Paper Verification Processing

Process & Procedure Guide

Document Purpose

When the shared HIX/Tier-1 is unable to verify a consumer-attested fact the system creates a verification checklist (VCL) in order to track those items requiring manual verification. Consumers mail documents to the scanning center or upload electronic documents directly through the consumer portal.

Scanned or uploaded documents are attached to electronic verification work items which are ordered by descending application date. This document provides the guidance for processing these verification work items.

Versioning Approach

Draft versions of this guide will be noted as V0.1. When a version is initially approved it will be promoted to V1. Whether to then use a decimal ("dot release") or a full integer release is discretionary based on the degree of change.

Intended Audience

The expected audience for this document includes:

1. DSS Management

2. DSS Cadres

3. Operational trainers

4. Operational staff as required

5. Access Health CT Staff

Version	Date	Author(s)	Change
1.0	05/02/2016	DSS/AHCT	Version 1
1.3	05/26/2017	Joe Huertas	Removed outbound call requirement for ahCT income verification failure Under Section: Attested Items That Can Require Manual Verification, added: Pre-Enrollment Eligibility for Special Enrollment (SE) Under "Verification Check List Item", added: "Pre-Enrollment Eligibility for Special Enrollment (SE)" in the column labeled Income VCL Item Under "Work Item" added guidance that contractor Verifications Processor is not to place a work item in the "On Hold" state. Under Managing the VCL: Income Items for HUSKY Programs, added list of items before discussion of individual items Under Managing the VCL: Income VCL for APTC/QHP, added list of items before discussion of individual items Added text relating to the handling of work items/verifications. "Processors

			are asked to manage the entire work item even if they are in the wrong queue.' Made various grammatical changes and corrected miscellaneous typographical errors
1.4	08/08/2017	Rob Marchant	Text editing/cleanup. Changed how to data enter weekly amounts for HUSKY, i.e., removed the x4.3 monthly conversion directive. Included other updates around currency conversions (use XE source), incorrect income types, etc. Added a new section with guidance to suppress new VCL items created when updating an application, i.e., "Disposition of Inadvertent Verifications" Clarified text around managing Discrepancies vs. Verifications. Added new AHCT SEP guidance for Household Applicability, i.e., a QLE does not need to list all application members explicitly. Removed outbound call requirement to confirm earnings when there is a

Version	Date	Author	Description
			partial earnings note on a UI benefits document. Clarified direction on how to handle discrepancies, i.e., when null reported but get a verification request. Previously, the text said that a workaround was required without stating the workaround.
NOTE: Version 1.4 was not formally approved and we skipped forward to version 1.5			
1.5	11/09/2017	Jose Martinez	Allowed use of "On Hold" status for verifications to allow for process clarification. Annual income changed from a 10% "reasonably compatible" test to a 20% one. Added Form 1040NR specifics for MAGI annual income verification. For Unemployment Benefits clarified that the WBA is usually on line 12. Greater specificity provided in the section "Additional Income Documents" on how to use different types of 1099 to verify annual MAGI income.
1.6	02/19/2018 04/13/2018 05/04/2018	Rob Marchant & Jose Martinez	Added note to use AHCT or DSS for translation support.

| | | | Added approach for data entry of non-whole hours for current income (convert to weekly). |
			Specified that the filing date of an application update should use the current date in order to avoid the appearance of aged applications.
1.7		Jose Martinez & Alexandra Dowe	-AHCT (QHP) Applicable only: Updated approach to process for multiple proof of annual income VCL
			-AHCT (QHP) applicable only: Updated details around acceptable employer statements and profit and loss statements that are in line with sample documents provided on the AHCT verification help webpage.
1.8	03/22/2019	Rob Marchant Ali Dowe	• Changes associated with the automation of VLP Steps 1, 2 and 3. This involved restructuring the document a little, e.g., separate Identity and Incarceration content from the Immigration/Citizenship type VCLs.
			• Pregnancy SEP Documents
			• 2018 1040 changes

Document Sign Off

Name	Kristin Dowty
Organization	DSS
Date	4/29/2019
Signature	Kristin Dowty

Name	Susan Rich-Bye
Organization	AHCT
Date	4/29/2019
Signature	Susan Rich-Bye

Name	Lana Willox
Organization	Conduent
Date	4/29/2019
Signature	Lana Willox

Table of Contents

Process Overview

High Level Description

Application data is entered into the shared HIX/Tier-1 system and the system determines eligibility for the different programs supported by that system, e.g., health insurance, premium tax credits and certain types of HUSKY.

The eligibility process involves using electronic data sources to verify key data elements provided in the application. Electronic data sources include:

- Social Security Administration (SSA) for citizenship, identity (SSN), death, incarceration, disability and Title II Social Security Disability Income (SSDI). This interface is part of the Federal Data Services Hub (FDSH).

- Department of Homeland Security (DHS) for lawful presence, immigration status and details, and naturalized citizenship information. This interface is part of the Federal Data Services Hub (FDSH).

- Internal Revenue Service (IRS) for past tax filing status, tax filing details and tax filing amounts. This interface is part of the Federal Data Services Hub (FDSH).

- Connecticut Department of Labor (DOL) for employment information and unemployment income information.

- Connecticut Department of Corrections (DOC) for incarceration information.

If someone is determined eligible for a program, but a relevant data item could not be verified electronically or there is a discrepancy between the application data and the external data sources, then the applicant is provided a Reasonable Opportunity Period (ROP) in which to provide alternative proof of what they entered on their application. The ROP may be up to 95 days in duration. The required verifications for an application are tracked and referred to as the *Verification Checklist* or VCL.

A client is formally informed of their need to provide additional verification information via a *1302 Additional Verification Required* notice. The one exception to the 1302 notice is for consumers who need to verify a QHP special enrollment reason; these consumers are sent a 1202 *Notice of SEP Verification Required* which is formatted similarly to the 1302.

Introduction to Special Enrollment

There is an annual Open Enrollment (OE) period in which individuals can apply and enroll in qualified health plans (QHPs) for the following plan (calendar) year. It is possible for consumers to enroll in QHPs outside of OE if they meet one of a set of special enrollment (SE) reasons. The period outside of OE is called the special enrollment period (SEP). QHP consumers who wish to enroll during SE may be required to verify their attested SE reason. The ROP for the SE verification is 35 days in duration. Rather than enrollments being fully processed and coverage activated upon eligibility determination, QHP enrollments via SE are pended until verification of eligibility for Special Enrollment is completed.

The 1302 and 1202 notices specify the types of documents that can be used as a source of proof for each of the outstanding verification items. The notices also contain a return envelope and a return coversheet. The coversheet has a barcode that specifies the notice type (1302 or 1202) and the consumer's application ID.

The consumer is expected to use the return envelope to send in the coversheet along with copies of their relevant documents. The envelope is received at the scanning center, opened and the contents scanned. Ultimately the scanned images are indexed into the workflow system (FileNet) using the barcode on the coversheet. A (FileNet) workflow item is created for a scanned set of documents and it is routed and queued for the Verification Processing group. In the case of an SEP, the routing is to the SEP VCL processing group.

It Doesn't Always Go Smoothly

This describes how the process is meant to work, and usually does work. But there can be challenges with consumers mailing original documents, forgetting the coversheet, mailing to the wrong address, etc.

It is also possible for consumers to use the consumer Portal of the HIX/Tier-1 system to upload documents directly into the system. This process bypasses the need for the mailing and scanning of documents. The documents which are uploaded by the consumer are attached to a work item and routed to a workflow for processing as if they had been physically mailed and then scanned.

Once a work item is routed to the correct work flow, Verification Processors start to review the associated PDF documents and/or uploaded images. Using the processes outlined in this document, the Verification Processors determine whether the received documents constitute acceptable proof of an item. The processors can either reject a document as not providing sufficient proof, or they can mark the outstanding verification item as complete.

Three Important Concepts

Within the general subject of verifications there are three (3) distinct concepts that are sometimes conflated:

1. Verifications

2. Discrepancies, and

3. Clarifications

The current HIX/Tier-1 system has a simple verification model that contributes somewhat to this conflation. The plan is to evolve that model via some tactical modifications, thereby reducing the potential for confusion between the concepts.

Verifications

This term describes those facts attested to on an application for which we need to find positive confirmation. The system first tries to confirm via electronic sources and then falls back to requesting paper documents as proof. Some items are binary in nature (e.g., you are a citizen or you are not a citizen) and some items require *reasonable compatibility* (e.g., if the electronic source of income found is greater or within 10% of the application income then it is considered reasonably compatible).

Discrepancies

Sometimes a discrepancy or conflict can be found between application data manually entered into the system, and data found electronically. For example, if someone does not enter any employment income, but the system finds apparent income via an electronic source (such as the CT Department of Labor), that situation would be considered a *discrepancy*.

> **System Enhancements**
>
> Enhancement requests exist to add discrepancy and clarification functionality into the HIX/Tier-1 system.

Discrepancies are handled in the system as verification items as the HIX/Tier-1 system doesn't have a dedicated discrepancy function. The shared HIX/Tier-1 system would request someone verify their zero employment income (when employment income was found electronically) using the same set of verification documents that are used to prove an income amount. For example, prove why you have no job income by mailing us 4 pay stubs. This is clearly an issue and the workaround requires manual involvement and still does not meet the policy intent.

