

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

State: Illinois

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	Attested amount is below the standard but the electronically verified amount is above the standard. Percent Threshold	30%	Yes	Yes	<p>IL allows self-attestation for income when there are no electronic sources available.</p> <p>If the individual attests to income below the applicable standard but the electronic data source indicates income above the applicable standard and the difference between the two is greater than 30%, the state will first request a reasonable explanation from the individual and/or request paper documentation. If the difference between what the individual attests to and what the electronic data source finds is within 30% then the individual is deemed eligible. If an individual attests to income above the standard and data source is below, the individual will be determined ineligible</p>

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								and referred to the Marketplace.
Residency	No	No	Yes	N/A	N/A	Yes	Yes	If electronic verification is not available or current (last updated), the State requests a reasonable explanation and/or paper documents to verify residency if the inconsistency would impact the individual's eligibility. State uses the Secretary of State database to establish Illinois residency.
Age (Date of Birth)	No	No	Yes	N/A	N/A	Yes	Yes	The state reviews the DOB data from SSA. If there is a discrepancy between applicant reported DOB and SSA, the state will request an explanation and/or paper documentation from the individual.
Social Security Number **	No	No	Yes	N/A	N/A	Yes	Yes	If electronic verification indicates a discrepancy, the state requests documents and

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								resubmits to SSA as a post-eligibility verification.
Citizenship **	No	No	Yes	N/A	N/A	N/A	Yes	If electronic verification indicates a discrepancy, the state requests documents and resubmits to SSA as a post-eligibility verification.
Immigration Status **	No	No	Yes	N/A	N/A	N/A	Yes	If electronic verification is not available, or there is an inconsistency between the attestation and the information from the data sources, the State requests documents to verify citizenship.
Household Composition	No	No	Yes	N/A	N/A	Yes	Yes	Illinois' new integrated eligibility system (IES) will identify any instances where the same individual is reported as living in more than one household receiving medical, SNAP or cash benefits. If there is an inconsistency between attestation and the IES or other sources that has an impact on

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								eligibility a reasonable explanation and/or paper documentation will be requested. No other source has been identified for verifying current household composition so the state will otherwise accept self-attestation.
Pregnancy ***	Yes	No	No	N/A	N/A	No	No	
Caretaker Relative	Yes	No	Yes	N/A	N/A	No	No	No known electronic source is available for non-TANF applicants. Relationship to the 5th degree is accepted. Proof of such relationship would be unduly burdensome if not impossible to produce. No other source has been identified for verifying current caretaker relative so the state will otherwise accept self-attestation. However, if the State identifies a discrepancy through the IES

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								or other sources then additional information may be requested from the individual.
Medicare	No	No	Yes	N/A	N/A	Yes	Yes	Medicare status is obtained from SSA.
Application for Other Benefits	Yes	No	No	N/A	N/A	No	No	State accepts self-attestation.
Other: (Please describe any other eligibility factors in the space below)								

* States must check electronic data sources determined useful to verify income in accordance with 42 CFR 435.948 but can be done post-enrollment. If the information obtained from electronic data sources and the information provided by or on behalf of the individual are both above, at or below the applicable income standard, the State must determine the applicant eligible or ineligible for Medicaid/CHIP. (NOTE: this option is prepopulated for the state and is not an option that can be changed).

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Section A: Verification Procedures for Factors of Eligibility

** 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)	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	Yes	Yes	Yes	Yes	Yes	Yes	No	No	No	No	Illinois will not obtain federal tax information from the data services hub because IRS security requirements are extremely burdensome and severely limit the utility of this source, the tax data is not current or available quickly and data obtained from the IRS cannot be used for SNAP or cash determinations thus precluding integrated eligibility dispositions. When no other source of verification is available, tax returns can be requested to be provided by applicants or clients.

