

MAGI-BASED ELIGIBILITY VERIFICATION PLAN (Insert Medicaid, CHIP, or Both) State: Medicaid & CHIP Maryland								
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)	See comments	YES	YES	Reasonable compatibility process for Maryland: First, if no electronic source found, accept attestation. If both attested and electronic income are above the applicable income standard, individual is income ineligible, and if both are at or below the applicable income standard the individual is determined eligible. If attestation is below the applicable income standard and electronic source indicated income above the applicable standard, as shown on the chart at last tab, we accept attestation if the difference is less than or equal to the dollar amount corresponding to 10% of 138% FPL for the appropriate family size (i.e., always based on 138% regardless of the applicable FPL standard). If the difference is greater than the specified amount, the applicant will be asked for reasonable explanation (i.e., change in circumstances). If there is no reasonable explanation for conflicting data source, Maryland will seek documentation from applicant. See Additional Comments for further explanation and chart.  When an individual attests to income above the applicable standard and data source indicates income below the standard, the state takes that attestation and make the person ineligible and screen for APTC.
Residency	YES	NO	NO	N/A	N/A	NO	NO	Accept self-attestation, unless information that conflicts is present at time of application in internal data sources from other programs. Where there is a conflict that affects eligibility, require paper documentation. Post-eligibility PARIS alerts reflecting eligibility in other States may also trigger requests for documentation.

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
Age (Date of Birth)	NO	NO	YES	N/A	N/A	NO	YES	Will use SSA data where available. If no SSA match, will accept attested age with post eligibility verification. If conflicting electronic information exists that would have an effect on eligibility, require paper.
Social Security Number **	NO	NO	YES	N/A	N/A	N/A	YES	Note: in addition to documents from applicant, protocols for resolving SSN conflicts involve research by a technical unit (see Additional Comments).
Citizenship **	NO	NO	YES	N/A	N/A	N/A	YES	Only require paper if electronic information absent or inconsistent with attestation.
Immigration Status **	NO	NO	YES	N/A	N/A	N/A	YES	Only require paper if electronic information absent or inconsistent with attestation.
Household Composition	YES	NO	NO	N/A	N/A	NO	NO	We are not actively using particular sources to verify household composition. When conflicting data found that would have an effect on eligibility via PARIS or SNAP/TANF data, may require documentation from participant showing relationship to child, and parent's (or Court's) authorization for acting as caretaker.
Pregnancy ***	YES	NO	NO	N/A	N/A	NO	NO	
Caretaker Relative	YES	NO	NO	N/A	N/A	NO	NO	Not actively verifying caretaker relative status. However, if conflicting information is found from internal data sources that would have an effect on eligibility, will reach out to individual for an explanation or documentation from participant showing relationship to child, and parent's (or Court's) authorization for acting as caretaker.
Medicare	NO	YES	YES		N/A	NO	NO	State will use SVES/SOLQ/SDX to verify. Presence or absence of Medicare is not a criterion for Medicaid eligibility, but the existence of Medicare eligibility requires an individual to be redirected away from the MAGI process. If an applicant feels s/he has been referred to non-MAGI in error due to disputed Medicare eligibility, s/he may use the (Exchange) Call Center, a navigator, a case worker, or other assisters to engage in further discussion/investigation.
Application for Other Benefits	NO	YES	YES	N/A	N/A	YES	YES	Paper documentation collected ONLY if not available from hub or SVES/SOLQ/SDX and individual does not supply a reasonable explanation.

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
Other: (Please describe any other eligibility factors in the space below)								
Public institution status	NO	YES	YES	N/A	N/A	YES	NO	Verified via Jail Match (from Dept. of Corrections) linked to MMIS. Incarceration status is used for limiting payment of benefits but does not preclude Medicaid eligibility.
American Indian/Alaska Native	YES	NO	NO	N/A	N/A	NO	NO	Pursuant to 42 CFR § 435.603(e)(3), Maryland must exclude certain types of income for AI/AN populations from the calculation of modified adjusted gross income (MAGI) - having an individual self-identify as AI/AN will ensure that the income review process can flag these types of income to ensure they are not inappropriately counted. In addition, pursuant to 42 CFR 457.535, Maryland may not impose premiums (applicable to some CHIP) on AI/AN individuals.
<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>								

MAGI-BASED ELIGIBILITY VERIFICATION PLAN (Insert Medicaid, CHIP, or Both) Medicaid & CHIP State: Maryland												
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	NO	YES	YES	YES	NO	NO	YES	YES	NO		Exchange will have appropriate security approvals from IRS. Will be used at redet only if application includes authorization.
2. Social Security Administration (SSA) (SSI, Title II)	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO		
3. State Wage Information Collection Agency (SWICA)	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO		Will be used upon application, at annual renewal, and when changes are reported. Available quarterly -may establish quarterly post-eligibility review cycle in future. See Additional Comments.
4. State Unemployment Compensation	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO		Same file as 3 (SWICA). See Additional Comments.
5. State Administered Supplementary Payment Program	NO	NO	YES	YES	YES	YES	NO	NO	NO	NO		Program is extremely small; includes adults in protected living arrangements only.

