

477-000-004 – Verification Plan/Verification and Document Guide**Verification and Documentation Guide**

When making a determination of eligibility, it is necessary for the worker to document how the determination was made. All points of eligibility must be considered. Certain elements require verification while others require only that they be considered when determining eligibility. Throughout the process, the worker must record pertinent facts establishing why and how a particular determination was made.

Verification is the process by which the worker establishes the accuracy of the client's declaration. This is usually accomplished by viewing electronic data sources, documents, statements, or other pertinent materials which substantiate the client's statement.

Documentation is the process whereby the worker records facts pertaining to the verification process or means by which the worker establishes the point of eligibility or ineligibility.

Documentation consists of, but is not limited to, the following information:

1. A description of what is being verified or considered; i.e., checking account number 123 456 7, ABC Bank;
2. A description of the source and date of verification. Example: "See bank statement from ABC Bank dated 4-10-06 in the case record. Worker received bank statement from ABC Bank on 4-12-06 for the period from 1-1-06 to 3-31-06";
3. For a resource, description of current ownership, i.e., Mary and/or John Jones; and
4. Current value, i.e., checking account balance \$5.12.

For every element of eligibility, the case record must contain an explanation of how a determination regarding that point was made.

In all cases the worker shall check reasonable compatibility in determining whether to use more than the minimum verifications. If the worker doubts the validity of a particular verification, s/he should investigate further and determine if a referral is needed for the Special Investigation Unit.

Nebraska MAGI-Based Eligibility Verification Plan for Medicaid & CHIP (MAGI)

Eligibility Factor	Verification Source	Reasonable Compatibility/ Reasonable Explanation	Electronic Sources to be Utilized	Comments
Income	<p>Electronic data sources shall be utilized to verify income if available.</p> <p>If the electronic data sources are not available, reasonably compatible or a reasonable explanation does not apply, paper documentation will be required.</p>	<p>If an applicant/beneficiary attests to income below the applicable standard and the electronic data source indicates income above the applicable standard, a 10% threshold shall be applied. If the attested income and the electronic data source is within 10% or less, the income is reasonably compatible and no further action is required.</p> <p>A reasonable explanation shall be used if for example, the individual ended employment the month (March) before the application was made (April).</p>	<p>Internal Revenue Service (IRS), TALX, SEW, SSA, or unemployment. New hire matches (NHM) and Provider payments are a lead only (not to be used to verify income). Applicable information gathered from TANF and SNAP (I.e. current paystubs)</p>	<p>If the self-attested income and electronic data source is both below the applicable standard, the income is verified.</p> <p>If the self-attested income and electronic data source is both above the applicable income standard, the individual is ineligible for Medicaid.</p> <p>If the self-attested income is above and the electronic data source is below the applicable standard, the individual is ineligible for Medicaid.</p>

Eligibility Factor	Verification Source	Reasonable Compatibility	Electronic Sources to be Utilized	Comments
Residency	Self-Attestation without additional documentation shall be applied.	If the attested information is not reasonably compatible to information known to the agency, additional information shall be required.	No electronic data sources are available to verify residency.	Paper documentation is required if the self-attested information is not reasonably compatible. I.e. a copy of the clients lease or utility bill that shows the clients address.
Age (date of birth)	Electronic data sources shall be utilized to verify age if available.	If the attested information is not reasonably compatible to information known to the agency, additional information shall be required.	Social Security Administration (SSA), Vital Statistics, Department of Motor Vehicles (DMV), Office of Child Support Enforcement, Medicare Part D Interface. Applicable information gathered from TANF or SNAP in the case file.	If the electronic data sources listed are not available or not reasonably compatible, paper documentation shall be required.
Social Security Number (SSN)	Electronic data sources shall be utilized to verify SSN if available.	If the attested information is not reasonably compatible to information known to the agency, additional information shall be required.	SSA, Vital Statistics, or applicable information gathered from TANF or SNAP in the case file.	A copy of the card is not necessary.

