

Section A. Verification Procedures for Factors of Eligibility

Eligibility Factor	Self-Attestation Accepted without Additional Verification (Y/N)	Self-Attestation Accepted with Post-Eligibility Verification (Y/N)	Electronic Data Source Used (Y/N)	Reasonable Compatibility Standard Used	Specify Reasonable Compatibility Standard for Income	Ask for a Reasonable Explanation from the Individual (Y/N)	Paper Documentation Required from the Individual (Y/N)	Comments
Income*	NO	NO	YES	Both are above, at or below the applicable income standard.  Percent Threshold	10%	YES	YES	If the individual attests to income below the applicable standard, and the data source indicates income above the applicable standard, and the difference between the two is greater than 10% then a reasonable explanation or paper documentation will be requested.  Self attestation of income without additional verification is accepted for CHIP. It is currently not used for CHIP. Using this data would violate Maintenance of Effort (MOE) ***  Michigan uses the attested data for determination and uses the TDS as verification of the attested information. If an applicant attests to income above the applicable standard, the applicant will be determined ineligible and will be routed to the FFM for APTC.  See additional comments for more information.
Residency	YES	NO	NO	N/A	N/A	NO	NO	None
Age (Date of Birth)	YES	NO	NO	N/A	N/A	NO	NO	State will accept self-attestation unless a discrepancy is found through other verifications. In the initial release, Michigan will be validating SSN through the SSA composite. Michigan understands that DOB is implicitly verified through the call to the SSA composite service because it is required to search for an individual but the Michigan MAGI Eligibility service is not individually validating Age/DOB via the rules that are executed
Social Security Number **	NO	NO	YES	N/A	N/A	N/A	YES	Applicants who cannot be verified electronically will be manually validated using paper documents.
Citizenship **	NO	NO	YES	N/A	N/A	N/A	YES	Applicants who can not be verified electronically will be manually validated using paper documents.
Immigration Status **	NO	NO	YES	N/A	N/A	N/A	YES	Applicants who can not be verified electronically will be manually validated using paper documents.
Household Composition	YES	NO	NO	N/A	N/A	NO	NO	
Pregnancy ***	YES	NO	NO	N/A	N/A	NO	NO	

Eligibility Factor	Self-Attestation Accepted without Additional Verification (Y/N)	Self-Attestation Accepted with Post-Eligibility Verification (Y/N)	Electronic Data Source Used (Y/N)	Reasonable Compatibility Standard Used	Specify Reasonable Compatibility Standard for Income	Ask for a Reasonable Explanation from the Individual (Y/N)	Paper Documentation Required from the Individual (Y/N)	Comments
Caretaker Relative	YES	NO	NO	N/A	N/A	NO	NO	
Medicare	NO	YES	YES	N/A	N/A	NO	YES	Post enrollment checks automatically validate enrolled population against TPL and MMA
Application for Other Benefits	YES	NO	NO	N/A	N/A	NO	NO	Applicants must avail themselves of other potential benefits including Medicare and SSI.  For the majority of cases, the State accepts self-attestation without additional verification. However if the state is made aware of inconsistencies through the course of other verifications or reported information, the State has systems in place that can perform verification. In such cases additional information including paper documentation maybe be requested if it were to affect eligibility.  ☐
Other: (Please describe any other eligibility factors in the space below)								

\* States must check electronic data sources determined useful to verify income in accordance with 42 CFR 435.948 but can be done post-enrollment.

If the information obtained from electronic data sources and the information provided by or on behalf of the individual are both above, at or below the applicable income standard, the State must determine the applicant eligible or ineligible for Medicaid/CHIP. (NOTE: this option is prepopulated for the state and is not an option that can be changed).

\*\* States must follow statute, regulations, and guidance for verification of SSN, citizenship and immigration status including obtaining such information through the federal data services hub if available.

\*\*\* States must accept self-attestation of pregnancy unless they have information that is not reasonably compatible with such attestation.

