

**MAGI-BASED ELIGIBILITY VERIFICATION PLAN**

(Insert Medicaid, CHIP, or Both)

Medicaid & CHIP

State:

California

Effective Date: (mm/dd/yyyy)

7/11/23

**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)	DHCS Comments
Income*	NO	YES	YES	Both are above, at or below the applicable income standard.	20% until May 2024 10% as of June 2024	YES	YES	<p><b>Reasonable Explanation:</b> Effective July 2022, California will allow an individual to provide a statement which reasonably explains the discrepancy, prior to the use of paper documentation. The state will develop a form for counties to use at application, renewal or a change in circumstance to assist with gathering the reasonable explanation. In instances when reasonable explanation is not viable or cannot be obtained, paper verifications will be requested.</p> <ul style="list-style-type: none"> <li>If more than 20%/10% difference in reasonable compatibility and the individual can provide a reasonable explanation/paper documentation, the individual will be determined eligible for Medicaid/CHIP benefits.</li> <li>If more than 20%/10% difference in reasonable compatibility and the individual cannot provide a reasonable explanation/paper documentation, the individual will be determined ineligible for Medicaid/CHIP benefits account transferred to CalHEERS for other IAP review.</li> <li>For additional information on the description of the reasonable explanation implementation process, please refer to the Additional Comments tab.</li> </ul> <p><b>Reasonable Compatibility</b></p> <ul style="list-style-type: none"> <li>If an individual attests to income below the MAGI eligibility group standard and the data match is above the standard, then the threshold of 20%/10% is applied.</li> <li>If both the attested income and the data match are at/below the MAGI eligibility group standard then the amounts are reasonably compatible. The 20%/10% threshold amount is not needed and the individual is determined eligible.</li> <li>If both the attested income and the data match are above the MAGI eligibility standard then the amounts are reasonably compatible, no threshold is needed, and the individual is determined ineligible and sent to the exchange for coverage.</li> <li>If the individual attests to income over the eligibility standard and the data match is below, then the 20%/10% threshold is not applied in this circumstance and the individual is determined ineligible and sent directly to the exchange for coverage.</li> <li>The reasonable compatibility 20% threshold will be applied starting in July 2022</li> </ul>
Residency	YES	NO	YES	N/A	N/A	NO	NO	<p>CA is using the California Healthcare Eligibility and Enrollment Retention System (CalHEERS) to electronically verify residency. If residency can not be verified through CalHEERS, the State will accept attestation of residing in California without seeking paper documentation from individual.</p> <p>The CalHEERS system is interfaced with the Medi-Cal Eligibility Data System (MEDS) and Franchise Tax Board (FTB). If CalHEERS successfully uses MEDS (SNAP, TANF and Medicaid) enrollment data or FTB data to electronically verify residency CalHEERS will set the residency verification flag to "e-verified" and continue to process the application. If CalHEERS cannot electronically verify residency, CalHEERS will set the residency verification flag to "not verified" and continue to process the application without requiring the applicant to provide paper verification of residency.</p>
Age (Date of Birth)	NO	NO	YES	N/A	N/A	NO	YES	The state verifies this information with the federal Social Security Administration (SSA) when verifying social security numbers. If the State finds an inconsistency with SSA data, then State will request paper documentation from individual.
Social Security Number **	NO	NO	YES	N/A	N/A	N/A	YES	An electronic request for verification of the Social Security Number for each individual will be made prior to a request for paper documentation.
Citizenship **	NO	NO	YES	N/A	N/A	N/A	YES	An electronic request for verification of the citizenship will be made prior to a request for paper 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)	DHCS Comments
Immigration Status **	NO	NO	YES	N/A	N/A	N/A	YES	California has implemented SAVE Steps 1, 2 and 3 for all applications that are processed through the CalHEERS access channel. CalHEERS will automatically initiate Step 2 when indicated, as the Hub VLP service no longer pushes to any step automatically (this has been the case since February 2019). If needed, a request can be made to CalHEERS to initiate Step 3 since such cases are already in process with DHS.
Household Composition	YES	NO	NO	N/A	N/A	NO	NO	There is currently no data source which provides Household Composition data.
Pregnancy ***	YES	NO	NO	N/A	N/A	NO	YES	Self-attestation is accepted unless the State finds information that is conflicting and may require follow-up with a request for paper documentation.
Caretaker Relative	YES	NO	NO	N/A	N/A	NO	NO	Self-attestation is accepted for "caretakers" if the individual is providing care to a minor child; this is consistent with current policy.
Medicare	NO	NO	YES	N/A	N/A	NO	YES	The Trusted Data Source for electronic verification of Medicare status is the Non-Employer Sponsored Insurance (Non-ESI) Minimal Essential Coverage (MEC) service provided by the Hub. An electronic request for verification of the Medicare Status for each individual will be made prior to a request for paper documentation.
Application for Other Benefits	YES	NO	NO	N/A	N/A	NO	NO	
Other: (Please describe any other eligibility factors in the space below)								
Deceased	NO	NO	YES	N/A	N/A	YES	NO	In cases where the State receives an erroneous death letter from SSA, the State will follow-up with a request for a reasonable explanation.
American Indian/Alaska Native Status for Cost-Sharing Exemptions	YES	NO	NO	N/A	N/A	NO	YES	Self-attestation is accepted unless the State finds information that is conflicting and may require follow-up with a request for paper documentation.
Former Foster Care and Medicaid Enrollment	NO	YES	YES	N/A	N/A	NO	YES	The State will accept self-attestation of an individual's enrollment in foster care and Medicaid upon obtaining age 18. Counties will verify this information post enrollment utilizing data from their county-based eligibility data systems or in the case of individuals attesting to enrollment in foster care outside of California, counties and/or the California Department of Social Services will contact the other state to confirm foster care placement and Medicaid enrollment.  The Trusted Data Source for electronic verification of Medicaid status is the Non-Employer Sponsored Insurance (Non-ESI) Minimal Essential Coverage (MEC) service provided by the Hub. An electronic request for verification of the Medicaid Status for each individual will be made prior to a request for paper documentation. Medicaid verification via the Non-ESI MEC service is called at initial application and at annual renewal.

