

HEALTH INSURANCE MARKETPLACE

Resolving Citizenship or Immigration Status Inconsistencies or Data-Matching Problems for People Who Use the Federally Facilitated Marketplace

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What is meant by “inconsistencies”?

The Federally Facilitated Marketplace (FFM or “Marketplace”) verifies the information consumers provide on their health insurance applications to determine their eligibility for a qualified health plan (QHP). The verification process can consist of several steps.

First, through its data services hub, the Marketplace accesses several electronic government databases to verify the information the applicant submits about his or her income, citizenship, immigration status, and other eligibility criteria. If the Marketplace cannot immediately verify all the information on a person’s application, the applicant still is allowed to buy a QHP and may get subsidies that make the cost more affordable (premium tax credits to help offset the cost of insurance premiums and cost-sharing reductions that lower the cost to the consumer of copays and deductibles).

People whose eligibility isn’t immediately verifiable have 90 days to provide additional documentation to prove they are eligible. This 90-day period is called an “inconsistency period.” Most data-matching issues have been pending for at least 90 days, but until recently the Marketplace was not able to process the copies of documents customers uploaded to the Marketplace’s website or sent in by regular mail. (Applicants should *not* mail their *original documents*; only *copies* of documents should be mailed to the Marketplace.)

There were an estimated 1.4 million people whose citizenship or immigration status could not be immediately verified when they submitted their applications to the Marketplace. Most of these cases have been resolved, but 300,000 Marketplace customers still have unresolved inconsistencies. This does not mean that they are ineligible for coverage, but they might need to submit additional documentation.

What is the Marketplace doing to clear up inconsistencies?

The Marketplace is focused on resolving the remaining data-matching problems. It has been sending notices to people with unresolved data-matching problems, asking that they upload or mail in additional documentation. On August 12, 2014, the Marketplace mailed a final notice warning customers to provide proof of citizenship or immigration status by September 5, 2014. If they fail to submit documents by September 5, their Marketplace plan will end September 30. Marketplace officials have said that the Marketplace will send each person who has a citizenship or immigration status inconsistency one notice by regular mail and will also telephone the person twice and send him or her one email message.

These notices are in either English or Spanish only, depending on the language the customer indicated he or she preferred. The written notices about citizenship or immigration

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status data–matching problems also include multilingual taglines directing limited–English proficient (LEP) consumers to call 1-800-318-2596 to talk to an interpreter or to obtain more information. The taglines do not convey a sense of urgency or alert the consumer that their insurance will end if they do not respond. Taglines are translated into 15 languages: Arabic, Chinese, French, French Creole, German, Gujarati, Hindi, Korean, Polish, Portuguese, Russian, Spanish, Tagalog, Urdu and Vietnamese.

What happens if the Marketplace can't resolve an inconsistency?

People with citizenship or immigration status inconsistencies who fail to provide additional documentation by September 5 will no longer be considered eligible for a QHP in the Marketplace. Their coverage will end September 30 and, when they file their 2014 income taxes by April 15, 2015, they may have to pay back any premium tax credits they received while they were enrolled.

If a person receives a letter or call saying that proof is needed to verify his or her eligibility, what should the person do?

To avoid losing their health insurance, consumers who receive a letter saying that proof is needed to verify their citizenship or immigration status should mail in or upload copies of documents right away, even if they have already uploaded or mailed in copies of documents. People who have Healthcare.gov accounts can also log in to their account and click on “Application Details” or their “Application Checklist” to see if they have to resolve an inconsistency in their application.

The person should follow the steps for each inconsistency to upload or mail in copies of the documents needed to fix the issue. People who mail the documents should include the barcode from the final inconsistency notice that was mailed to them. Otherwise, they should write their name and application ID number on each document copy they mail.

What if the person already uploaded and mailed in copies of documents?

If the customer already has uploaded or mailed the requested documents but continues to receive notices, he or she can call the Marketplace call center at 1-800-318-2596 to clarify whether additional documents need to be submitted. The call center is maintaining a list of people who still need to submit additional documentation, which it will update as new documents are received. People may call to see if they are on the list and thus need to submit documents, or to confirm that their documents have been received.

Individuals who are told by the Marketplace call center that they need to submit additional documentation should repeat the process of uploading or mailing (by regular mail) copies of their documents to the Marketplace. People who have resubmitted copies of their documents should then call the Marketplace call center again to confirm that the documents were received.

What if the documents are received after the September 5, 2014, deadline?

Documents received after the September 5 deadline will still be processed, but people who submitted their documents late *may* lose their coverage on September 30. People who lose coverage, but who then are found to be eligible for a Marketplace plan with subsidies once their documents are processed, will be allowed to reenroll during a special enrollment period. Thus, eligible people who submit documents after the September 5 deadline may experience a gap in coverage.

Are health insurance customers in states that run their own marketplaces also at risk of losing their health insurance?

The information in this FAQ pertains only to people who live in FFM and Partnership Marketplace states. States that established their own state-based marketplaces must also resolve customers' citizenship and immigration status data-matching problems, but may have different procedures, notices, and deadlines. At least some states, however, are imposing the same deadline as the FFM.

Are customers whose inconsistencies are related to income or other non-immigration status factors also at risk of losing their health insurance?

Currently, only Marketplace customers with citizenship or immigration status data-matching problems are at risk of losing their health insurance on September 30 if they do not submit copies of documents proving their citizenship or immigration status by September 5.

Is there anything else a Marketplace customer can do?

The online Marketplace had a lot of technical problems during the open enrollment period. Since early March 2014, many workarounds have been added to the application process in order to minimize problems related to verifying applicants' immigration status. Therefore, we also recommend that people who have inconsistencies try to resubmit their applications, in addition to uploading or mailing in proof of their immigration status.

To resubmit an application, the person should (1) log in to his or her Marketplace account, (2) select the option to report a change, (3) review and, if necessary, update the answers about his or her immigration status and immigration document, and (4) resubmit the application.

If the person has received a Medicaid denial because of not meeting Medicaid's immigration status requirements, he or she should also make sure to answer the new questions about receiving a Medicaid denial based on immigration status.

People who can't access their application online can call the call center to update and resubmit their application. More information on resolving Marketplace data-matching problems is available on Healthcare.gov, at www.healthcare.gov/blog/the-marketplace-might-need-more-information-from-you/.