



2023 Agent and Broker Summit

Data Matching Issues Workshop

Minimizing and Resolving Enrollment Blockers

Centers for Medicare & Medicaid Services (CMS)
Center for Consumer Information & Insurance Oversight (CCIIO)

May 24, 2023

The information provided in this presentation is intended only as a general, informal summary of technical legal standards. It is not intended to take the place of the statutes, regulations, and formal policy guidance that it is based upon. This presentation summarizes current policy and operations as of the date it was presented. Links to certain source documents have been provided for your reference. We encourage audience members to refer to the applicable statutes, regulations, and other interpretive materials for complete and current information about the requirements that apply to them. The contents of this document do not have the force and effect of law and are not meant to bind the public in any way, unless specifically incorporated into a contract. This document is intended only to provide clarity to the public regarding existing requirements under the law.

This document generally is not intended for use in the State-based Marketplaces (SBMs) that do not use HealthCare.gov for eligibility and enrollment. Please review the guidance on our Agent and Broker Resources webpage (<http://go.cms.gov/CCIOAB>) and Marketplace.CMS.gov to learn more.

Unless indicated otherwise, the general references to "Marketplace" in the presentation only include Federally-facilitated Marketplaces (FFMs) and State-based Marketplaces on the Federal Platform (SBM-FPs).

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Data Matching Issues (DMIs)

Why are DMIs generated?

- » The Marketplace is not able to verify a consumer's application information through trusted data sources.*
- » A trusted data source, such as the Internal Revenue Service (IRS), may not have data for a consumer.
- » Information is missing or incorrect on the application, especially the Social Security Number (SSN), which is required for verification.

DMI Examples

- » A consumer who has an SSN did not provide it on their application, so the Marketplace was unable to verify income and citizenship status, resulting in multiple DMIs.
- » A consumer's name used on their application differs from how it appears on their citizenship document or other document (such as a Social Security card), causing a citizenship DMI.
- » A consumer did not provide their immigration document numbers and ID numbers, causing an immigration DMI.

* While CMS is not currently generating any new Medicaid/Children's Health Insurance Program (CHIP) DMIs during the Medicaid unwinding period, consumers can generate other DMIs that require documents to be submitted, such as to verify income or lawful presence.

Plan Year 2023 DMI Update



For the Plan Year 2023 Open Enrollment Period (OEP), DMI generation numbers were **highest for consumers who completed applications with the assistance of agents and brokers.**

DMIs put your clients at risk of **losing coverage and/or financial assistance** and you at risk of losing commissions.



When consumers do not add their SSN, income and citizenship DMIs will be generated!

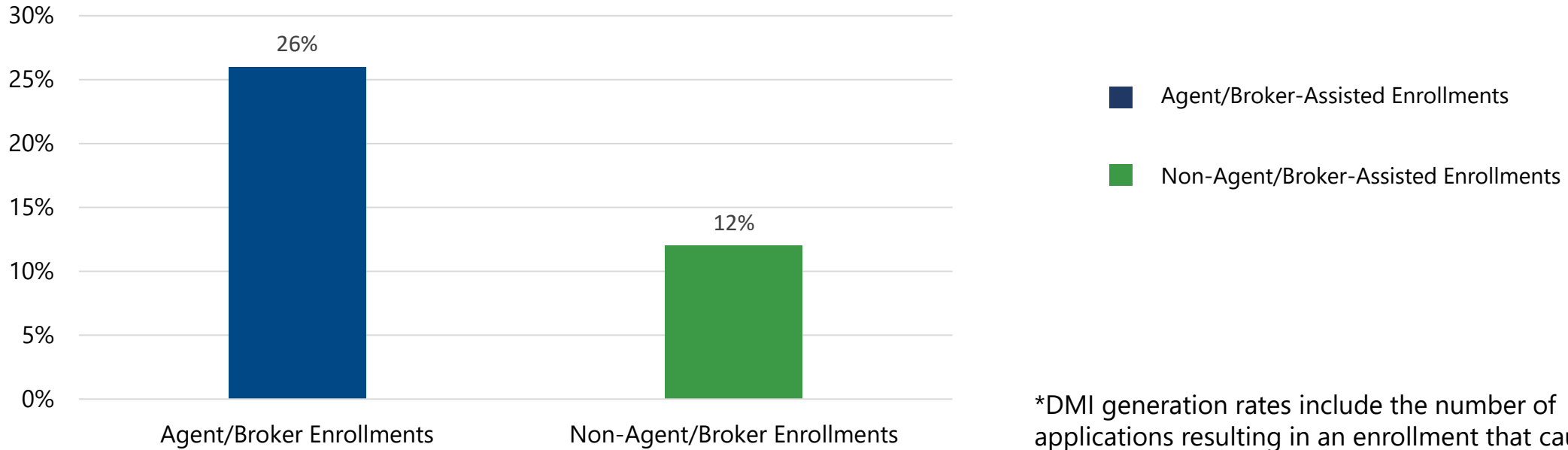
- Reminder: **Individuals who are requesting coverage are required to provide an SSN on the application if they have an SSN.**

Please take action as soon as possible. Agents and brokers should ensure that if their clients have a DMI, they assist the clients to submit any required documentation to the Marketplace as soon as possible or, if information on the application is incorrect, update their application with correct information.



