Helping Consumers Resolve Data Matching Issues (DMIs)

Division of Eligibility Support, Marketplace Eligibility and Enrollment Group, CCIIO

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Table of Contents

I. Overview of Data Matching Issues (DMIs)

II. Tips For Preventing DMIs and Steps to Help Resolve DMIs

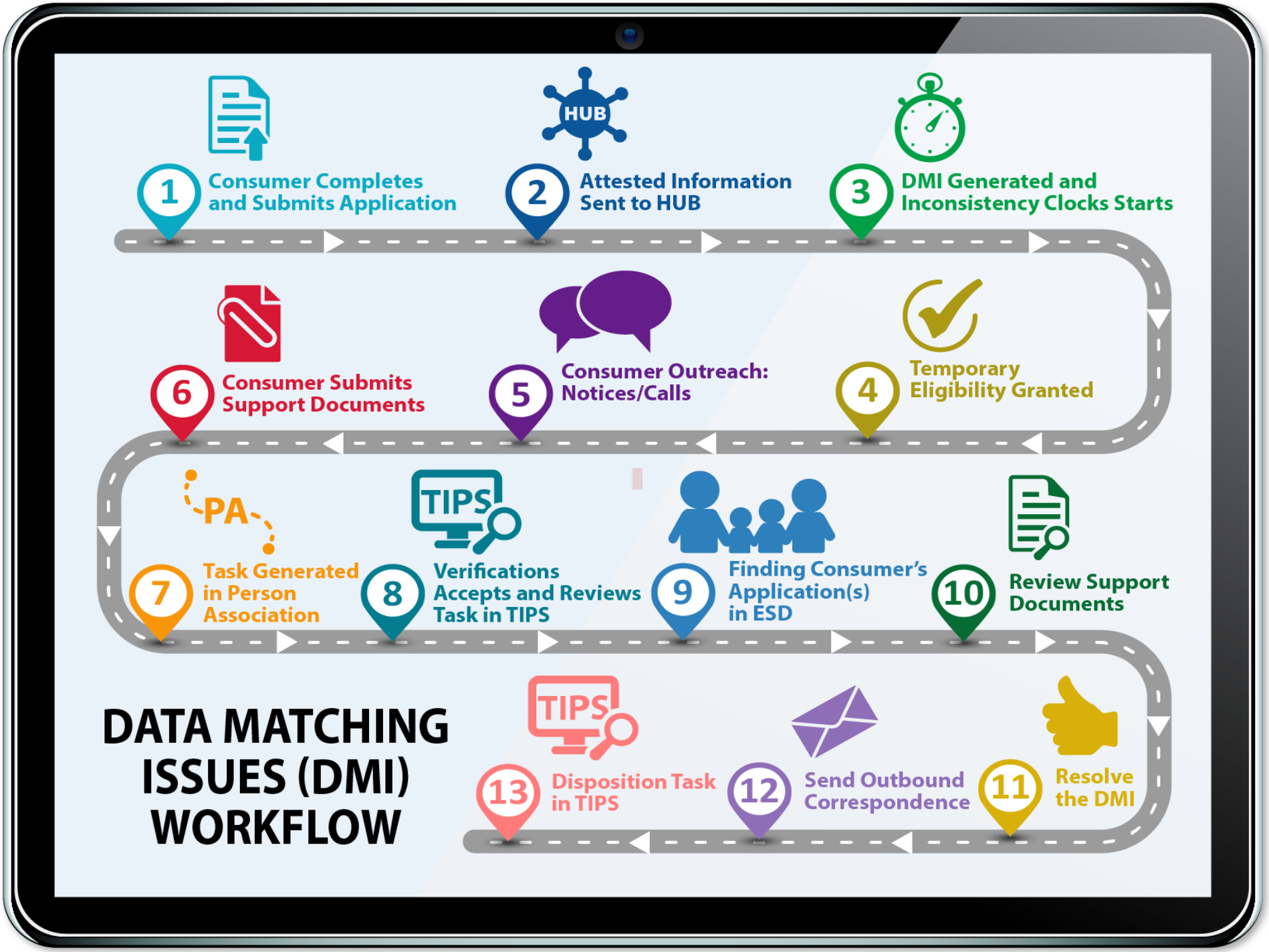
III. DMI Scenarios

IV. Resources

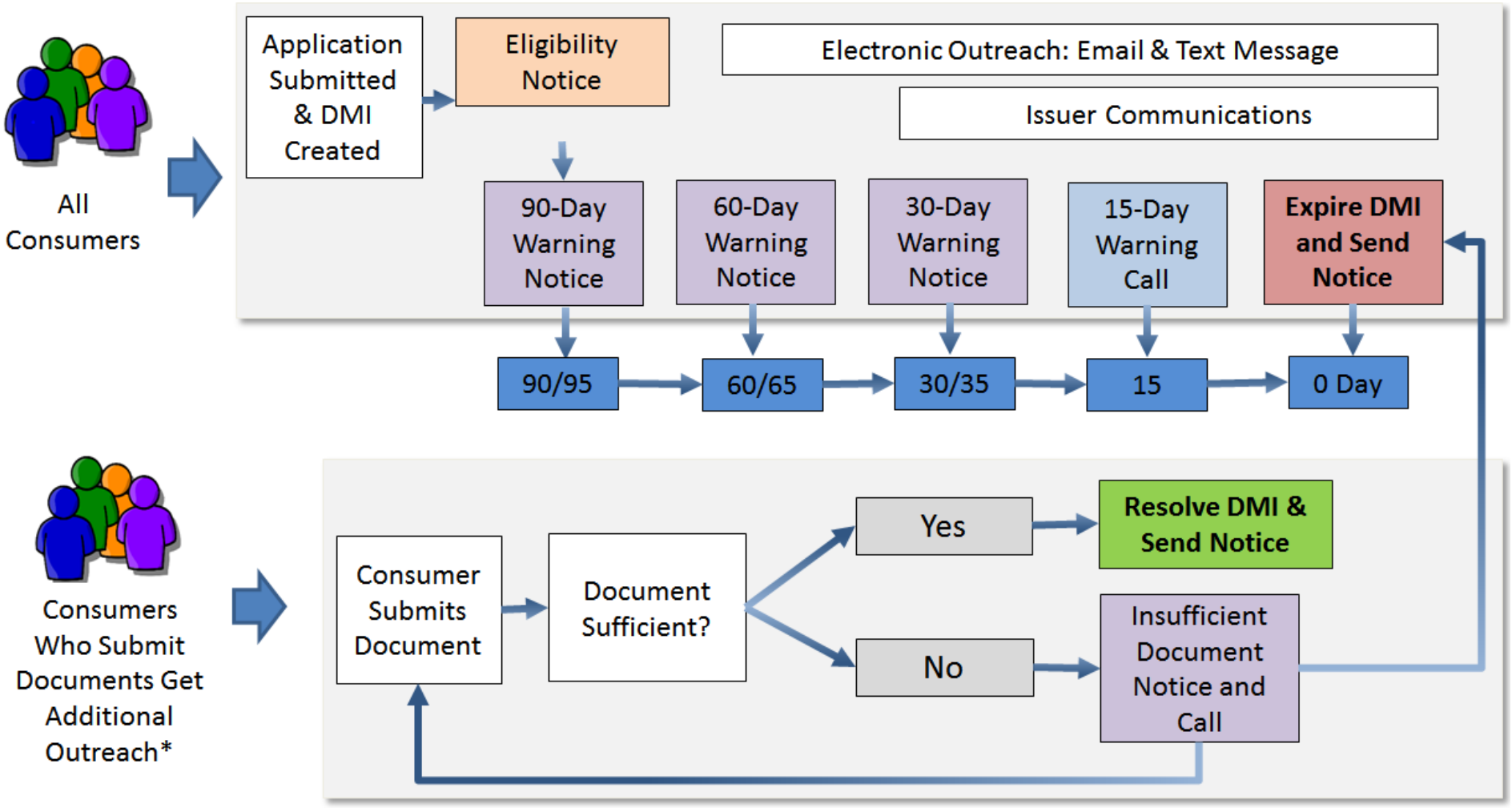
V. Appendices

- Appendix A: Why are DMIs Generated?
- Appendix B: Steps to Help Resolve DMIs
- Appendix C: Acceptable Documents List for each DMI Type

DMI Overview


1 Consumer Completes and Submits Application
HUB
2 Attested Information Sent to HUB
3 DMI Generated and Inconsistency Clocks Starts
4 Temporary Eligibility Granted
5 Consumer Outreach: Notices/Calls
6 Consumer Submits Support Documents
PA
7 Task Generated in Person Association
TIPS
8 Verifications Accepts and Reviews Task in TIPS
9 Finding Consumer's Application(s) in ESD
10 Review Support Documents
11 Resolve the DMI
12 Send Outbound Correspondence
TIPS
13 Disposition Task in TIPS
DATA MATCHING ISSUES (DMI) WORKFLOW

Consumer Outreach



* Consumers who submit documents can get additional notices and calls, which do not replace the notices and calls that all consumers receive.

Impact of DMI Expiration

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

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
  - A consumer failed to provide a Social Security Number (SSN) on their application
  - A consumer failed to provided all household income on the application
