

MAGI-BASED ELIGIBILITY VERIFICATION PLAN
 (Insert Medicaid, CHIP, or Both) Medicaid & CHIP
 State: Arizona
 Last updated 09/27/2016

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. Other (Specify in Comments)	N/A	YES	YES	<p>If the individual attests to income below the applicable standard, but the data sources indicate income above the applicable standard, a reasonable explanation/paper documentation will be requested.</p> <p>If the individual attests to income above the applicable standard and data source indicates income below the standard, accept the customer's attestation and screen for APTC.</p> <p>State will utilize the Federal Data Service Hub (FDSH) for some income but not the IRS.</p> <p>For additional information, see "Additional Comments 1" for in depth information on Health-e-Arizona Plus Application Questions to Clarify Income Inconsistencies.</p>
Residency	NO	NO	YES	N/A	N/A	NO	YES	Request documentation if residency cannot be verified electronically
Age (Date of Birth)	NO	NO	YES	N/A	N/A	NO	YES	Verify age only when there is a discrepancy that affects eligibility between electronic data from the Federal hub, State hub and State Eligibility Determination Systems and the attestation.

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
Social Security Number **	NO	NO	YES	N/A	N/A	N/A	YES	Request documentation if the SSN cannot be verified through the Federal Hub.
Citizenship **	NO	NO	YES	N/A	N/A	N/A	YES	Request documentation if citizenship cannot be verified through the Federal or State Hub.
Immigration Status **	NO	NO	YES	N/A	N/A	N/A	YES	Request documentation if immigration status cannot be verified through the Federal or State Hub. The State will utilize the Federal Data Service Hub (FDSH) for SAVE steps 1 and 2, but will use the State's existing direct connection to SAVE for step 3.
Household Composition	YES	NO	YES	N/A	N/A	NO	YES	Verify household composition when there is a discrepancy between the State's eligibility determination system and the attestation. State only uses internal data sources (previous records and not external data source). If not known to the internal data sources, will accept self-attestation.
Pregnancy ***	YES	NO	NO	N/A	N/A	NO	NO	Request verification only if the state has information that is not consistent with the attestation. For example, medical records indicate that the woman was sterilized.

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	YES	N/A	N/A	NO	YES	Verify only when there is a discrepancy between the State's Eligibility Determination System and the attestation. State only uses internal data sources (previous records and not external data source). If not known to the internal data sources, will accept self-attestation.
Medicare	NO	NO	YES	N/A	N/A	NO	YES	Request documentation only if it cannot be verified electronically.
Application for Other Benefits	NO	NO	YES	N/A	N/A	NO	YES	
Other: (Please describe any other eligibility factors in the space below)								
<p>* 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).</p> <p>** 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.</p> <p>*** States must accept self-attestation of pregnancy unless they have information that is not reasonably compatible with such attestation.</p>								

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Section B1. Use of Electronic Data Sources

Electronic Data Source	Determined Useful (Y/N) ¹	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)	NO	NO	NO	YES	YES	YES	NO	NO	NO	NO		IRS security requirements and safeguards are too stringent. In addition, FTI data will be at least a year to 18 months old.
2. Social Security Administration (SSA) (SSI, Title II)	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO		This information is retrieved through the Hub at application. Arizona is still testing the RRV service, and is using the existing SSA match at renewal. Arizona anticipates having the RRV service by August 31, 2016.
3. State Wage Information Collection Agency (SWICA)	YES	YES	YES	YES	NO	YES	NO	YES	YES	YES	Other (specify in comments)	This source will be considered only if more current data from The Work Number is not available. SWICA is functional and used in the hub checks at application, renewal and reported change events. Arizona is building functionality to be able to do a 6-month check for households who report no income. It will also be accessed when employment is reported. Once implemented and we have had a period of time to collect data, we will evaluate the effectiveness of the 6 month post-enrollment check to determine if a more frequent check is needed and may change the frequency.
4. State Unemployment Compensation	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Monthly	This source will be accessed when loss of employment is reported. It will also be accessed monthly for those who have filed an application for unemployment benefits.
5. State Administered Supplementary Payment Program	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		There is no SPP program in Arizona
6. State General Assistance Programs	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		There is no GA program in Arizona

Electronic Data Source	Determined Useful (Y/N) ¹	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
7. Supplemental Nutrition Assistance Program (SNAP)	YES	YES	YES	YES	YES	YES	YES	YES	YES	NO		Arizona will have an integrated eligibility system including Medicaid, CHIP, SNAP and TANF. The Yes in the Other column represents this. The implementation of the SNAP and TANF programs in the eligibility system is projected for July 2017. Can be used for raw income data (distinct from MAGI).
8. Temporary Assistance for Needy Families (TANF)	YES	YES	YES	YES	YES	YES	YES	YES	YES	NO		Arizona will have an integrated eligibility system including Medicaid, CHIP, SNAP and TANF. The Yes in the Other column represents this. The implementation of the SNAP and TANF programs in the eligibility system is projected for July 2017. Can be used for raw income data (distinct from MAGI).
10. State Income Tax	NO	NO	NO	YES	NO	YES	NO	NO	NO	NO		Due to no change in the state statute, this source cannot be used at this time
11. Commercial database: (Please describe any commercial databases in the space below)												
The Work Number	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	Because the data in The Work Number is more current than data from any other source, it is considered primary to SWICA. This source will be accessed when employment is reported and every 6 months for households who report no income. Once implemented and we have had a period of time to collect data, we will evaluate the effectiveness of the 6 month post-enrollment check to determine if a more frequent check is needed and may change the frequency. State uses the FDSH, but the Work Number is also part of the State Hub.
12. Other: (Please describe any additional electronic data sources in the space below)												
State New Hire	YES	YES	YES	YES	YES	NO	NO	YES	YES	NO		Used post-enrollment when new employment is reported but not at a regular frequency.

