

# Resolving Data Matching Issues (DMIs)

This job aid provides information and guidance for Navigators and certified application counselors (collectively, assisters) when helping consumers resolve data matching issues (DMIs) (or “inconsistencies”).

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Version 1.0. March 2024. This information is intended only for the use of entities and individuals certified to serve as Navigators, certified application counselors, or non-Navigator assistance personnel in a Federally-facilitated Marketplace. The terms “Federally-facilitated Marketplace” and “FFM,” as used in this document, include FFMs where the state performs plan management functions. Some information in this manual may also be of interest to individuals helping consumers in State-based Marketplaces and State-based Marketplaces using the Federal Platform. This material was produced and disseminated at U.S. tax filer expense.

## Overview

After a consumer submits a Marketplace application, they may generate a data matching issue (DMI) (or “inconsistency”) if the Marketplace can’t confirm the application information the consumer provides on their application. The Marketplace alerts the consumer to any DMIs on their eligibility determination notice (EDN), provides a deadline for resolving DMIs, and instructs them to submit document copies to the Marketplace to confirm their information and resolve the DMI. Generally, DMIs are generated if:

- A consumer’s information doesn’t match information from the Marketplace’s trusted data sources.
- A trusted data source doesn’t have information for a consumer.
- Information is missing or incorrect on the application because the consumer failed to:
  - Provide a Social Security Number (SSN) on their application.
  - Provide all household income on the application, if applying for financial assistance. Income must be projected for all household members, even those not applying for coverage.
  - Enter their name exactly how it appears on their citizenship document or other document.
  - Provide their immigration document numbers and ID numbers.

The most common types of DMIs are income, citizenship, and immigration. Consumers may encounter other DMIs related to the following types of application information:

- American Indian or Alaska Native status
- Minimum essential employer-sponsored coverage
- Coverage through: Medicaid or the Children’s Health Insurance Program (CHIP)
- Coverage through: TRICARE
- Coverage through: Veterans Health Care Program
- Coverage through: Medicare
- Coverage through: Peace Corps

If a consumer has a DMI, their EDN will indicate “Your eligibility is temporary” and will provide a timeframe for submitting documents to confirm information. Consumers can also determine whether they have an unresolved DMI by reviewing the “Application Details” section of their Marketplace account for a list of all unresolved inconsistencies.

## DMI Notices and Consumer Outreach

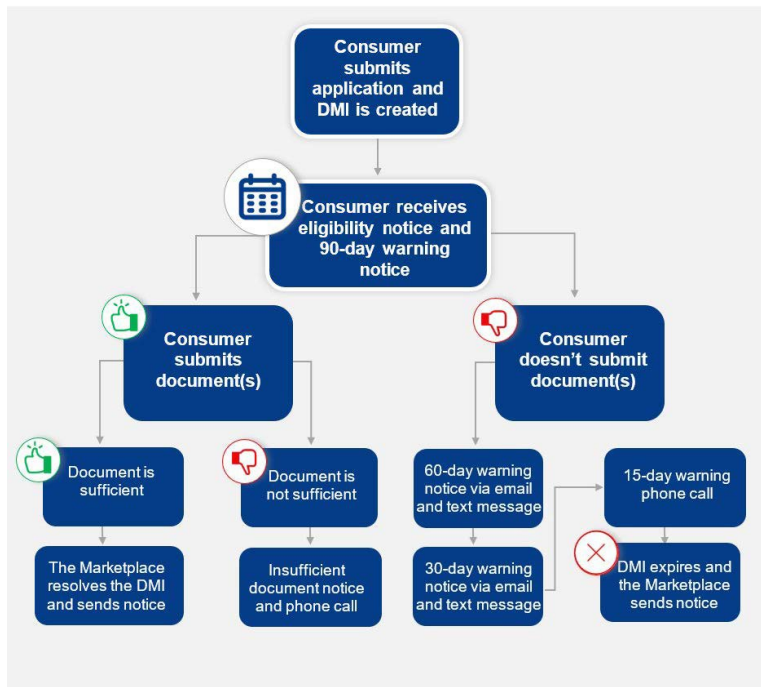
Consumers with DMIs have 90 days from the date of the eligibility notice to resolve the issue, with the exception of citizenship/immigration DMIs, for which consumers have 95 days from the date of the eligibility notice to resolve the issue. As of June 18, 2023, consumers who are unable to submit documents to verify their income attestation within 90 days will receive an additional 60 days to resolve an income-related DMI, at the option of the Exchange.<sup>i</sup>