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
6. State General Assistance Programs	NO	NO	YES	YES	YES	YES	NO	NO	NO	NO		This data will not be utilized because Maryland's program is extremely small and addresses disabled individuals in supported living arrangements. The system for generating unique identifiers, referenced in rows 7 and 8 is also used by State General Assistance, so a MAGI applicant already known to this program can be identified as such.
7. Supplemental Nutrition Assistance Program (SNAP)	YES	YES	YES	YES	YES	YES	NO	NO	YES	NO		Financial data may not be available at application 2013/2014, but will be added as system matures. Updates of address, income, etc. reported to SNAP can be used post-eligibility to verify or trigger review of information for Medicaid/CHIP record. No automated or manual posteligibility review cycle has been established. See Additional Comments.
8. Temporary Assistance for Needy Families (TANF)	YES	YES	YES	NO	YES	YES	NO	NO	YES	NO		Financial data may not be available at application 2013/2014, but will be added as system matures. Updates of address, income, etc. reported to TANF can be used post-eligibility to trigger review/update of same information for Medicaid/CHIP participant, but no automated or manual review cycle has been established for posteligibility. See Additional Comments.

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)	YES	YES	YES	YES	YES	NO	NO	NO	YES	NO		OCSE data will not be used to augment applicants' income with (non-countable) child support. OCSE data on absent parent's medical child support helps Medicaid gather primary insurance information for TPL purposes. Financial data may not be available at application 2013/2014, but will be added as system matures. The intended use is once annually (at renewal). See Additional Comments.
10. State Income Tax	NO	YES	YES	YES	NO	YES	NO	NO	NO	NO		Unable to access.
11. Commercial database: (Please describe any commercial databases in the space below)												
Equifax Work Number	YES	YES	YES	YES	YES	NO	NO	YES	YES	YES	Other (specify in comments)	Financial data accessed via the Federal hub will be used on application, when changes are reported, and at redetermination. The intended use is once annually and as needed when change reported.
12. Other: (Please describe any additional electronic data sources in the space below)												
1. The state marked any criterion YES if it was considered as a reason the data source was determined useful/not useful.												

MAGI-BASED ELIGIBILITY VERIFICATION PLAN (Insert Medicaid, CHIP, or Both) Medicaid & CHIP State: Maryland																	
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	YES	NO	NO	NO	YES	YES	NO	YES	YES	YES	Other (specify in comments)	Used post enrollment and renewal for Medicare and application of other benefit, and at application for SSN and citizenship.  Post enrollment verification frequency of Medicare and application of other benefit left at the discretion of eligibility worker at this time, however, metrics will be put in place at a later date. Generally performed within days.
2. Department of Homeland Security (DHS) - SAVE	YES	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO		In future may limit redetermination check of this criterion to individuals up for renewal of immigration status.
3. Vital Statistics	YES	NO	YES	NO	NO	YES	NO	NO	NO	NO	NO	YES	YES	YES	YES	Other (specify in comments)	Daily connection via MMIS for death match-not integrated with eligibility process.  Vital Statistics may be used as a backup to verify Citizenship and Age/DOB.
4. Department of Motor Vehicles (DMV)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	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	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	NO	NO	Other (specify in comments)	Medicaid will use common system module for establishing unique identifiers and will process some individuals known to other programs. At application, Medicaid will use existing identifier for applicant known to TANF. Information available via TANF records can affect any of these factors.
6. Supplemental Nutrition Assistance Program (SNAP)	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	NO	NO	Other (specify in comments)	Medicaid will use common system module for establishing unique identifiers and will process some individuals known to other programs. At application, Medicaid will use existing identifier for applicant known to SNAP. Information available via SNAP records can affect any of these factors.
7. Office of Child Support Enforcement	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	NO	NO	Other (specify in comments)	Medicaid will use common system module for establishing unique identifiers and will process some individuals known to other programs. At application, Medicaid will use existing identifier for applicant known to OCSE. Information available via OCSE records can affect any of these factors.
8. State General Assistance Programs	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
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		