MAGI-BASED ELIGIBILITY VERIFICATION PLAN

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

State: Michigan

Section B1. Use of Electronic Data Sources

Financial:

Electronic Data Source	Determined Useful (Y/N) <sup>1</sup>	Accuracy Considered (Y/N)	Timeliness Considered (Y/N)	Ability to Access Considered (Y/N)	Age of Data Considered (Y/N)	Comprehensive Considered (Y/N)	Other Criteria Used (Y/N) (Please Describe in Comments section)	Data Source Used at Application (Y/N)	Data Source Used at Renewal (Y/N)	Data Source Used Post-Enrollment (Y/N)	If Data Source Used for Post-Enrollment - Frequency Used (e.g. monthly, quarterly)	Comments
1. Internal Revenue Service (IRS)	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO		Used at renewal to the extent consent is provided.
2. Social Security Administration (SSA) (SSI, Title II)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	State intends to use Hub data at application and renewal. State will continue with bi-monthly post-enrollment data matches through the State-SSA connection.
3. State Wage Information Collection Agency (SWICA)	NO	YES	YES	YES	YES	YES	NO	NO	NO	YES	Quarterly	Based on the timeliness and comprehensiveness of the data it is not going to be used for the October release but will stay in scope as a possible TDS  To clarify Michigan's approach to wage data: Michigan uses attested data for the MAGI calculation. The TDS data is used to validate the attested data. Wage data outside of reasonably compatible causes the application to pend for further verification by the applicant  Due to a delay in having a new eligibility system fully operational, MI is only able to collect income information from IRS and SSA(Title II) through the Hub. We currently do not have the capability to retrieve TALX data through the Hub or access any state/local current data sources, including SWICA, for current income information. As a result, MI must ask for paper documentation if IRS or SSA data is outside of our 10% reasonable compatibility standard. We intend this to be a temporary process until the new system is fully functional, late in 2014.
4. State Unemployment Compensation	NO	YES	YES	YES	YES	YES	NO	NO	NO	YES	Quarterly	State Unemployment Compensation data is not going to be used for the October release for initial determination but will stay in scope as a possible TDS.  Michigan does not have an automated interfaces with UI data at this time. Verification Plan to be updated if/when state does have automated interface.
5. State Administered Supplementary Payment Program	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		The State will not use State Administered Supplementary Payment Program data. This data will not be available for release 1 (october 2013), and is not yet scheduled for a future release at this time.
6. State General Assistance Programs	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Non-existent for Michigan
7. Supplemental Nutrition Assistance Program (SNAP)	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		Michigan will not use SNAP data for release 1 (October 2013) nor is use of SNAP data scheduled for a future release at this time.
8. Temporary Assistance for Needy Families (TANF)	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		Michigan will not use TANF data for release 1 (October 2013) nor is use of TANF data scheduled for a future release at this time.

Electronic Data Source	Determined Useful (Y/N) <sup>1</sup>	Accuracy Considered (Y/N)	Timeliness Considered (Y/N)	Ability to Access Considered (Y/N)	Age of Data Considered (Y/N)	Comprehensive Considered (Y/N)	Other Criteria Used (Y/N) (Please Describe in Comments section)	Data Source Used at Application (Y/N)	Data Source Used at Renewal (Y/N)	Data Source Used Post-Enrollment (Y/N)	If Data Source Used for Post-Enrollment - Frequency Used (e.g. monthly, quarterly)	Comments
9. Office of Child Support Enforcement (OCSE)	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		Michigan will not use OCSE data for release 1 (October 2013) nor is use of OCSE data scheduled for a future release at this time.
10. State Income Tax	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		Michigan will not use State Income Tax data for release 1 (October 2013) nor is State Income Tax Data scheduled for a future release at this time.
11. Commercial database: (Please describe any commercial databases in the space below)												
The Work Number	NO	YES	YES	YES	YES	YES	NO	NO	NO	NO		The Work Number will not be included in the initial October 1, 2013 release. Michigan will use the work number in the future, however a specific release date has not been scheduled at this time.
12. Other: (Please describe any additional electronic data sources in the space below)												

1. The state marked any criterion YES if they were considered in determining the usefulness of the electronic data source; however, the determination of whether the data source was useful/not useful did not rest solely on these criteria.

