

# Data Matching Issue (DMI) Office Hour

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

*February 15, 2024*

# Disclaimer



*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/CCIIOAB>) and [Marketplace.CMS.gov](http://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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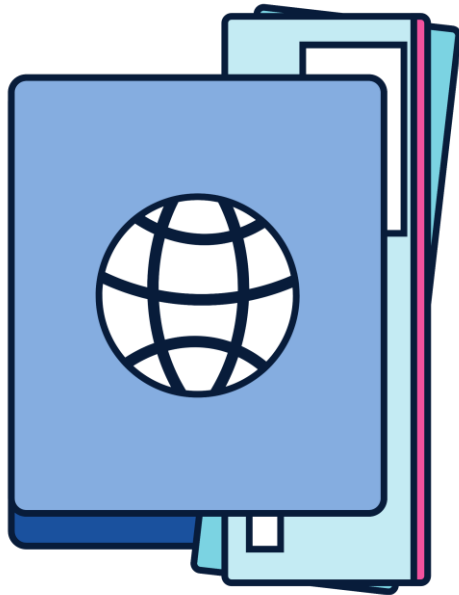
# Your Role in Preventing and Resolving DMIs

- » During Plan Year 2024 OEP, agent-and broker-assisted enrollments generated **high** levels of DMIs.
- » As an agent or broker, you play a pivotal role in ensuring consumers you assist are submitting **complete** and **accurate** eligibility information.
- » **Consumers are relying on YOU** to ensure they get the coverage they need, when they need it! Give them a great experience and ensure your book of business continues to grow by submitting their application right the first time.



# About DMIs

- » When a consumer submits an eligibility application through the Marketplace, the **following consumer information is verified** to determine eligibility for coverage through the Marketplace and for financial assistance:



**Citizenship**



**Income**

*(Current monthly household income and family size, annual household income and family size)*



**Coverage**

# What are DMIs?



» **What are DMIs?** A DMI occurs when:

- Information on a consumer's application is **missing** from or **doesn't match** information from the Marketplace's trusted data sources; or
- Information is **missing or incorrect** on the application.



» **What actions trigger a DMI?**

- A consumer failed to provide a **Social Security number (SSN)** on their application.
- A consumer failed to provide **all household income** on the application.
- A **consumer's name** used for their application differs from how it appears on their citizenship document or other document.
- A consumer failed to provide their **immigration document numbers and ID numbers**.



» **Who triggers DMIs?** Most DMIs are generated by **agents and brokers (ABs)** assisting consumers with submitting the eligibility application!

# The Risks of DMIs

- » When a consumer receives a DMI, they are required to submit additional support documentation to validate missing, mismatched, or incorrect information listed on their eligibility application.
- » While temporary eligibility is granted to the consumer while they work to provide the requested documentation, this creates **undue burden** and poses **several risks** for both the consumer and you as the agent or broker. These risks may include:



The **consumer** loses coverage



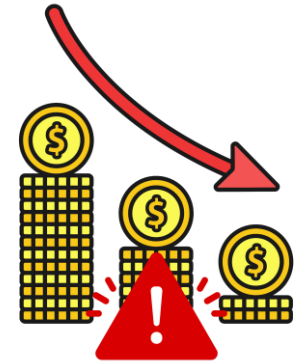
The **consumer** loses eligibility for financial assistance



The **consumer** may have their financial assistance reduced, making coverage unaffordable



The **AB** loses commission



The **AB** loses a client



# Quick Tips for Preventing and Resolving DMIs

## Complete the application



- » Complete all possible fields in the application. Make sure there are no errors or typos.
- » Ensure the consumer's name matches documents such as their Social Security card.
- » Include all household members' income on the application, including those not applying for coverage.

## Don't forget the SSN



- » Those who have an SSN must include it on the application to receive financial assistance coverage!
- » Non-applicants in the household are strongly encouraged to provide an SSN if they have one.

# Quick Tips for Preventing and Resolving DMIs

## Include all Immigration numbers



- » These can include A-Numbers, I-551s, I-94s, I-327s, I-571s, among others.
- » Clients with Immigration statuses should include these to help prevent DMIs or help them resolve quicker.