  - A consumer's name used for their application differs from how it appears on their citizenship document or other document
  - A consumer failed to provide their immigration document numbers and ID numbers

See Appendix A for more details about why DMIs are generated.

Tips for Preventing and Resolving DMIs

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General Tips for Preventing All DMI Types

Complete all possible fields in the application

Ensure consumer's name exactly matches documents such as their social security card

Non-applicants in the household are strongly encouraged to provide an SSN if they have one

Double check that the information on the application is complete and that there are no errors or typos

Steps to Help Resolve DMIs

1. Help confirm if the consumer has a DMI through My Account and notices
2. Help the consumer go back to the application to confirm the information that is included is correct
3. Help consumer submit document(s) online or by mail to resolve their DMI

See Appendix B: Steps to Help Resolve DMIs for additional details

DMI Scenarios

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Annual Income DMI Scenario

Jane Doe submits an application, which has an Annual Income DMI – she receives EN

Jane receives a 90-Day Warning Notice requesting documents sent by the Exchange

Jane sends in a W-2 that lists her income as $25,000 for 2017

The Exchange uses the W-2 and IVT to project Jane's income for 2018. Projected income = $25,000, but attested income = $14,000. Attested income is $9,000 (36%) less than projected, which is outside of the acceptable verification threshold (25% or 6,000)