To resolve a DMI, a consumer must submit required documents to the Marketplace so it can make a final eligibility determination. Consumers with DMIs will receive 90-, 60-, and 30-day warning notices (based on communication preferences)—as well as a phone call and email—to ask for documents if the DMI has not been resolved. The Marketplace will determine if the documents are sufficient to resolve the DMI:

- If the documents are sufficient, the DMI is resolved, and the consumer is notified.
- If the documents are insufficient, the consumer is notified and must submit additional documents to resolve the DMI.

Exhibit 1 displays a flowchart of the consumer outreach timeline:

**Exhibit 1 - DMI Notices and Consumer Outreach**



*\*Note: Consumers with citizenship and immigration DMIs receive warning notices and emails 65 days and 35 days after receiving their EDN.*

## Documents for Resolving a DMI

Both the consumer’s EDN and the 90-day warning notice the Marketplace will send provide a list of acceptable documents the consumer can submit to resolve their DMI. Exhibit 2 provides a partial list of some of the acceptable documents consumers can submit to resolve the most common DMIs. For a full list of acceptable documents for all DMIs, visit [How do I resolve a data matching issue?](#).

**Exhibit 2 - Acceptable Documents to Resolve Certain Common DMIs**

DMI Type	Acceptable Documents to Resolve Certain Common DMIs
<p><b>Annual Income</b></p>	<ul style="list-style-type: none"> <li>▪ Federal or state tax return</li> <li>▪ Wages and tax statement (W-2)</li> <li>▪ Pay stub</li> <li>▪ Self-employment ledger or documentation</li> <li>▪ Document or letter from the SSA</li> <li>▪ Unemployment benefits letter</li> </ul>
<p><b>Citizenship</b></p>	<ul style="list-style-type: none"> <li>▪ U.S. passport</li> <li>▪ Certificate of Naturalization (N-550/N-570)</li> <li>▪ Certificate of Citizenship (N-560/N-561)</li> <li>▪ Document from a federally recognized Indian tribe</li> </ul> <p>If consumers don’t have any of the above documents, they can submit one of the following documents:</p> <ul style="list-style-type: none"> <li>▪ U.S. public birth certificate</li> <li>▪ Consular Report of Birth Abroad (FS-240, CRBA)</li> <li>▪ Certification of Report of Birth (DS-1350)</li> <li>▪ Certification of Birth Abroad (FS-545)</li> <li>▪ U.S. Citizen identification card (I-197 or the prior version, I-179)</li> </ul> <p><b>And</b> one of these documents:</p> <ul style="list-style-type: none"> <li>▪ Driver’s license issued by a state or territory, or ID card issued by the Federal, state, or local government</li> <li>▪ School ID card</li> <li>▪ U.S. military card or draft record or military dependent’s ID card</li> <li>▪ Voter registration card</li> </ul>