Agent and Broker Priority Areas for Improvement

DMI Generation Rates on Agent/Broker- and Non-Agent/Broker-Assisted Enrollments*



*DMI generation rates include the number of applications resulting in an enrollment that caused at least one DMI to be generated

- » During the Plan Year 2023 OEP, agent- and broker-assisted enrollments generated **high** levels of DMIs. These DMIs lead to operational issues and in many cases lead to **consumers losing coverage and financial assistance.**
- » It is **important** to take steps as an agent or broker to both prevent DMIs and assist consumers in resolving them in a timely manner to ensure consumers continue to have access to healthcare coverage.

Note: Data in the chart reflects data collected through January 2023 and is updated as of February 13, 2023

Social Security Number DMIs

- » During the Plan Year 2023 OEP, of consumers who made active plan selections:
 - 16% of those who enrolled in coverage with the help of an agent or broker submitted Marketplace applications with missing SSNs.
 - Less than 1% of consumers who self-enrolled submitted applications with missing SSNs.
- » Reminder: It is **required** for everyone requesting coverage to provide their SSN if they have one. Anyone requesting coverage who does not provide their SSN on their Marketplace application will very likely generate an income and/or citizenship DMI.
- » If a DMI is not resolved by the DMI deadline and goes unresolved, **the consumer will lose financial assistance and/or Marketplace coverage.**
- » The simplest way to resolve an SSN inconsistency is to return to the application and add the SSN(s) back into all applications with missing or incorrect SSNs. This has the potential to resolve most remaining DMIs.

Agent and Broker Priority Areas for Improvement (continued)

What you can do to avoid DMIs:

- » Complete all possible fields in the application when assisting consumers, and double check that their information is complete without errors or typos.
- » Ensure consumers' names match documents such as their Social Security card.
- » Non-applicants in the household are strongly encouraged to provide an SSN if they have one, as this is used to help verify household income information.
- » If a consumer applying for coverage has an SSN, it must be included on the application to receive and retain financial assistance for coverage. You may submit the SSN when prompted on the application or assist consumers to enter this information directly on their Marketplace account or by calling the Marketplace Call Center.
- » Include Immigration Document Numbers, including I-94, A-Number, or I-551 numbers, for consumers who have those statuses.
- » Include all the consumer's household's income on the application, including household members who are not applying for coverage.

Handling DMIs Related to Household Income

- » If a consumer's household income cannot be verified by the Marketplace's trusted data sources, consumers will be notified of a Marketplace inconsistency, or DMI, in the initial eligibility notice they receive after submitting their Marketplace application.
- » Most income DMIs can be prevented or resolved by including SSNs on the application for all household members who have one.
- » Agents and brokers should review the available document types listed in the application with their client and help determine which document attests to the client's income and expenses.



Documents to attest to income and expenses:

- [Annual Income Letter of Explanation](#)
- 1040 federal or state tax return
- Wages and tax statement (W-2 and/ or 1099, including 1099-MISC, 1099-G, 1099-R, SSA-1099, 1099-DIV, 1099-S, and 1099-INT)
- Pay stub
- Self-employment ledger documentation (can be a Schedule C, the most recent quarterly or year-to-date profit and loss statement, or a self-employment ledger)
- Social Security Administration Statements (Social Security benefits letter)
- Unemployment benefits letter

Handling DMIs Related to Household Income (continued)

- » Consumers will be asked to submit documentation to verify their annual household income if:
 - Their application is missing an SSN for any household member, which prevents the Marketplace from verifying income with our data sources.
 - Their attested household income is more than \$12,000 or 50% (whichever is greater) over the amount found in the Marketplace's data sources.
- » If the Marketplace is unable to verify your client's household income, it will establish temporary eligibility based on the individual's attestation. Your client will have 90 days to resolve an income DMI, or they will lose financial assistance through the Marketplace, often leading to lost coverage.