Some discrepancies can be fixed by encouraging a person to consider the data that they have entered. For example, someone reporting zero income for a job (which pays them only at the end of the month) should be encouraged to enter not the literal value of this month's income (i.e., zero if applying at a time other than on their month's end pay date), but rather a more prorated average value for a typical month.

"Verifications" that are discrepancies are often less "black and white", and therefore need handling somewhat differently that 'real' verifications. They typically require a DSS caseworker (a "merit worker") to assess the details and make a determination.

Clarifications

Often the need for follow-up verification or discrepancy related information can be handled by asking a few "clarifying" questions. For example, the reason someone has no employment income could be because they have recently lost their job. The reason why their income is lower is because their hours have been cut.

The federal Centers for Medicare & Medicaid Services (CMS) single streamlined application includes a series of these clarifying questions that can work to suppress the need to ask for paper documents to address verification and discrepancy issues.

These clarifying questions can help explain an item, and also provide additional direction on how someone should answer them, thereby providing an opportunity for people to adjust previous answers.

Attested Items that can Require Manual Verification

The following items can require verification depending on what a consumer attested to in their application, what was found electronically, and/or what program(s) someone is otherwise eligible for:

1. **Identity. This is usually a combination of SSN, name and age**

   Can be triggered for HUSKY or QHP determinations.

2. **US Citizenship**

   Can be triggered for HUSKY or QHP determinations.

3. **Lawful presence**

   Can be triggered for HUSKY or QHP determinations.

4. **Five (5) years or more as a lawful permanent resident (e.g. as a "green card" holder)**

   Can be triggered by HUSKY determinations.

5. **Annual income**

   Can be triggered by APTC determinations.

6. **Monthly employment income**

   Can be triggered by HUSKY determinations.

   Exception: Jobs can be reported with zero income. These are often data-entry errors and consequently there is a planned system enhancement to make changes to the clarification screens to encourage correct reporting of the (missing) income. These "Jobs reported with zero income" are to be handled using the same procedures as a standard monthly employment income verification, i.e., the submission of paper pay stubs will result in updated/corrected data.

7. **Monthly self-employment income**

   Can be triggered by HUSKY determinations.

8. **Monthly unemployment income**

Can be triggered by HUSKY determinations.

9. **Monthly social security income**

   Can be triggered by HUSKY determinations.

10. **Resident in the community**

    Can be triggered by QHP determinations.

11. **Eligibility for QHP Financial Assistance**

    Can be triggered by Advanced Premium Tax Credits (APTC) determinations.

12. **Eligibility for Special Enrollment (SE)**

    Can be triggered for QHP determinations outside of Open Enrollment for certain qualified life events (QLEs).

    - Marriage
    - Birth, adoption, or foster care
    - Loss of MEC (loss of HUSKY should be identified by the system without requiring additional verification)
    - Permanent Move to CT from another State or outside the U.S.
    - Other legal decree or court order

Discrepancies Generated as Verifications

As stated earlier, discrepancies occur when income is unreported and yet an electronic interface finds a non-zero source of income, i.e., they are different than someone reporting an income source of zero (0).

The general guidance for handling discrepancies is as follows:

- If the consumer submits non-zero paperwork then enter the non-zero value into the appropriate field and verify.

- If the consumer submits any clarification type document (e.g., a letter or note), the processor should accept the document and verify the item, i.e., do not question further and disposition the verification item.

- If in doubt the processor should consult with the DSS cadre.

The following are system discrepancies that are currently being generated as system verifications:

1. **Unreported Jobs Discrepancy**

   This is included in the shared HIX/Tier-1 system as of today but as an income amount verification.

2. **Unreported Unemployment Income (UI) Discrepancy**

   This is included in the shared HIX/Tier-1 system as of today but as an income amount verification.

3. **Unreported Social Security Income Discrepancy**

   This is included in the shared HIX/Tier-1 system as of today but as an income amount verification.

Process Components

There are three (3) main components that workers will interact with when processing verifications:

1. FileNet Work Items

   These are the items found in the worker's HIX/Tier-1 (FileNet) inbox. A work item would be a collection of submitted verification documents for a consumer. Workers will use the documents attached in the work item to manage the Verification Check List (VCL) on the consumer's latest application.

2. Verification Check List (VCL) items

   These are the individual verifications on the consumer's HIX/Tier-1 system account. After ninety-five (95) days, having unresolved verifications could lead to the consumer's disenrollment from their coverage.

3. Pre-Enrollment Verification for SEP VCL Items

   These are individual verifications for eligibility on the QHP consumer's HIX/Tier-1 system account. Having unresolved verifications will lead to cancellation of the consumer's coverage before it becomes active.

   Note:

   Workers will on occasion encounter SEP verifications which have been misrouted into the general verifications queue or are otherwise included with a general verification.

   If this situation is encountered, the instructions in the document section *Handling Misrouted SEP Verifications* should be followed.

The Work Item

Verification Processors working in the manual verifications queue will receive documents that require processing via work items sent to their shared HIX/Tier-1 system inbox. Each work item contains one or more documents that have been indexed with a consumer's application ID. This is accomplished by consumers returning the barcoded coversheet for the 1302 or 1202 notice with their documents.

Work items are indexed to an application ID and sometimes this can be an older application, i.e., the consumer submitted multiple application changes. However the changes to the VCL should be made on the most recent application ID. Each time new information is updated and submitted on a consumer's application, a new, higher application ID is generated in the shared HIX/Tier-1 system. The indexed work item application ID may not be the most recent for the consumer and so an application search must be performed.

A document may be sent to the scanning center without a coversheet. In that situation the scanned document is sent to the Unknown Queue where a worker researches the document and indexes the document with a consumer's application ID. The now indexed work item is routed to the verification queue.

Occasionally a system issue may cause an unindexed work item to be sent to the Verifications queue. Verification Processors then need to follow processes for the Unknown Queue in order to search the shared HIX/Tier-1 system for the correct application. Once the application is identified the verification processor can proceed with the normal processing.

Each document within a verification work item will have a link. Work items may have several documents, which may have been sent by the consumer at different times; they are all consolidated to the same work item. Because of that, each link will have a corresponding document ID and a document received-date located under the document details section of the work item. Each link may have several pages of paper verifications that need to be assessed by the Verification Processor.

After a Verification Processor has completed their processing duties, or has reached a point where he/she needs further assistance, a work item action must be selected to close the item window. Verification Processors will have several manual verification work item actions available, Including:

- **Send To DSS** – This action is not used in the Manual Verification queue.

- **On Hold** - This action would close the work item, but keep it in the Verification Processor's inbox for further review. This is used when seeking clarification on the process.

- **Escalate** – This action will close the work item, remove it from the Verification Processor's inbox and send it to the desired party. When the action is selected, a

dropdown menu will populate with names of leadership/training staff. Verification Processors should only escalate items based on specific directives.

- **Complete** – This action will close the work item and remove it from the Verification Processor's inbox. Verification Processors are to select this action when processing actions are complete and there are no outstanding VCL items remaining on the consumer's account i.e., all items are Verified.

- **Awaiting Documentation** – This action will close the work item and remove it from the Verification Processor's inbox. Verification Processors are to select this action when processing actions are complete and there is at least one outstanding VCL item on the consumer's account i.e., Not Verified, Provided and/or Failed.

Verification Check List Item

When consumer data is not electronically verified, a Verification Checklist (VCL) generates on the consumer's account. The VCL is accessible via the "Manage VCL Quick Link" on the homepage of the consumer's account. The VCL displays required verification items separately for each family member (consumer).

The goal of the Verification Processor is to satisfy any outstanding VCL items on the consumer's account with documents provided in the work item; this process is referred to as "managing the VCL". If any clarification is necessary, Verification Processors can make outbound calls to speak with the consumer. Outbound calls are generally discouraged and the scenario requiring the call should be an agreed part of the process.

Depending on the scenario, case comments (or notes) will be left on the consumer's account to summarize action taken and/or additional action required.

When managing the VCL, Verification Processors have several status options available to select via a dropdown menu. The VCL item status options include:

- **Not Verified** – This is the initial status for all VCL items. The status indicates that the data item was not verified electronically for the corresponding consumer. Verification Processors will not manually select this status option.

- **Failed** – This status will be selected by the Verification Processor when unacceptable documentation is received for the corresponding VCL item.

Verification Processors are required to add the document ID and document type to the VCL item record.

- **Provided** – This system-generated status is populated when a consumer electronically uploads a verification document through the AHCT consumer portal. An item with this status will prevent any adverse action on the consumer's account, as a Verification Processor has not had a chance to review the uploaded documents. Verification Processors will <u>not manually select</u> this status option.

- **Verified** – This status will be selected by the Verification Processor when acceptable documentation is received for the corresponding VCL item. Verification Processors are required to add the document ID and document type to the VCL item record. A Verified status may also represent an item whose data was verified electronically, e.g., through the FDSH. When this occurs, the document information is missing from the VCL item record.

The documents that are considered as acceptable proof for a particular VCL or SEP VCL item are included in Appendix A. The VCL documents in Appendix A are consistent with those requested on the *1302 Additional Verification* notice.

Detailed guidance on how to process specific types of Appendix A documents are provided in subsequent sections. Income documents can be particularly varied and complex; as such the dedicated document section *Processing Income Documents* provides detailed guidance.

