

VERIFICATION

Legal Authority: 42 CFR 435.945; 42 CFR 435.948; 42 CFR 435.949; 42 CFR 435.952; 42 CFR 435.956; 42 CFR 457.380; 42 CFR 435.1101; 42 CFR 435.1102; 42 CFR 435.1103

1. Overview

The Affordable Care Act (ACA) of 2010 reformed the verification processes used to determine eligibility for TennCare Medicaid and CoverKids. To support a streamlined application process, state Medicaid agencies must use electronic data sources, if available, to verify information provided by an individual. If an electronic data source is not available, or there are discrepancies between the information provided by the individual and the information obtained via an electronic data source, the state may request additional verification if the information is necessary to make the eligibility determination.

2. Policy Statement

Verification is the process of confirming or substantiating information provided by an individual. Non-financial and financial information must be verified and documented for all TennCare Medicaid and CoverKids individuals.

It is the responsibility of the applying individual to provide additional information that is requested. TennCare is required to verify information provided by the individual using electronic data sources, whenever possible. If information is available through an electronic data source, TennCare must use the information available prior to requesting additional information or documentation from the individual.

TennCare follows the verification procedures for TennCare Medicaid and CoverKids as established in TennCare's Verification Plan, or as otherwise agreed to by the Single State Agency and the Centers for Medicare and Medicaid (CMS).

NOTE: Self-attestation is accepted for certain non-financial eligibility criteria for TennCare Medicaid and CoverKids, unless other procedures are required by law (such as for citizenship and immigration status and enumeration). Self-attestation is accepted for all eligibility criteria for presumptive categories.

3. The Federal Data Services Hub

The Federal Data Services Hub (the Hub) is an electronic service established by the U.S. Department of Health and Human Services (HHS) to facilitate sharing of data and other information between federal agencies, state agencies and other entities involved in administering Insurance Affordability Programs (IAPs). The Hub allows TennCare to verify data from the following sources:

- a. SSA Composite;
- b. Remote Identity Proofing (RIDP);
- c. Verify Current Income (VCI);
- d. Verify Annual Household Income (VAHI);
- e. Renewal and Redetermination Verification (RRV); and
- f. Verify Lawful Presence (VLP).

Federally Facilitated Marketplace (FFM) applications are also received through the Hub.

TennCare will use eligibility-related information received through the Hub, when available.

4. Use of Electronic Data and Requesting Additional Information

Information provided by an individual at application, when reporting a change, and at renewal is verified with available data sources. Individuals are not required to provide additional documentation when the information is available for verification, as long as the information provided by the individual is reasonably compatible with such data sources. See the *Reasonable Compatibility and Verification* policy for further explanation of reasonable compatibility.

When additional information or documentation is requested, individuals have until the due date specified on the notice to provide the requested documentation. Information returned from an electronic data source that is determined not to be reasonably compatible with information provided by the individual cannot be used to deny or terminate eligibility without first requesting additional information from the individual. If the requested information is not received by the due date specified on the notice, a denial or termination notice is sent to the individual for failure to respond to the request for documentation.

5. Documentary Evidence

a. Official Evidence

Official documentation is documentation that is prescribed or recognized as authorized, and is most commonly provided by businesses, agencies and organizations engaged in specific enterprises or service delivery. A Social Security card, utility bill and award letter are examples of official documents.

b. Unofficial Evidence

Unofficial documentary evidence may include such items as handwritten notes from an employer, an estimate from a real estate agent, etc.

c. Exception for Special Circumstances

When providing documentary evidence is an insurmountable procedural barrier to accessing coverage, TennCare may, on a case by case basis and in limited circumstances, accept self-attestation for all eligibility criteria when documentation does not exist, or is not reasonably available, such as in the case of individuals who are homeless or have experienced domestic violence or a natural disaster.

6. Non-Financial Eligibility Requirements

The list below provides an overview of how each eligibility requirement is verified. Additional information about verification requirements can be found in the relevant policy chapters.

a. Age

TennCare verifies date of birth systematically through the Hub. When date of birth is unable to be verified systematically, Staff conduct electronic data inquiries through the State Verification and Exchange System (SVES) and the State Online Query Internet (SOLQi). If TennCare is unable to electronically verify age, additional verification may be requested.

b. Citizenship and Immigration Status

Federal law requires TennCare to use SSA and DHS data to verify citizenship and immigration status. An individual's attested status is verified systematically through the Hub. If an individual's status is not verified systematically, Staff conduct electronic data inquiries through the Systematic Alien Verification for Entitlements Program (SAVE), SOLQi and SVES.