MAGI-BASED ELIGIBILITY VERIFICATION PLAN

(Insert Medicaid, CHIP, or Both)

Medicaid & CHIP

State:

Michigan

Section B2. Use of Electronic Data Sources

Non-Financial:

Electronic Data Source	To Be Used (Y/N)	Social Security Number	Citizenship	Immigration Status	Residency	Age/DOB	Pregnancy	Household Composition	Caretaker Relative	Medicare	Application for other Benefits	Other	Data Source Used at Application (Y/N)	Data Source Used at Renewal (Y/N)	Data Source Used Post-Enrollment (Y/N)	If Used for Post-Enrollment Frequency Used (i.e. monthly, quarterly)	Comments
1. Social Security Administration (SSA)	YES	YES	YES	NO	NO	NO	NO	NO	NO	YES	NO	NO	YES	YES	YES	Other (specify in comments)	SSA will be accessed through the Federal Data Hub as part of the initial release for determination and redetermination. Post enrollment use is ad hoc using existing data match with SSA for Medicare verification. Used at renewal for Medicare only.  SSA can be used as a backup data source to verify age/DOB if necessary.
2. Department of Homeland Security (DHS) - SAVE	YES	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	NO	YES	YES	YES	Other (specify in comments)	DHS will be accessed through the Federal Data Hub as part of the initial release.  DHS is used at renewal and post-enrollment when the 5-year bar is met or when the status is subject to change.
3. Vital Statistics	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Michigan is implementing a phased approach to incorporating trusted data sources. During the initial roll out only data sources available through the Federal Data Hub will be used. Subsequent data sources and validation rules will be added over time. This data source is being considered for use after the initial roll out for citizenship, age/DOB, and death records.

Electronic Data Source	To Be Used (Y/N)	Social Security Number	Citizenship	Immigration Status	Residency	Age/DOB	Pregnancy	Household Composition	Caretaker Relative	Medicare	Application for other Benefits	Other	Data Source Used at Application (Y/N)	Data Source Used at Renewal (Y/N)	Data Source Used Post-Enrollment (Y/N)	If Used for Post-Enrollment Frequency Used (i.e. monthly, quarterly)	Comments
4. Department of Motor Vehicles (DMV)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Michigan is implementing a phased approach to incorporating trusted data sources. During the initial roll out only data sources available through the Federal Data Hub will be used. Subsequent data sources and validation rules will be added over time. This data source is being considered for use after the initial roll out to verify residency.
5. Temporary Assistance for Needy Families (TANF)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Michigan is implementing a phased approach to incorporating trusted data sources. During the initial roll out only data sources available through the Federal Data Hub will be used. Subsequent data sources and validation rules will be added over time. This data source is being considered for use after the initial roll out
6. Supplemental Nutrition Assistance Program (SNAP)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Michigan is implementing a phased approach to incorporating trusted data sources. During the initial roll out only data sources available through the Federal Data Hub will be used. Subsequent data sources and validation rules will be added over time. This data source is being considered for use after the initial roll out
7. Office of Child Support Enforcement	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES		Michigan is implementing a phased approach to incorporating trusted data sources. During the initial roll out only data sources available through the Federal Data Hub will be used. Subsequent data sources and validation rules will be added over time. This data source is being considered for use after the initial roll out
8. State General Assistance Programs	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		This currently does not exist in Michigan

Electronic Data Source	To Be Used (Y/N)	Social Security Number	Citizenship	Immigration Status	Residency	Age/DOB	Pregnancy	Household Composition	Caretaker Relative	Medicare	Application for other Benefits	Other	Data Source Used at Application (Y/N)	Data Source Used at Renewal (Y/N)	Data Source Used Post-Enrollment (Y/N)	If Used for Post-Enrollment Frequency Used (i.e. monthly, quarterly)	Comments
9. Women, Infants and Children Program (WIC)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Michigan is implementing a phased approach to incorporating trusted data sources. During the initial roll out only data sources available through the Federal Data Hub will be used. Subsequent data sources and validation rules will be added over time. This data source is being considered for use after the initial roll out
10. State Income Tax	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		IRS information is perceived to be more complete and accurate
11. Commercial database: <i>(Please describe any commercial databases in the space below)</i>																	
13. Other: <i>(Please describe additional electronic data sources in the space provided below)</i>																	
12. PARIS*	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	NO	NO	YES	Quarterly	Current process will be leveraged going forward.  State will be using PARIS to determine if individual has Medicaid coverage in another State.