Jane receives an insufficient document notice and call from the Exchange detailing the discrepancy

Jane receives 60 and 30-Day Warning Notices and e-mails from the Exchange

Jane receives a warning call from the Exchange (3 attempts are made at different times of day)

Jane does not respond and her issue remains open

DMI clock runs out and the DMI is expired by the Exchange , expiration notice sent

Jane's eligibility is rerun with the income information from the HUB and she loses APTC and CSR starting at the beginning of the next month. Jane receives a new EN.

Citizenship DMI Scenario

John Smith submits an application, which has a citizenship DMI – he receives an EN

John receives a 90-Day Warning Notice requesting documents sent by the Exchange

John receives a 60-Day Warning Notice from the Exchange and an e-mail from OC

John sends in a copy of his birth certificate

The Exchange reviews the birth certificate and finds it insufficient

John receives an insufficient document notice and call from the Exchange explaining that we need another document or a new set of documents

John receives a 30-Day Warning Notice

John uploads a copy of his drivers license

The Exchange reviews the license and resolves the DMI, and John receives a DMI resolution notice

John's coverage continues unchanged

Special Enrollment Period for Cit/Imm DMIs Resolved After Expiration

Consumers with **citizenship/immigration** DMIs who do not resolve within 95 days will have their Exchange coverage terminated.