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
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>																	
Jail Match	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	NO	NO	YES	Other (specify in comments)	Daily comparison against MMIS recipient file for public institution status
12. PARIS*	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	NO	NO	YES	Quarterly	State receives quarterly files generating caseworker research--don't know of any associated database. Used to determine whether recipient has federal, military or non-Maryland Medicaid coverage. Result of research may affect various eligibility factors such as residency, income, or household composition.
* 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) Medicaid & CHIP State: Maryland						
Section C . Additional Factors of Eligibility for Separate CHIP						
Eligibility Factor	Self-Attestation Accepted without Additional Verification	Self-Attestation Accepted with Post-Enrollment Verification	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	NO	Must be Applied	Attestation accepted at application for purposes of eligibility. Post-eligibility, absence of other healthcare coverage is verified continually by TPL contractor via matches with MMIS claims processing. When TPL contractor detects liability of an insurer for a CHIP enrollee, the Medicaid Recoveries and Financial Services unit generate notice for caseworker to follow up and terminate CHIP participation as appropriate. This TPL process is used uniformly across Medicaid and CHIP, although its implications for eligibility are limited to CHIP. (Maryland does not use TPL vendor's data sources directly and therefore can't describe, so originally put "N" in column D.)  Process is consistent for Medicaid Expansion.
2. Applicant does not have access to affordable ESI					N/A	
3. When child has had coverage (as applicable to states' waiting period)					N/A	
4. Access to public employee coverage					N/A	
5a. Waiting period exception #1 (describe):					N/A	

Eligibility Factor	Self-Attestation Accepted without Additional Verification	Self-Attestation Accepted with Post-Enrollment Verification	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):					N/A	
5c. Waiting period exception #3 (describe):					N/A	
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>						
Lockout (max. 90 days) for failure to pay family contribution	NO	NO	YES	NO		Uses data from MCHP Premium Accounts Receivable system. Paper documentation would not be necessary; generally, payments missing from the system would have to be resubmitted to correct this element of eligibility.

MAGI-BASED ELIGIBILITY VERIFICATION PLAN (Insert Medicaid, CHIP, or Both) State:		Medicaid & CHIP Maryland
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):	Maryland intends to use paper documentation in limited circumstances for determining eligibility: for income when electronic sources are incompatible with attestation; for age when inconsistent electronic records are found and eligibility would be affected; for citizenship if not in SSA composite or through a match with Vital Statistics; and immigration status if not found in SAVE. If application for other benefits is not found post-eligibility in SSA composite or SVES/SOLQ/SDX, follow-up would require documentation.
2	Please describe how the state uses PARIS?	PARIS quarterly "alerts" are received centrally and allocated among case workers statewide. Case manager follows up by phone to counterpart agency to determine whether recipient has federal, military or non-Maryland Medicaid coverage, closes Maryland MA eligibility if appropriate, and resolves ("dispositions") alert.
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"> <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 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>	
5	<p>Describe any additional MAGI-based eligibility verification policies and procedures that have not been covered in this verification plan (optional):</p>	

Section A. Additional Comments

Research protocols for resolving conflicting/missing SSNs post-eligibility: A technical unit within the Office of Eligibility Services receives a report of missing or problematic SSNs, and uses SSA databases to check. The overnight batch system, SVES, permits a "fuzzy" search and helps to identify typographical errors in name or number. The real-time query system, SOLQ, permits immediate verification (particularly useful for verifying that expected updates to the SSA data have been completed). Telephone contacts with the applicant/recipient and with the local SSA District Office are also used. This group has not at this time reduced its research protocol to a written standard operating procedure

Section B1. Additional Comments

3. SWICA--Data generated quarterly. Data will be used at least annually (at redetermination) and when changes are reported, in addition to use at application. Additional post-eligibility "pings" may be established later. 4. Unemployment--Consolidated with SWICA. 7. SNAP and 8. TANF--Will be used at least annually (at redetermination) and when changes are reported, in addition to use at application. Additional post-eligibility "pings" may be established later. 9. OCSE--Annual use at renewal, same as SNAP/TANF. Note: Data will not be used to augment income with (non-countable) child support. Data will only be used to the extent absent parent information assists in identifying other health coverage for purposes of TPL. Data from 11. Equifax Work Number--Intended use is once annually, although greater frequency may be established later.