Electronic Data Source	Determined Useful (Y/N) ¹	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
Existing information in State Eligibility Determination Systems	YES	NO	YES	YES	NO	NO	NO	YES	YES	NO		Data source containing previous application data. We will have data from previous applications, non-MAGI Medicaid eligibility such as ABD populations, Medicaid Buy-In program, Breast & Cervical Cancer Treatment Program, etc. If a case already exists and a new application is being made, we will compare the previous data to the new application for inconsistencies in income. Can be used for raw income data (distinct from MAGI).
PARIS	YES	YES	YES	YES	NO	NO	NO	NO	NO	YES	Quarterly	AZ uses PARIS to identify benefits being received in another state and to verify VA income.

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.

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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	YES	YES	NO	NO	NO	YES	YES	NO	YES	YES	NO		Arizona uses the Hub for SSN, Age/DOB, and citizenship. Will only be used for Medicare, Residency at Renewal. Will be used for application for potential benefits at application and renewal.
2. Department of Homeland Security (DHS) - SAVE	YES	NO	YES	YES	NO	NO	NO	NO	NO	NO	NO	NO	YES	NO	NO		Arizona uses steps 1 and 2 through the Hub. For step 3, AZ uses its direct connection to SAVE.
3. Vital Statistics	YES	NO	YES	NO	NO	YES	NO	NO	NO	NO	NO	NO	YES	NO	NO		Vital Statistics is used to verify citizenship and age/DOB if not verified through the Hub.
4. Department of Motor Vehicles (DMV)	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO		

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
5. Temporary Assistance for Needy Families (TANF)	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO	NO	NO	YES	YES	NO		Arizona will have an integrated eligibility determination system in July 2017 which will include Medicaid, CHIP, SNAP and TANF. If the eligibility factor has been verified for SNAP or TANF, will not reverify. For citizenship and immigration status will only use the verification if it meets the same standards as Medicaid. Will only use for SSN if the SSN has been verified with SSA.
6. Supplemental Nutrition Assistance Program (SNAP)	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO	NO	NO	YES	YES	NO		Arizona will have an integrated eligibility determination system in July 2017 which will include Medicaid, CHIP, SNAP and TANF. If the eligibility factor has been verified for SNAP or TANF, will not reverify. For citizenship and immigration status will only use the verification if it meets the same standards as Medicaid. Will only use for SSN if the SSN has been verified with SSA.

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
7. Office of Child Support Enforcement	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
8. State General Assistance Programs	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Arizona does not have a GA program
9. Women, Infants and Children Program (WIC)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
10. State Income Tax	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Due to no change in the state statute, this source cannot be used at this time (and not by Oct. 1).
11. Commercial database: <i>(Please describe any commercial databases in the space below)</i>																	

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
13. Other: <i>(Please describe additional electronic data sources in the space provided below)</i>																	
12. PARIS*	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	YES	YES	NO	NO	YES	Quarterly	When change in residency is reported by PARIS and for VA benefits
Existing information in State Eligibility Determination Systems	YES	NO	NO	NO	NO	NO	NO	YES	YES	NO	NO	NO	YES	YES	NO		We will have data from previous applications, non-MAGI Medicaid eligibility such as ABD populations, Medicaid Buy-In program, Breast & Cervical Cancer Treatment Program, etc. If a case already exists and a new application is being made, we will compare the previous data to the new application for inconsistencies in household composition, relationships, etc.
* 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.																	

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Medicaid & CHIP

State:

Arizona

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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	NO	YES	YES	Must be Applied	Arizona will use its TPL Contractor to verify health insurance enrollment. Paper documentation will be required only if needed and can't be verified by the TPL Contractor. The contractor will be called directly to resolve and only in rare instances paper documentation is needed.
2. Applicant does not have access to affordable ESI	NO	NO	NO	NO	N/A	
3. When child has had coverage (as applicable to states' waiting period)	NO	NO	YES	YES		Arizona will use its TPL Contractor to verify health insurance termination date. Paper documentation will be required only if needed and can't be verified by the TPL Contractor. The contractor will be called directly to resolve and only in rare instances paper documentation is needed.
4. Access to public employee coverage	NO	NO	NO	NO		Request verification only if questionable such as state employment identified by The Work Number.
5a. Waiting period exception #1 (describe):	NO	NO	YES	YES		Involuntary termination of employment. Arizona will verify this electronically through The Work Number, SWICA and UI. Non-electronic verification will be required only if electronic verification is not available; for example, lost employment in another state

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
5b. Waiting period exception #2 (describe):	NO	NO	YES	YES		Lost other government funded coverage. This will be verified electronically through the State's eligibility determination system. Paper documentation will be required only when electronic data is not available (e.g. loss of coverage in another state). The government entity will be called directly to resolve and only in rare instances paper documentation is needed.
5c. Waiting period exception #3 (describe):	YES	NO	NO	NO		Chronically or seriously ill
5d. Waiting period exception #4 (describe):					N/A	
5e. Waiting period exception #5 (describe):					N/A	
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>						

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
Resident of a Public Institution	NO	NO	YES	NO		This would include both penal institutions and Institutions for Mental Disease. For Penal Institutions, Arizona will electronically match with the Arizona Department of Corrections and the County Jails.