If these consumers ultimately submit documentation to the Exchange and resolve their DMI, they can regain Exchange coverage through a Special Enrollment Period (SEP).

- The consumer can choose to enroll with a prospective or retroactive coverage date.

- If a consumer qualifies for a SEP to change plans or enroll in coverage, they will have 60 days from the beginning of the SEP to enroll.

Resources

Resources for Consumers and Assisters/Agents/Brokers

- **How do I Resolve an Inconsistency? Webpage:** https://www.healthcare.gov/help/how-do-i-resolve-an-inconsistency/
- **Tips to Resolve Outstanding Data Matching Issues Presentation:** https://marketplace.cms.gov/technical-assistance-resources/resolve-data-match-issues.pdf
- **Consumer Guide for Annual Data Matching Issues:** https://marketplace.cms.gov/outreach-and-education/household-income-data-matching-issues.pdf
- **DMI Blog Post:** https://www.healthcare.gov/blog/the-marketplace-might-need-more-information-from-you/
- **Sample Data Matching Notices to consumers:** https://marketplace.cms.gov/applications-and-forms/notices.html
- **How do I Upload a Document? Webpage:** https://www.healthcare.gov/help/how-to-upload-documents/
- **Uploading Documents Tips Webpage:** https://www.healthcare.gov/tips-and-troubleshooting/uploading-documents/
- **Tips for Submitting Supporting Documents to the Marketplace Presentation:** https://marketplace.cms.gov/technical-assistance-resources/submitting-supporting-documents.pdf
- **Five Things Assisters Should Know About Data Matching Terminations Factsheet:** http://marketplace.cms.gov/technical-assistance-resources/data-matching-terminations.pdf
- **Consumer Guide for Annual Household Income DMIs:** https://marketplace.cms.gov/outreach-and-education/household-income-data-matching-issues.pdf

Questions

Appendix A: Why are DMIs Generated?

Why are Annual Income DMIs Generated?

- Annual income data matching issues can be generated for a variety of reasons, including:
  - **A consumer failed to provide a SSN on their application**. Annual household income may not have been verified if the consumer didn't provide their SSN or the SSNs of all members of their household. Only applicants who have SSNs, and an applicant's household tax filer who has an SSN, are required to provide their SSNs, but providing them for all household members on the application helps the Exchange verify annual household income without generating DMIs.
  - **A consumer failed to provided all household income on the application**. Income must be projected for all household members, even those not applying for coverage.
  - **A consumer did not file taxes**. In order for the Exchange to match an applicant's annual household income data with IRS data, it's necessary for everyone in their household to have filed taxes, if they were required to do so. Without a tax return, the Exchange may not be able to verify the income information on the application.
  - **A consumer's household composition may have changed affecting their household annual income.** Verify that any changes were accounted for and included in the projected household annual income total on the application.

Why are Citizenship DMIs Generated?

- Citizenship data matching issues can be generated for a variety of reasons, including:
  - **A consumer failed to provide a SSN on their application**. Only applicants who have SSNs, and an applicant's household tax filer who has an SSN, are required to provide their SSNs, but providing them for all household members on the application can help the Exchange confirm citizenship with SSA.
  - **A consumer's name used for their application differs from how it appears on their citizenship document or other documents** (such as Social Security Number), and they did not provide their name as written on those documents.

Why are Immigration DMIs Generated?