Step 1 – Check for Denied Accounts or Discontinued Coverage

Verification Processors first perform an application search, using the work item application ID, in order to find the most recent (physical) application for the indexed application-string.

If the most recent (physical) application for the work item application-string does not have active coverage, Verification Processors need to perform account research to determine if any action is required in response to the paper verifications. Application coverage that has been "positively discontinued" by the system does not need any verification action, whereas accounts that are missing the enrollment step still need to be managed.

When there is not active coverage, the Manage Active Enrollment (MAE) Quick Link will display:

> *"No Active Enrollment Info!"*

When there is active enrollment the Verification Processor can skip to the next step.

The following describes types of inactive accounts that do not require any Verification Processor action in the manual verification queue:

1. **Denied Accounts** – Accounts that are denied due to inactivity may or may not show a Report a Change link. Under the Case Comments Quick Link, Denied Accounts will display the following system generated comment:
   > *"The following notice was requested: FORM 1328 – 45 MI Denial."*
2. *Canceled Accounts* – When consumers do not respond to renewal requests (e.g., return renewal applications) before the end of their coverage/benefit period, their coverage will be terminated and their record will reflect inactive coverage. Under the Case Comments Quick Link, for consumers who failed to renew their coverage there will be a comment displayed indicating:
   > *"Medicaid Discontinuance."*
3. **90-day Termination** – When consumers do not provide required paper verifications before the ROP expires, the household's coverage may be terminated. To confirm inactive coverage due to 90-day termination, Verification Processors should check the Change Eligibility Determination Quick Link and review the Explanation column for the following remark:
   > *"Individual failed to provide verification in 90 days…"*

If the account status reflects one of the above inactive reasons, no update actions are required and the work item can be dispositioned.

Note: If the account shows no active enrollments, and none of the above scenarios apply, it is assumed that the enrollment process has not yet been completed by the consumer. In this situation, Verification Processors need to act and manage the VCL (in case the consumer does complete his enrollment at a later date or the consumer is actually already enrolled, i.e., HUSKY does not require a positive enrollment on a change if someone is already enrolled).

Step 2 – Check for Open VCLs

There are situations where a manual verification was already complete prior to the Verification Processor beginning to process a work item. This can happen for various reasons, including when a consumer makes updates to their application and the latest application now passes the verification, or when a consumer submits documents multiple times for different application IDs (due to a current system limitation, a consumer will receive ongoing reminder correspondence for each application).

Verification Processors need only act if there are outstanding VCL items on the latest application. If all VCL items are verified for the household, no update actions are required and the work item can be dispositioned.

Step 3 – Check for Pending Changes

In most cases, if the most recent application has not been submitted and is pending or in-process, Verification Processors should click "Delete Pending Changes". This action will erase the pending application changes from the system, and enable the processor to work their assigned work item documents on the most recently submitted application. Prior to deleting pending changes, Verification Processors must check the Case Comments Quick Link. If there are previous user notes indicating new information was added, but the application was unable to be submitted, the Verification Processor's approach will shift from managing the VCL to submitting the application, according to the *Tier 1 Paper Applications: Process and Procedure Guide.*

Step 4 – Managing the Verification

The processes are different depending on the VCL item type, however the action taken by the Verification Processor falls into one of the following types:

1. If unacceptable documentation is submitted, the VCL item is marked as **Failed**.

2. If acceptable documentation is submitted:

    a. If the VCL type is for a HUSKY monthly income type, then the Verification Processor will perform a Change Report on the application to align the application exactly with the submitted documentation, i.e., any subsequent income verification can be marked as **Verified** as by definition it equals the submitted documentation, or

    b. if the information is reasonably compatible, the VCL item is marked as **Verified**, or

    c. if the information is not reasonably compatible, the Verification Processor will perform a Change Report on the application to align the application with the submitted documentation, i.e., any subsequent verification can be marked as **Verified** as by definition it equals the submitted documentation.

    The application filing date for the new application would use the current date. (Originally the approach was to use the receipt date for a document as this paralleled the application filing approach. However, the need to submit an application in order to apply a change is a feature of the technical system design and not a business requirement. When a historical date is used it can make the application look like it is an aged application, e.g., for a mixed household with someone who is not enrolled in HUSKY they look like a new applicant with an aged application.)

If the approach above involves updating the application information, there are special considerations if the household is in a renewal period.

Managing the VCL: Disposition of Inadvertent Verifications

Procedures for managing verifications include, in certain scenarios, the submission of an updated HIX/Tier-1 application. The greatest volume of these updates are the result of verifying

monthly-type incomes for the HUSKY program; the procedures require the processor to enter the paper-based income amounts into the system so that the system is exactly aligned. However, the correction of submitted data also occurs when there is a material difference, e.g., the correction of a mistyped SSN or the correction of an immigration document number.

An unintended consequence of submitting an update through the Worker Portal is that all electronically verifiable items will be submitted for verification. Whenever an electronic verification runs it is possible to get a different result than a prior successful execution because interfaces may now be (temporarily) unavailable or only partially available, the load may cause an interface to timeout and so provide an inconclusive answer, etc.

In addition to the availability of an electronic interface, it is also possible that the electronic interface returns a "fail" for something that was previously verified manually via a paper-based source.

The general guidance is that when new VCL items are generated, as the result of processing a manual VCL item, then they can be immediately dispositioned, i.e., select Verify from the dropdown menu.

The one exception to this scenario is when a monthly income submission results in a new annual income verification (i.e., household members went from HUSKY eligible to QHP/APTC eligible). In this situation the procedures for managing the Annual Income VCL should be followed since this verification item is genuinely new (typically we would expect that the paper-based monthly income amounts could now be used to verify the annual income as reasonably compatible).

The rationale for closing new VCL items is as follows:

1. Running a new household-wide determination in order to test that income is reasonably compatible or to update non-eligibility data is a current system limitation/design-defect. We should not be running eligibility in this scenario and so we should not respond to new verification requests that are a result of this (unfortunate) determination.

2. From a HUSKY perspective re-running eligibility as a result of change processing is equivalent to running a renewal more frequently than 12 months, i.e., this is incorrect per regulations.

3. Whereas items 1 and 2 are the compelling reasons, it is worth noting:

    a. That the new VCL items that are generated will have been previously verified electronically or by paper within a reasonable timeframe. Certainly within a 12-month benefit period and in all likelihood within the last 90 days, i.e., in the determination that triggered the current task.

    b. A number of verifiable items, once proven should remain proven forever, e.g., citizenship, 5-year bar met and Identity.

Managing the VCL: Common Approach for Non-Income Items for All Programs

There are five (5) Non-Income VCL Items:

1. Proof of Citizenship
2. Proof of Immigration Status
3. Proof of Five (5) Years of Lawful Residency – HUSKY consumers Only
4. Proof of Identity
5. Proof of Residence in the Community (Non-Incarceration) – QHP consumers Only

The initial approach for managing non-income related VCL items is common across all VCL types. Once the most recently submitted application from the indexed string is identified, Verification Processors need to assess whether the demographic data on each acceptable document received matches the data in the shared HIX/Tier-1 system. This includes Identity, Citizenship, Immigration Status, Five Year Bar, and Residence of the Community.

If there is a meaningful discrepancy between the document and the application data in the shared HIX/Tier-1 system, the document data will be used to update the application's data. Verification Processors will need to update the application with the correct information by performing a "Report a Change" action.

The following considerations need to be kept in mind when renewing QHP/APTC consumers during Open Enrollment.

- **For renewing APTC/QHP consumers**: If a change report is necessary, clicking the Report a Change/Renew Coverage link yields a Renewal/Change Decision screen. Verification Processors will select Option 2 (Change Decision) to update the application data without renewing the account.

If unacceptable verification documents are received, Verification Processors will:

1. Navigate to the application home page and click Manage VCL.
2. Select **Fail** from the dropdown menu.
3. Click Add VCL Item to populate the fields to enter Document ID and Type.
4. Click Save.
5. Case comments are required when VCL items are failed. (Refer to Case Comments section)

Managing the VCL: Immigration and Citizenship

US citizenship, for those who are born in the USA, is electronically verified via an interface with the Social Security Administration (SSA). When the interface fails to verify citizenship, the HIX system requests supporting documentation from the consumer and once received we manually review those documents, i.e., there is not a multi-step process with the SSA. Proof of US citizenship and proof of identity are closely associated and correcting detail such as name, SSN and date of birth (see "Managing the VCL: Proof of Identity" for the steps used to correct information) will often allow the electronic interfaces to verify both citizenship and identity using the updated information. If the system is still unable to verify citizenship, follow the process described in the section "Manual Processing for Proof of Citizenship VCL Items".

Immigration status and <u>naturalized</u> citizenship are electronically verified via the Verify Lawful Presence (VLP) interface with the Department of Homeland Security (DHS). This electronic interface has up to three separate steps:

- VLP Step 1: This is a real-time check with DHS. There are possible follow-on sub-steps (1a and 1b) if the initial response identifies an issue with the data or the need for a SEVIS ID to be entered.

- VLP Step 2: If VLP Step 1 was inconclusive, the HIX system will initiate a VLP Step 2 process. The HIX system allows DHS up to 7 business days to respond to this request before timing out the process (this is longer than DHS expect to need).

- VLP Step 3: If VLP Step 2 was inconclusive, the system will ask the consumer to submit supporting documentation (it is possible to go directly from VLP Step 1 to VLP Step 3 for some classes of immigration). Once those documents arrive, they can be assembled into a package and submitted to DHS as part of a VLP Step 3 request.