If TennCare is unable to verify status electronically, additional verification may be requested.

c. Death

Death is verified systematically through Vital Statistics and TennCare's Medicaid Management Information System (MMIS). If TennCare is unable to verify status electronically, additional verification may be requested. See the *Death* or *ABD Death* policy.

d. Health Insurance Information

TennCare accepts self-attestation of health insurance information. TennCare verifies state health insurance benefits post-eligibility through the State Benefits Administration (SBA) and TennCare's MMIS. TennCare requests verification, when applicable, for individuals that indicate a lack of coverage or lack of access to coverage. See the *TennCare Standard*, *CoverKids* and *Breast or Cervical Cancer* policies.

e. Identity

If TennCare is given a reason to doubt an individual's identity, additional verification may be requested. See examples of documentary evidence of identity in the *Citizenship and Immigration* or *ABD Citizenship and Immigration* policy.

f. Medicare Parts A and B

Medicare Parts A and B are systematically verified through BENDEX. TennCare may also conduct electronic data inquiries through SOLQi and BENDEX inquiry.

If Medicare eligibility cannot be verified electronically, additional verification may be requested.

g. Parent/Caretaker Relative Status

TennCare accepts self-attestation of parent and caretaker relative status. If there is a discrepancy in information provided by multiple caretakers of a child, additional verification may be requested.

h. Pregnancy

TennCare accepts self-attestation of pregnancy as required by federal law. If TennCare has reason to doubt the individual's pregnancy status, additional verification may be requested.

i. Residence

TennCare accepts self-attestation of residency. TennCare conducts post-eligibility verification of state residency using the Public Assistance Reporting Information System (PARIS). When TennCare has reason to doubt self-attestation of residency, such as receipt of benefits in another state, staff conduct electronic data inquiries through PARIS. When there is reason to doubt attestation of residency, additional verification may be requested.

j. Social Security Number (SSN)

SSNs can be verified systematically through the Hub. If the SSN is unable to be verified systematically, TennCare will attempt to verify the SSN electronically through SOLQi and SVES.

If unable to verify an individual's SSN electronically, a copy of the individual's SSN card or a copy of the Application for a Social Security Card (SS-5 form) can be used as verification of SSN.

7. Financial Information

a. Income

Earned income is verified systematically through the Hub, The Work Number (TALX) and Department of Labor - Quarterly Wage (DOL-QW).

Unearned Income can be verified systematically through the Hub, Low Income Subsidy (LIS), BENDEX and Department of Labor - Unemployment Insurance (DOL-UI).

If an individual's income is not systematically verified, staff will conduct electronic data inquiries through SOLQi, LIS and DOL. If TennCare is unable to verify status electronically, paper documentation may be requested.

b. Resources

Resources are not verified through the Hub. If unable to verify resources from available sources, paper documentation may be requested. Verification of resources may include bank statements, stock certificates, titles, contracts or information regarding real property provided by knowledgeable sources.

Administrative Manual Policy Manual Number: 200.035	Section: General Administrative Procedures and Compliance Chapter: Verification
--	--

Version History

Revision Date	Section	Section Title	Page Number(s)	Reason for Revision	Reviser
03.23.2015				Publication	
12.02.2015	4.	Use of Electronic Data and Requesting Additional Information	2	Non-Substantive Change	SN
06.01.2018	2.	Policy Statement	1	Policy Clarification	NF
06.01.2018	5.c.	Exception for Special Circumstances	2	Policy Change	NF
06.01.2018	7.g.	Identity	4	Policy Clarification	NF
03.18.2019	1.; 3-4.; 5.c.; 6.a- d.; 6.f.; 7.	Overview; Federal Data Services Hub; Use of Electronic Data and Requesting Additional Information; Exception for Special Circumstances; Age; Citizenship and Immigration Status; Death; Health Insurance Information; Medicare Parts A and B; Financial Information	1-5	Policy Clarification	JH
03.18.2019	2.; 6.; 6.e.; 6.i- j.	Policy Statement; Non-Financial Eligibility Requirements; Identity; Residence; Social Security Number (SSN)	1; 3-4	Non-Substantive Change	JH
05.01.2025	6.c.	Non-Financial Eligibility Requirements	4	Policy Clarification	LW