\* 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.

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**Section B1. Use of Electronic Data Sources**

**Financial:**

Electronic Data Source	Determined Useful (Y/N)	Accuracy Considered (Y/N)	Timeliness Considered (Y/N)	Ability to Access Considered (Y/N)	Age of Data Considered (Y/N)	Comprehensiveness 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		IRS data through the Hub will be used at application and renewal.  The State understands that to use IRS data at renewal, individual must consent to use of that data. The application will have as a standard question if the individual wishes to provide such consent.
2. Social Security Administration (SSA) (SSI, Title II)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES		SSA data through the Hub will be used at application and renewal.
3. State Wage Information Collection Agency (SWICA)	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	This information is provided quarterly via Recipient IEVS reports which will also be leveraged by CalHEERS interfaces with EDD.
4. State Unemployment Compensation	YES	YES	YES	YES	YES	YES	NO	YES	YES	YES	Other (specify in comments)	This information is provided monthly via Recipient IEVS reports which will also be leveraged by CalHEERS interfaces with EDD.
5. State Administered Supplementary Payment Program	NO	NO	NO	NO	NO	NO	YES	NO	NO	NO		SSA administers this program for California
6. State General Assistance Programs	NO	YES	NO	NO	YES	YES	NO	NO	NO	NO		Useful if made available in real-time; today, the State does not have established interfaces with the General Assistance programs.
7. Supplemental Nutrition Assistance Program (SNAP)	NO	YES	NO	NO	YES	YES	NO	NO	NO	NO		Useful if made available in real-time; today, the State does not have any interfaces in real-time with SNAP.
8. Temporary Assistance for Needy Families (TANF)	NO	YES	NO	NO	YES	YES	NO	NO	NO	NO		Useful if made available in real-time; today, the State does not have any interfaces in real-time with TANF.
9. Office of Child Support Enforcement (OCSE)	NO	YES	NO	NO	YES	YES	NO	NO	NO	NO		Useful if made available in real-time; wage data is not stored, therefore, this data source would not be useful. Today, the State does not have any interfaces with OSCE.
10. State Income Tax	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO		State income tax data will be used at application and renewal.
11. Commercial database: (Please describe any commercial databases in the space below)												

Electronic Data Source	Determined Useful (Y/N)	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
TALX Service	YES	YES	YES	YES	YES	YES	NO	YES	YES	NO		DHCS utilizes the TALX service at application and renewal. DHCS implemented this service (known as the Verify Current Income (VCI) Service) as a Trusted Data Source for electronic income verifications in February 2022.
12. Other: (Please describe any additional electronic data sources in the space below)												

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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	NO	YES	NO	NO	NO	YES	NO	YES	YES	NO	YES	Quarterly	SSA can be used to verify Age/DOB, if needed. Incarceration status is checked post-enrollment on a quarterly basis. Post-enrollment SSA data is not accessed through the HUB but through direct mainframe file sharing matches with the SSA.
2. Department of Homeland Security (DHS) - SAVE	YES	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO		DHS data is used at renewal if the individual's status is subject to change or if the 5-year bar is met.
3. Vital Statistics	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	NO	NO	YES	Other (specify in comments)	The California Department of Public Health (CDPH) vital statistics interface with the Medi-Cal Eligibility Data System (MEDS) can be used as a backup data source to verify citizenship. DHCS has an agreement with CDPH to perform post-enrollment death detection on a weekly basis.
4. Department of Motor Vehicles (DMV)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		DMV data will be used to electronically verify residency once such functionality is deployed in CalHEERS. No timeline for this implementation has been identified at this time.
5. Temporary Assistance for Needy Families (TANF)	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO		
6. Supplemental Nutrition Assistance Program (SNAP)	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO		
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	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	YES	YES	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	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO		
11. Commercial database: (Please describe any commercial databases in the space below)																	
12. PARIS*	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	YES	NO	NO	YES	Quarterly	See Section D for further detail. Residency verification is performed post-enrollment to identify inconsistencies.