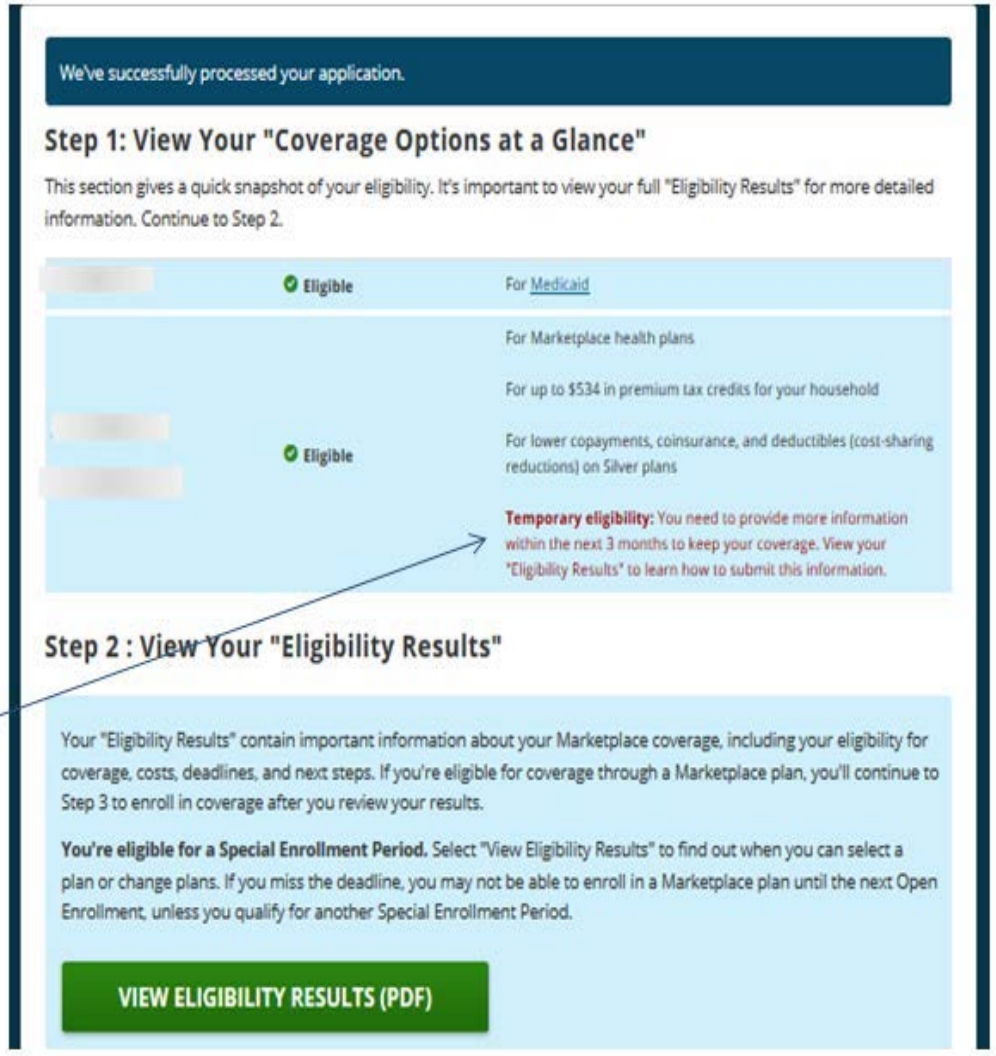
- Immigration data matching issues can be generated for a variety of reasons, including:
  - **A consumer's name used for the Exchange application differs from how it appears on their immigration document or other document** (such as Green Card), and they did not provide their name as written on those documents.
  - **A consumer failed to provide their immigration document numbers and ID numbers**, if applicable. This could include the Alien Number or "A # (sometimes also the USCIS number) or I-94 number.
    - Note: An applicant with an Alien number that is 7 or 8 digits should add 1 or 2 zeroes ("0" or "00") at the beginning so the number is 9 digits long.

