

Marketplace Verification of Citizenship and Immigration Status Step 2 Overview



*Center for Consumer Information
and Insurance Oversight (CCIIO)*

August 28, 2017

<https://www.regtap.info/FFENR.php>

The information provided in this presentation is not intended to take the place of the statutes, regulations, and formal policy guidance that it is based upon. This material summarizes current policy and operations as of the date it was uploaded to REGTAP. Links to certain source documents may have been provided for your reference. We encourage persons taking the course to refer to the applicable statutes, regulations, and other interpretive materials for complete and current information.

Update to How the Marketplace Verifies Citizenship and Immigration Status

This presentation will cover:

- An Overview of the Systematic Alien Verification Entitlement Program (SAVE) and how the Marketplace uses it to verify citizenship and immigration status
- How new SAVE Step 2 functionality will improve verification of citizenship and immigration status
- How you can help consumers with citizenship or immigration data matching issues (DMIs)
- Where you can find additional resources

Background: Systematic Alien Verification of Entitlements (SAVE)

- The Federally-facilitated Marketplace (Marketplace)* attempts to verify naturalized and derived U.S. citizenship and eligible immigration status through the Department of Homeland Security (DHS), which utilizes a database known as the Systematic Alien Verification of Entitlements (SAVE) program.
- Currently, the Marketplace uses only SAVE Step 1 through the Hub** to verify consumer information. Step 1 is a real-time verification of a consumer's citizenship or immigration status while a consumer navigates through and submits his or her application for coverage.
- SAVE also offers a Step 2 verification process which can be used to attempt verification of citizenship or immigration status if Step 1 cannot. This Step 2 process typically takes 3 – 5 days to complete.

**"The Marketplace" refers to all Federally-facilitated Marketplaces and State-based Marketplaces which use the federal eligibility and enrollment platform.*

***The Data Services Hub, or the "Hub", is an automated means of transferring data to/from data sources like DHS SAVE, among others.*

Background: Systematic Alien Verification of Entitlements (SAVE)

- Currently, if the Marketplace is unable to verify a consumer's citizenship or immigration status at Step 1, a DMI is generated.
- CMS reviews and processes DMIs for consumers not verified on Step 1 through a manual verification process.
- The Marketplace currently does not have the ability to use Step 2 through the Hub to verify citizenship and immigration status.
- Soon, the Marketplace will begin using SAVE Step 2 functionality in an automated way.
- SAVE Step 2 functionality will allow the Marketplace to continue to attempt to verify some consumers electronically through the Hub after a consumer submits his or her application and he or she has a DMI.

New: Using SAVE Step 2 to resolve DMIs

- The Marketplace will implement new functionality in **August 2017** that will allow it to more seamlessly verify citizenship and immigration status using SAVE Step 2.
- This new functionality will reduce the need for some consumers to provide documentation in order to resolve their citizenship or immigration status DMIs.
- After August 2017, if a consumer's citizenship or immigration status cannot be verified in real-time using Step 1, the Marketplace will generate a DMI and may also call SAVE Step 2 to attempt to verify the information automatically, without the consumer needing to send in documents right away.*
- After a DMI is generated, a consumer will have 95 days of enrollment eligibility for FFE coverage with APTC/CSRs, if otherwise eligible, while their citizenship or immigration status is being verified. Up to three DMI reminder notices will be sent to the household contact for the application as a reminder to take steps to resolve the open DMI before the due date (95 days after initial generation), as applicable.

**In order to initiate Step 2 processing, a consumer must enter sufficient information on the application. In the absence of sufficient information, all processing will continue to be done manually by the Eligibility Support Contractor.*

If an attested immigration status cannot be verified by SAVE Step 2, DMI review and processing will be handled by CMS, including manual adjudication for processing, if applicable.

New: Step 2 Consumer Experience Changes

If a consumer's immigration status cannot be verified in real-time through Step 1:

- The Marketplace may automatically send information to DHS to attempt verify them through Step 2. This process can take between 3 to 5 days.
- Upon Marketplace application submission, the Eligibility Determination Notice (EDN) will let the consumer know that the Marketplace is continuing to try to verify their information.