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Section D. Additional Verification Questions

	Question	Response
1	If paper documentation is required when a data source is not available or the information obtained from a data source is not reasonably compatible with the information provided by or on behalf of the individual, briefly describe how the state determined that establishing and using an electronic data source was not effective, considering such factors as cost and program integrity in accordance with 42 CFR 435.952(c):	The state accepts self-attestation without additional verification for some factors of eligibility. For those that it doesn't the state uses all available electronic data sources, including Vital Statistics as a back-up for citizenship. For factors that can be verified with electronic data, non-electronic verification is requested only if questionable or not reasonably compatible. The state tries to resolve inconsistencies with follow-up questions and reasonable explanations prior to requesting paper documentation.
2	Please describe how the state uses PARIS?	<ul style="list-style-type: none"> • Interstate residency check for leads on out-of-state moves • VA match for leads on VA income and benefits <p>Arizona is also working on using PARIS to provide leads on federal pensions and benefits.</p>
3	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).	NO

	Question	Response
	<p>If (YES), please submit a letter to CMS requesting such approval describing how the the state meets the following requirements:</p> <ol style="list-style-type: none"> 1) Reduces administrative costs and burdens on both individuals and the State, 2) Maximizes accuracy and minimizes delay, 3) Meets the requirements related to confidentiality, disclosure, maintenance and use of information, and 4) Promotes coordination with other insurance affordability programs. 	
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>	<p>YES</p>
	<p>If (YES), please submit a letter to CMS requesting such approval describing how the the state meets the following requirements:</p> <ol style="list-style-type: none"> 1) Reduces administrative costs and burdens on both individuals and the State, 2) Maximizes accuracy and minimizes delay, 3) Meets the requirements related to confidentiality, disclosure, maintenance and use of information, and 4) Promotes coordination with other insurance affordability programs. 	<p>AZ has been granted a Hub waiver to use an existing SAVE match for step 3 rather than using the Hub VLP Service for this step.</p>

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

Section A. Additional Comments

Eligibility Factor	Source	Reasonable Compatibility Plan	State Flexibility	Reference
SSN	SSA	If unable to verify with electronic source, obtain verification of SSN or proof of application for SSN	No state flexibility	Medicaid Final Rule 42 CFR 435.956(d) 435.910(g) and (f)
Citizenship	Prior citizenship documentation in eligibility systems SSA Arizona Vital Stats (AVS)	If unable to verify with electronic source, obtain hard copy verification	No state flexibility	Medicaid Final Rule 42 CFR 435.949
Non-citizenship	Prior non-citizenship information in eligibility system Dept of Homeland Security (DHS) SAVE	Use self-attestation for non-qualified immigrants If unable to verify with electronic source, obtain hard copy verification for others	No state flexibility	Medicaid Final Rule 42 CFR 435.949
Identity	Prior identity documentation in eligibility systems SSA Motor Vehicle Division (MVD)	If unable to verify with electronic source, obtain hard copy verification	No state flexibility	Medicaid Final Rule 42 CFR 435.949
Incarceration	Arizona Department of Corrections (ADC) County jails SSA	If attestation is inconsistent with source, obtain verification If no source available, accept attestation	No state flexibility	42 CFR 457.310(c)(2)
State residency	Prior information in eligibility systems SSA TWork Number Unemployment Insurance (UI) New Hire MVD	If unable to verify with electronic source, obtain verification.	State flexibility to accept attestation of States define	Medicaid Final Rule 42 CFR 435.956(c)

Eligibility Factor	Source	Reasonable Compatibility Plan	State Flexibility	Reference
Marriage	Prior household composition information in eligibility systems	If attestation is inconsistent with source, obtain verification If no source available, accept attestation	Agency MUST accept self-state verities reasonable	Medicaid Final Rule 42 CFR 435.956(f)
Pregnancy	Prior information in eligibility systems	If attestation is inconsistent with source, obtain verification If no source available, accept attestation	Agency MUST accept self-state verities reasonable	Medicaid Final Rule 42 CFR 435.956(e)
Household members	Prior household composition information in eligibility systems	If attestation is inconsistent with source, obtain verification If no source available, accept attestation	If electronic verification is not States may, but are state verities reasonable	Medicaid Final Rule 42 CFR 435.956(f)
The relationships of household members	Prior household composition information in eligibility systems	If attestation is inconsistent with source, obtain verification If no source available, accept attestation	If electronic verification is not States may, but are state verities reasonable	Medicaid Final Rule 42 CFR 435.956(f)
Deprivation (18 Year Old Students)	There is no reliable electronic method to verify deprivation	Obtain verification	If electronic verification is not States may, but are state verities reasonable	Medicaid Final Rule 435.956(f)
American Indian	Prior ethnicity (and tribe) information in eligibility systems	Use self attestation if CHIP or FTW premiums are not affected. Obtain verification if CHIP or FTW premiums are affected.	For CHIP and FTW, state flexibility to accept attestation or require hard	42 CFR 457.535
Age	Prior information in eligibility systems SSA AVS Dept of Homeland Sec (DHS) SAVE	If attestation is inconsistent with source, use source. Obtain verification (if age affects eligibility)	If electronic verification is not available, the State State flexibility to	Medicaid Final Rule 42 CFR 435.956(f)
	The Work Number		Flexibility to rely exclusively on IRS	Medicaid Final Rule 42 CFR 435.945