## Submit required documents



- » Check the consumer's EDN and other notices to confirm which documents need to be submitted (multiple documents may need to be submitted to resolve one DMI).
- » Confirm that any submitted documents are the correct type for the DMI.



## Keep the consumer connected



- » Check consumers' communication preferences for Marketplace notifications to ensure they're receiving the correct information.



# DMI Poll #1

**Poll Question:** Which DMI type do you most frequently see?

**Answer Options:**

1. Citizenship DMIs
2. Immigration DMIs
3. Annual Income DMIs
4. Social Security Number inconsistencies



# DMI Poll #2

**Poll Question:** Why do you believe that you are seeing this specific type of DMI most often?

## Answer Options:

1. Consumer does not have appropriate documentation to attest to their citizenship or immigration status.
2. Consumer forgets to input or is hesitant to input their SSN.
3. Consumer provides a name on their application that differs from how it appears on their citizenship or immigration document.
4. Consumer is unable to attest to their annual income or is unable to estimate within 50% (or \$12,000).
5. Other/not listed.



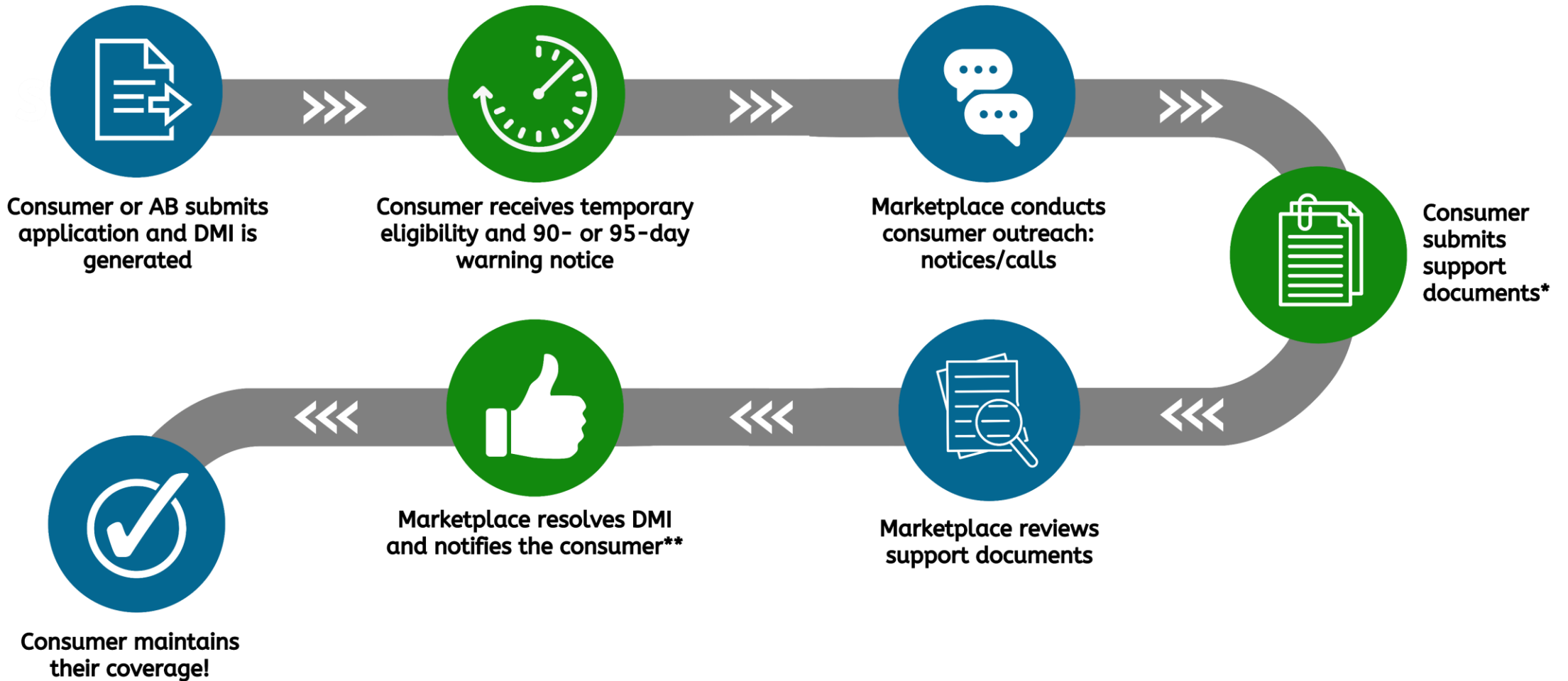
# DMI's on the Rise

- » Nationwide, most DMIs generated through agents and brokers are related to **immigration**.
- » These DMIs are on the rise and usually occur because a consumer is missing certain required documents or numbers at the time of applying for coverage.
- » **Agents and brokers should provide as much information as possible** when the client applies to minimize the likelihood that they will generate a Marketplace DMI.
- » If an immigration-related DMI does occur, **agents and brokers should assist consumers** to upload the required supporting documents.
  - When possible, agents and brokers should upload documents directly on behalf of consumers.
  - Otherwise, agents and brokers should explain to consumers how to access their account on HealthCare.gov to upload these documents themselves.
  - Additionally, consumers may choose to mail in their documents.



For more information on how consumers can mail in their supporting documents, please see <https://www.healthcare.gov/verify-information/>

# DMI Workflow



*\* If the consumer does NOT submit support documents, the Marketplace will send them reminder notices until the DMI expires.*