After DHS responds to the Marketplace with the Step 2 finding:

- If a consumer's citizenship or immigration status DMI is resolved through Step 2, an updated EDN and a Resolution Notice will be sent to the household contact with details about the verification result(s) from Step 2.
- If Step 2 does not resolve the consumer's DMI, a follow-up notice will be sent to let the consumer know they need to send the Marketplace documents.

SAVE Step 2: EDN Updates

When Step 2 is called, the EDN will display the messages below:

- If a U.S. Citizen or National has a citizenship DMI:
 - The EDN will now read under **“What Should I Do Next?”**:
“For each person listed here: We’re still confirming your U.S. citizenship information. We’ll send you another notice when this is complete, and we may ask you to upload or mail documents to help us confirm your information. If you already have documents to confirm your citizenship status, you may want to send them now to help with this process. If your citizenship information isn’t confirmed by [date], your eligibility for Marketplace health coverage may end.”
- If a consumer has an immigration DMI:
 - The EDN will now read under **“What Should I Do Next?”**:
“For each person listed here: We’re still confirming your immigration information. We’ll send you another notice when this is complete, and we may ask you to upload or mail documents to help us confirm your information. If you already have documents to confirm your immigration status, you may want to send them now to help with this process. If your immigration status isn’t confirmed by [date], your eligibility for Marketplace health coverage may end.”

SAVE Step 2:

EDN Updates, continued

- A consumer may receive an EDN that includes an immigration DMI and highlights that an immigration status will expire soon:
 - The EDN will now read under **“What Should I Do Next?”**:

“For each person listed here: According to our data, your immigration status is about to expire. Upload or mail documentation to confirm your most recent immigration status. If you don’t send documents by [date], your eligibility for Marketplace health coverage may end.”
- A consumer always has the option to send in documents immediately, so a list of acceptable documents is also included in the notice.

SAVE Step 2:

Resolution Notice Updates

- If the Marketplace is able to resolve a consumer's DMI through SAVE Step 2, a Resolution Notice will be sent to the household contact of the application to inform him or her that the Marketplace has verified citizenship or immigration status for an applicant or applicants.
- This notice also states that the applicant does not need to send documentation to verify citizenship or immigration status.
- Eligibility for coverage through the Marketplace will remain the same as described in the consumer's EDN received at the time of application.

SAVE Step 2:

Resolution Notice Sample

Health Insurance Marketplace

DEPARTMENT OF HEALTH AND HUMAN SERVICES
465 INDUSTRIAL BOULEVARD
LONDON, KENTUCKY 40750-0001

[First Name, Last Name of Household Contact]
[Address of Household Contact]

[Date of notice]

[Coverage year] Application ID: [corresponding year application ID #]

Dear [First name, last name of household contact]:

The Health Insurance Marketplace has verified citizenship or immigration status information for [first name, last name of impacted consumer(s)].

You no longer need to send documents to verify this information. We recently verified citizenship or immigration status information through a trusted data source. Eligibility will stay the same as described in your Eligibility Notice.

However, if you have received other notices asking for additional documents to prove other information you included on your coverage application (like household income), you still need to submit those documents to the Marketplace so that you can keep your health insurance, along with any financial help you may be getting. For more about sending documents, visit [HealthCare.gov/verify-information/documents-and-deadlines](https://www.healthcare.gov/verify-information/documents-and-deadlines).

SAVE Step 2:

FFM Account Updates

- A consumer's EDN and resolution notices, as applicable, will be mailed and/or posted (depending on what the household contact selected as his or her communication preference) in their Marketplace account.
 - If the household contact has selected a preference for email communication, the Marketplace will send an email to inform him or her that a new notice is available for review in his or her account.
- The following details regarding Step 2 processing will be available under the "Application Details" tab of "My Account":
 - First name(s) of applicant(s) with a citizenship or immigration DMI.
 - A button to download a PDF of the household EDN, which includes steps a consumer may wish to take to resolve the open DMI.
 - Confirmation of citizenship or immigration status verification, as applicable.
 - The date on which citizenship or immigration status was verified, as applicable.
 - A button to download a PDF of the Resolution Notice, as applicable.
 - The deadline to submit documentation to resolve the DMI, as applicable.