Eligibility Factor	Verification Source	Reasonable Compatibility/ Reasonable Explanation	Electronic Sources to be Utilized	Comments
Citizenship	Electronic data sources shall be utilized to verify Citizenship if available.	If the attested information is not reasonably compatible to information known to the agency, additional information shall be required.	SSA, Department of Homeland Security (DHS)-SAVE, Vital Statistics, State Verification and Exchange System (SVES) or applicable information gathered from TANF or SNAP in the case file.	If the electronic data sources listed are not available or not reasonably compatible, paper documentation shall be required. Consider the 90-day reasonable opportunity period.
Immigration Status	Electronic data sources shall be utilized to verify Immigration if available.	If the attested information is not reasonably compatible to information known to the agency, additional information shall be required.	DHS-SAVE or applicable information gathered from TANF or SNAP.	If the electronic data sources listed are not available or not reasonably compatible, paper documentation shall be required. Consider the 90-day reasonable opportunity period.
Household Composition	Self-attestation without additional documentation shall be applied for household composition.	If the attested information is not reasonably compatible with information that is known the agency, additional documentation shall be required.	No electronic data sources are available to verify household composition.	Paper documentation is required if the self-attested information is not reasonably compatible. I.e. a signed statement from the landlord.

Eligibility Factor	Verification Source	Reasonable Compatibility/ Reasonable Explanation	Electronic Sources to be Utilized	Comments
Pregnancy	Self-attestation without additional documentation shall be applied for pregnancy and due date.	If the attested information is not reasonably compatible with information that is known to the agency additional documentation is required.	No electronic data sources are available to verify pregnancy.	Paper documentation is required if the self-attested information is not reasonably compatible (i.e., a statement from a doctor verifying the pregnancy).
Caretaker Relative	Self-attestation without additional documentation shall be applied for caretaker relative.	If the attested information is not reasonably compatible with information that is known to the agency additional documentation is required.	If necessary: Vital Statistics, Office of Child Support Enforcement, or applicable information gathered from TANF.	Paper documentation is required if the self-attested information is not reasonably compatible (i.e., court ordered guardianship /conservatorship papers).
Medicare	Electronic data sources shall be utilized to verify Medicare.	If the attested information is not reasonably compatible with information that is known to the agency, additional documentation is required.	SSA, SNAP, or Medicare Part D interface.	If the electronic data sources listed are not available or not reasonably compatible, paper documentation is required.
Application for Other Benefits	Electronic data sources shall be utilized to verify application for other benefits.	If the attested information is not reasonably compatible with information that is known to the agency, additional documentation is required.	SSA, PARIS, or applicable information gathered from TANF.	If the electronic data sources listed are not available or not reasonably compatible, paper documentation is required.

Reasonably Compatibility Scenarios

The following scenarios provide examples related to reasonable compatibility with respect to income:

Scenario 1: Charles submitted an initial application for Medicaid. He is a single, parent/caretaker relative to three children.

Individual self-attestation of income is below the Medicaid MAGI eligibility level and the Data match shows Charles' income is below the Medicaid eligibility level:

- Eligibility level= \$1175 (monthly)
- Self-attested current income= \$700
- IRS data= \$800

Determination: Charles is determined eligible for Medicaid because the information received from the electronic data sources and the self-attested information is all below the Medicaid eligibility level.

Scenario 2: Betty submitted an initial application for Medicaid. She is a single, parent/caretaker relative to one child.

Individual self-attestation of income is above the Medicaid MAGI eligibility level and the Data match shows that the Betty's income is above the Medicaid MAGI eligibility level.

- Eligibility level= \$774
- Self-attested current income= \$1,655
- IRS data= \$1,542

Determination: The self-attested income and the information from the data sources are all above the Medicaid eligibility level, so Betty is determined ineligible for Medicaid and screened for eligibility for APTC/CSR through the Exchange.

Scenario 3: Sophie submitted an initial application for her two children, Scarlett (age 3) and Ben (age 7). The children have creditable health insurance.

Ben: Individual self-attestation of income is below the Medicaid MAGI eligibility level and the Data match shows that Sophie's income is above the Medicaid MAGI eligibility level.

Scarlett: Individual self-attestation of income is below the Medicaid MAGI eligibility level and the data match shows that Sophie's income is below the Medicaid MAGI eligibility level.