The HIX system allows DHS up to 25 business days to respond to this request before timing out the process (this is longer than DHS expect to need).

Wherever possible, we want DHS to make the adjudication on immigration and citizenship and not the verification processing vendor. However, there are instances that trigger the need for a manual verification, e.g., VLP Step 2 times-out (therefore we have no adjudication and no ability to launch a VLP Step 3), there was a technical submission error and the HIX could not start or continue the VLP Steps, the data being entered by the consumer was unable to be used in a Step 1 and they eventually bypassed the screens (the HIX requires 3 attempts).

Even when the processing has fallen to a manual verification approach, the verification processor should first try to (re) initiate the electronic processing steps. This can involve correcting data using the information on received documents and resubmitting (the details of which are described in the Manual Processing sections below). Alternatively, if it was a temporary/transitional technical issue, just resubmitting the application might address the issue and allow the HIX system to now use the VLP interface.

When a Document Arrives While a VLP Step 2 is Underway

If an immigration or citizenship document arrives while a VLP Step 2 is still underway, the processor should review the information on the document.

If the information is different from that on the application, the processor should follow standard data entry steps (see the Manual Processing steps for guidance) to update the information and submit the application. This will create a new VLP Step 1 which will either provide a definitive response or initiate a new VLP Step 2.

The work item can be marked as complete whether there is an application submission or not.

Managing a VLP Step 3 Alert

A VLP Step 3 alert will be created when a VLP Step 2 has finished inconclusively and there are previously submitted documents.

If VLP Step 2 had a technical failure or timed-out, then the processor should follow the appropriate instructions for manual processing (see below). Otherwise the processor should follow the instructions for *Submitting a VLP Step 3 Package*.

Submitting a VLP Step 3 Package

This process can be triggered by a document arriving for someone who has a DHS case awaiting a VLP Step 3 submission or because a VLP Step 3 alert was generated (a document was received while the VLP Step 2 was still underway).

This process involves using the HIX "Initiate Step 3 Verification" screens to view and select the appropriate documents for submission to DHS.

Managing a Step 4 Alert

This process is triggered when a Step 3 response is still inconclusive.

The verification processor should do one more final check of the data on the application. However, this should have been carried out previously and they would be unlikely to find any need to update the application.

The steps are different for the two HIX programs:

- QHP: Verify the VCL if there is a document that shows lawful presence. Otherwise take no action beyond dispositioning the alert, i.e., let the 90-day clock run out.

- HUSKY: Execute the directions in the section *Discontinue for Failure to Verify Immigration and Citizenship*.

Discontinue for Failure to Verify Immigration and Citizenship

This is the general process to discontinue an individual because they failed to verify their immigration or citizenship, i.e., discontinue someone before the end of their 90-day reasonable opportunity period (ROP).

This can be invoked as part of a Step 4 alert for a HUSKY consumer. It is also possible for DSS or AHCT to direct the verification processing vendor to execute this process on a specific individual or group of individuals, e.g., if it becomes clear that an individual is repeatedly executing 90-day ROPs and should be disenrolled immediately.

The steps are as follows:

1. Click the Report a Change Quick Link
2. Update the Application Information section accordingly:
   a. Application Filing Date: Use current processing date
   b. Document ID: Use document number from work item

    c. Channel: Select Paper

    d. Applying for Subsidy: Should remain Yes

    e. Click Save

3. Navigate to the Citizenship and Immigration section and set their status to "Unknown" and then click Save.

4. Each time a change is reported, the Signature section of the application needs to be updated, prior to submission:

    a. Signature Provided: Yes

    b. Signature Type: Paper

    c. Click Save

5. Click Submit Pending Changes to submit application. The individual should now be discontinued on the end of the current or the following month. The denial reason will reflect that they are do not have the correct citizenship or immigration status.

Manual Processing for Proof of Citizenship VCL Items

If acceptable documents are received for an outstanding Proof of Citizenship VCL item, Verification Processors need to compare the document data to the Household Members and Citizenship and Immigration sections of the shared HIX/Tier-1 system.

- If any information needs to be updated from acceptable documents, navigate to the home page of the consumer's application and follow the steps below:

    1. Click the Report a Change Quick Link

    2. Update the Application Information section accordingly:

        f. Application Filing Date: Use current processing date

        g. Document ID: Use document number from work item

        h. Channel: Select Paper

        i. Applying for Subsidy: Should remain Yes

        j. Click Save

    3. If demographic information needs to be updated, navigate to the Household Members section. Update information as necessary and click Save.

    4. If the Immigration status for the consumer is incorrect, navigate to the Citizenship and Immigration section. Update status accordingly and click Save.

    5. Each time a change is reported, the Signature section of the application needs to be updated, prior to submission:

HUSKY HEALTH CONNECTICUT

       d.   Signature Provided: Yes

       e.   Signature Type: Paper

       f.   Click Save

6. Click Submit Pending Changes to submit application.

7. Follow enrollment steps, if necessary. (Refer to Enrollment section)

8. Navigate to the application home page and click Manage VCL.

9. If the VCL item for Proof of Citizenship is still outstanding, select Verify from the dropdown menu.

10. Click Add VCL Item to populate the fields to enter Document ID and Type.

11. Click Save

- If the information from acceptable documents matches the status and data provided in the shared HIX/Tier-1 system, navigate to Manage VCL:

    1. Select Verify from the dropdown menu for the corresponding consumer's Proof of Citizenship VCL item.

    2. Click Add VCL Item to populate the fields to enter Document ID and Type.

    3. Click Save

Manual Processing for Proof of Immigration Status VCL Items

If acceptable documents are received for an outstanding Proof of Immigration VCL item, Verification Processors need to compare the document data to the Citizenship and Immigration section of the application.

- If any information needs to be updated from acceptable documents, navigate to the home page of the consumer's application and follow the steps below:

    1. Click the Report a Change Quick Link

    2. Update the Application Information section accordingly:

        a. Application Filing Date: Use current processing date

        b. Document ID: Use document number from work item

        c. Channel: Select Paper

        d. Applying for Subsidy: Should remain Yes

        e. Click Save

    3. If the status or demographic information for the consumer is incorrect, navigate to the Citizenship and Immigration section. Update information accordingly and click Save.

HUSKY HEALTH
CONNECTICUT

4. Each time that a change is reported, the Signature section of the application needs to be updated prior to submission:

    a. Signature Provided: Yes

    b. Signature Type: Paper

    c. Click Save

5. Click Submit Pending Changes to submit application.

6. Follow enrollment steps, if necessary. (Refer to Enrollment section)

7. Navigate to the application home page and click Manage VCL.

8. If the VCL item for Proof of Immigration status is still outstanding, select Verify from the dropdown menu.

9. Click Add VCL Item to populate the fields to enter Document ID and Type.

10. Click Save

- If the information from acceptable documents matches the status and data provided in the shared HIX/Tier-1 system, navigate to Manage VCL:

    1. Select Verify from the dropdown menu for the corresponding consumer's Proof of Immigration Status VCL item.

    2. Click Add VCL Item to populate the fields to enter Document ID and Type.

    3. Click Save

Manual Processing for Proof of Five (5) Years of Lawful Residence VCL Items

This is only applicable to HUSKY consumers.

If acceptable documents are received for an outstanding Proof of Five (5) Years of Lawful Residence VCL item, Verification Processors need to check the "Residence Since" field on the LPR card to determine whether in fact the consumer has met the five (5) year requirement.

- If the consumer does not meet the five (5) year requirement, Verification Processors should navigate to the home page of the consumer's application and follow the steps below:

    1. Click the Report a Change Quick Link

    2. Update the Application Information section accordingly:

        a. Application Filing Date: Use current processing date

        b. Document ID: Use document number from work item

        c. Channel: Select Paper

        d. Applying for Subsidy: Should remain Yes

e. Click Save

3. Navigate to the Citizenship and Immigration section of the application to check the question: "Has (Consumer) lived in the U.S. as a lawful resident for at least five years."

   a. If the response is Yes, change the answer to No and click Save.

      i. Note: The shared HIX/Tier-1 system will not allow a No response to this question, if the previous question is set to Yes. Previous question: "Has (Consumer) lived in the U.S. since August 22nd, 1996?"

   b. If the response is already No, the Proof of Five (5) Years of Lawful Residence VCL item is appearing in error. Click Cancel to navigate to the application homepage and Delete Pending Changes. Skip to step 7.

4. Each time that a change is reported, the Signature section of the application needs to be updated prior to submission:

   a. Signature Provided: Yes

   b. Signature Type: Paper

   c. Click Save

5. Click Submit Pending Changes to submit application.

6. Follow enrollment steps, if necessary. (Refer to Enrollment section)

7. Navigate to the application home page and click Manage VCL.

8. If the VCL item for Proof of Five Years of Lawful Residence is still outstanding, select **Verify** from the dropdown menu.

9. Click Add VCL Item to populate the fields to enter Document ID and Type.

10. Click Save.

Managing the VCL: Proof of Identity

If acceptable documents are received for an outstanding Proof of Identity VCL item, Verification Processors need to compare the document data to the Household Members section of the shared HIX/Tier-1 system.