Electronic Data Source	To Be Used (Y/N)	Social Security Number	Citizenship	Immigration Status	Residency	Age/DOB	Pregnancy	Household Composition	Carotaker 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: (Please describe additional electronic data sources in the space provided below)																	
Non-Employer Sponsored Insurance (Non-ESI) Minimal Essential Coverage (MEC)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO		The Trusted Data Source for electronic verification of Medicare status is the Non-Employer Sponsored Insurance (Non-ESI) Minimal Essential Coverage (MEC) service provided by the Hub. An electronic request for verification of the Medicare Status for each individual will be made prior to a request for paper documentation. Medicare verification via the Non-ESI MEC service is called at initial application and at annual renewal.
National Change of Address Database (NCOA) and United States Postal Services (USPS) In-State Forwarding Address	NO	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	NO	YES	YES	Other (specify in comments)	NCOA and USPS in-state forwarding address will be used to update in-state contact information confirmed by and received from the NCOA database or USPS returned mail with a forwarding address, when confirmed by the Medicaid beneficiary.  USPS in-state forwarding address will be used when mail is returned as undeliverable by the state, when confirmed by the Medicaid beneficiary.

\* 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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**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	YES	NO	NO	NO	Must be Applied	For the majority of cases, the State will accept self-attestation. If the State finds an inconsistency with Social Security Administration (SSA) data or MEDS data during client indexing, then the State will reach out for a reasonable explanation and/or request paper documentation from individual. This process will be utilized to determine eligibility for California's Title XXI Expansion coverage group.
2. Applicant does not have access to affordable ESI	YES	NO	NO	NO		For the majority of cases, the State will accept self-attestation. If the State finds an inconsistency with Social Security Administration (SSA) data or MEDS data during client indexing, then the State will reach out for a reasonable explanation and/or request paper documentation from individual.
3. When child has had coverage (as applicable to states' waiting period)	YES	NO	NO	NO		
4. Access to public employee coverage	YES	NO	NO	NO		
5a. Waiting period exception #1 (describe):	YES	NO	NO	NO		Description: Loss of employment due to factors other than voluntary termination
5b. Waiting period exception #2 (describe):	YES	NO	NO	NO		Description: Change to a new employer that does not provide an option for dependent coverage
5c. Waiting period exception #3 (describe):	YES	NO	NO	NO		Description: Change of address so that no employer sponsored covered is available
5d. Waiting period exception #4 (describe):	YES	NO	NO	NO		Description: Discontinuance of health benefits to all employees of the applicant's employer
5e. Waiting period exception #5 (describe):	YES	NO	NO	NO		Description: Expiration of COBRA coverage period
5f. Waiting period exception #6 (describe):	YES	NO	NO	NO		Description: Coverage provided pursuant to an exemption authorized under subdivision (l) of Section 1367 of the Health and Safety Code
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: (Please describe in the space provided below)					N/A	

