

# State Health Reform Assistance Network

## Charting the Road to Coverage

ISSUE BRIEF  
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## Analysis of Federal Eligibility and Enrollment Requirements: Medicaid MAGI, CHIP, Non-MAGI, TANF, SNAP and Child Care Assistance Program

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As states work to implement the Affordable Care Act (ACA), many are considering the legal, technical, and operational implications of integrating their eligibility determinations for Medicaid and CHIP with eligibility determinations for other means-tested programs such as Temporary Assistance for Needy Families (TANF), child care, and Supplemental Nutrition Assistance Program (SNAP), also known as horizontal integration. Other states may not be able to achieve full horizontal integration in the short term, but they still are seeking to achieve a coordinated strategy across programs in order to leverage new eligibility systems, increase participation across public benefits, and consolidate administrative eligibility processes.

Development of a unified enrollment pathway for Medicaid, CHIP, and social services programs starts with an assessment of the federal eligibility requirements across programs. The following chart summarizes the federal statutory and regulatory eligibility and enrollment requirements for Medicaid (using the Modified Adjusted Gross Income methodology (MAGI)), CHIP, Non-MAGI Medicaid, TANF, Child Care Assistance Program, and SNAP. The analysis highlights potential points of alignment and meaningful differences across all six programs. (Note: the attached summary document reflects more detailed analysis, which can be found [here](#).)

Despite the many shared eligibility requirements across the six programs, there are a number of requirements that are distinct to one or several of the programs, creating a barrier to full alignment. For example, there are many eligibility requirements for SNAP that do not align with those seeking to enroll in health insurance using a MAGI methodology, including those related to household composition, asset tests, and the use of a net income test. While the SNAP program makes provisions for waivers, it is unclear whether the United States Department of Agriculture would approve a state's waiver of all or even any of these requirements. By contrast, federal statutory and regulatory eligibility guidance for the Child Care Assistance Program is sparse, providing states considerable flexibility and the opportunity for potential alignment with Medicaid and CHIP.

States may use this analysis to evaluate their current rules and process for determining eligibility for social services programs. If a state identifies a specific eligibility criteria not rooted in federal statute or regulation, it may want to eliminate or modify the criteria to enable better alignment with Medicaid and CHIP. Where an eligibility criteria is required by federal law, such as the application of a resource test, the state will have to determine how that eligibility criteria can be added to a multi-benefit application that includes Medicaid and CHIP without overly complicating the enrollment process for the applicant. Ultimately, development of a multi-benefit application offers states the opportunity to evaluate, streamline, and simplify eligibility and enrollment rules for its public benefit programs, as they are now doing for Medicaid and CHIP.

### ABOUT STATE NETWORK

State Health Reform Assistance Network, a program of the Robert Wood Johnson Foundation, provides in-depth technical support to states to maximize coverage gains as they implement key provisions of the Affordable Care Act. The program is managed by the Woodrow Wilson School of Public and International Affairs at Princeton University. For more information, visit [www.statenetwork.org](http://www.statenetwork.org).

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**Summary of Federal Statutory and Regulatory Eligibility and Enrollment  
Federal Requirements: Medicaid MAGI, CHIP, Non-MAGI, TANF, SNAP and Child Care Assistance Program**