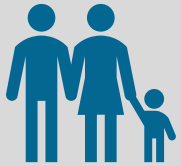
*\*\* If the support documents are deemed sufficient. If insufficient, the consumer will receive a notice and phone calls.*

# Impact of DMI Expiration: Annual Income



## Description

Applicant is unable to document annual household income is within 50% or \$12,000 (whichever is greater) of attested income.



## Consumer Impact

Household's eligibility for financial assistance is adjusted, possibly to nothing, based on the level of income on record with Marketplace trusted data sources. If the income entered on a consumer's application is less than the income reported on their taxes at the end of the year, consumers may have to pay back some of all of their premium tax credit when they file their taxes.



## Resources

FAQs: <https://www.agentbrokerfaq.cms.gov/s/topic/0TOt0000000Gw5cGAC/estimating-household-income>

Income DMI Guide: <https://www.cms.gov/marketplace/outreach-and-education/household-income-data-matching-issues.pdf>

Annual Income Letter: <https://www.healthcare.gov/downloads/annual-income-letter-explanation.pdf> (En)

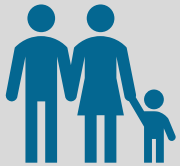
Annual Income Letter: <https://www.cuidadodesalud.gov/downloads/es/annual-income-letter-explanation.pdf> (Es)

# Impact of DMI Expiration: Citizenship/Immigration (Cit/Imm)



## Description

Consumer is unable to verify an eligible citizenship or lawful presence status.



## Consumer Impact

Consumer loses their eligibility for Marketplace coverage and is terminated if enrolled.



## Resources

FAQs: <https://www.agentbrokerfaq.cms.gov/s/topic/0TOt0000000Gw5bGAC/citizenship-and-immigration>

Documentation information: <https://www.healthcare.gov/immigrants/documentation/> (English)

Documentation information: <https://www.cuidadodesalud.gov/es/immigrants/documentation/> (Spanish)

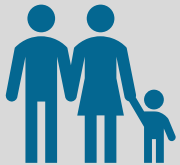


# Impact of DMI Expiration: American Indian/Alaskan Native (AI/AN) Status



## Description

Consumer is unable to verify they are a member of a Federally recognized tribe or shareholder in an Alaska Native corporation (ANCSA).



## Consumer Impact

Consumer loses their eligibility for financial assistance provided specifically to members of Federally recognized tribes, which is eliminated if enrolled.