- If any information needs to be updated from acceptable documents, navigate to the home page of the consumer's application and follow the steps below:

  1. Click the Report a Change Quick Link
  2. Update the Application Information section accordingly:
     a. Application Filing Date: Use current processing date
     b. Document ID: Use document number from work item
     c. Channel: Select Paper
     d. Applying for Subsidy: Should remain Yes
     e. Click Save
  3. If demographic information needs to be updated, navigate to the Household Members section. Update information as necessary and click Save. Note: If the last name of the consumer does not match, it is not necessary for Verification Processors to update the shared HIX/Tier-1 system, as the consumer may have married/divorced since the identification document was issued.
  4. Each time a change is reported, the Signature section of the application needs to be updated, prior to submission:
     a. Signature Provided: Yes
     b. Signature Type: Paper
     c. Click Save
  5. Click Submit Pending Changes to submit application.
  6. Follow enrollment steps, if necessary. (Refer to Enrollment section)
  7. Navigate to the application home page and click Manage VCL.
  8. If the VCL item for Proof of Identity is still outstanding, select Verify from the dropdown menu.
  9. Click Add VCL Item to populate the fields to enter Document ID and Type.
  10. Click Save

- If the information from acceptable documents matches the status and data provided in the shared HIX/Tier-1 system:

  Navigate to Manage VCL:

  1. Select Verify from the dropdown menu for the corresponding consumer's Proof of Identity VCL item.

2. Click Add VCL Item to populate the fields to enter Document ID and Type.

3. Click Save

Managing the VCL: Proof of Residence in the Community (Non-incarceration)

This is only applicable to QHP consumers.

If acceptable documents are received for an outstanding Proof of Residence in the Community (Non-incarceration) VCL item, Verification Processors will assess whether the consumer is incarcerated or has been released.

- If the consumer has been released, Verification Processors will navigate to the Manage VCL Quick Link to verify the outstanding item:

    1. Select **Verify** from the dropdown menu for the corresponding consumer's Proof of Residence in the Community (Non-incarceration) Status VCL item.

    2. Click Add VCL Item to populate the fields to enter Document ID and Type.

    3. Click Save.

- If the consumer is still incarcerated, the following information needs to be updated in the shared HIX/Tier-1 system by performing a Report a Change action:

    1. Click the Report a Change Quick Link

    2. Update the Application Information section accordingly:

        a. Application Filing Date: Use work item document received date

        b. Document ID: Use document number from work item

        c. Channel: Select Paper

        d. Applying for Subsidy: Should remain Yes

    3. Click Save

    4. Navigate to the Household Members section and under Resides with Primary, select "No".

    5. Navigate to the Living Arrangement section and select Correctional Facility for the incarcerated individual and click Save.

    6. Each time that a change is reported, the Signature section of the application needs to be updated prior to submission:

        a. Signature Provided: Yes

        b. Signature Type: Paper

c. Click Save

7. Click Submit Pending Changes to submit application.

8. Follow enrollment steps, if necessary. (Refer to Enrollment section)

9. Navigate to the application home page and click Manage VCL.

10. If the VCL item for Proof of Residence in the Community (Non-incarceration) is still outstanding, select Verify from the dropdown menu.

11. Click Add VCL Item to populate the fields to enter Document ID and Type.

12. Click Save.

Managing the VCL: Income Items for HUSKY Programs

There are four (4) income-related VCL Items for HUSKY consumers:

1. Proof of Employment Income
2. Proof of Unemployment Income
3. Proof of Social Security Benefits
4. Proof of Self-Employment Income

The general approach for a HUSKY income verification, is to perform a Change Report on the application to align the application exactly with the submitted documentation, i.e., any subsequent income verification can be marked as **Verified** as by definition it equals the submitted documentation. This approach avoids the Verification Processor having to make decisions about whether the income amount is reasonably compatible.

The processor should enter the income amount data in a form as close to that submitted on the document as possible. Specifically:

- The processor should NOT calculate a monthly amount if the income was received in some other payment period, e.g., do NOT convert weekly income into monthly income by multiplying by 4.3, and do not convert annual income into monthly by dividing by 12. The processor should enter the data as-is, select the correct payment period and let the system perform any calculations.

- When four weekly or two bi-weekly paystubs are received that have different payment amounts (e.g., due to overtime) then the individual amounts should be added together and submitted as if a 4-week pay period.

- For consumers who provide an hourly rate and number of hours worked weekly, if the number of hours is not a whole number (e.g., 10.5 hours), processors are unable to populate the field in the system. For these cases, workers should convert the income to a weekly frequency in order to update the income record precisely.

- There are times when a processor may suspect that a consumer has incorrectly classified their self-employment income as employment income, e.g., a ride-fare driver. There is no need to re-enter the income type; simply align the income amounts.

- When income is received in a currency other than USD, the processor should convert the foreign income into USD using the XE conversion tool (http://www.xe.com/currencyconverter/).

There are detailed instructions provided in how to interpret Income documents in the document section *Processing Income Documents*.

The general process, is that Verification Processors will compare the paper-based amounts to the consumer's attested income under the Current Income section of the shared HIX/Tier-1 system:

- If the paper-based amount is different than attested, Verification Processors will update the application by following the steps below:

  1. Click the Report a Change Quick Link
  2. Update the Application Information section accordingly:
     a. Application Filing Date: Use current processing date
     b. Document ID: Use document number from work item
     c. Channel: Select Paper
     d. Applying for Subsidy: Should remain Yes
     e. Click Save
  3. Navigate to the Current Income section and update with calculated total.
  4. Each time that a change is reported, the Signature section of the application needs to be updated prior to submission:
     a. Signature Provided: Yes
     b. Signature Type: Paper
     c. Click Save

5. Click Submit Pending Changes to submit application.

6. Follow enrollment steps, if necessary. (Refer to Enrollment section)

7. Navigate to the application home page and click Manage VCL.

8. If the corresponding HUSKY income VCL item is still outstanding, select Verify from the dropdown menu.

9. Click Add VCL Item to populate the fields to enter Document ID and Type.

10. If the VCL now displays other VCL items, handle in the following way:

   a. If the VCL is for Annual Income then refer to the APTC/QHP Annual Income VCL directives to finish managing the VCL.

   b. Other newly generated VCL items can be dispositioned as per the procedure *Disposition of Inadvertent Verifications*, i.e., select **Verify** from the dropdown menu.

- If the paper-based amount is the same as attested, Verification Processors will update the application by following the steps below:

   1. Navigate to the application home page and click Manage VCL.

   2. Identify the corresponding outstanding HUSKY income VCL item and select **Verify** from the dropdown menu.

   3. Click Add VCL Item to populate the fields to enter Document ID and Type.

   4. Click Save

Managing the VCL: Annual Income Item for APTC/QHP

There are two (2) Income VCL Items for APTC/QHP Programs/Consumers:

1. Proof of Annual Income (incl. Multiple Proof of Annual Income)

2. Failure to Reconcile: Proof of Eligibility for QHP Financial Assistance

Once the most recently submitted application from the indexed string is identified, Verification Processors need to assess:

- The household's program eligibility via Eligibility Results to gain an understanding of the household as well as to validate Step 1 – Checking for Denied and Canceled Accounts.

- Confirm Application Filing date

- Renewal Status: Renewing APTC/QHP consumers are identified as such by the Report a Change/Renew Coverage link replacing the standard Report a Change link. APTC/QHP consumers are only able to renew during the Open Enrollment Period, so this may not apply.

NOTE: For renewing APTC/QHP consumers: If a change report is necessary, clicking the Report a Change/Renew Coverage link will yield a Renewal/Change Decision screen, where Verification Processors will select Option 2 to update the application data without renewing the account.

- Outstanding items (Provided, Not Verified and/or Failed) in the consumer's VCL via the Manage VCL Quick Link to validate Step 2 – Checking for Open VCLs.

Review all documents in assigned work item. If the Verification Processor receives documents for a consumer's VCL category that is already **Verified**, no further action is required.

If unacceptable verification documents are received, Verification Processors will navigate to the Manage VCL screen to fail the corresponding Annual Income VCL item. Case comments are required when VCL items are failed. (Refer to Case Comments section)

Proof of Annual Income VCL Items

If acceptable documents are received for outstanding Proof of Annual Income VCL items, Verification Processors will need to calculate the document's yearly MAGI income. Annual income will be calculated as follows:

- Annual amount = Monthly Amount * 12
- Annual amount = Twice a Month * 2 * 12
- Annual amount = Every Two (2) Weeks * 2.15 * 12
- Annual amount = Weekly Amount * 4.3 * 12

The twenty (20) percent pass/fail test will then be performed by comparing the yearly calculated total to the amount in the Yearly Income section of the application.

- If the calculated yearly amount is non-zero and is less than or no more than twenty percent (20%) of the Yearly Income on the application, Verification Processors will:
    1. Navigate to the application home page and click Manage VCL.
    2. Locate the outstanding Annual Income VCL item that corresponds to the document's consumer and select Verify from the dropdown menu.