DMI Type	Acceptable Documents to Resolve Certain Common DMIs
<b>Immigration</b>	<ul style="list-style-type: none"> <li>▪ Permanent Resident card, or “Green Card” (I-551)</li> <li>▪ Reentry permit (I-327)</li> <li>▪ Temporary I-551 stamp (on a foreign passport or I-94/I-94A)</li> <li>▪ Arrival/Departure record (I-94/I-94A)</li> <li>▪ Unexpired foreign passport</li> <li>▪ Certificate of eligibility for non-immigrant student status (I-20)</li> <li>▪ Employment Authorization Card (I-766)</li> </ul>
<b>American Indian/Alaska Natives (AI/AN)</b>	<ul style="list-style-type: none"> <li>▪ Tribal enrollment/membership card from a federally recognized Indian tribe</li> <li>▪ Authentic document from a federally recognized tribe declaring membership for an individual</li> <li>▪ U.S. AI/AN tribal enrollment or shareholder documentation</li> <li>▪ Certificate of Degree of Indian Blood (CDIB) issued by the Bureau of Indian Affairs (BIA) or a tribe, if the CDIB includes tribal enrollment information</li> <li>▪ Letter from the Exchange granting a tribal exemption based on tribal membership or Alaska Native shareholder status.</li> </ul>

## Household Income DMIs

One of the most common DMIs is the Household Income DMI. The Marketplace verifies consumers’ income to provide the correct financial assistance and to help protect against owing money back when filing annual federal income tax returns. Financial assistance for Marketplace plans is based on:

- Consumers’ expected household income for the year they want coverage, not last year’s income.
  - Consumers may have the option to enter their income as monthly or yearly.
- Income is counted for applicants, their spouses, and everyone who they will claim as a tax dependent on their federal income tax return. Remember to include all the household members’ income, even if they don’t need health coverage.
  - Tax Household = Tax filer + spouse + tax dependents

The Marketplace will ask you to submit documents to confirm your annual household income if:

- The Marketplace can't find a record of your income with its data sources.
- The expected income you listed on your application doesn't match the amount shown in Marketplace data sources.

If consumers don't send documents in a timely manner, or if the Marketplace can't verify the expected annual household income, consumers may be at risk of losing their financial assistance or having it adjusted to reflect the income information from the Marketplace's trusted data sources.

If consumers enroll and use any advance payments of the premium tax credit (APTC) amount during an inconsistency period, they must acknowledge that those payments are subject to reconciliation when they file federal income tax returns.

For more information on household income DMIs, visit the [How to Resolve Income Data Matching Inconsistencies \(DMIs\) webinar](#) and for more information in immigration and citizenship DMIs, visit the [Immigrant Eligibility for Marketplace and Medicaid and CHIP Coverage webinar](#) and [Health Coverage Options for Immigrants job aid](#).

## Assister Tips

- Explain to consumers that the Marketplace will continue to send them notices until the consumer resolves their DMI or the DMI expires.
  - If the DMI expires, the Marketplace will redetermine their eligibility based on the information the Marketplace received from trusted data sources and send the consumer a new EDN.
  - They must take action within the period provided to resolve the inconsistency and to keep their health coverage and financial assistance, if applicable, through the Marketplace.
- Remind consumers that during the DMI period, they will still be eligible for health coverage through the Marketplace and can continue to enroll in coverage consistent with the eligibility provided by the Marketplace.

Note: While DMIs are generated after a consumer submits an application, prior to submitting their Marketplace application, the Marketplace also checks with trusted sources to verify a consumer's identity; this process is (referred to as "ID proofing"). For more information on identity verification visit the [Identity Verification and Screening Questions microlearning module](#) and [CMS.gov/marketplace/outreach-and-education/your-marketplace-application.pdf](#).

## Resources

[Resolving an Income Data Issue microlearning module](#)

[Guide to Confirming Your Income Information](#)

[Health Coverage Options for Immigrants job aid](#)

[How do I resolve a data matching issue?](#)

[How to Resolve Income Data Matching Inconsistencies \(DMIs\) webinar](#)

[Identity Verification and Screening Questions](#)

[Immigrant Eligibility for Marketplace and Medicaid and CHIP Coverage webinar](#)

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<sup>i</sup> [FederalRegister.gov/documents/2023/04/27/2023-08368/patient-protection-and-affordable-care-act-hhs-notice-of-benefit-and-payment-parameters-for-2024](https://www.federalregister.gov/documents/2023/04/27/2023-08368/patient-protection-and-affordable-care-act-hhs-notice-of-benefit-and-payment-parameters-for-2024)

