Helping Consumers Resolve Data Matching Issues (DMIs)

Centers for Medicare & Medicaid Services (CMS)
Center for Consumer Information & Insurance Oversight (CCIIO)

April 14, 2022
Disclaimer

The information provided in this presentation is intended only as a general, informal summary of technical legal standards. It is not intended to take the place of the statutes, regulations, and formal policy guidance that it is based upon. This presentation summarizes current policy and operations as of the date it was presented. Links to certain source documents have been provided for your reference. We encourage audience members to refer to the applicable statutes, regulations, and other interpretive materials for complete and current information about the requirements that apply to them. The contents of this document do not have the force and effect of law and are not meant to bind the public in any way, unless specifically incorporated into a contract. This document is intended only to provide clarity to the public regarding existing requirements under the law.

This document generally is not intended for use in the State-based Marketplaces (SBMs) that do not use HealthCare.gov for eligibility and enrollment. Please review the guidance on our Agent and Broker Resources webpage (http://go.cms.gov/CCIIOAB) and Marketplace.CMS.gov to learn more.

Unless indicated otherwise, the general references to “Marketplace” in the presentation only include Federally-facilitated Marketplaces (FFMs) and State-based Marketplaces on the Federal Platform (SBM-FPs).

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Why are DMIs Generated?

» A consumer’s data may not match information at our trusted data sources

» A trusted data source may not have data for a consumer

» Information is missing or incorrect on the application
  o A consumer failed to provide a Social Security Number (SSN) on their application
  o A consumer failed to provide all household income on the application
  o A consumer’s name used for their application differs from how it appears on their citizenship document or other document
  o A consumer failed to provide their immigration document numbers and ID numbers
General Tips for Avoiding All DMI Types

- Complete all possible fields in the application
- Non-applicants in the household are strongly encouraged to provide an SSN if they have one
- Ensure consumer’s name matches documents such as their Social Security card
- Double check that the information on the application is complete and that there are no errors or typos
Acceptable Documents to Resolve Citizenship DMIs

» U.S. passport
» Certificate of Naturalization (N-550/N-570)
» Certificate of Citizenship (N-560/N-561)
» State-issued enhanced driver's license (available in Michigan, New York, Vermont, and Washington)
» Document from federally recognized Indian tribe that includes your name and the name of the **federally recognized Indian tribe** that issued the document, and shows your membership, enrollment, or affiliation with the tribe. Documents you can provide include:
  o A Tribal enrollment card
  o A Certificate of Degree of Indian Blood
  o A Tribal census document
  o Documents on Tribal letterhead signed by a Tribal official
If a consumer doesn’t have any of the documents listed on the previous slide, they can provide two (2) documents – one (1) from each column below.

One (1) of these:
- U.S. public birth certificate
- Consular Report of Birth Abroad (FS-240, CRBA)
- Certification of Report of Birth (DS-1350)
- Certification of Birth Abroad (FS-545)
- U.S. Citizen Identification Card (I-197 or the prior version I-179)
- Northern Mariana Card (I-873)
- Final adoption decree showing the person’s name and U.S. place of birth
- U.S. Civil Service Employment Record showing employment before June 1, 1976
- Military record showing a U.S. place of birth
- U.S. medical record from a clinic, hospital, physician, midwife or institution showing a U.S. place of birth
- U.S. life, health or other insurance record showing U.S. place of birth
- Religious record showing U.S. place of birth recorded in the U.S.
- School record showing the child’s name and U.S. place of birth
- Federal or State census record showing U.S. citizenship or U.S. place of birth
- Documentation of a foreign-born adopted child who received automatic U.S. citizenship (IR3 or IH3)

AND one (1) of these documents (that has a photograph or other information, like your name, age, race, height, weight, eye color, or address):
- Driver’s license issued by a State or Territory, or ID card issued by the Federal, state, or local government
- School identification card
- U.S. military card or draft record or Military dependent’s identification card
- U.S. Coast Guard Merchant Mariner card
- Voter Registration Card
- A clinic, doctor, hospital, or school record, including preschool or day care records (for children under 19 years old)
Acceptable Documents to Resolve Immigration DMIs

A consumer may need to have one (1) or more of the following documents when they apply for and enroll in Exchange coverage.