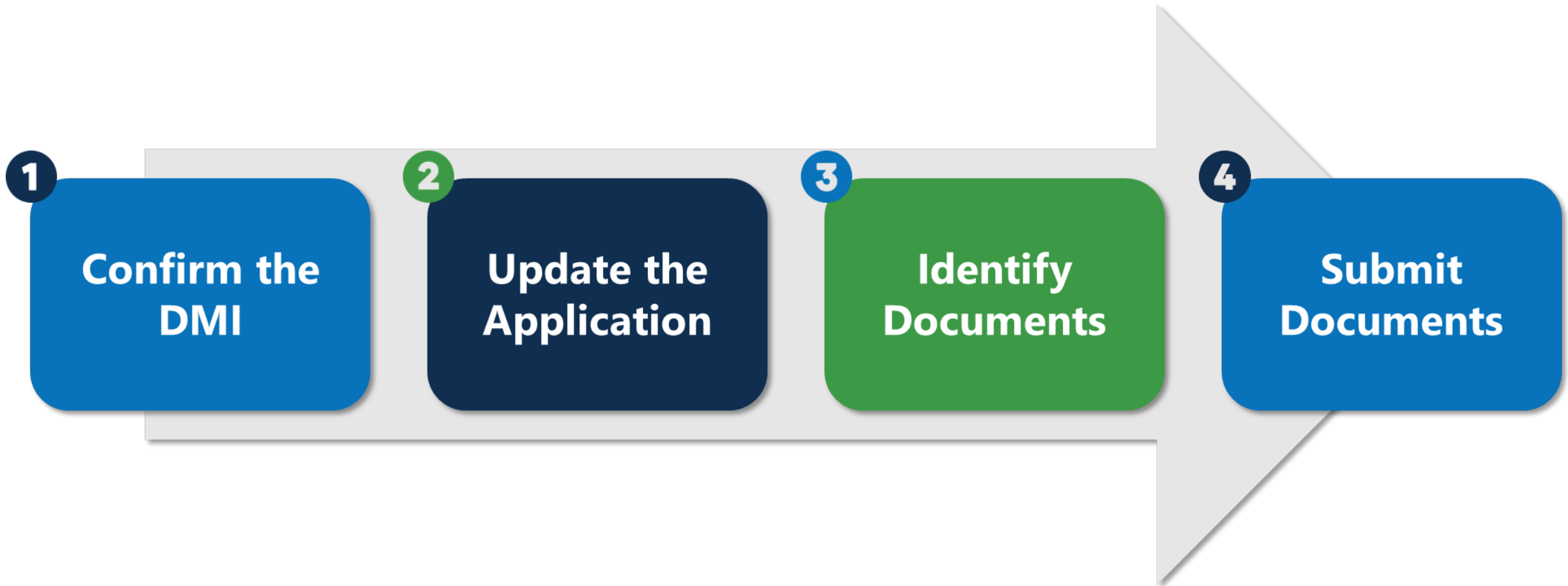
Note: You should review the notice of Marketplace DMIs with your client to help them identify which document(s) they should submit to resolve the DMI. You can also help your client prevent a DMI from being generated by helping them understand which household income and expenses they should report on their Marketplace application and by including SSNs for all household members on the application.

Handling DMIs Related to Citizenship and Immigration

- » Consumers will be asked to submit documentation to verify their citizenship or immigration status if:
 - Their application does not include their SSN or relevant immigration number, preventing the Marketplace from verifying this information with our trusted data sources.
 - The information on their application does not match our trusted data sources.
- » Consumers with citizenship or immigration DMIs will have 95 days to resolve these issues (90 days for all other inconsistencies) or they will lose their eligibility for coverage and financial assistance through the Marketplace.
- » During these 95 days, the consumer can enroll in Marketplace coverage if otherwise eligible and, if applicable, get help paying for coverage. The temporary Eligibility Determination Notice (EDN) will provide a date by which the individual must resolve the DMI. The DMI must be resolved by the close of the 95-day period to continue their eligibility for Marketplace coverage and any help paying for coverage.

Note: You should attempt to help your clients understand their DMIs and encourage them to submit any required documentation before the 95-day deadline. You should also make sure the application filer submits the correct documentation for the correct member of the enrollment group, as the Marketplace may be requesting documentation for someone other than the filer.


Resolving DMIs



Step 1: Confirm the DMI

- » Applicants with a DMI will see language in red under their eligibility results:

Eligibility overview

Susan Doe	 Eligible	To buy a Marketplace plan For a premium tax credit of up to \$343 each month for your tax household
John Doe		Your eligibility is temporary: By July 30, you must submit documents to confirm some information. See your eligibility notice for details and deadlines.