Eligibility and Enrollment Criteria	Medicaid MAGI Statute/Regulation Summary	CHIP Statute/Regulation Summary	Non-MAGI (Aged, Blind, Disabled) Statute/Regulation Summary	TANF Federal Statute/Regulation Summary	Child Care Assistance Program Statute/Regulation Summary	SNAP Federal Statute/Regulation Summary	Alignment and Differences
<b>Household Composition</b>							
Household Composition	<p><b>Regulation:</b> 1. Taxpayers not claimed as dependents: Household is taxpayer and all dependents.</p> <p>2. Tax dependents: household claiming such individual as a dependent. Exceptions: (a) individuals other than spouse/child claimed as dependent; (b) children living with both parents, one parent claims child as dependent, but parents do not expect to file a joint tax return; (c) children claimed as a tax dependent by a non-custodial parent. Children defined as either 19, or at state option, under 21 if a full-time student.</p> <p>3. Non-filers/non tax dependents: (a) spouse; (b) children (including natural, adopted and step) under 19, or at state option, under 21 if a full-time student; (c) parents (including natural, adopted, and step) and siblings (including natural, adopted, and step) if under 19, or at state option, under 21.</p>	<p><b>Regulation:</b> CHIP aligned to Medicaid household definition. Exception: Express Lane Eligibility. 42 CFR §457.315.</p>	<p><b>Regulation:</b> Household includes spouses and parents of children under age 21.</p> <p>State option to establish household composition rules for institutionalized spouses who are aged, blind, or disabled. 42 CFR §435.602</p>	<p><b>Statute:</b> Family assistance only to families with a minor child or a pregnant individual. 42 USC §608(a)(9).</p> <p><b>Regulation:</b> Family is defined as: parents or caretaker relatives of any minor child; minor child; and minor siblings of any child. 45 CFR §265.2.</p> <p>Step-parents are included in household. 45 CFR §233.53.</p>	<p><b>Regulation:</b> Residing with a parent. 45 CFR §98.20</p>	<p><b>Statute:</b> Household is defined as: an individual who lives alone or who, while living with others, customarily purchase food and prepares meals together; spouses who live together, parents and their children 21 years of age or younger who live together; and children under age 18 who are under parental control of a non-parent; or an individual who is 60+ and disabled. 7 USC §2012(n).</p> <p><b>Regulation:</b> Same definition as outlined in statute. Special rules for boarders, foster children, roomers, and live-in attendants apply. 7 CFR §273.1(a)-(c).</p>	<p><b>Alignment:</b></p> <ul style="list-style-type: none"> <li>• Non-MAGI household composition rules aligned with Medicaid MAGI household rules for families who do not file taxes (except the age of Medicaid MAGI children is under 19 not under 21).</li> </ul> <p><b>Differences:</b></p> <ul style="list-style-type: none"> <li>• Medicaid MAGI and CHIP household definition is based on those who claim dependents and those who are claimed as tax dependents, with some exceptions. Household composition rules for families who do not file taxes: parents, spouses, children under 19 (21 if full-time students), and siblings.</li> <li>• TANF and SNAP household rules are not based on tax filing status and each has its own definition.</li> <li>• Only SNAP household composition definition includes those who “purchase and prepare food together.”</li> <li>• Child Care based on “living with a parent.”</li> </ul>