Eligibility Factor	Source	Reasonable Compatibility Plan	State Flexibility	Reference
Earned Income	Base Wage New Hire Report SSA – SVES, SOLQI, SDX Arizona Department of Revenue Prior information in eligibility systems	See “Health-e-Arizona Plus Application Questions to Clarify Income Inconsistencies” Table	Flexibility to determine what Flexibility to Flexibility to Flexibility to determine the Flexibility to define the “reasonably	Medicaid Final Rule 42 CFR 435.948 Medicaid Final Rule 42 CFR 435.952
Unearned Income	SSA Railroad Retirement Board Unemployment Insurance Arizona Department of Revenue Arizona Lottery PARIS (if real time) Prior information in eligibility systems	If attestation is inconsistent with source, obtain verification If no source available, obtain verification	Flexibility to determine how to Flexibility to Flexibility to establish Flexibility to determine what Flexibility to rely on alternate financial reduce maximize accuracy minimize delay meet applicable confidentiality,	
Tax payer filing status	Arizona Department of Revenue	If attestation is inconsistent with source, ask clarifying questions. If no source available, accept attestation	If electronic verification is not States may, but are State defines “reasonably	Medicaid Final Rule 42 CFR 435.956(f)
Dependents on tax return	Arizona Department of Revenue	If attestation is inconsistent with source, ask clarifying questions. If no source available, accept attestation	State flexibility to accept attestation States define “reasonably	Medicaid Final Rule 42 CFR 435.956(f)

Eligibility Factor	Source	Reasonable Compatibility Plan	State Flexibility	Reference
Current health insurance	Prior information in eligibility systems Health Management Systems The Work Number	If attestation is inconsistent with source, obtain verification If no source available, accept attestation	State flexibility to accept attestation States define "reasonably"	Medicaid Final Rule 42 CFR 435.119(c) 42 CFR 457.310(c)
Potential benefits	UI/Base Wage Prior information in eligibility systems	Use self-attestation	State flexibility to States define "reasonably"	42 CFR 435.608
Paid for Working - Payment of Social Security & Medicare Taxes (for Freedom to Work only)	The Work Number Base Wage New Hire Arizona Department of Revenue	If no source available, obtain verification	No state flexibility	42 USC 1396a(a)(10)(A)(ii)(XVI) & (XVI) ARS 36-2928 & 2950 AAC R9-22-1918; R9-22-1919; R9-28-1320
Medicare	SSA	If attestation is inconsistent with source, obtain verification If no source available, obtain verification	No State flexibility	Medicaid Final Rule 42 CFR 435.119(b)(3) Medicaid Final Rule 42 CFR 435.603(j)(5) 42 USC 1396d(p)
Disability	Prior information in eligibility systems SSA Seriously Mentally Ill diagnosis from ADHS (SSI MAO)	If needs to have eligibility determined under an optional disabled group (SSI MAO or FTW), refer to DDSA if there is no current information showing disability (receipt of SSDI, referred by ADHS as an SMI, etc.)	No State flexibility	Medicaid Final Rule 42 CFR 435.603(j)(3) 42 CFR 435.540
Breast or Cervical Cancer Diagnosis (for the Breast and Cervical Cancer	None	Obtain verification from one of Arizona's programs of the National Breast and Cervical Cancer Early Detection Program (AZ-NBCCEDP) that is funded by the Centers for Disease Control and Prevention	No State flexibility	42 USC 1396(a)(10)(A)(ii)(XVIII)

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Additional Comments

Eligibility Factor	Source	Reasonable Compatibility Plan	State Flexibility	Reference
Treatment Program only)		by the Centers for Disease Control and Prevention (CDC)		ARS 36-2901.05 AAC R9-22-2003
Placement in an Institution for Mental Disease (IMD) – only a factor for CHIP	Arizona Department of Health Services (potential)	If attestation is inconsistent with source, obtain verification If no source available, accept attestation	State flexibility to accept attestation or require hard copy. State defines reasonably	42 CFR 457.310(c)(2)

Health-e-Arizona Plus Application Questions to Clarify Income Inconsistencies

Income information from the Federal and State hubs will be auto-populated into the Health-e-Arizona Plus online application as the applicant completes the application. If the applicant states that the information from the electronic source is incorrect, Health-e-Arizona Plus will present the applicant or recipient with a clarifying questions and drop down lists of answers that the applicant can select to explain why the income data from the hubs is inconsistent with their current income. Arizona has created rules that Health-e-Arizona Plus will use to determine if the information to which the applicant attests is reasonably compatible. When the information provided is reasonably compatible, this will eliminate the need for worker intervention and requests for additional non-electronic verification. However, if the information to which the applicant has attested is not reasonably compatible, non-electronic verification will be requested systematically and reviewed by a worker upon receipt. Arizona anticipates using multiple electronic sources to verify income such as SSA, State UI, Base Wage (SWICA) and The Work Number. Some of these sources provide current data but others provide less up to date information (such as from SWICA), so it is possible that Arizona will receive income data from multiple sources that will support an applicant’s attestation. For example, Arizona could receive current data from The Work Number that differs from the income reported through SWICA. Or a person could have earnings reported through SWICA but more current information from SSA shows that they are receiving Social Security Retirement of Disability benefits.