- Eligibility level for Scarlett= \$ 2,436
- Eligibility level for Ben= \$2,234
- Self-attested current income= \$2,100
- IRS data= \$2,250

Determination: Scarlett is determined eligible for Medicaid as the information received from the electronic data source and the self-attested information is below the Medicaid eligibility level. The reasonable compatibility standard is applied in Ben's scenario as the self-attested income is below the Medicaid level and the data source is above the applicable income level. Ben is determined Medicaid eligible as the self-attested income and the electronic data source is at 10%.

Scenario 4: Sophie submitted an initial application for her two children, Scarlett (age 3) and Ben (age 7). The children have no creditable health insurance.

Individual self-attestation of income is below the Medicaid MAGI eligibility level and the Data match shows that Sophie's income is above the Medicaid MAGI eligibility level.

- Eligibility level for Scarlett= \$2,436
- Eligibility level for Ben= \$2,234
- CHIP level= \$3,578
- Self-attested current income= \$3,400
- IRS data= \$3,850

Determination: The reasonable compatibility standard is applied in Scarlett and Ben's scenario. Paper documentation is required as the self-attested income is not within 10% of the electronic data source. Once verification is received the determination will be made.

Scenario 5: James submitted an initial application for Medicaid. James is a single parent to four children.

Individual self-attestation of income is above the Medicaid MAGI eligibility level and the data match shows that James' income is below the Medicaid MAGI eligibility level.

- Eligibility level= \$1375
- Self-attested current income= \$2,450
- IRS data= \$1,000

Determination: James is determined ineligible for Medicaid based on his self-attested income and screened for APTC/CSR through the Federally Facilitated Marketplace (FFM).

Scenario 6: Kimberly submitted an initial application for Medicaid. Kimberly is a single parent to one child.

- Eligibility level= \$774
- Self-attested current income= \$1,500
- IRS data= \$2,000

Determination: Kimberly is determined ineligible for Medicaid based on her self-attestation and the data match over the applicable income standard. Kimberly is screened for APTC/CSR through the FFM.

Data Sources and Verifications

The following is a listing of some of the most common verification sources. There may be other acceptable sources that are not listed here.

A. Age

Primary Source

Federal Data Hub (Social Security data match), BDE, or SDX.

Secondary Sources

- a. Birth certificate (Bureau of Vital Statistics);
- b. Department of Motor Vehicles (DMV);
- c. Office of Child Support Enforcement (CSE);
- d. Adoption papers or records;
- e. Hospital or clinic birth records;
- f. U.S. Passport; Immigration or Naturalization Papers; or
- g. Indian census records.

Sources of Third Level Documentation

- a. School records;
- b. Census records;
- c. Court support order;
- d. Juvenile court records;
- e. Child welfare records;
- f. Voluntary social service agency records;
- g. Insurance policy or insurance company records;
- h. Affidavits;
- i. Baptismal certificate recorded before age five;
- j. Church records;
- k. Military service record; or
- l. Midwife's record of birth.

B. Relationship

1. Specified Relative

Accept attestation. If information is conflicting for any reason, follow up with verifications.

Primary Sources

State data interfaces available on N-FOCUS (Bureau of Vital Statistics, Child Support Enforcement).

Secondary Sources

- a. Birth certificate;
- b. Adoption records;
- c. Court order records;
- d. Indian census records;
- e. Marriage licenses;
- f. Divorce papers;
- g. Court records of parentage;
- h. Signed paternity acknowledgement;
- i. Hospital or clinical records;
- j. Social service and welfare records; or
- k. Child support orders.

2. Marital Status

Accept attestation. If information is conflicting for any reason, follow up with verifications.

Primary Sources

- a. Bureau of Vital Statistics;
- b. Marriage license;
- c. Divorce papers; or
- d. Separation papers.

Secondary Sources

- a. Local judicial records;
- b. Social Security Administration.

C. Citizenship

See 477-000-003.

D. Identity

Accept attestation. If information is conflicting for any reason, follow up with verifications.

See 477-000-003.

E. Residency

See 477 NAC 6-002, 6-004 for residency requirements for institutionalized individuals and individuals entering a facility.