- I-327 Reentry Permit
- I-551 Permanent Resident Card
- I-571 Refugee Travel Document
- Machine-readable Immigrant Visa (MRIV) with Temporary I-551 Notation
- Temporary I-551 Stamp on Foreign Passport
- Unexpired Foreign Passport
- I-94 Arrival/Departure Record with a foreign passport
- I-20 Certificate of Eligibility for Non-immigrant (F-1) Student Status
- DS-2019 Certificate of Eligibility for Exchange Visitor (J-1) Status
- I-766 Employment Authorization Card
- I-797A,B,C,D,E, or F Notice of Action and I-485 or I-360 if included
- Document indicating a member of a federally recognized Indian tribe or American Indian born in Canada
- Office of Refugee Resettlement (ORR) eligibility letter (if under 18)
- Resident of American Samoa Card
Acceptable Documents List to Resolve Annual Income DMIs

- Tax Return
- Wages and Tax Statement (W-2)
- Tax Statement Form SSA 1042
- Pay Stub
- Letter from employer
- Cost of living adjustment letter and other benefit verification notices
- Lease agreement (for household members who are lessors)
- Copy of a check paid to the household member
- Bank or investment fund statement
- Self-employed ledger
- Letter from government agency for unemployment benefits
- Document or letter from Social Security Administration (SSA)
- Form SSA 1099 Social Security Benefits Statement
- Court records for alimony and records of agency through which alimony is paid
- Legal documents that establish amount and frequency of alimony
- IRS tax refunds
- 1065 schedule K1 with schedule E
- Receipts from all allowable expenses
- Signed time sheets with receipt of payroll
- Most recent quarterly or year-to-date profit and loss statement
- Annuities
- Pensions from any government or private source
- Workers’ compensation documentation
- Prizes, settlements and awards, including court ordered awards
- Proceeds of life insurance policies
- Gifts and contributions
- Inheritance in cash or property
- Rental income
- Strike pay or other benefits from unions
- Money from the sale, exchange, or replacement of items a consumer owns
- Interests on dividend income
- Proceeds of a loan
- Royalties
- Bonus or incentive payments
- Severance pay
- Sick pay
- Disability payments
- Deferred compensation payments
Acceptable Documents List to Resolve American Indian/Alaska Native DMIs

- Tribal Enrollment/Membership Card (in a federally recognized Indian Tribe)
- Authentic document from a tribe declaring membership for an individual
- U.S. American Indian/Alaska Native tribal enrollment or shareholder documentation
  - Enrollment or membership document from a federally-recognized tribe or the Bureau of Indian Affairs (BIA). It must be on tribal letterhead or an enrollment/membership card that contains the tribal seal and/or an official signature
  - Document issued by an Alaska Native village/tribe, or an Alaska Native Corporation Settlement Act (ANCSA) regional or village corporation acknowledging shareholder status
- Certificate of Degree of Indian Blood (CDIB) issued by the BIA or a tribe, if the CDIB includes tribal enrollment information
- Letter from the Exchange granting a tribal exemption based on tribal membership or Alaska Native shareholder status
- I-872 American Indian Card (Texas and Oklahoma Kickapoo American and Mexican members)
# Impact of DMI Expiration

<table>
<thead>
<tr>
<th>DMI</th>
<th>Expiration Description</th>
<th>Impact</th>
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<tbody>
<tr>
<td><strong>Annual Income</strong></td>
<td>Applicant is unable to document annual household income is within 25% or $6,000 of attested income</td>
<td>Household’s eligibility for financial assistance is adjusted, possibly to nothing, based on the level of income on record with Exchange trusted data sources</td>
</tr>
<tr>
<td><strong>Citizenship/Immigration</strong> <em>(Cit/Imm)</em></td>
<td>Consumer is unable to verify an eligible citizenship or lawful presence status</td>
<td>Consumer loses their eligibility for Exchange coverage and is terminated if enrolled</td>
</tr>
<tr>
<td><strong>American Indian/Alaskan Native</strong> <em>(AIAN)</em> Status</td>
<td>Consumer is unable to verify they are a member of a Federally recognized tribe or shareholder in an Alaska Native corporation <em>(ANCSA)</em></td>
<td>Consumer loses their eligibility for financial assistance provided specifically to members of Federally recognized tribes, which is eliminated if enrolled</td>
</tr>
<tr>
<td><strong>Non-Employer Sponsored Coverage</strong> <em>(non ESC MEC)</em></td>
<td>Consumer is unable to verify they are not eligible/enrolled in Non-Employer Sponsored Coverage</td>
<td>Consumer loses their eligibility for financial assistance, which is eliminated if enrolled</td>
</tr>
<tr>
<td><strong>ESC MEC</strong> <em>(OPM Only)</em></td>
<td>Consumer is unable to verify they are not eligible/enrolled in Employee Sponsored Coverage from OPM</td>
<td>Consumer loses their eligibility for financial assistance, which is eliminated if enrolled</td>
</tr>
</tbody>
</table>
URGENT: Reminder About Submitting Documents for DMIs