Clarifying Questions and Answers	Rule
If the person attests that the earned income being received has ended, this dropdown list appears:	
Fired/laid off/employer out of	<ul style="list-style-type: none"> o If UI shows claim, accept attestation o Otherwise, request non-electronic verification
Quit	Request non-electronic verification
Changed employers	Request non-electronic verification
Retired	<ul style="list-style-type: none"> o If hubs shows pension(s), accept attestation o If not, request non-electronic verification
On leave without pay – obtain: o When did the leave begin?	o If the data source shows income that is under the income limit, accept attestation.

Clarifying Questions and Answers	Rule
o When does [earner] expect to return to work?	o Otherwise, request non-electronic verification
Medical/disability leave – follow reasonably compatible rules o When did the leave begin? o When does [earner] expect to return to work?	o If the data source shows income that is under the income limit, accept attestation. o Otherwise, request non-electronic verification
Other	Comments (provide free space for other). Will require State worker intervention
If the person attests that the earned income amount has changed, this drop down list appears:	
Received a raise	Accept attestation
Reduction in pay	o If the data source shows income that is under the income limit, accept attestation. o Otherwise, request non-electronic verification
Increase in hours	Accept attestation
Decrease in hours	o If the data source shows income that is under the income limit, accept attestation. o Otherwise, request non-electronic verification
On leave without pay – obtain: o When did the leave begin?	o If the data source shows income that is under the income limit, accept attestation.

Clarifying Questions and Answers	Rule
o When does [earner] expect to return to work?	o Otherwise, request non-electronic verification
Medical/disability leave – follow reasonably compatible rules o When did the leave begin? o When does [earner] expect to return to work?	o If the data source shows income that is under the income limit, accept attestation. o Otherwise, request non-electronic verification
If the person attests that the person never worked there, ask the following question:	
Does this income belong to a different household member?	o If it does not belong to a different household member, accept attestation. (Arizona is exploring on line report of Identity Theft to the SOS.) o If it belongs to a different household member, attribute the income to the correct household member
If the person attests the unearned income amount has changed, this drop down list appears:	
Benefits ran out/exhausted	o If the data source shows income that is under the income limit, accept attestation. o Otherwise, request non-electronic verification
no longer qualify (i.e. Unemployment benefits ran out; no longer disabled; aged out)	o If the data source shows income that is under the income limit, accept attestation. o Otherwise, request non-electronic verification

Clarifying Questions and Answers	Rule
Payer stopped paying (Child support; alimony; foster care)	Accept Attestation
Not accounting for deductions	Count gross amount
Overpayment	Refer to State worker
Garnishment	Count gross amount
Cost of Living Adjustment change	Accept attestation
[Earner] started working	Request non-electronic verification of recent pay
Income fluctuates/changes regularly	<ul style="list-style-type: none"> o If the data source shows income that is under the income limit, accept attestation. o Otherwise, request non-electronic verification
Never received this Income	Refer to a State worker
If the person attests to having no income, ask how the person is meeting their living expenses	
Living with family/friends	<p>Accept attestation and, for households with no income, perform post-eligibility match with The Work Number and Base Wage every six months.</p> <p>Note: Once implemented and we have had a period of time to collect data, we will evaluate the effectiveness of the 6 month post-enrollment check to determine if a more frequent check is needed and may change the frequency.</p>
Using money from my savings/checking account	<p>Accept attestation and, for households with no income, perform post-eligibility match with The Work Number and Base Wage every six months.</p> <p>Note: Once implemented and we have had a period of time to collect data, we will evaluate the effectiveness of the 6 month post-enrollment check to determine if a more frequent check is needed and may change the frequency.</p>
	Accept attestation and, for households with no income, perform post-eligibility match with The Work Number and Base Wage every six months.

Clarifying Questions and Answers	Rule
Living on credit cards	Note: Once implemented and we have had a period of time to collect data, we will evaluate the effectiveness of the 6 month post-enrollment check to determine if a more frequent check is needed and may change the frequency.
Borrowing money If this is selected, obtain: <input type="checkbox"/> Name and contact info of person who loaned you the money <input type="checkbox"/> Expected repayment date <input type="checkbox"/> Amount of loan	Accept attestation and, for households with no income, perform post-eligibility match with The Work Number and Base Wage every six months. Note: Once implemented and we have had a period of time to collect data, we will evaluate the effectiveness of the 6 month post-enrollment check to determine if a more frequent check is needed and may change the frequency.
Someone is giving me money as a gift	Accept attestation and disregard (since gifts are not taxable). For households with no income, perform post-eligibility match with The Work Number and Base Wage every six months. Note: Once implemented and we have had a period of time to collect data, we will evaluate the effectiveness of the 6 month post-enrollment check to determine if a more frequent check is needed and may change the frequency.
Someone is paying my bills. If this is selected, obtain: <input type="checkbox"/> Name and contact info of person who is paying your bills <input type="checkbox"/> Which bills paid?	Accept attestation and, for households with no income, perform post-eligibility match with The Work Number and Base Wage every six months. Note: Once implemented and we have had a period of time to collect data, we will evaluate the effectiveness of the 6 month post-enrollment check to determine if a more frequent check is needed and may change the frequency.

Clarifying Questions and Answers	Rule
Rent/Mortgage Telephone Utilities Other o How long do you expect this person to continue to pay your bills? Less than three months Three months or more	
Working in exchange for rent	Accept attestation and, for households with no income, perform post-eligibility match with The Work Number and Base Wage every six months. Note: Once implemented and we have had a period of time to collect data, we will evaluate the effectiveness of the 6 month post-enrollment check to determine if a more frequent check is needed and may change the frequency.
Working odd jobs	Accept attestation count the income amount reported.
Other	Provide free form explanation field. Requires State worker intervention.