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**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>California accepts self-attestation for select application data elements. For those application data elements where California does not accept self-attestation, California will use an electronic data source to verify, to the extent that there is a comprehensive, timely, accurate, cost effective data source readily available. If an electronic data source is not available or electronic verification is not reasonably compatible with self-attestation, then California will first begin by initiating administrative verification process which will include a search of the databases of the local county consortia systems. If information cannot be obtained through the search of databases, California will then seek additional information from the individual including a statement which reasonably explains the discrepancy, prior to the use of paper documentation. All available electronic/online data sources will be used prior to requesting paper documentation from the individual. California plans to use multiple backup data sources (i.e. DMV, SNAP, TANF, State Income Tax, and PARIS can be used to verify residency).</p> <p>The California Department of Public Health (CDPH) vital statistics interface with the Medi-Cal Eligibility Data System (MEDS) can be used as a backup data source to verify citizenship. It is also used to ensure that Medi-Cal benefits are not issued to individuals who are using the Social Security numbers of deceased persons.</p>
2	<p>Please describe how the state uses PARIS?</p>	<p>a) PARIS Interstate - The PARIS Interstate match allows states to compare their beneficiary information with other states. California receives approximately 60,000 matches per quarter and does not have the staffing resources to process this volume. California does filter the quarterly match based on certain risk factors. DHCS places the highest priority on individuals that match in multiple states and on outbound cases (someone leaving California). It is DHCS' objective to avoid improper payments for individuals that no longer meet the California residency requirement. DHCS focuses on individuals that have moved away and have signed up for public assistance in another state. Therefore, DHCS does not place a high priority on inbound cases, which are situations where the individual recently moved into California. These are considered low risk because county eligibility workers have just verified residency during the application process and because the other state needs to act on the PARIS match by disenrolling the individual from their public assistance program. DHCS sends residency verification letters to the individuals with the highest risk factors based on the PARIS match. If the individual is non-responsive or confirms that they have left California, the beneficiaries are discontinued from California's Medicaid program.</p> <p>b) PARIS Veterans – Using the PARIS Veterans data match, California identifies individuals that are eligible or likely to be eligible for veteran's health care benefits. In coordination with local county offices, outreach is performed to encourage the identified individuals to utilize VA health benefits instead of Medicaid, resulting in a cost avoidance savings to the state.</p> <p>c) Using the PARIS federal data match California identifies federal income and shares this information with the counties, who then compare the federal income identified by PARIS to the reported income of beneficiaries to assess for unreported income. In addition, California uses data from the PARIS Federal data match to identify Medicaid beneficiaries with private health coverage and codes the eligibility database accordingly which may result in cost avoidance savings for the state.</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 style="text-align: center;"><b>NO</b></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"> <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,</li> </ol> <p>and</p> <ol style="list-style-type: none"> <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>	<p style="text-align: center;"><b>NO</b></p>
	<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,</li> </ol> <p>and</p> <ol style="list-style-type: none"> <li>4) Promotes coordination with other insurance affordability programs.</li> </ol>	



	<b>Question</b>	<b>Response</b>
<b>5</b>	Describe any additional MAGI-based eligibility verification policies and procedures that have not been covered in this verification plan (optional):	<b>NO</b>

**Section A. Additional Comments**

The verification process is virtually the same for all consumers regardless of the modality in which the application is received. One exception relates to the verification of state residency. In the event that a consumer presents in person at a county office and brings with them paper-based verification of state residency, the Statewide Automated Welfare Systems (SAWS) will verify the authenticity of the consumer's paper verification and if the paper-based verification document is acceptable to verify state residency, SAWS set the state residency electronic verification by-pass flag logic to inform CalHEERS that state residency has been verified. Eligibility results for MAGI-Based MC will be determined in CalHEERS via the Business Rules Engine (BRE). Data verified via the Federal Hub, or other electronic data sources will be flagged as verified data when it goes to SAWS. Any verification documentation that the consumer provides to CalHEERS will be sent, via electronic Health Information Transfer (eHIT) to SAWS. If the individual is referred to SAWS for a full Medi-Cal determination, any verifications and/or documentation provided in CalHEERS will be sent to SAWS via eHIT.

Effective July 1, 2022, California implemented the use of reasonable explanation as part of the verification process. California is unable to fully automate reasonable explanation until July 2024 and has developed a short term manual process for use prior to system implementation.

**Reasonable Explanation Short Term Plan: Effective July 1, 2022**

Manually obtain a reasonable explanation at application, annual renewal or a change in circumstance:

- If more than 20%/10% difference in reasonable compatibility, the county will make an attempt to reach the individual by their preferred method of contact to obtain a reasonable explanation, or if in person, the county will obtain the reasonable explanation directly from the individual. The county will try to resolve the discrepancy with obtaining a reasonable explanation prior to requesting paper documentation.
- Since automated functionality for reasonable explanations will not be implemented until 2024, the state developed a form for counties to use in conjunction with the redetermination form in situations where a reasonable explanation was not able to be obtained in person or verbally.

**Reasonable Explanation Automated Plan: Beginning July 2024**

Automate systems to obtain a reasonable explanation at application, annual renewal or a change in circumstance:

- Update the California Health Eligibility Enrollment and Retention System (CALHEERS) to provide drop down the option for an individual to choose from pre-populated reasonable explanations when income is not reasonably compatible. If certain reasonable explanations are selected, income will be verified automatically and eligibility will be determined "real time" without additional verification.
- Update the Statewide Automated Welfare System portal providing the option for an individual to choose from pre-populated reasonable explanations when completing an application, annual renewal, or reporting a change in circumstance.
- If unable to obtain a reasonable explanation electronically, the county will make an attempt to reach the individual by their preferred method of contact to obtain a reasonable explanation, or if in person, the county will obtain the reasonable explanation directly from the individual. The county will try to resolve the discrepancy with obtaining a reasonable explanation prior to requesting paper documentation.
- Update the paper application and annual renewal to include the reasonable explanation options.

Except as otherwise noted, the implementation date of this verification plan is 7/1/22.

**Section B1. Additional Comments**

None.

**Section B2. Additional Comments**

None.

**Section C. Additional Comments**

None.