STATE OF DELAWARE
DELAWARE HEALTH AND SOCIAL SERVICES
DIVISION OF MEDICAID & MEDICAL ASSISTANCE
POLICY, PLANNING & QUALITY

M E M O R A N D U M

REPLY TO
ATTN. OF: Administrative Notice DMMA-09-2015

TO: All DMMA and DSS Staff

DATE: March 30, 2015

SUBJECT: Reasonable Compatibility for Medicaid Eligibility Groups and the Delaware Healthy Children Program Subject to Modified Adjusted Gross Income Methodologies

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BACKGROUND

The Affordable Care Act (ACA) was signed into law on March 23, 2010. Under the ACA, health reform will make health care more affordable, guarantee choices when purchasing health insurance, expand Medicaid coverage to millions of low-income Americans and make numerous improvements to both Medicaid and the Children's Health Insurance Program (CHIP).

DISCUSSION

Prior to implementation of the ACA, individuals were required to provide verification of income at the time of application, renewal, or for an interim change of income.

The agency now accepts self-attestation of income with verification occurring post-enrollment, post-renewal, and after a redetermination of eligibility due to an interim change of income. The agency will obtain verification of income via electronic data sources. Individuals will not be required to provide additional information or documentation unless the information cannot be obtained electronically or is not reasonably compatible with the attested information.

Reasonably compatible means that the information obtained from an electronic data source is generally consistent with the information reported by the individual. Income verification obtained from an electronic data source shall be considered reasonably compatible when:

- self-attested income and the electronic verification are at or below the income standard;
- self-attested income and the electronic verification are above the income standard; and
- self-attested income is at or below the income standard, the electronic verification is above the income standard, and the difference between the two is 10% or less.

When the difference between the self-attested income and the electronic verification is more than 10%, a reasonable explanation will be sought from the individual. A reasonable explanation may include, but is not limited to, a loss of employment or reduced hours of employment.

ACTION REQUIRED

Staff who process eligibility determinations for MAGI-based Medicaid groups and the Delaware Healthy Children Program (DHCP) must review and apply the policy at DSSM *14800 Verifications of Factors of Eligibility* to ensure compliance with Federal and State regulations.

DIRECT INQUIRIES TO

Jill Williams
(302)255-9609

March 30, 2015
DATE

Glyne Williams
Glyne Williams, Chief
Policy, Planning & Quality
Division of Medicaid & Medical Assistance