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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)	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
2. Social Security Administration (SSA) (SSI, Title II)	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Monthly	State receives monthly feed through its current data match with SSA for program integrity or if notified of changes post-enrollment. State uses data obtained from the State Online Query (SOLQ) real time connection to verify SSA Title II income at intake and again at renewal.
3. State Wage Information Collection Agency (SWICA)	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Monthly	State receives monthly feed post-enrollment for program integrity or if notified of changes. Law was passed in IL requiring specific employers with certain number of employees to submit monthly

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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
												wage information. This is being phased in (from quarterly). However, for other employer types, State is still requesting information quarterly.
4. State Unemployment Compensation	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Monthly	State receives monthly feed post-enrollment for program integrity or if notified of changes.
5. State Administered Supplementary Payment Program	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Monthly	State receives monthly feed post-enrollment for program integrity or if notified of changes.
6. State General Assistance Programs	No	No	No	Yes	No	No	No	No	No	No		The State General Assistance program has been discontinued in Illinois.
7. Supplemental Nutrition 8.	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Monthly	State receives monthly feed post-enrollment

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Assistance Program (SNAP)												for program integrity or if notified of changes. State uses this data source for raw income data (distinct from the MAGI calculation).
8. Temporary Assistance for Needy Families (TANF)	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Monthly	State receives monthly feed post-enrollment for program integrity or if notified of changes. State uses this data source for raw income data (distinct from the MAGI calculation).
9. Office of Child Support Enforcement (OCSE)	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Monthly	State receives monthly feed post-enrollment for program integrity or if notified of changes.
10. State Income Tax	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	No		State law mandates use of State Income Tax data. Age of this data may not be within the state's definition of

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Section B1. Use of Electronic Data Sources – Financial:

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												timeliness for usage in its eligibility determination.
11. Commercial database: (Please describe any commercial databases in the space below)												
The Work Number	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Yes		The state finds the Work Number useful and current for those individuals whose employers report. The state will access the Work Number information provided through individual state contract rather than through the Hub. State checks the Work

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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
												Number post-enrollment for program integrity purposes or if notified of changes needed.
12. Other: (Please describe any additional electronic data sources in the space below)												
PARIS	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Quarterly	Veterans' income information and potential TPL is investigated at redetermination or if high unreported income is identified.

* Footnote Option 2 - The state marked any criterion YES if it was considered as a reason the data source was determined useful/not useful.

MAGI-BASE ELIGIBILITY VERIFICATION PLAN

Date Updated: 5/10/2024

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State: Illinois

Section B1. Use of Electronic Data Sources – Financial:

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State: Illinois

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	No	Yes	Yes	Yes	Monthly	The state reviews the DOB data from SSA. If there is a discrepancy between applicant reported DOB and SSA, the state will request an explanation and/or paper documentation from the individual. Utilized at renewal and post-enrollment for Medicare verification.
2. Department of Homeland Security (DHS) SAVE	Yes	No	No	Yes	No	No	No	No	No	No	No	Yes	Yes	Yes	Yes	Other (specify in comments)	The state uses information from the federal HUB for Step 1 of the process. If the status is not confirmed, the state uses existing SAVE data matches (manual process) to complete Steps 2 and 3.
3. Vital Statistics	Yes	No	Yes	No	No	Yes	No	No	No	No	No	No	Yes	No	No	Other (specify in comments)	Vital records may be used for citizenship and Age/DOB verification at the

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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
																	secondary level if the electronic interface with SSA fails to confirm. Data source may be used to verify Caretaker Relative service if discrepancy is discovered.
4. Department of Motor Vehicles (DMV)	Yes	No	No	No	Yes	No	No	No	No	No	No	No	Yes	Yes	No		
5. Temporary Assistance for Needy Families (TANF)	Yes	No	No	No	Yes	No	No	Yes	No	No	No	No	Yes	Yes	No		For those known through the TANF program, the state will use the IES system to verify caretaker relative status
6. Supplemental Nutrition Assistance Program	Yes	No	No	No	Yes	No	No	Yes	No	No	No	No	Yes	Yes	No		For those known through the SNAP program, the state will use the IES system to verify caretaker relative status
7. Office of Child Support Enforcement	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No		Does not provide relevant non-financial information.
8. State General Assistance Programs	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No		The State General Assistance program has been discontinued in Illinois.