3. Click Add VCL Item to populate the fields to enter Document ID and Type.

4. Click Save

- If the calculated yearly income amount is greater than twenty percent (20%) of the Yearly Income on the application, or if the consumer reports zero income, Verification Processors will fail the corresponding Annual Income VCL item as follows:

  1. Navigate to the application home page and click Manage VCL.

  2. Select **Fail** from the dropdown menu.

  3. Click Add VCL Item to populate the fields to enter Document ID and Type.

  4. Click Save.

  5. Case comments are required when VCL items are failed. (Refer to Case Comments section)

• If the consumer reports zero income, Verification Processors may be able to verify the Annual Income VCL item with the steps above, when the following conditions apply:

- The consumer and his/her tax filing household members report zero Yearly Income for the coverage seeking year (i.e. no one displays an amount)

Multiple Proof of Annual Income VCL items

If acceptable documentation is received for only one (1) consumer, but there are outstanding Annual Income VCL items for multiple consumers in the same tax filing household, Verification Processors will perform the twenty percent (20%) test to potentially verify all VCL items. If the documents received yield an income total that is within ~~at least~~ twenty percent (20%) of the Yearly Income section of the application, all Annual Income VCL items for the household may be verified.

Note: In most cases, one consumer's income will not yield an amount greater than the total Yearly Income for the household. However, if the income calculated is greater, the Verification Processor will need to perform the twenty percent pass/fail test from the *Proof of Annual Income VCL Items* section above.

- If the documents received show an annual income that is no more than twenty percent (20%) greater than the total Yearly Income, Verification Processors will:
    1. Navigate to the application home page and click Manage VCL.
    2. Identify the outstanding Annual Income VCL items for the same tax filing household and select **Verify** from the dropdown menu.
    3. Click Add VCL Item to populate the fields to enter Document ID and Type.
    4. Click Save.
- If the documents received show an annual income that is not within twenty percent (20%) greater than, the total Yearly Income, Verification Processors will:
    1. Navigate to the application home page and click Manage VCL.
    2. Under the Annual Income VCL item for the document's consumer only, select **Verify** from the dropdown menu.
    3. Click Add VCL Item to populate the fields to enter Document ID and Type.
    4. No action will be taken on the Annual Income VCL items for which the Verification Processor did not receive any documents.
    5. Click Save.

Failure to Reconcile: Proof of Eligibility for QHP Financial Assistance

Consumers receiving advance payments of the Premium Tax Credit (APTC) are required to file a tax return for the year when they receive APTC and file Form 8962 to reconcile their APTCs. In 2015 the Internal Revenue Service (IRS) began making information available to Exchanges regarding whether or not individuals met the filing requirement for APTC. If an individual failed to meet the requirement, he or she was determined ineligible for APTC for coverage year 2016. This was completed through a manual process by AHCT Customer Service.

The shared HIX/Tier-1 system was updated to include a Failure to Reconcile (FTR) attestation, wherein consumers are asked whether they reconciled tax credits received for previous years. This attestation in combination with IRS data will determine whether the consumer is eligible for APTC. Individuals who are determined ineligible for APTC based on FTR will receive an attachment in their 1301 Eligibility and Enrollment notice. Those impacted by FTR in this way can change the denial by proving that they filed their federal return with Form 8962. The Eligibility for QHP Financial Assistance VCL item will be opened for individuals potentially impacted by FTR and a portion of the population that was not impacted. This was done to mask the Federal Tax Information (FTI). There are three (3) items that must be submitted to satisfy the VCL:

1. Most recent signed Federal Tax Return (IRS Form 1040 pages 1 and 2)

2. IRS Form 8962 (from the same year filing)

3. One of the following to verify proof of filing:

    a. Copy of certified mail or return receipt

    b. Copy of e-mail confirmation of electronic filing

    c. Copy of proof of mailing

If Verification Processors need to clarify any information about the documents submitted for this VCL item, they must not disclose any tax filing information during a call or voicemail to the consumer.

Managing the VCL: Mixed Program Eligibility Households

A mixed eligibility household contains family members that are both in HUSKY and APTC/QHP programs. There is a potential for these households to have outstanding income items from the

HUSKY category, as well as Annual Income VCL items. In these scenarios, Verification Processors should manage the VCL in this order:

1. Address the HUSKY related VCL income items first, by following the instructions under the Managing the VCL: Income Items for HUSKY Programs section above.

2. Once the HUSKY related VCL income items are managed, address the Annual Income VCL items, by following instructions under the Managing the VCL: Annual Income Item for APTC/QHP section above.

Managing the SEP VCL: Pre-Enrollment Eligibility for Special Enrollment

Pre-enrollment eligibility for Special Enrollment (SE) mirrors the standard verification checklist in most ways, except for the following:

1. The Reasonable Opportunity Period (ROP) for verification is thirty-five (35) days instead of ninety-five (95) days
2. Enrollment transactions are not sent to the carrier until proof/verification of the SE reason.

Timeliness

If individuals are attesting to any of the QLEs that require verification (except for Future Loss of MEC), documents submitted must be dated within sixty (60) days of the enrollment date.

NOTE: Individuals will also have to attest to an event date in the application, so processors can also use the event date in the system to verify against.

For example: if an individual attested to a marriage on 03/18/2017 and came on to report the event on 4/20/2017, the marriage license/certificate should be dated 03/18/2017 or a date within sixty (60) days of the application date.

Individuals attesting to a future loss of MEC under advance availability rules will have to show that their coverage is ending on a date within sixty (60) days following the application date.

For example: if an individual applies on 05/12/2017 they may show coverage ending any time between the application date and sixty (60) days in the future from the application date. Since policies are typically end dated with the last day of the month, this could either be 05/31/2017 or 06/30/2017.

Consistency

Contractor should be sure that the document submitted is acceptable and representative of the QLE that was attested to in the application.

Household Applicability

In scenarios where an entire household has attested to a qualifying life event but submits documents that list either only the policyholder or only the primary on the application, the document(s) may be used to verify the life event for the entire household. These documents do not need to list every covered individual's name.

Managing SEP VCL: Special Case Handling

The following outlines scenarios for which there are additional processing instructions under the category of SEP VCL.

1. **Processing for Current Enrollee Requested Change of Plan**

   When a current enrollee reports a QLE and opens an SEP VCL, they will only be able to make changes to their current policy, rather than ending the current policy and choosing a new plan. However, should they wish to shop for a new plan, they can contact the Call Center regarding shopping for a new plan. The following rules apply to SEP VCL document processing when an individual wishes to shop:

   Processors are asked to review case comments before managing an SEP VCL work item. Specifically, processors should look for the following standard case comment:

2. **Existing consumer called in with SEP and wishes to shop for new plan. An escalation to AHCT customer service has been created.**

   If the comment is not present, processors may move forward with managing the work item based on standard processing instructions and SEP VCL document standards.

   If the comment is present, indicating that the consumer on the app would like to shop for a different plan, the Contractor should review the document for timeliness and consistency. Upon determining that the documents satisfy the SEP VCL, processors should NOT mark the item as verified. Marking the item as verified will send the transaction for the consumer's current plan, which they no longer want.

   Processors will then close the work item and add the following standard case comment:

The <Document Type> has been verified for this SEP and the consumer can now be contacted to complete application

Processors will add the consumer's name, app ID and document ID to the daily SEP report. This report will be sent to AHCT customer service for outreach to the consumer regarding their opportunity to shop.

Contractor will mark inadequate documents as **Failed** regardless of whether the consumer wishes to shop for a plan.

Translation Support

A verification processor may encounter documents in languages other than English or Spanish (which they are expected to be able to handle). In this situation they would put the work item on hold and export all relevant details as a PDF and email to a supervisor.

The contractor supervisor would forward the document to either the AHCT or DSS translation designee, as appropriate, depending on the program being verified. The supervisor would be responsible for tracking the response and following up should the response not be timely.

Multiple Initial Applications (MIAs)

Prior to a 2016 implementation of the shared HIX/Tier-1 system, consumers were able to apply multiple times by creating more than one initial application. Each initial application allows for a separate string of physical application IDs (original/initial followed by changes) and eligibility determinations for the consumer.

With the current release of the shared HIX/Tier-1 system, consumers and processors receive an MIA hard stop when attempting to submit an application for a consumer that is already requesting coverage on a separate application-string. To proceed, Verification Processors will need to resolve the MIAs by identifying the appropriate application-string to keep and dis-enroll the consumer from the other application-strings. In the verification queue, processors will select the application-string that corresponds to the work item application, unless the consumer has active coverage on a separate string.

NOTE: Verification Processors encountering a consumer with active APTC/QHP coverage on multiple application-strings should place a work item **On Hold** and alert their supervisor.

Enrollment of Applicants

When Verification Processors process a Report a Change to update consumer data and submit the application, the shared HIX/Tier-1 system will display the Eligibility Results page. This page presents the program eligibility status for each applying consumer. The system will automatically send Enrollment Selection Notices to the household once eligibility is determined. However, to take a proactive approach, Verification Processors may need to enroll or re-enroll consumers.

- The following scenarios require program enrollment action:

  - Consumers are eligible for HUSKY A, HUSKY B (Band 1 and Band 2) and/or HUSKY D.

  - For Mixed Households, consumers who are not newly APTC/QHP eligible, along with the HUSKY program eligible consumers. Consumers who remain eligible for APTC/QHP are identifiable in the Eligibility Results screen by the following:

    1. Consumer's eligibility displayed as Ineligible for all programs. This represents the consumer's ineligibility to shop for a new plan; not that they are ineligible for coverage. To confirm this from the account homepage, navigate to the Change Eligibility Determination Quick Link. This screen will display the true eligibility status for continuing APTC/QHP consumers.

