Roberto is self-employed and Monica works part-time at a bookstore
- On the family's 2016 tax return:
 - Roberto reported self-employment income of \$50,000
 - Monica earned \$25,000 at her part-time job
 - Total: \$75,000
- Roberto lost his best customer in late 2017 and he expects his income will be only \$25,000 in 2018 (after allowable deductions)
- When applying for 2018 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 2016 tax return shows



- The Ruiz family attests to projected annual income of \$50,000 for 2018 (203% FPL) → 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 2016 tax return as the basis for determining their premium tax credits

Documents family can submit:

- Ledger showing current income and expenses
- A statement explaining that Roberto lost a client from 2016 and does not expect to replace the lost income with new business
- Monica's most recent pay stub

What's the math behind the documentation?

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



- John has never filed taxes and has a new job starting in mid-January
- He attests to annual projected income of \$22,000 for 2018



- Because no electronic data are available, John has to submit documents to verify his 2018 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



- 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 2016 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 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
- 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



- 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 the person was enrolled in a Marketplace plan in months APTC weren't paid and she paid the premiums for those months



- John attested to annual projected income of \$22,000 for 2018
 - 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 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

Verification of Other Minimum Essential Coverage

- 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



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



- If not resolved in 90 days, lose premium tax credits



Identity Proofing for Healthcare.gov

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



The screenshot shows a web interface for reporting a life change. On the left is a sidebar menu with options: 'My plans & programs', 'Eligibility & appeals', 'Applications details', 'Report a life change' (highlighted with a blue background), 'Communication preferences', 'Authorized users', and 'Exemptions'. The main content area is titled 'Report a life change' and asks, 'Do you want to report a change in circumstances that may qualify you or your dependents for a Special Enrollment Period?'. Below this, it explains that changes in household or income can affect health coverage costs and advises reporting changes as soon as they occur. A section titled 'What kinds of changes should be reported?' lists examples: change in citizenship or immigration status, change in household members, change in marital status, marriage, birth, or adoption, and change in health coverage. At the bottom is a green button labeled 'REPORT A LIFE CHANGE'.

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



One of these:	Alternatively, two of these:
<ul style="list-style-type: none">• Driver's license issued by state or territory• School identification card• Voter identification card• U.S. military draft card or draft record• Identification card issued by the federal, state, or local government• U.S. passport or U.S. passport card• Certificate of Naturalization (Form N-550 or N-570) or Certificate of U.S. Citizenship (Form N-560 or N-561)• 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	<ul style="list-style-type: none">• Birth certificate• Social Security card• Marriage certificate• Divorce decree• Employer identification card• High school or college diploma (including high school equivalency diplomas)• Property deed or title

- 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

HealthCare.gov Individuals & Families Small Businesses Log In ESPAÑOL

2016 health insurance plans & prices

People covered: Primary (Age 35) [EDIT](#)

34 plans available SORT BY: Premium PLAN TYPE: Health plans

FILTERS

Monthly premium

- less than \$200 (1)
- less than \$300 (18)
- less than \$400 (30)
- less than \$500 (33)
- less than \$600 (34)

Plan category

- Bronze plans (12)
- Silver plans (11)
- Gold plans (10)
- Platinum plans (1)

Plan type

- PPO (10)
- HMO (21)
- POS (3)

Medical management programs

- Asthma (28)
- Heart Disease (34)
- Depression (28)
- Diabetes (34)
- High Blood Pressure and High Cholesterol (28)
- Low Back Pain (28)
- Pain Management (28)
- Pregnancy (34)
- Weight Loss Programs (25)

Insurance companies

Innovation Health Insurance Company · Innovation Health Leap Bronze Basic
Bronze PPO | Plan ID: 12028VA0120028

Estimated monthly premium \$198	Deductible \$6,850 Estimated Individual Total	Out-of-pocket maximum \$6,850 Estimated Individual Total
Estimated total yearly costs CALCULATE	Your doctors and prescription drugs EDIT	Copayments / Coinsurance BETA

[LEARN MORE ABOUT THIS PLAN](#) [COMPARE](#)

Innovation Health Insurance Company · Innovation Health Leap Bronze HSA
Bronze PPO | Plan ID: 12028VA0120019

Estimated monthly premium \$203	Deductible \$6,450 Estimated Individual Total	Out-of-pocket maximum \$6,450 Estimated Individual Total



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

- 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

- 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 **Consumer Guide for Annual Household Income DMIs**:
marketplace.cms.gov/outreach-and-education/household-income-data-matching-issues.pdf
- CMS sample notices: marketplace.cms.gov/applications-and-forms/notices.html

- Shelby Gonzales, gonzales@cbpp.org, Twitter: @shelbytg74
- 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