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Electronic Data Source	To Be Used (Y/N)	Social Security Number	Citizenship	Immigration Status	Residency	Age/DOB	Pregnancy	Household Composition	Caretaker Relative	Medicare	Application for other Benefits	Other	Data Source Used at Application (Y/N)	Data Source Used at Renewal (Y/N)	Data Source Used Post-Enrollment (Y/N)	If Used for Post-Enrollment Frequency Used (i.e. monthly, quarterly)	Comments
9. Women, Infants and Children Program (WIC)	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No		The Illinois WIC program verifies against Medicaid data rather than vice-versa.
10. State Income Tax	Yes	Yes	No	No	Yes	No	No	No	No	No	No	No	Yes	No	No		The state income tax data will be used for verifying residency and SSN at a secondary level. This data is requested as frequently as necessary to determine eligibility. Only use for SSN if verified with SSA first.
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	Yes	Yes	Quarterly	PARIS involves matching people who are already enrolled to verify if applicant has coverage in another State and as a back-up for Residency. It is not useful for

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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
																	making initial eligibility determinations.
13. Other: (Please describe additional electronic data sources in the space provided below)																	

* 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.

(Insert Medicaid, CHIP or Both): Medicaid & CHIPState: Illinois**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) If Yes, please describe in comments	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	HFS takes all reasonable measures to ascertain the legal liability of third party payers via the cross match of eligible recipients/clients with Illinois health insurance carriers as required by Section 6035 of the Deficit Reduction Act of 2005. These same policies apply to IL's Medicaid Expansion applicants as well. (Similarly, for IL's Medicaid Expansion population, questions 2-6 are N/A).
2. Applicant does not have access to affordable ESI					N/A	Illinois' Title XXI State Plan Amendment #8 has been approved. This criteria is applied at renewal to cases with income in excess of 200% FPL.
3. When child has had coverage (as applicable to					N/A	

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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) If Yes, please describe in comments	Paper Documentation Required from the Individual (Y/N)	Non-Applicable (N/A)	Comments
states' waiting period)						
4. Access to public employee coverage					N/A	Illinois covers children with access to public employee coverage at state expense.
5a. Waiting period exception #1 (describe):					N/A	
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	

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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) If Yes, please describe in comments	Paper Documentation Required from the Individual (Y/N)	Non-Applicable (N/A)	Comments
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)						

(Insert Medicaid, CHIP or Both): Medicaid & CHIPState: Illinois**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):	We have already determined that the security regulations, timeliness elements, and other administrative complexities make using the IRS data for FTI unduly burdensome. Additionally the data may not be used for other programs, (SNAP, Cash) rendering this program less useful for our integrated eligibility system. However we use electronic data that is necessary to determine initial eligibility and redeterminations, both financial and non- financial, when it is available and provides the information required in an acceptable timeframe, as evidenced by the numerous sources we cited in our earlier responses in this document. Paper documentation is requested from the applicant/ recipient when we do not accept self-attestation and there is no accessible electronic source, or if there is a discrepancy that cannot be resolved with the information we have available. State intends to utilize multiple backup data sources such as Vital Records for citizenship, prior to requesting paper documentation.
2	Please describe how the state uses PARIS?	PARIS Interstate file is used to identify individuals potentially living in another state while receiving IL medical assistance. Contact by mail is made with the household to determine current IL residence. IL has not had a case on the Federal file for a number of years. The Veterans file is used to identify unbudgeted VA benefits and to work with veterans to identify enhanced benefits

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Section D. Additional Verification Questions

	Question	Response
		available from all sources. Veterans income information and potential TPL is investigated at redetermination or if high unreported income is identified. Interstate receipt of benefits are reviewed when identified on PARIS match.
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
). If (YES), please submit a letter to CMS requesting such approval describing how the state meets the following requirements: 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	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.	YES
	If (YES), please submit a letter to CMS requesting such approval describing how the state meets the following requirements:	Illinois has a permanent Hub waiver dated 2/14/14 for SSA Title II and SAVE VLP Steps 2 & 3.

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Section D. Additional Verification Questions

	Question	Response
	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.	
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

The state reserves the right to investigate any identified discrepancy between what an individual reports and any other source of information concerning an eligibility factor. If electronic verification is not available or current, the state requests documentation to verify eligibility.

Section A: updates from 5/10/24 are effective 6/1/24.

Section B1. Additional Comments

The state reserves the right to investigate any identified discrepancy between what an individual reports and any other source of information concerning an eligibility factor. If electronic verification is not available or current, the state requests documentation to verify eligibility.

Section B2. Additional Comments

The state reserves the right to investigate any identified discrepancy between what an individual reports and any other source of information concerning an eligibility factor. If electronic verification is not available or current, the state requests documentation to verify eligibility.

Section C. Additional Comments-Updates from 5/10/24 are effective 6/1/24.