Primary Sources

1. Rent or mortgage receipt, lease, agreement, etc.;
2. A signed statement from a landlord;
3. Property ownership records; or
4. A signed statement from an employer.

Secondary Sources

1. A current driver's license;
2. Utility bills or company records;
3. Verification of vehicle registration from the Department of Motor Vehicles;
4. County assessor records;
5. Post Office records;
6. Church or synagogue records; or
7. A signed statement from an individual(s) who has knowledge of the situation.

F. Household Composition

Accept attestation. If information is conflicting for any reason, follow up with verifications.

Primary Sources

1. Rent or mortgage receipt, lease, agreement, etc.;
2. School records; or
3. A signed statement from a landlord;

Secondary Sources

1. A current driver's license;
2. Utility bills or company records;
3. Verification of vehicle registration from the Department of Motor Vehicles;
4. County assessor records;
5. Post Office records;
6. Church or synagogue records; or
7. A signed statement from an individual(s) who has knowledge of the situation.

G. Pregnancy

Accept attestation. If information is conflicting for any reason, follow up with verifications. Verification may be provided by a physician or another licensed medical professional who verifies pregnancy for programs such as Maternal Health, WIC, Family Planning, or presumptive eligibility. Licensed medical professionals may include but are not limited to –

1. Physicians;
2. Nurse practitioners;
3. Physician assistants;
4. Nurse midwives;
5. Qualified providers (for presumptive eligibility determinations); or
6. Other, with approval of the DHHS Central Office.

The verification statement must include the licensed medical professional's name, title, date completed, and expected due date.

H. Social Security Number

Primary Source

Federal Data Hub (Social Security data match)

Secondary Sources

1. Attestation of Social Security number;
2. Signed copy of Form SS-5;
3. Copy of a birth certificate with permission checked to provide Social Security Administration with information for a Social Security card;
4. Form SSA-2853 with the name of the newborn, and a signature and date by an authorized hospital official;
5. Medicare card with a claim number with a suffix "A"; or
6. Dated documentation from SSA that an application for an SSN has been made.

Note: A copy of an individual's Social Security card is NOT required. As a courtesy, a client who does not have a Social Security number but would like to apply for a one may be given a Referral for Social Security Number Application form.

I. Non-MAGI Resources

Please see 477-000-052 for the Non-MAGI Resource Verification Plan

J. Income: Verify income declared by the client or appearing on SEW and evaluate the possibility of additional income. Also consider potential income for which the client may be eligible.

1. **Earned Income:** Verify the employment status (full time, part time, or temporary), name of the employer, and the gross amount and frequency of the earnings.

Primary Sources

Federal Data Hub (Tax interface is only applicable to MAGI-based methodology and TALX is applicable for MAGI-based methodology and non-MAGI).

Secondary Sources

- a. Nebraska's electronic data sources (SEW);
- b. Paystubs;
- c. Employer's wage records; or
- d. A statement from the employer.

K. Self-Employment: Verify the amount of income as well as the allowable expenses directly related to producing the goods and services.

Primary Source

Federal Data Hub (The tax interface is only applicable to MAGI-based methodology).

Secondary Sources

- a. An income tax return;
- b. Self-employment bookkeeping records;
- c. Sales and expenditure records;
- d. State income tax bureau; or
- e. Business expense receipts.

Source of Third Level Documentation

A Statement from the client of estimated earnings.

L. Unearned Income: Explore all potential sources of unearned income.

When the client states s/he does not receive a benefit, evaluate this in terms of the client's background, marital history, past work history, and present circumstances. For example, a review of the client's employment history may indicate a possible eligibility for unemployment compensation, a company retirement pension, or benefits from past union membership.

1. RSDI Benefits: Verify the amount of RSDI benefits and evaluate the existence of RSDI as potential income.

A routine check should be made in all cases where a child is deprived of parental support because of death or incapacity, or when a client is retired, disabled, widowed, or divorced.

Primary Sources

Federal Data Hub, BDE, or SDX file.

Secondary Sources

- a. RSDI benefit payment check;
- b. Recent RSDI award letter or other correspondence from SSA; or
- c. Contact with SSA.