\* Under 42 CFR 435.945(d), all State Medicaid eligibility systems must conduct a match with PARIS for Interstate benefit information. If used for other purposes, please indicate in Section D.

MAGI-BASED ELIGIBILITY VERIFICATION PLAN

(Insert Medicaid, CHIP, or Both)

State:

Medicaid & CHIP

Michigan

Section C . Additional Factors of Eligibility for Separate CHIP

Eligibility Factor	Self-Attestation Accepted without Additional Verification	Self-Attestation Accepted with Post-Enrollment Verification (Y/N)	Electronic Data Source Used (Y/N) <i>If Yes, please describe in comments</i>	Paper Documentation Required from the Individual (Y/N)	Non-Applicable (N/A)	Comments
1. Applicant does not have other coverage	NO	YES	YES	YES	Must be Applied	<p>Monthly matches with Medicaid and Blue Cross after enrollment to check for other coverage</p> <p>Paper documentation is required if a discrepancy is found in the data match (i.e. If match shows the individual has active private insurance)</p> <p>For the Medicaid Expansion program, State accepts self-attestation without additional verification. If State finds out the applicant has other type of insurance, State would not bar the applicant from coverage.</p> <p>State would not bar the applicant for coverage for Medicaid coverage</p>
2. Applicant does not have access to affordable ESI	YES	NO	NO	NO		
3. When child has had coverage (as applicable to states' waiting period)	NO	YES	YES	YES		<p>Monthly matches with Medicaid and Blue Cross after enrollment to check for other coverage</p> <p>If a discrepancy is found through the electronic data match, state will request paper documentation from the applicant.</p>
4. Access to public employee coverage	YES	NO	NO	NO		
5a. Waiting period exception #1 (describe):	YES	NO	NO	NO		Employer stopped allowing coverage of dependents
5b. Waiting period exception #2 (describe):	YES	NO	NO	NO		Change of employment including involuntary separation resulting in loss of employee sponsored insurance
5c. Waiting period exception #3 (describe):	YES	NO	NO	NO		Child loss coverage due to death or divorce of parent



Eligibility Factor	Self-Attestation Accepted without Additional Verification	Self-Attestation Accepted with Post-Enrollment Verification (Y/N)	Electronic Data Source Used (Y/N) <i>If Yes, please describe in comments</i>	Paper Documentation Required from the Individual (Y/N)	Non-Applicable (N/A)	Comments
5d. Waiting period exception #4 (describe):	YES	NO	NO	NO		Cost prohibitive premiums/copays/deductibles
5e. Waiting period exception #5 (describe):	YES	NO	NO	NO		Access to Service - Individuals who drop private insurance because of lack of access are not subjected to a waiting period
5f. Waiting period exception #6 (describe):					N/A	
5g. Waiting period exception #7 (describe):					N/A	
5h. Waiting period exception #8 (describe):					N/A	
5i. Waiting period exception #9 (describe):					N/A	
5j. Waiting period exception #10 (describe):					N/A	
6. Other eligibility factors or exceptions to eligibility factors: <i>(Please describe in the space provided below)</i>						

MAGI-BASED ELIGIBILITY VERIFICATION PLAN

(Insert Medicaid, CHIP, or Both)

State:

Medicaid & CHIP

Michigan

Section D. Additional Verification Questions

	Question	Response
1	<p>If paper documentation is required when a data source is not available or the information obtained from a data source is not reasonably compatible with the information provided by or on behalf of the individual, briefly describe how the state determined that establishing and using an electronic data source was not effective, considering such factors as cost and program integrity in accordance with 42 CFR 435.952(c):</p>	<p>The state plans to use Self Attestation for multiple eligibility factors. All other eligibility factors will be verified through electronic data sources available through the Hub prior to requesting reasonable explanation/paper documentation, if necessary. The State will only use paper verification in cases where no electronic data source exists through the hub and self-attestation is not reasonably compatible with data sources.</p> <p>Michigan is implementing functionality in iterative releases. The effort/duration and resource analysis the State did for release planning indicated that for the initial release, Michigan was able to incorporate trusted data sources through the Federal Data Hub. This approach was confirmed during the CMS Concept of Operations Meeting and the initial CMS Stage Gate meeting. Subsequent releases will include Michigan trusted data sources to supplement Federal Data Hub trusted data sources.</p>
2	<p>Please describe how the state uses PARIS?</p>	<p>State of Michigan will use PARIS the same way as it is used today. It will be a post eligibility case maintenance function. The Beneficiary is instructed to contact the case worker to clarify discrepancies.</p>
3	<p>Please indicate (YES) or (NO) if the State intends to request Secretarial approval to solely use alternative data sources for financial verification other than those listed in 42 CFR 435.948 (Numbers 1-8 in Section B-1).</p>	<p>NO</p>

	Question	Response
	<p>If (YES), please submit a letter to CMS requesting such approval describing how the state meets the following requirements:</p> <ol style="list-style-type: none"> <li>1) Reduces administrative costs and burdens on both individuals and the State,</li> <li>2) Maximizes accuracy and minimizes delay,</li> <li>3) Meets the requirements related to confidentiality, disclosure, maintenance and use of information, and</li> <li>4) Promotes coordination with other insurance affordability programs</li> </ol>	
4	<p>Please indicate (YES) or (NO) if the State intends to request Secretarial approval to use a mechanism other than the federal data services hub for information that is available through the hub.</p>	NO
	<p>If (YES), please submit a letter to CMS requesting such approval describing how the state meets the following requirements:</p> <ol style="list-style-type: none"> <li>1) Reduces administrative costs and burdens on both individuals and the State,</li> <li>2) Maximizes accuracy and minimizes delay,</li> <li>3) Meets the requirements related to confidentiality, disclosure, maintenance and use of information, and</li> <li>4) Promotes coordination with other insurance affordability programs.</li> </ol>	

	Question	Response
5	Describe any additional MAGI-based eligibility verification policies and procedures that have not been covered in this verification plan (optional):	Mitigation: Use of Non-MAGI Methodology from January 1 - January 25 for Medicaid and CHIP: Michigan's MAGI determination service became functional on January 25, 2014. For applications submitted January 1 through January 24, we determined eligibility based on 2013 rules. However, if an application resulted in a denial for other than non-procedural reasons, we are rechecking eligibility based on MAGI. We may need to ask the applicant for additional information in order to complete the MAGI determination but we are not requesting an entirely new application. Medicaid eligibility will be effective on the first day of the month in which the applicant originally applied. CHIP is prospective enrollment so eligibility would be either February 1 or March 1, depending on the date in January in which the applicant applied.

Section A. Additional Comments

Due to a delay in having a new eligibility system fully operational, MI is only able to collect income information from IRS and SSA(Title II) through the Hub. We currently do not have the capability to retrieve TALX data through the Hub or access any state/local current data sources, including SWICA, for current income information. As a result, MI must ask for paper documentation of income if IRS or SSA data is outside of our 10% reasonable compatibility standard. We intend this to be a temporary process until the new system is fully functional, late in 2014. This is documented in our approved mitigation plan.

Section B1. Additional Comments

For items marked "Yes" Michigan marked "Yes" that Michigan considered the factor even though in the end we may have not choose to use the data source.

Section B2. Additional Comments

For items marked "Yes" Michigan marked "Yes" that Michigan considered the factor even though in the end we may have not choose to use the data source.

Section C. Additional Comments