Appendix B: Steps to Help Resolve DMIs

Step 1 to Resolve DMIs: Confirm the DMI

- **Help confirm if the consumer has a DMI**
  - Read the full eligibility determination notice from the Exchange. If a consumer has a data matching issue, the notice will say, “Send the Marketplace more information.” It is important to identify which members of the household have data matching issues that need to be resolved.
  - Consumers can also determine whether they have an unresolved data matching issue by checking the *Application Details* sections of their Marketplace accounts for a list of all unresolved inconsistencies.

An applicant with a DMI will see language in red that says “temporary eligibility.” This language alerts them that they must provide more information to keep their coverage.



Step 2 to Resolve DMIs: Update the Application

- **Help the consumer go back to the application to confirm the information that is included is complete and correct.**
  - Double check there are no errors or typos.
  - Confirm all members of the household applying for coverage have provided accurate SSNs, *if they have one.* Remember: non-applicants (other than the tax filer) are not required to provide their SSNs, but are strongly encouraged to do so if possible.
  - Review projected income to make sure it is as accurate as possible and remind consumers to report any changes in income or other application information within 30 days of the change.
  - Check their communication preferences for notifications from the Exchange to make sure they are getting the correct information.
  - If there are changes to their application resubmit the application to see if the consumer still has a data matching issue.
  - If a consumer's name used for the Exchange application differs from how it appears on their immigration document or other documents (such as Social Security card), advise the applicants to provide their name as written on those documents.

Step 3 to Resolve DMIs: Identify Documents

- **Help consumer submit document(s) to resolve their DMI**
  - Check the consumers EDN and DMI notices to confirm what documents need to be submitted
  - If the consumer has already submitted documents, confirm they are the correct type of documents for their DMI.
  - It may be necessary to submit multiple documents to resolve one DMI.
    - For example, consumers who submit birth certificates to prove citizenship will also need to submit an additional document that has a photograph **or** other information (i.e., name, age, race, height, weight, eye color, or address).

Step 4 to Resolve DMIs: Submit Documents

Tips for document submission:

- Not every document consumers may want to upload is included in the drop-down menu of *Document Types* viewable after clicking *Verify* in the *Application Details* section of consumers' *My Account*. If consumers need to upload a document that is not listed, they should choose "Other" from the drop-down menu.
  - Encourage consumers to upload their documents instead of mailing them. If the document is uploaded successfully, it should show up as *submitted* under *Application Details* right away.
  - Ensure that the documents consumers submit electronically are in one of the following formats: .pdf, .jpeg, .jpg, .gif, .xml, .png, .tiff, or .bmp, and are no larger than 10 megabytes.
- If consumers do mail in documents, tell them to send copies, not their originals, and to include the barcode from their notice and also include their name, state, and application ID on any documentation they are submitting.

Appendix C: Acceptable Documents List for each DMI Type

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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:
  - A Tribal enrollment card
  - A Certificate of Degree of Indian Blood
  - A Tribal census document
  - Documents on Tribal letterhead signed by a Tribal official

Acceptable Documents to Resolve Citizenship DMIs Continued

- **If a consumer doesn't have any of the documents listed on the previous slide, they can provide 2 documents – one from each column below.**

One 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 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

- You may need to have one or more of the following documents when you 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)

Acceptable Documents List to Resolve MEC DMIs

- Employee Sponsored Coverage (ESC) MEC
  - Cover Letter from employer coverage tool
  - Health insurance letter
  - Letter from employer that includes:
  - Eligibility dates if applicable
  - An attestation that the employer doesn't offer coverage to the employee/employee's family member
  - An attestation that the employer doesn't provide coverage that meets the minimum value standard
  - If the employer offers a plan that meets the minimum value standard, the cost o f the employee's share o f the premium for the lowest cost self only plan that meets the minimum value standard
- Non-ESC MEC
  - Health insurance letter, including coverage termination date
  - Statement of health benefits
  - Letter from Veterans Affairs and/or Veterans Administration
  - Letter from Peace Corps
  - Letter or statement of Medicare benefits
  - Letter or statement of Medicaid or Children's Health Insurance Program (CHIP) benefits