## Resources

Working with AI/AN fact sheet: [https://www.cms.gov/ccio/programs-and-initiatives/health-insurance-marketplaces/downloads/american-indians\\_alaska-native-fact-sheet.pdf](https://www.cms.gov/ccio/programs-and-initiatives/health-insurance-marketplaces/downloads/american-indians_alaska-native-fact-sheet.pdf)

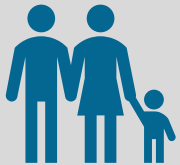
Documentation information: <https://www.healthcare.gov/help/how-do-i-resolve-an-inconsistency/#indian-status>

# Impact of DMI Expiration: Non-ESC Minimum Essential Coverage (MEC)



## Description

Consumer is unable to verify they are not eligible/enrolled in Non-Employer Sponsored Coverage.



## Consumer Impact

Consumer loses their eligibility for financial assistance, which is eliminated if enrolled.



## Resources

Documents information: <https://www.healthcare.gov/help/how-do-i-resolve-an-inconsistency/#job-based>

# DMI Cheat Sheet



DMI Type	Description	Consumer Impact	Preventing the DMI	Resolving the DMI
<b>Annual Income</b>	Unable to document annual household income is within 25% or \$6,000 of attested income.	Eligibility for financial assistance adjusted; may have to pay back some/all of their PTC.	Inform consumers to report their annual income as accurately as possible.	Assist consumer with submitting the requested support documents.
<b>Citizenship/ Immigration</b>	Unable to verify an eligible citizenship or lawful presence status.	May lose eligibility for Marketplace coverage and may be terminated if enrolled.	Ensure SSN is provided, and that consumer provides any applicable immigration documents.	Assist consumer with submitting the requested support documents.

# DMI Cheat Sheet



DMI Type	Description	Consumer Impact	Preventing the DMI	Resolving the DMI
<b>AI/AN</b>	Unable to verify they are a member of a Federally recognized tribe or shareholder in an ANCSA.	May lose eligibility for Federally recognized tribe-specific financial assistance (eliminated if enrolled).	Ensure consumer has appropriate documents to verify their status in a Federally recognized tribe or shareholder in an ANCSA.	Assist consumer with submitting the requested support documents.
<b>Non-Employer Sponsored Coverage Minimum Essential Coverage (Non ESC MEC)</b>	Consumer is unable to verify they are not eligible/enrolled in Non-Employer Sponsored Coverage	Consumer loses their eligibility for financial assistance, which is eliminated if enrolled	Consumer should submit a completed Employer Coverage Tool and cover letter, or other supporting documentation from the employer verifying they do not provide MEC.	Assist consumer with submitting the requested support documents.

# DMI Resolution Periods

- » Consumers with all DMI types (besides citizenship or immigration DMIs) will have **90 days** to resolve issues or they will lose their eligibility for coverage and/or financial assistance through the Marketplace.
  - Consumers with citizenship or immigration DMIs will have **95 days** to resolve issues.
- » If consumers with a **citizenship/immigration DMI** don't resolve their DMI within 95 days, their coverage will be terminated.
  - If they ultimately submit documentation to resolve their DMI, they may regain coverage through a Special Enrollment Period (SEP).
    - Qualifying consumers will have 60 days from the beginning of the SEP to enroll in coverage. They may choose between a prospective or retroactive coverage date.



# Resources: Acceptable Documents to Resolve DMIs

## Citizenship DMIs



<https://www.healthcare.gov/help/how-do-i-resolve-an-inconsistency/#citizenship>

## Immigration DMIs



<https://www.healthcare.gov/help/how-do-i-resolve-an-inconsistency/#immigration>

## Annual Income DMIs



<https://www.healthcare.gov/help/how-do-i-resolve-an-inconsistency/#household-income>

## AIAN DMIs



<https://www.healthcare.gov/help/how-do-i-resolve-an-inconsistency/#indian-status>



# DMI Scenario #1

**Scenario:** Crystal's income amount is different from last year but is from the same source. Crystal is self-employed and works more hours. Which documents should she submit for verification?