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	<p>4. Married couples: counted together, regardless of whether they file a joint return or one is claimed as a dependent.</p> <p>5. If a taxpayer cannot reasonably establish that another individual is a tax dependent, then Medicaid household rules shall apply. 42 CFR. §435.603(f).</p> <p><i>Pregnant women:</i> Pregnant woman is counted as herself plus the number of children she is expected to deliver. In the case of determining the family size of other individuals, at state option: 1, 2, or pregnant woman and number she is expected to deliver. 42 CFR. §435.603(b).</p>						
<b>Financial Eligibility</b>							
Household Income	<p><b>Statute:</b> Household income is defined by IRS Code 36B. ACA §2002.</p> <p><b>Regulation:</b> Sum of the MAGI-based income of every individual included in the household minus an amount equivalent to 5 percentage points of the FPL.</p>	<p><b>Statute:</b> CHIP income rules aligned to Medicaid MAGI rules which include applicable IRS income rules. ACA §2101(d).</p> <p><b>Regulation:</b> CHIP shall apply the standards set forth in 435.603 [includes household income] in determining financial eligibility. 42 CFR. §315. Exception is Express Lane Eligibility. 42 CFR §457.315</p>	<p><b>Regulation:</b> Earned and unearned income of spouses, parents (including step), and children. Disregarded income includes:</p> <ul style="list-style-type: none"> <li>• The first \$90</li> <li>• \$30 plus 1/3 of earned income not already disregarded</li> <li>• child/dependent costs not to exceed \$175</li> <li>• \$30 earned income for those re-applying within 8 months</li> </ul>	<p><b>Regulation:</b> Earned and unearned income of spouses, parents (including step), and children. Disregarded income includes:</p> <ul style="list-style-type: none"> <li>• The first \$90</li> <li>• \$30 plus 1/3 of earned income not already disregarded</li> <li>• child/dependent costs not to exceed \$175</li> <li>• \$30 earned income for those re-applying within 8 months</li> </ul>	<p><b>Regulation:</b> Income does not exceed 85% of the FPL. Regulations otherwise silent on household income rules.</p>	<p><b>Statute:</b> Outline of exclusions from income. See below regulation for full description. 7 USC 2014(d)</p> <p><b>Regulation:</b> Earned Income:</p> <ul style="list-style-type: none"> <li>• wages and salaries</li> <li>• gross income from self-employment</li> <li>• SSI, SSA, and TANF benefits</li> <li>• training allowances</li> <li>• VISTA payments</li> <li>• work study</li> </ul>	<p><b>Alignment:</b></p> <ul style="list-style-type: none"> <li>• The following income is excluded from all programs <ul style="list-style-type: none"> <li>(1) lump sum payments counted in month received;</li> <li>(2) Scholarships, awards, or fellowship grants used for education purposes; and</li> <li>(3) American Indian/Alaska Native income exclusions.</li> </ul> </li> <li>• Non-MAGI and TANF household income rules are aligned.</li> </ul>

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	<p>The MAGI-based income of a child and tax dependent who is not required to file taxes is not included in household income.</p> <p>For individuals other than spouses or children who are tax dependents: household income, at State option, may also include actually available cash support provided by a person claiming such individual as a tax dependent.</p> <p>42 CFR §435.603(d)</p> <p>MAGI based income means income calculated using the same financial methodologies used in IRS Code 36B.</p> <p>Exceptions:                      (1) lump sum payments;                      (2) Scholarships, awards, or fellowship grants used for education purposes; and                      (3) American Indian/Alaska Native income exclusions.</p> <p>42 CFR. §435.603(e)</p> <p>No income or expense disregards shall be applied.                      42 CFR. §435.603(g).</p>		<ul style="list-style-type: none"> <li>monthly earned income of full-time student/part-time student who is not a full-time employee</li> <li>monthly income of dependent child receiving income from Job Training Partnership Act</li> <li>Earned Income Tax Credit payment 45 CFR §233.20(a)(11).</li> </ul> <p>Disregarded income continued:</p> <ul style="list-style-type: none"> <li>donated foods</li> <li>payment received under Uniform Relocation Assistance</li> <li>Grant or loans to any undergraduate student</li> <li>funds distributed/held in trust for members of Indian Tribes and Native Americans</li> <li>benefices received under Nutrition Program for the Elderly</li> <li>out of pocket expenses paid to volunteers serving as foster grandparents, senior health aides or senior companions</li> <li>VISTA payments</li> <li>value of SNAP</li> <li>LIHEAP payments</li> <li>disaster relief funds</li> <li>Agent Orange funds</li> <li>radiation compensation funds 45 CFR §233.20(a)(4)</li> </ul> <p>See also, SSI resource eligibility rules at 20 CFR §416.1131</p>	<ul style="list-style-type: none"> <li>monthly earned income of full-time student/part-time student who is not a full-time employee</li> <li>monthly income of dependent child receiving income from Job Training Partnership Act</li> <li>Earned Income Tax Credit payment 45 CFR §233.20(a)(11).</li> </ul> <p>Disregarded income continued:</p> <ul style="list-style-type: none"> <li>donated foods</li> <li>payment received under Uniform Relocation Assistance</li> <li>Grant or loans to any undergraduate student</li> <li>funds distributed/held in trust for members of Indian Tribes and Native Americans</li> <li>benefices received under Nutrition Program for the Elderly</li> <li>out of pocket expenses paid to volunteers serving as foster grandparents, senior health aides or senior companions</li> <li>VISTA payments</li> <li>value of SNAP</li> <li>LIHEAP payments</li> <li>disaster relief funds</li> <li>Agent Orange funds</li> <li>radiation compensation funds 45 CFR §233.20(a)(4)</li> </ul>		<p><b>Unearned Income:</b></p> <ul style="list-style-type: none"> <li>SSI and TANF</li> <li>retirement/veterans/ disability benefits</li> <li>OASDI</li> <li>strike benefits</li> <li>worker's compensation</li> <li>child support/alimony payments from a non-household member</li> </ul> <p>Income exclusions:</p> <ul style="list-style-type: none"> <li>in-kind benefits</li> <li>public assistance vendor payments with exceptions</li> <li>general assistance vendor payments with exceptions</li> <li>educational assistance grants/fellowships/scholarships</li> <li>reimbursements for past or future expenses</li> <li>moneys received for care of a third-party beneficiary not in the household</li> <li>earned income of under 18 year old child</li> <li>non-recurring lump sum payment (counted only in month received)</li> <li>energy assistance</li> <li>cash donations based on need (but not to exceed \$300)</li> <li>Earned Income Tax Credit</li> <li>Costs related to E&amp;T participant</li> <li>foster care payments</li> <li>child support payments</li> </ul> <p>Income deductions:</p> <ul style="list-style-type: none"> <li>Standard deduction is 8.31% of monthly net income eligibility</li> </ul>	<ul style="list-style-type: none"> <li>Child Care rules are silent allowing for potential alignment.</li> </ul> <p><b>Differences:</b></p> <ul style="list-style-type: none"> <li>Medicaid MAGI and CHIP apply MAGI-based IRS income rules (including IRS exclusions).</li> <li>TANF, Non-MAGI and SNAP each apply different countable earned and unearned income, exclusions and deduction eligibility rules from each other and from Medicaid MAGI/CHIP.</li> <li>Non-MAGI applies post eligibility financial calculations for institutionalized individuals.</li> </ul>