Clarifying Questions and Answers	Rule
If the person attests that the earned income being received has ended, this dropdown list appears:	
Fired/laid off/employer out of business	<ul style="list-style-type: none"> o If UI shows claim, accept attestation o Otherwise, request non-electronic verification
Quit	Request non-electronic verification
Changed employers	Request non-electronic verification
Retired	<ul style="list-style-type: none"> o If hubs shows pension(s), accept attestation o If not, request non-electronic verification
On leave without pay – obtain: o When did the leave begin? o When does [earner] expect to return to work?	<ul style="list-style-type: none"> o If the data source shows income that is under the income limit, accept attestation. o Otherwise, request non-electronic verification
Medical/disability leave – follow reasonably compatible rules o When did the leave begin? o When does [earner] expect to return to work?	<ul style="list-style-type: none"> o If the data source shows income that is under the income limit, accept attestation. o Otherwise, request non-electronic verification
Other	Comments (provide free space for other). Will require State worker intervention
If the person attests that the earned income amount has changed, this drop down list appears:	
Received a raise	Accept attestation
Reduction in pay	<ul style="list-style-type: none"> o If the data source shows income that is under the income limit, accept attestation. o Otherwise, request non-electronic verification
Increase in hours	Accept attestation

Clarifying Questions and Answers	Rule
Decrease in hours	<ul style="list-style-type: none"> ○ If the data source shows income that is under the income limit, accept attestation. ○ Otherwise, request non-electronic verification
<p>On leave without pay – obtain:</p> <ul style="list-style-type: none"> ○ When did the leave begin? ○ When does [earner] expect to return to work? 	<ul style="list-style-type: none"> ○ If the data source shows income that is under the income limit, accept attestation. ○ Otherwise, request non-electronic verification
<p>Medical/disability leave – follow reasonably compatible rules</p> <ul style="list-style-type: none"> ○ When did the leave begin? ○ When does [earner] expect to return to work? 	<ul style="list-style-type: none"> ○ If the data source shows income that is under the income limit, accept attestation. ○ Otherwise, request non-electronic verification
If the person attests that the person never worked there, ask the following question:	
Does this income belong to a different household member?	<ul style="list-style-type: none"> ○ If it does not belong to a different household member, accept attestation. (Arizona is exploring on line report of Identity Theft to the SOS.) ○ If it belongs to a different household member, attribute the income to the correct household member
If the person attests the unearned income amount has changed, this drop down list appears:	
Benefits ran out/exhausted	<ul style="list-style-type: none"> ○ If the data source shows income that is under the income limit, accept attestation. ○ Otherwise, request non-electronic verification

Clarifying Questions and Answers	Rule
No longer qualify (i.e. Unemployment benefits ran out; no longer disabled; aged out)	<ul style="list-style-type: none"> o If the data source shows income that is under the income limit, accept attestation. o Otherwise, request non-electronic verification
Payer stopped paying (Child support; alimony; foster care)	Accept Attestation
Not accounting for deductions	Count gross amount
Overpayment	Refer to State worker
Garnishment	Count gross amount
Cost of Living Adjustment change	Accept attestation
[Earner] started working	Request non-electronic verification of recent pay
Income fluctuates/changes regularly	<ul style="list-style-type: none"> o If the data source shows income that is under the income limit, accept attestation. o Otherwise, request non-electronic verification
Never received this Income	Refer to a State worker
If the person attests to having no income, ask how the person is meeting their living expenses	
Living with family/friends	<p>Accept attestation and, for households with no income, perform post-eligibility match with The Work Number and Base Wage every six months.</p> <p>Note: Once implemented and we have had a period of time to collect data, we will evaluate the effectiveness of the 6 month post-enrollment check to determine if a more frequent check is needed and may change the frequency.</p>
Using money from my savings/checking account	<p>Accept attestation and, for households with no income, perform post-eligibility match with The Work Number and Base Wage every six months.</p> <p>Note: Once implemented and we have had a period of time to collect data, we will evaluate the effectiveness of the 6 month post-enrollment check to determine if a more frequent check is needed and may change the frequency.</p>

Clarifying Questions and Answers	Rule
<p>Living on credit cards</p>	<p>Accept attestation and, for households with no income, perform post-eligibility match with The Work Number and Base Wage every six months.</p> <p>Note: Once implemented and we have had a period of time to collect data, we will evaluate the effectiveness of the 6 month post-enrollment check to determine if a more frequent check is needed and may change the frequency.</p>
<p>Borrowing money</p> <p>If this is selected, obtain:</p> <ul style="list-style-type: none"> o Name and contact info of person who loaned you the money o Expected repayment date o Amount of loan 	<p>Accept attestation and, for households with no income, perform post-eligibility match with The Work Number and Base Wage every six months.</p> <p>Note: Once implemented and we have had a period of time to collect data, we will evaluate the effectiveness of the 6 month post-enrollment check to determine if a more frequent check is needed and may change the frequency.</p>
<p>Someone is giving me money as a gift</p>	<p>Accept attestation and disregard (since gifts are not taxable). For households with no income, perform post-eligibility match with The Work Number and Base Wage every six months.</p> <p>Note: Once implemented and we have had a period of time to collect data, we will evaluate the effectiveness of the 6 month post-enrollment check to determine if a more frequent check is needed and may change the frequency.</p>
<p>Someone is paying my bills.</p> <p>If this is selected, obtain:</p>	<p>Accept attestation and, for households with no income, perform post-eligibility match with The Work Number and Base Wage every six months.</p> <p>Note: Once implemented and we have had a period of time to collect data, we will evaluate the effectiveness of the 6 month post-enrollment check to determine if a more frequent check is needed and may change the frequency.</p>