2. Veteran's Income: Verify the amount and type of VA income and evaluate the existence of VA as potential income. Explore the client's and spouse's background and past military service record.

Primary Sources

- a. VA check;
- b. VA award letter or other written correspondence;
- c. VA Form 21-0172, Certificate of Permanent and Total Disability;
- d. IRS Form 1099-R (May be issued to a veteran by the Defense Finance and Accounting Services which reflects the taxable portion of compensation received.)
- e. A release from active duty showing disability;
- f. Other contact from VA; or
- g. SDX financial file.

NOTE: Income alerts from interfaces such as PARIS regarding Veterans/Military income are to be treated as leads only.

3. **SSI:** If any person is aged, blind, or disabled, explore the client's eligibility for SSI benefits. Verify the amount of the benefit.

Primary Sources

Federal Data Hub or SDX file.

Secondary Sources

- a. Current award letter or other correspondence;
- b. Recent SSI check; or
- c. Contact with SSA.

4. **Unemployment Compensation:** Verify the amount of unemployment compensation received. Explore the client's background, past work history, and recent employment to determine eligibility for unemployment compensation.

Primary Sources

- a. Unemployment data match;
- b. Unemployment compensation award letter; or
- c. Correspondence from unemployment compensation office.

5. **Workers' Compensation:** Verify receipt, continuation of, and amount of worker's compensation. Examine the client's past work history and present circumstances, especially if the client is disabled, to determine eligibility for or receipt of worker's compensation.

Primary Sources

- a. Workers' compensation award notice;
- b. Workers' compensation payment check; or
- c. Workers' compensation office correspondence.

6. **Other Unearned Income:** Verify the receipt and amount of pensions, benefits, annuities, child support, etc. Explore the potential for other income by evaluating the client's background, past work history, and present circumstances.

Primary Sources

- a. Current award letter;
- b. Current benefit check;
- c. Correspondence;
- d. Contact with the agency;
- e. Court records; or
- f. Computer printouts.

Secondary Sources

- a. Past award letter; or
- b. Copies of past checks.

- 7. Contributions and In-Kind Income:** Verify any in-kind income and contributions to which a money value is given. Verify the source and the amount. Verification consists of the name and address of the source of payment. Contact the source to verify the amount and frequency of the payment.

Primary Sources

- a. Contribution check;
- b. Statement from the person making a contribution;
- c. Cancelled checks of the person making a contribution; or
- d. Receipt for the contribution.

Secondary Sources

- a. Client's statement of receipt; or
- b. A signed statement from an individual(s) who has knowledge of the situation.

- 8. Deemed Income:** Determine and document whether deeming is appropriate. Verify the amounts of earned and unearned income and allowable deductions.

Primary Sources

- a. Receipts of unearned income, e.g., award letter or benefit check;
- b. Receipts of earned income, e.g., paystubs or employer records;
- c. Immigration and Naturalization Service records;
- d. Correspondence from INS; or
- e. Receipts verifying income deductions.

Secondary Sources

- a. Statement from client; or
- b. A signed statement from an individual(s) who has knowledge of the situation.

- 9. Educational Grants, Scholarships, Loans:** Verify -

- a. The contract or the originator of the grant, loan, or scholarship;
- b. If the grant, loan, or scholarship may be used for current living costs; and
- c. If the grant, loan, or scholarship is for educational purposes and insured under any program administered by the Department of Education.

Primary Sources

- a. Statement from the client; or
- b. A signed statement from an individual(s) who has knowledge of the situation.

M. Student Status

Accept attestation. If information is conflicting for any reason, follow up with verifications.

Primary Sources

- a. School class schedule; or
- b. Letter from the school registrar

N. Maternity/Paternity

Primary Sources

State data interfaces available on N-FOCUS (Bureau of Vital Statistics, Child Support Enforcement).

Secondary Sources

- a. Birth certificate;
- b. Adoption records;
- c. Court order records;
- d. Indian census records;
- e. Court records of parentage;
- f. Signed paternity acknowledgement;
- g. Hospital or clinical records;
- h. Social service and welfare records; or
- i. Child support orders.