Section B2. Additional Comments

5. TANF--At application, common system module for State program identifiers that is used for TANF, SNAP and OCSE will be used for Medicaid applicants. An applicant known to TANF will be assigned existing identifier. This will allow Exchange system to identify TANF record which may be used to verify any eligibility criterion. 6. SNAP--At application, common system module for State program identifiers that is used for SNAP, TANF and OCSE will be used for Medicaid applicants. An applicant known to SNAP will be assigned existing identifier. This will allow Exchange system to identify TANF record which may be used to verify any eligibility criterion. 7. OCSE--At application, common system module for State program identifiers that is used for OCSE, SNAP and TANF will be used for Medicaid applicants. An applicant known to OCSE will be assigned existing identifier. This will allow Exchange system to identify TANF record which may be used to verify any eligibility criterion. 12. PARIS--alerts generated quarterly are used to determine whether recipient may have federal, military or non-Maryland coverage. Not a match or database search: caseworker research is required to dispose alerts correctly. Research in response to PARIS alerts may verify any of these eligibility criteria. 13. Jail Match--Daily match run against claims system to ensure proper application of service limits based on institutional status.

Section C. Additional Comments

5. Maryland is eliminating its 6-month waiting period effective 1/1/2014, so no exceptions are described.

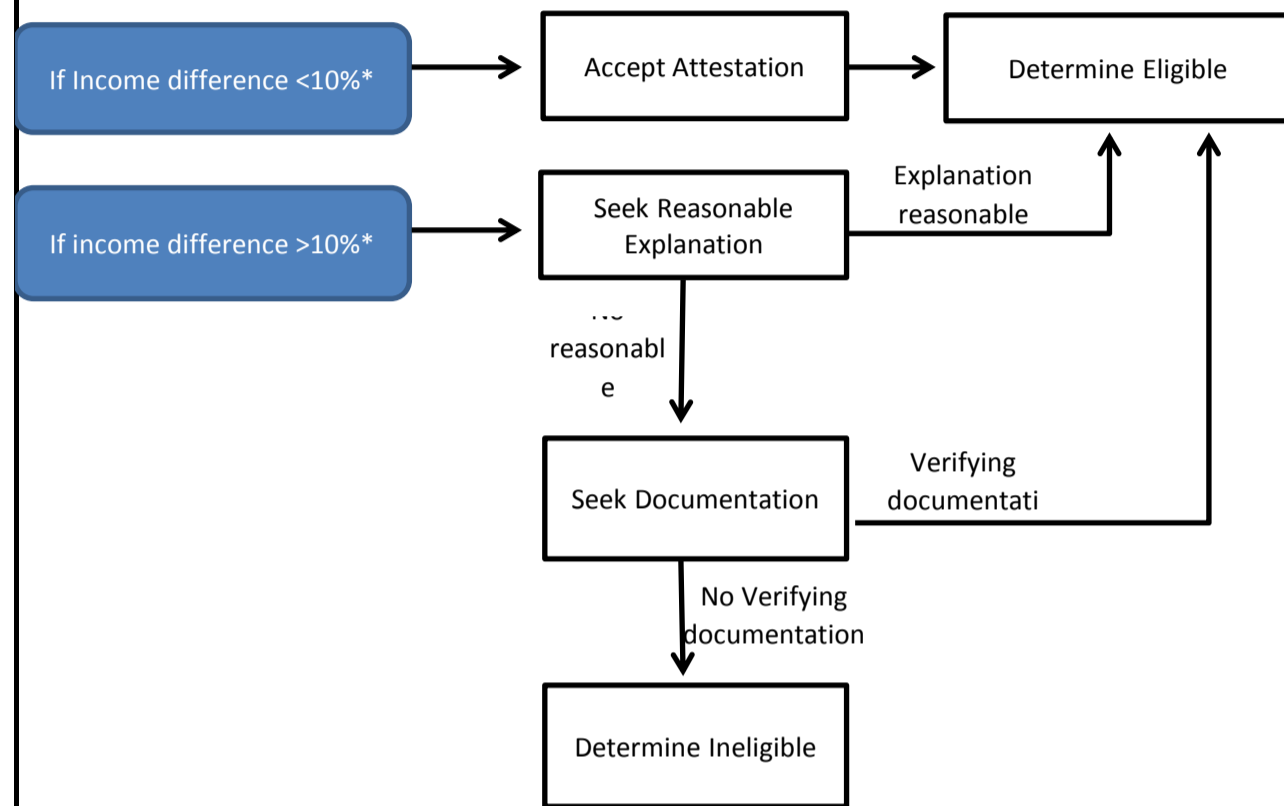
Maryland's Reasonable Compatibility Strawmodel (Income Eligibility)

If both attestation and data source are above Medicaid/CHIP standard, applicant is ineligible

If both attestation and data source are below Medicaid/CHIP standard, applicant is eligible

If attestation is above Medicaid/CHIP standard and data source is below Medicaid/CHIP standard, applicant is ineligible

Applicant Attestation is Below Applicable Income Standard  
but Data Sources Shows Income Above Applicable Income Standard



\*Note: Maryland's threshold will be the dollar equivalent of 10% of 138% FPL for the appropriate family size.