Clarifying Questions and Answers	Rule
<ul style="list-style-type: none"> o Name and contact info of person who is paying your bills o Which bills paid? <ul style="list-style-type: none"> Rent/Mortgage Telephone Utilities Other o How long do you expect this person to continue to pay your bills? <ul style="list-style-type: none"> Less than three months Three months or more 	
Working in exchange for rent	<p>Accept attestation and, for households with no income, perform post-eligibility match with The Work Number and Base Wage every six months.</p> <p>Note: Once implemented and we have had a period of time to collect data, we will evaluate the effectiveness of the 6 month post-enrollment check to determine if a more frequent check is needed and may change the frequency.</p>
Working odd jobs	Accept attestation count the income amount reported.
Other	Provide free form explanation field. Requires State worker intervention.

Health-e-Arizona Plus Application Questions to Clarify Income Inconsistencies

Income information from the Federal and State hubs will be auto-populated into the Health-e-Arizona Plus online application as the applicant completes the application. If the applicant states that the information from the electronic source is incorrect, Health-e-Arizona Plus will present the applicant or recipient with a clarifying questions and drop down lists of answers that the applicant can select to explain why the income data from the hubs is inconsistent with their current income. Arizona has created rules that Health-e-Arizona Plus will use to determine if the information to which the applicant attests is reasonably compatible. When the information provided is reasonably compatible, this will eliminate the need for worker intervention and requests for additional non-electronic verification. However, if the information to which the applicant has attested is not reasonably compatible, non-electronic verification will be requested systematically and reviewed by a worker upon receipt. Arizona anticipates using multiple electronic sources to verify income such as SSA, State UI, Base Wage (SWICA) and The Work Number. Some of these sources provide current data but others provide less up to date information (such as from SWICA), so it is possible that Arizona will receive income data from multiple sources that will support an applicant’s attestation. For example, Arizona could receive current data from The Work Number that differs from the income reported through SWICA. Or a person could have earnings reported through SWICA but more current information from SSA shows that they are receiving Social Security Retirement of Disability benefits.

Eligibility Factor	Source	Reasonable Compatibility Plan	State Flexibility	Reference
SSN	SSA	If unable to verify with electronic source, obtain verification of SSN or proof of application for SSN	No state flexibility	Medicaid Final Rule 42 CFR 435.956(d) 435.910(g) and (f)
Citizenship	Prior citizenship documentation in eligibility systems	If unable to verify with electronic source, obtain hard copy verification	No state flexibility	Medicaid Final Rule 42 CFR 435.949

Eligibility Factor	Source	Reasonable Compatibility Plan	State Flexibility	Reference
	SSA Arizona Vital Stats (AVS)			
Non-citizenship	Prior non-citizenship information in eligibility system Dept of Homeland Security (DHS) SAVE	Use self-attestation for non-qualified immigrants If unable to verify with electronic source, obtain hard copy verification for others	No state flexibility	Medicaid Final Rule 42 CFR 435.949
Identity	Prior identity documentation in eligibility systems SSA Motor Vehicle Division (MVD)	If unable to verify with electronic source, obtain hard copy verification	No state flexibility	Medicaid Final Rule 42 CFR 435.949

Eligibility Factor	Source	Reasonable Compatibility Plan	State Flexibility	Reference
Incarceration	Arizona Department of Corrections (ADC) County jails SSA	If attestation is inconsistent with source, obtain verification If no source available, accept attestation	No state flexibility	42 CFR 457.310(c)(2)
State residency	Prior information in eligibility systems SSA TWork Number Unemployment Insurance (UI) New Hire MVD	If unable to verify with electronic source, obtain verification.	State flexibility to accept attestation of residency or to require database matching for verification States define “reasonably compatible” standard	Medicaid Final Rule 42 CFR 435.956(c)
Marriage	Prior household composition information in eligibility	If attestation is inconsistent with source, obtain verification If no source available, accept attestation	Agency MUST accept self-attestation unless not reasonably compatible State defines “reasonably compatible”	Medicaid Final Rule 42 CFR 435.956(f)

Eligibility Factor	Source	Reasonable Compatibility Plan	State Flexibility	Reference
Pregnancy	Prior information in eligibility systems	<p>If attestation is inconsistent with source, obtain verification</p> <p>If no source available, accept attestation</p>	<p>Agency MUST accept self-attestation unless not reasonably compatible</p> <p>State defines “reasonably compatible”</p>	Medicaid Final Rule 42 CFR 435.956(e)
Household members	Prior household composition information in eligibility systems	<p>If attestation is inconsistent with source, obtain verification</p> <p>If no source available, accept attestation</p>	<p>If electronic verification is not available, the State may request other documents and/or use a reasonable compatibility process.</p> <p>States may, but are not required to use self-attestation</p> <p>State defines “reasonably compatible”</p>	Medicaid Final Rule 42 CFR 435.956(f)
The relationships of household members	Prior household composition information in eligibility systems	<p>If attestation is inconsistent with source, obtain verification</p> <p>If no source available, accept attestation</p>	<p>If electronic verification is not available, the State may request other documents and/or use a reasonable compatibility process.</p> <p>States may, but are not required to use self-attestation</p> <p>State defines “reasonably compatible”</p>	Medicaid Final Rule 42 CFR 435.956(f)