    2. The "Select" enrollment box will not be present.

  NOTE: Verification Processors will not enroll any newly eligible APTC/QHP consumers as this possibly requires a plan selection and may affect premiums.

- The enrollment process involves the following steps:

    1. Consumers who require enrollment will have their "Select" box checked by the Verification Processor.

    2. Click Proceed to Enrollment and then click Continue.

    3. The final steps depend on the household's program:

        o When all consumers are HUSKY eligible - Click Next/Confirm on the following three pages to finalize enrollment. The Voter Registration page is last in the enrollment screen sequence. Verification Processors will select "**No Response**" and click "Proceed to Account Home".

        o When a Mixed Household includes non-newly eligible APTC/QHP consumers - A Coverage Change page may appear first in the screen sequence, if there was a change in the APTC amount for the consumer; click "Next". The following page will require Verification Processors to check the boxes next to the following statements and click "Next":

            ☐ "I wish to remain in my currently selected QHP for (current year) and do not wish to shop for a different plan."

            ☐ "I have read and understood the above Disclaimer."

        Click "**Next/Confirm**" on the following pages to finalize enrollment. The Voter Registration page is last in the enrollment screen sequence. Verification Processors will select "**No Response**" and click "Proceed to Account Home".

Case Comments are essential for successful processing across multiple vendors. They provide information that will assist future workers understand prior actions taken and detail account history. Depending on the action taken by the Verification Processor, it may be necessary to leave notes, or Case Comments, in the consumer's account.

From the account homepage, the notes section is accessible by clicking the "**Manage Case Comments**" Quick Link. From this page, Verification Processors will click "Add Case Comment", which will yield a popup text box for required notes.

The following scenarios require Verification Processors to leave Case Comments when processing paper verifications:

1. If a VCL item was failed, case comments must indicate the consumer's name, the VCL category failed, what document was received and why it was deemed unacceptable, and provide an alternate document the consumer may provide.

2. If an outbound call was made to clarify information, all data obtained during the call must be documented in a case comment.

3. For applications that are In-Process, when case comments indicate new information was updated, Verification Processors are not to Delete Pending Changes. Instead, processors will attempt to submit the application, according to the Paper Application Process and Procedure Guide directives. If unable to submit application, Verification Processors will manage the VCL for the in-process application.

4. For accounts that have been denied or canceled, Verification Processors are not required to take any processing action. A Case Comment is required, however, indicating that verification documents were not processed, since the account has been denied/canceled.

5. When a document found via a Document Search is used to manage the VCL, Case Comments must indicate the Document Type and Document Number for the item.

6. If the Proof of Citizenship and/or Proof of Identity for a consumer were previously Verified, Verification Processors may manually verify the VCL item(s) on the most recent App ID. Verification Processors are not required to enter the Document Type and Document Number.

7. Consumer requests to be dis-enrolled from QHP coverage.

8. When acceptable documents are received for an SEP VCL item and previous notes on the account indicate the consumer wishes to shop for a new plan, Verification Processors are required to leave a case comment as described in the document section *Managing SEP VCL: Special Case Handling.*

When required, the Case Comments must include the following:

1. Verification Processor's HIX/Tier-1 system username

2. Vendor name

3. Processing Queue: Verification Processed or Verification Received

4. Detailed information from the required scenarios listed above.

Closing the Work Item

After Verification Processors have assessed all documents included in their work item and have taken all necessary actions in the shared HIX/Tier-1 system, the correct action must be selected to close the work item window. For work item actions and their corresponding use, refer to The Work Item section.

Handling Misrouted SEP Verifications

When SEP documents are found as work items in the verification queue and VCL documents found as work items in the SEP queue, document processors are asked to manage the entire work item even if they are in the wrong queue.

Processing Income Documents

Income documents can be particularly varied and complex. As such, this document section provides document-specific guidance.

Gross income, along with household size, yields a consumer's federal poverty level (FPL) percentage. The FPL amount determines the healthcare program for which the consumer is eligible.

Unless otherwise stated, each of the following documents must meet the timeliness criteria below. A date calculator should be made available to all Verification Processors. The timeliness criteria varies by program:

- HUSKY VCL items – Typically documents must be dated within sixty (60) days of the work item document received date.

- APTC/QHP Annual Income VCL item – Typically documents must be dated within six (6) months of the Application Date.

Proof of Earned and Self-Employment Income Documents

- Paycheck Stubs – Paystubs have different formats, but the goal is to identify the <u>federal taxable wages</u> for the given period, which is calculated by the following formula:

    Federal Taxable Wages = Gross Pay - Pretax Deductions

    Consumers must send a full four weeks or a month's worth of consecutive paystubs. If a consumer submits a series of paystubs that is missing pay coverage for two weeks or less, Verification Processors may use the year to date (YTD) calculation to yield the amount for the missing wages:

    Missing Wages = Most Recent YTD - Most Recent Wages - Previous YTD

- Employer Statements – Statements prepared by the consumer may be handwritten or typed.

- AHCT provides a sample employer statement for the purpose of verifying Annual Income. Statements must include at a minimum:

- Name of Employer

- Employer Address

- Date of the Statement (should be within 12 months of application filing date)

- Attestation that applicant is or was an employee of the aforementioned employer

- Gross pay for a specified period of time

- Signature of employer

- Date of signature

- Letters – <u>For HUSKY VCL items only</u> - May be typed or handwritten, dated to gauge timeliness criteria, include employer signature (typed or signed), and list gross wages calculable for a full month. Unless otherwise indicated, Verification Processors will assume there are no pretax deductions. They may utilize employer contact information and make outbound calls to try and achieve clarity on any missing component(s).

- Self-Employed consumers – <u>For HUSKY VCL items only</u>, Verification Processors may accept written statements from the consumer indicating their self-employment income if they do not have any tax documents to provide.

- Gross Pay Summary Sheet – Must include a defined pay period and at least a month's worth of income. Unless otherwise indicated, Verification Processors will assume there are no pretax deductions.

- IRS Form W-2 – Must be from the previous calendar year. Verification Processors will use the amount provided on Line 1 to yield the yearly MAGI total.

- Income Tax Return Documents – Verification Processors can calculate MAGI income from the first page of the IRS Form 1040 tax return, using the corresponding formula below. Consumers who are self-employed have the option of submitting profit and loss statements and other forms included in their tax return. Tax returns from a previous tax year (no more than two (2) years prior to year in which coverage is sought) can be used up until no more than three (3) months after the tax filing

deadline for the current year. The formula for determining yearly MAGI income is provided for each tax document below:

- o 2017 Form 1040: Line 37 + (Line 20a - Line 20b) + Line 8b + Form-2555 amount [if submitted]

- o 2017 Form 1040EZ: Line 4 + Form-2555 amount [if submitted]

- o 2017 Form 1040A: Line 21 + (Line 14a - Line 14b) + Line 8b + Form-2555 amount [if submitted]

- o 2017 Form 1040ES: Line 1 + Form-2555 amount [if submitted]

- o 2017 Form 1040NR: Line 23

- o 2017 Form 1040NR-EZ: Line 7

- o 2018 Form 1040: Line 7 + (Line 5a – Line 5b) + Line 2a + Form 2555 amount [if submitted]

    - ▪ Note: Line 7 includes deductions from Schedule 1. Schedule 1 encompasses deductions that were previously included in Form 1040 for prior years

- o Schedule C: Line 31 + Line 12 + Line 19 + Line 27 [Only Amortization & Charitable Gifts applicable]

- o Schedule F: Line 34 + Line 23 + Line 32 [Only Amortization & Charitable Gifts applicable]

- o Schedule SE: Line 2

- o Partnership Income:

    - ▪ Form 1065: Line 22 + Line 17 + Line 18 + Line 20

    - ▪ K-1: Section J provides partner's share; Line 4 provide Draw

    - ▪ TOTAL = [Form 1065 * (K1 percentage)] + Draw = Yearly Business Income

- o S Corporation Income:

    - ▪ Form 1120 S: Line 21 + Line 15 + Line 17 + Line 7 + Line 19

    - ▪ K-1: Section F provides partner's share

    - ▪ TOTAL = [Form 1120S * (K1 percentage)] = Yearly Business Income

- o Rental Income:

    - ▪ Schedule E: Line 21 [Add all properties; disregard negative figures]

- Profit and Loss Statements – Ledgers prepared by the consumer; may be a typed/handwritten document or spreadsheet. For APTC/QHP consumers:

- The period defined by the consumer must be within twelve months of the application date.

- Period of time is defined by the consumer and should be used to calculate a net annual income amount based on existing directives (page 34 of this guide).

For HUSKY consumers: Dated (1) year from the work item document received date. Statements should include a pay period (at least one (1) month, but weekly calculations may be performed when appropriate. Expenses must be itemized and Verification Processors will need to add draws, guaranteed payment, and salary/wages (with consumer's name) expenses back to the bottom line. Unless otherwise indicated, consumer is assumed to be the sole earner for a partnership.

Proof of SSA Benefit Documents

- SSA Award Notice – Must be no more than one (1) year older than work item document received date. Amount is reported on a monthly basis. Verification Processors are to take the full dollar amount indicated and disregard the change (cents).

- SSA Statement Letter – Must be no more than one (1) year older than work item document received date. Amount is reported in monthly figure. Verification Processors are to take the full dollar amount indicated and disregard the change (cents).

- Form SSA-1099 – Must be dated from the previous year. Verification Processors will use the amount indicated in box 3. Amount is reported in a yearly figure.