SAVE Step 2: FFM Account Updates

Status: Complete ID#: 140545573

Your application is complete
Your Marketplace application is complete and has been processed. View your eligibility results to find out if you can enroll in health coverage.

[VIEW ELIGIBILITY RESULTS](#)
[REMOVE MY APPLICATION](#)

Send documents for data matching issues
If you don't resolve the data matching issues (or "inconsistencies") by the deadline, you could lose your coverage. Select "Upload Documents" to see a list of documents to send.
Send one or more documents to verify the immigration status of the person below.

ROSLYN: send documents verifying immigration status.
Send documents by 7/24/2017

[UPLOAD DOCUMENTS](#)

Send proof for your Special Enrollment Period
You can enroll now. But, if you don't send proof by the deadline, you could lose your new coverage. Select "Upload Documents" to see a list of documents to send.

ROSLYN: send documents proving loss of coverage
Send documents by 5/20/2017
You don't need to send documents. Your Special Enrollment Period ended, and you didn't enroll or change plans.

[UPLOAD DOCUMENTS](#)

- If a consumer has a citizenship or immigration status DMI, the resolution status of the DMI can be found in the "Account Details" section of "My Account".
- Any documentation submitted to assist in verification of citizenship or immigration status may be used by the Eligibility Support Contractor, as applicable.

SAVE Step 2: FFM Account Updates

Your application is complete

VIEW ELIGIBILITY RESULTS
REMOVE MY APPLICATION

Your Marketplace application is complete and has been processed. View your eligibility results to find out if you can enroll in health coverage.

Send documents for data matching issues

If you don't resolve the data matching issues (or "inconsistencies") by the deadline, you could lose your coverage. Select "Upload Documents" to see a list of documents to send.

Send one or more documents to verify the person below has other coverage that isn't qualifying health coverage.

Susan: send documents verifying health coverage
STATUS: Send documents by 8/18/2016

UPLOAD DOCUMENTS

Your immigration status has been verified.

<FirstName>: Your immigration status has been verified. You don't need to do anything else at this time.
Your immigration status was verified on <TimerEndDate>
Documents to verify your status were due on <TimerStartDate + 95 days>

DOWNLOAD NOTICE (PDF)

Your application is complete

VIEW ELIGIBILITY RESULTS
REMOVE MY APPLICATION

Your Marketplace application is complete and has been processed. View your eligibility results to find out if you can enroll in health coverage.

Send documents for data matching issues

If you don't resolve the data matching issues (or "inconsistencies") by the deadline, you could lose your coverage. Select "Upload Documents" to see a list of documents to send.

Send one or more documents to verify the person below has other coverage that isn't qualifying health coverage.

Susan: send documents verifying health coverage
STATUS: Send documents by 8/18/2016

UPLOAD DOCUMENTS

Your citizenship status has been verified

<FirstName>: Your citizenship status has been verified. You don't need to do anything else at this time.
Your citizenship status was verified on <TimerEndDate>
Documents to verify your status were due on <TimerStartDate + 95 days>

DOWNLOAD NOTICE (PDF)

- After a citizenship or immigration status DMI has been resolved, a Resolution Notice will be found in the "Account Details" section of "My Account".
- If a citizenship or immigration status DMI is unable to be resolved within 95 days of DMI generation, information regarding deadlines in the "Account Details" section of "My Account" will be updated accordingly.

What You Should Know: How to Help

Consumers whose applications undergo SAVE Step 2 processing may contact you:

- For help understanding the notices
- For help resolving their citizenship or immigration DMI
 - See “Other Resources” slide for instructions
- To follow up on the status of citizenship or immigration status processing
- If they think their DMI has already been resolved

Other Resources

- Sample EDN:
 - English: Link Forthcoming
 - Spanish: Link Forthcoming
- Sample Resolution Notice:
 - English: Link Forthcoming
 - Spanish: Link Forthcoming
- HealthCare.gov instructions for DMIs:
<https://www.healthcare.gov/verify-information/send-more-info/>
- HealthCare.gov instructions for helping immigrant consumers:
<https://www.healthcare.gov/immigrants/coverage/>