Eligibility Factor	Source	Reasonable Compatibility Plan	State Flexibility	Reference
Deprivation (18 Year Old Students)	There is no reliable electronic method to verify deprivation	Obtain verification	<p>If electronic verification is not available, the State may request other documents and/or use a reasonable compatibility process.</p> <p>States may, but are not required to use self-attestation</p> <p>State defines “reasonably compatible”</p>	Medicaid Final Rule 435.956(f)
American Indian	Prior ethnicity (and tribe) information in eligibility systems	<p>Use self attestation if CHIP or FTW premiums are not affected.</p> <p>Obtain verification if CHIP or FTW premiums are affected.</p>	For CHIP and FTW, state flexibility to accept attestation or require hard copy verification	42 CFR 457.535
Age	<p>Prior information in eligibility systems</p> <p>SSA</p> <p>AVS</p>	<p>If attestation is inconsistent with source, use source.</p> <p>Obtain verification (if age affects eligibility)</p>	<p>If electronic verification is not available, the State may request other documents and/or use a reasonable compatibility process.</p> <p>State flexibility to define “reasonably compatible” standard</p>	Medicaid Final Rule 42 CFR 435.956(f)

Eligibility Factor	Source	Reasonable Compatibility Plan	State Flexibility	Reference
	Dept of Homeland Sec (DHS) SAVE			
Earned Income	<p>The Work Number</p> <p>Base Wage</p> <p>New Hire Report</p> <p>SSA – SVES, SOLQI, SDX</p>	See “Health-e-Arizona Plus Application Questions to Clarify Income Inconsistencies” Table	<p>Flexibility to rely exclusively on IRS data or combination of IRS and state and federal data sources, or non-IRS state and federal data sources showing current monthly income.</p> <p>Flexibility to determine what data sources are “useful” , with certain exceptions (e.g. PARIS)</p> <p>Flexibility to determine current income by using available annual income and divide it by 12.</p> <p>Flexibility to employ reasonably predictable income and projected annual income methodologies</p>	<p>Medicaid Final Rule 42 CFR 435.945</p> <p>Medicaid Final Rule 42 CFR 435.948</p> <p>Medicaid Final Rule 42 CFR 435.952</p>

Eligibility Factor	Source	Reasonable Compatibility Plan	State Flexibility	Reference
	Arizona Department of Revenue Prior information in eligibility systems		Flexibility to determine the hierarchy of verification through data base matching and Attestation	
	SSA Railroad Retirement Board Unemployment Insurance Arizona Department of Revenue	If attestation is inconsistent with source, obtain verification If no source available, obtain verification	Flexibility to define the “reasonably compatible” standard. Flexibility to determine how to assist individuals in constructing MAGI household income. Flexibility to determine whether, how and how often to conduct post eligibility data matching. Flexibility to establish operational infrastructure (scan capacity, in-person kiosks, email) to accept paper documentation.	

Eligibility Factor	Source	Reasonable Compatibility Plan	State Flexibility	Reference
Unearned Income	<p>Arizona Lottery</p> <p>PARIS (if real time)</p> <p>Prior information in eligibility systems</p>		<p>Flexibility to determine what data sources to rely on for re-determining eligibility.</p> <p>Flexibility to rely on alternate financial eligibility data sources subject to HHS approval and provided they:</p> <ul style="list-style-type: none"> reduce administrative costs and burdens on individuals and States maximize accuracy minimize delay meet applicable confidentiality, disclosure and maintenance requirements promote coordination with other insurance affordability programs 	

Eligibility Factor	Source	Reasonable Compatibility Plan	State Flexibility	Reference
Tax payer filing status	Arizona Department of Revenue	<p>If attestation is inconsistent with source, ask clarifying questions.</p> <p>If no source available, accept attestation</p>	<p>If electronic verification is not available, the State may request other documents and/or use a reasonable compatibility process.</p> <p>States may, but are not required to use self-attestation</p> <p>State defines “reasonably compatible”</p>	Medicaid Final Rule 42 CFR 435.956(f)
Dependents on tax return	Arizona Department of Revenue	<p>If attestation is inconsistent with source, ask clarifying questions.</p> <p>If no source available, accept attestation</p>	<p>State flexibility to accept attestation or require hard copy verification</p> <p>States define “reasonably compatible” standard</p>	Medicaid Final Rule 42 CFR 435.956(f)
Current health insurance	<p>Prior information in eligibility systems</p> <p>Health Management Systems</p> <p>The Work Number</p>	<p>If attestation is inconsistent with source, obtain verification</p> <p>If no source available, accept attestation</p>	<p>State flexibility to accept attestation or require hard copy verification</p> <p>States define “reasonably compatible” standard</p>	<p>Medicaid Final Rule 42 CFR 435.119(c)</p> <p>42 CFR 457.310(c)</p>

Eligibility Factor	Source	Reasonable Compatibility Plan	State Flexibility	Reference
Potential benefits	UI/Base Wage Prior information in eligibility systems	Use self-attestation	State flexibility to accept attestation or require hard copy verification States define “reasonably compatible” standard	42 CFR 435.608