# DMI Scenario #1

**Explanation:** The best document that Crystal can submit for verification is a self-employment document (self-employment ledger) that shows:

- First and last name of earner
- Company name
- Income amount, including dates covered by the ledger and the net amount for profit/loss

**Note:** If the consumer doesn't expect their self-employment income to be the same as the amount on the most recent profit and loss statement, they should include the estimates for the rest of the year.

Consumers can also use this **Annual Income Letter of Explanation** if they got a letter from the Marketplace saying need to submit documents to confirm their annual income, but they don't have any of the other acceptable documents listed. Download the letter here: <https://www.healthcare.gov/downloads/annual-income-letter-explanation.pdf>.



A sample self-employment ledger is available in this document on page 9: <https://www.cms.gov/marketplace/outreach-and-education/household-income-data-matching-issues.pdf>

# DMI Scenario #2

**Scenario:** Joshua receives a 60-day warning citizenship DMI and sends in a copy of his birth certificate to resolve the DMI. What will happen if Joshua's birth certificate is deemed as insufficient documentation?



# DMI Scenario #2

**Explanation:** Joshua will receive an insufficient document notice and phone call from the Marketplace explaining that he needs to submit another acceptable document or new set of documents.



# DMI Scenario #3



**Scenario:** Emmaneul has a Permanent Resident Card and entered the document number on his application. However, he mistyped the number and receives a 95-day warning immigration DMI. What can Emmanuel do to resolve his DMI?



# DMI Scenario #3

**Explanation:** Emmanuel should first try to correct the document number through his Marketplace application. If Emmanuel still receives a DMI after attempting to correct it in his application, he should submit the documentation as requested in his DMI notice to resolve the DMI.





# Key Takeaways



**SSNs are required for everyone who has one!**



**Make sure the consumer's name matches what's listed on their SSN card.**

(For consumers with immigration statuses, include their immigration numbers – such as A-Numbers – on their application)



**Make sure all household income is included on the application, including for individuals who are not on the application.**



**Complete all fields in the application accurately.**



**Understand the documentation requirements for each DMI and check the consumer's eligibility determination notice to confirm which documents need to be submitted.**

# DMI Resolution Resources



## HealthCare.gov Resources

- » How do I resolve a DMI?: <https://www.healthcare.gov/help/how-do-i-resolve-an-inconsistency/>
- » How do I upload a document?: <https://www.healthcare.gov/help/how-to-upload-documents/>
  - Tips & troubleshooting for uploading documents: <https://www.healthcare.gov/tips-and-troubleshooting/uploading-documents/>
- » How we use consumer data: <https://www.healthcare.gov/how-we-use-your-data/#ssn>
- » Employer Coverage Tool: <https://www.healthcare.gov/downloads/employer-coverage-tool.pdf>

## CMS.gov Resources

- » Sample data matching notices to consumers: <https://marketplace.cms.gov/applications-and-forms/notices.html>
- » Income guide: <https://www.cms.gov/marketplace/outreach-and-education/household-income-data-matching-issues.pdf>

## Agent and Broker Resources

- » FAQs:
  - How can I help my clients resolve DMIs related to citizenship or immigration status?: <https://www.agentbrokerfaq.cms.gov/s/article/How-can-I-help-my-clients-resolve-data-matching-issues-related-to-citizenship-or-immigration-status>
  - How can I help my clients resolve DMIs related to income?: <https://www.agentbrokerfaq.cms.gov/s/article/How-can-I-help-my-clients-resolve-data-matching-issues-related-to-income>
  - How can I resolve my SSN inconsistency?: <https://www.agentbrokerfaq.cms.gov/s/article/How-can-I-resolve-my-Social-Security-number-SSN-inconsistency>
- » Video: How to Resolve a Marketplace DMI: [https://youtu.be/HnPkozPjjwQ?si=gXHgWZE1ga\\_CWG9w](https://youtu.be/HnPkozPjjwQ?si=gXHgWZE1ga_CWG9w)



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 during this OEP and beyond!