Large numbers of consumers are now **running out of time** to submit documents to resolve their data matching issues.

Consumers who do not resolve their issues will **lose Advanced Payments of the Premium Tax Credit (APTC) or coverage.**

Agents and brokers will **lose commissions** for many of these consumers if documents are not submitted and issues not resolved.

**Check consumer accounts NOW** and have consumers submit any needed documents.

Resources for Consumers and Assisters/Agents/Brokers


» DMI Blog Post: https://www.healthcare.gov/blog/the-marketplace-might-need-more-information-from-you/


The “Family Glitch” and IRS Proposed Rule for Affordability of ESC for Family Members of Employees

What is the “Family Glitch”? 
» The current affordability calculation for offers of Employer Sponsored Coverage (ESC) only accounts for a consumer's self-only premium, as opposed to the family premium, even if the coverage is offered to more than one (1) person.

» Because of this, an offer of ESC may be considered affordable for an employee and their dependents, even if the cost of covering everyone offered coverage would exceed the affordability threshold. This is called the “family glitch.”

Internal Revenue Service (IRS) Proposed Rule 
» On Thursday, April 7, the IRS released a proposed rule that would amend existing regulations regarding eligibility for premium tax credits (PTCs) and update the calculation used to assess the affordability of an offer of ESC so that the cost of the family premium is used to determine whether an employee’s household members have an offer of affordable ESC, rather than the cost of the individual premium.

To submit public comments on the purposed rule visit, https://www.regulations.gov/ (indicate IRS and REG-114339-21). Once submitted to the Federal eRulemaking Portal, comments cannot be edited or withdrawn. Both written and electronic comments must be received by June 6, 2022. A public hearing has been scheduled for Monday, June 27, 2022, at 10:00 a.m. EDT.
## Agent/Broker Marketplace Help Desks and Call Centers

<table>
<thead>
<tr>
<th>Name</th>
<th>Phone # and/or Email Address</th>
<th>Types of Inquiries Handled</th>
<th>Hours (Closed Holidays)</th>
</tr>
</thead>
</table>
| **Marketplace Service Desk** | 1-855-CMS-1515              | • CMS Enterprise Portal password resets and account lockouts  
• Other CMS Enterprise Portal account issues or error messages  
• General registration and training questions (not related to a specific training platform)  
• Login issues on the DE agent/broker landing page  
• Technical or system-specific issues related to the MLMS  
• User-specific questions about maneuvering in the MLMS site, or accessing training and exams |
|                             | 1-855-267-1515              | Monday-Friday  
8:00 AM–8:00 PM ET  
October–November only: Saturday-Sunday 10:00 AM–3:00 PM ET |
| **Agent/Broker Email Help Desk** | FFMProducer-AssisterHelpDesk@cms.hhs.gov | • General enrollment and compensation questions  
• Manual identity proofing/Experian issues  
• Escalated general registration and training questions (not related to a specific training platform)  
• Agent/Broker RCL issues  
• Find Local Help listing issues  
• Help On Demand participation instructions or questions  
• Report concerns that a consumer or another agent or broker has engaged in fraud or abusive conduct |
|                             |                             | Monday-Friday  
8:00 AM–6:00 PM ET |
| **Marketplace Call Center**  | 1-855-788-6275              | Specific consumer application questions related to:  
• Password reset for a consumer HealthCare.gov account,  
• SEP not available on the consumer application, or  
• Consumer specific eligibility and enrollment questions |
| Agent/Broker Partner Line    | Note: Enter your NPN to access this line.  
TTY users 1-855-889-4325 | Monday-Sunday 24 hours/day |