- » Read the full EDN from the Marketplace.
- » If a consumer has a DMI, the notice will say, “Choose a plan and submit documents to confirm: [data that needs to be confirmed].”
 - It is important to identify which members of the household have DMIs that need to be resolved.
 - Consumers can also determine whether they have an unresolved DMI by checking the “Application Details” section of their Marketplace accounts for a list of all unresolved inconsistencies.

Step 2: Update the Application

- » Double check that all information entered on the application is complete and correct.
- » Ensure that:
 - There are no errors or typos.
 - All members with SSNs or immigration numbers have included that information.
 - An accurate projected household income is included.
 - Consumers should report changes to household income within 30 days and resolve any resulting income DMIs within 90 days.
 - Names are consistent with government identification, such as Social Security cards or immigration documents.
- » If there are changes to an application, resubmit with those changes and see if the DMI persists.
- » Check consumers' communication preferences for Marketplace notifications to ensure they're receiving the correct information.

Note: You must always obtain consumer consent before searching for a consumer's Marketplace application or making updates to an application. If you have worked with a client in the past, you should receive consent from them again to conduct a person search or make updates to their application.

Step 3: Identify Documents

- » Check the consumer's EDN and other notices to confirm which documents need to be submitted.
 - Regarding income DMIs, a household's income documents must match the attested income on the application. If they are very different, the submitted documents will not resolve the issue. Since we know household incomes are complicated and frequently changing, the best way to resolve an income DMI is to have the consumer complete the [Annual Income Letter of Explanation](#).
- » If the consumer has already submitted documents, confirm the documents are the correct type for the DMI.
- » It may be necessary to submit multiple documents to resolve one DMI.
 - For example, consumers who submit documents to confirm their annual household income may need to provide documents verifying the annual income for every member of the household and every income source, even if those individuals aren't seeking health coverage.
- » Review [Helping Consumers Resolve Data Matching Issues](#) for a complete list of documents that may be used to resolve DMIs.

Step 4: Submit Documents

- » If the consumer is able to easily access their account:
 - In the consumer's account, consumers should click on "Verify the Application Details," then select the document type in the drop-down menu.
 - Not every document type is included in the drop-down menu.
 - If the consumer is uploading something that is not listed, they should select "Other."
- » Consumers are also able to send the necessary documents to their agent or broker to upload through a Direct Enrollment (DE) or Enhanced Direct Enrollment (EDE) partner's website or submit them by mail.
 - Submit copies, not originals.
 - On documents submitted via mail, consumers should include on every page:
 - The barcode from their notice
 - Their full name
 - Their state
 - Application ID
- » When documents are uploaded successfully, they will immediately appear as "submitted" under "Application Details."
- » Documents uploaded must be under 10 megabytes and in one of the following formats: .pdf, .jpeg, .jpg, .gif, .xml, .png, .tiff, or .bmp.

- » **How We Use Consumer Data** (<https://www.healthcare.gov/how-we-use-your-data/#ssn>)
- » **Enrolling Consumers the Right Way: SSN Requirements** (<https://www.cms.gov/files/document/enrolling-consumers-right-way-ssn-requirements.pdf>)
- » **What type of verification or consent do I need to obtain from clients when assisting with Marketplace enrollments?** (<https://www.agentbrokerfaq.cms.gov/s/article/What-type-of-verification-or-consent-do-I-need-to-obtain-from-clients-when-assisting-with-Marketplace-enrollments>)
- » **How do I resolve a DMI?** (<https://www.healthcare.gov/help/how-do-i-resolve-an-inconsistency/>)
- » **Guide to Confirming Consumer Income Information** (<https://marketplace.cms.gov/outreach-and-education/household-income-data-matching-issues.pdf>)
- » **English Annual Income DMI Letter of Explanation** (<https://www.healthcare.gov/downloads/annual-income-letter-explanation.pdf>)
- » **Spanish Annual Income DMI Letter of Explanation** (<https://www.cuidadodesalud.gov/downloads/es/annual-income-letter-explanation.pdf>)
- » **Agent and Broker General Resources:** https://regtap.cms.gov/reg_librarye.php?i=4182
- » **Agent and Broker Help Desk Information:** <https://www.cms.gov/CCIIO/Programs-and-Initiatives/Health-Insurance-Marketplaces/Downloads/Agent-Broker-Help-Desks.pdf>
- » **Agent and Broker FAQs:** <https://www.agentbrokerfaq.cms.gov/s/>



Agents and brokers are valued partners to all of us at CMS for the vital role you play in enrolling consumers in qualified health coverage.

We thank you for the trusted advice, support, and assistance you provide throughout the year and wish you continued success!