Proof of Unemployment Benefits Documents

- Department of Labor Statement – Must reflect income no more than sixty (60) days from work item document received date. Verification Processors must determine income from most recent four (4) weeks. Weekly unemployment total is calculated by adding the amounts indicated in these columns:

  o Amount of Payment
  o Federal Inc. Tax Withheld
  o State Inc. Tax Withheld

- o Child Support Withheld

- Unemployment Award Notice – Must reflect income from current benefit year. Verification Processors will obtain Weekly Benefit Amount (WBA) from the form, usually on line 12.

- Form 1099-G - Must be from the previous year. Verification Processors will use the amount provided in box 1 to yield the yearly MAGI total.

Additional Income Documents

- Form 1099-MISC – Must be from the previous year. Verification Processors will use the amount provided in box 7 to yield the yearly MAGI total.

- Pension, Capital Gains, Investment, and Dividend Statements – For consumers that earn any of these types of income, a statement (usually monthly) from their institution may be provided. The document must indicate a defined pay period. A letter from the consumer's accountant denoting the taxable distribution amount is also acceptable.

- Form 1099-R – Must be no later than the prior calendar year. Verification Processors will use the amount provided in box 2a to yield the yearly MAGI total.

- Form 1099-INT - Must be no later than the prior calendar year. Verification Processors will use the amount provided in boxes 1 and 3 to yield the yearly MAGI total.

- Form 1099-DIV - Must be no later than the prior calendar year. Verification Processors will use the amount provided in boxes 1a and 2a to yield the yearly MAGI total.

- Form 1099-B - Must be no later than the prior calendar year. Verification Processors will use the amount provided in boxes 1d and 1e to yield the yearly MAGI total.

Appendix A – Acceptable Verifications Documents

These document types are as they appear on the 1302 Verification notice.

> **NOTE**
>
> **These tables align with the (redesigned) 1302 notice and should not be updated independently of the notice, i.e., copy the content from the notice.**

Social security numbers or Identity (name, age, etc.)

- Clinic, doctor, hospital, or school record
- Driver's license issued by a Canadian government authority
- Driver's license issued by a State or Territory
- Driver's license issued by a State or Territory
- Finding of identity from a Federal or State governmental agency
- Identification card issued by federal, state, or local government
- Military dependent's identification card
- Native American tribal documents
- School identification card
- Signed affidavit
- Two documents containing consistent information that corroborates an applicant's identity
- U.S. Coast Guard Merchant Mariner card
- U.S. military card or draft record
- Voter's registration card

HUSKY HEALTH
CONNECTICUT

U.S. Citizenship

Primary document types:
- 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

If they don't have any of the primary document types, they can submit 2 documents – one from each list below.
One of these documents:
- 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)

With one of these documents (that has a photograph or other information such as 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)
- 2 documents containing consistent information that proves your identity, like employer IDs, high school and college diplomas, marriage certificates, divorce decrees, property deeds, or titles

Lawful Presence

- Permanent Resident Card ("Green Card", I-551)
- Temporary I-551 Stamp (on passport or I-94, I-94A)
- Immigrant Visa (with temporary I-551 language)
- Employment Authorization Card (EAD or I-766)
- Arrival/Departure Record (I-94 or I-94A)
- Arrival/Departure Record in foreign passport (I-94)
- Foreign passport
- Country of issuance Reentry Permit (I-327)
- Refugee travel document (I-571)
- Certificate of Eligibility for Nonimmigrant (F-1) Student Status (I-20)
- Certificate of Eligibility for Exchange Visitor (J-1) Status (DS2019)
- Notice of Action (I-797)

You can also send these documents or statuses:
- Document indicating a member of a federally recognized Indian tribe or American Indian born in Canada. This is considered an eligible immigration status for HUSKY, but not for an Access Health CT insurance plan.
- Certification from U.S. Department of Health and Human Services (HHS) Office of Refugee Resettlement (ORR)
- Office of Refugee Resettlement (ORR) eligibility letter (if under 18)
- Document indicating withholding of removal Administrative order staying removal issued by the Department of Homeland Security (DHS)
- Cuban/Haitian entrant
- Resident of American Samoa
- Alien registration number (USCIS) or an I-94 number

Lawful Permanent Residents for at least Five (5) years

- Permanent Resident Card ("Green Card," I-551)
- Temporary I-551 Stamp (on passport or I-94, I-94A)
- Machine Readable Immigrant Visa (with temporary I-551 language)
- Employment Authorization Card (EAD, I-766)
- Arrival/Departure Record (I-94, I-94A)
- Arrival/Departure Record in foreign passport (I-94)
- Foreign passport
- Reentry Permit (I-327)
- Refugee Travel Document (I-571)
- Certificate of Eligibility for Nonimmigrant (F-1) Student Status (I-20)
- Certificate of Eligibility for Exchange Visitor (J-1) Status (DS2019)
- Notice of Action (I-797)
- Certification from U.S. Department of Health and Human Services (HHS) Office of Refugee Resettlement (ORR)
- Office of Refugee Resettlement (ORR) eligibility letter (if under 18)
- Cuban/Haitian Entrant
- Document indicating withholding of removal
- Document indicating resident of American Samoa
- Administrative order staying removal issued by the Department of Homeland Security

Annual Income

- Tax return, W-2 or 1099s filed with the IRS after your application date
- A month's worth of current paystubs (2 if biweekly, 4 if weekly, 1 if monthly)
- Business records showing income after allowable expenses
- Unemployment Award Notice
- Dept. of Labor Statement
- Employer Letter
- Income Source Statement
- Pension Award Notice
- Statement of Projected Earnings and allowable deductions submitted with documentation
- SSA Award Notice
- SSA Statement Letter
- SSA Benefit verification letter
- SSA Budget Letter
- SSA Benefits Letter
- Social Security Income Letter
- SSA Payment History
- SSA Earning Record

Monthly Employment Income (wages, commissions and bonuses)

- A month's worth of current paystubs (2 if biweekly, 4 if weekly, 1 if monthly)
- Tax return, W-2 or 1099s filed with the IRS after your application date
- Employer Letter

Monthly Self-Employment Income

- Business records showing income after allowable expenses
- Statement of Projected Earnings
- Your most recent 1099-MISC
- Recent/Quarterly tax returns

Monthly Unemployment Income

- Dept. of Labor Statement
- Unemployment Award Notice

Monthly Social Security Income

- SSA Award Notice
- SSA Statement Letter
- SSA Benefit verification letter
- SSA Budget Letter
- SSA Benefits Letter
- Social Security Income Letter
- SSA Payment History
- SSA Earning Record

Resident in the Community

- Written, signed statement from spouse, parent, sibling, teacher, doctor, lawyer, etc.
- Non Incarceration Form (available from (860) 757-6841)
- Copy of prison release papers

- Recent rent or mortgage receipts with copy of lease or loan document for effected person
- Recent utility bills in that person's name
- Recent paystub for effected person

Pre-Enrollment Eligibility for Special Enrollment (SEP VCL)

Event Type	Document	Standards
Marriage	Marriage license or certificate with a date consistent with the attested event date.	The marriage license does not need to be from Connecticut. Proof of prior MEC for at least one spouse, for at least one day in the sixty (60) days before the event date required. Note: if the marriage is to a current enrollee, there will not be a prior MEC VCL opened.
Pregnancy	Certification of pregnancy	Proof can be in the form of either AHCT's Pregnancy Certification form (available on AHCT website and with form 1202); or a letter from a healthcare provider acting within the scope of his or her practice, certifying pregnancy. Date of pregnancy certification letter must be within thirty (30) days of attested event date.
Birth	Birth certificate with a date consistent with the attested event date.	Does not need to be issued by an entity in Connecticut.
Adoption, Foster Care	Court-issued adoption or foster care papers showing a decision date consistent with the attested event date.	
Loss of MEC	Coverage termination letter, which can be from either an employer to demonstrate a termination of employer-sponsored coverage, or from the HR department of the employer; A coverage letter directly from an Issuer; Coverage end date must be consistent with the attested event date.	Documents that yield either (1) a termination for non-payment of premium or (2) an elective termination of coverage such as COBRA, should not be used to verify loss of MEC. Some documents may show the ending of a non-calendar year plan, which are acceptable to show loss of MEC.

Permanent move to CT from another state	**2 documents**: (1) showing the prior address in another state (2) showing the new address. These documents could be a: credit card bill billing invoice for utility an electronic copy of a bill that was emailed to the individual; a paystub from a previous employer and a new employer with consistent addresses on each; request for a change of address from the DMV and/or request to forward mail from the prior address; Proof of change of address for renter's insurance policy;	Permanent move to CT from another state requires proof of prior MEC for at least one day in the sixty (60) days before the event date required. Documents must show a date of permanent residency that is within sixty (60) days following the attested event date. For example, if an attested move date is 3/24, but the lease documents provided show 5/1, these will be acceptable because the lease date is within sixty (60) days following the event date.
Proof of Prior MEC	Coverage Activation Notice Notice showing a payment processed Employer or HR department confirmation of coverage Notice of Medicaid coverage from another state Statement of a Claim paid by an issuer – could be from the issuer or from the provider's office. Documents should be dated or show a coverage span that includes at least one (1) day of the sixty (60) days before the event date.	An insurance card does not show prior MEC.