A full list of Agent/Broker Help Desks and Call Centers is available from the Agent and Broker Resources webpage ([http://go.cms.gov/CCIIOAB](http://go.cms.gov/CCIIOAB)) under Quick Links.
### Acronym Definitions

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<tr>
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<tr>
<td>AIAN</td>
<td>American Indian/Alaskan Native</td>
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<td>ANCSA</td>
<td>Alaska Native Corporation Settlement Act</td>
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<tr>
<td>APTC</td>
<td>Advance Payments of the Premium Tax Credit</td>
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<tr>
<td>BIA</td>
<td>Bureau of Indian Affairs</td>
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<tr>
<td>CCIIO</td>
<td>Center for Consumer Information and Insurance Oversight</td>
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<tr>
<td>CDIB</td>
<td>Certificate of Degree of Indian Blood</td>
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<tr>
<td>CMS</td>
<td>Centers for Medicare &amp; Medicaid Services</td>
</tr>
<tr>
<td>DMI</td>
<td>Data Matching Issue</td>
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<tr>
<td>ESC</td>
<td>Employer Sponsored Coverage</td>
</tr>
<tr>
<td>IRS</td>
<td>Internal Revenue Service</td>
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<tr>
<td>MEC</td>
<td>Minimum Essential Coverage</td>
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<td>MRIV</td>
<td>Machine-readable Immigrant Visa</td>
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<td>OPM</td>
<td>Office of Personnel Management</td>
</tr>
<tr>
<td>ORR</td>
<td>Office of Refugee Resettlement</td>
</tr>
<tr>
<td>PTC</td>
<td>Premium Tax Credits</td>
</tr>
<tr>
<td>SSA</td>
<td>Social Security Administration</td>
</tr>
<tr>
<td>SSN</td>
<td>Social Security Number</td>
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# Agent and Broker Resources

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<tr>
<th>Resource</th>
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<tr>
<td>Agent and Broker Resources webpage</td>
<td><a href="http://go.cms.gov/CCIIOAB">http://go.cms.gov/CCIIOAB</a></td>
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<tr>
<td>CMS Enterprise Portal</td>
<td><a href="https://portal.cms.gov/">https://portal.cms.gov/</a></td>
</tr>
<tr>
<td>Agent and Broker FFM Registration Completion List</td>
<td><a href="https://data.healthcare.gov/ffm_ab_registration_lists">https://data.healthcare.gov/ffm_ab_registration_lists</a></td>
</tr>
<tr>
<td>Agent and Broker Marketplace Registration Tracker</td>
<td><a href="https://data.healthcare.gov/ab-registration-tracker/">https://data.healthcare.gov/ab-registration-tracker/</a></td>
</tr>
<tr>
<td>Find Local Help Tool</td>
<td><a href="https://www.healthcare.gov/find-assistance/">https://www.healthcare.gov/find-assistance/</a></td>
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<tr>
<td>Agent and Broker NPN Search Tool</td>
<td><a href="http://www.nipr.com/PacNpnSearch.htm">www.nipr.com/PacNpnSearch.htm</a></td>
</tr>
<tr>
<td>Issuer and Direct Enrollment Partner Directory</td>
<td><a href="https://data.healthcare.gov/issuer-partner-lookup">https://data.healthcare.gov/issuer-partner-lookup</a></td>
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<tr>
<td>See Plans and Prices Tool</td>
<td><a href="https://www.healthcare.gov/see-plans/#/">https://www.healthcare.gov/see-plans/#/</a></td>
</tr>
<tr>
<td>Agent and Broker FAQs website</td>
<td><a href="https://www.agentbrokerfaq.cms.gov/s/">https://www.agentbrokerfaq.cms.gov/s/</a></td>
</tr>
<tr>
<td>Privacy and Security FAQ page</td>
<td><a href="https://www.agentbrokerfaq.cms.gov/s/topic/0T0t0000000TUeLGAW/privacy-and-security-requirements">https://www.agentbrokerfaq.cms.gov/s/topic/0T0t0000000TUeLGAW/privacy-and-security-requirements</a></td>
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</table>
Agents and brokers are valued partners to all of us at CMS for the vital role you play in enrolling consumers in qualified health coverage.

We thank you for the trusted advice, support, and assistance you provide throughout the year and wish you continued success!