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		<p>Post eligibility financial calculations for institutionalized individuals. 42 CFR §435.725</p>				<ul style="list-style-type: none"> <li>• Earned income deduction: 20% of gross income</li> <li>• Excess medical deductions</li> <li>• dependent care</li> <li>• optional child support</li> <li>• shelter costs</li> </ul> <p>7 CFR §273.9(b)-(d).</p>	
<p><b>Asset/Resource Test</b></p>	<p><b>Statute:</b> No asset or resource test permitted for MAGI populations. ACA §2002(a).</p> <p><b>Regulation:</b> No asset or resource test permitted for MAGI populations. 42 CFR §435.603(g).</p>	<p><b>Statute:</b> Medicaid financial eligibility rules apply [including no asset test]. ACA §2101(d).</p> <p><b>Regulation:</b> Medicaid financial eligibility rules apply [including no asset test]. 42 CFR §457.315.</p>	<p><b>Regulation:</b> Resources not counted:</p> <ul style="list-style-type: none"> <li>• home</li> <li>• one car (not to exceed \$1,500 in value)</li> <li>• burial plot</li> <li>• funeral agreements</li> <li>• real property for six months that the family intends to sell</li> <li>• at state option, basic maintenance items</li> </ul> <p>45 CFR §233.20(a)(3)</p> <p>See also SSI resource eligibility rules at 20 CFR §416.1210</p>	<p><b>Regulation:</b> Resources should not exceed \$1,000. Resources not counted:</p> <ul style="list-style-type: none"> <li>• home</li> <li>• one car (not to exceed \$1,500 in value)</li> <li>• burial plot</li> <li>• funeral agreements</li> <li>• real property for six months that the family intends to sell</li> <li>• at state option, basic maintenance items</li> </ul> <p>45 CFR §233.20(a)(3).</p>		<p><b>Statute:</b> \$2,000 for an individual, \$3,000 for aged or disabled. See regulations below for included/excluded resources. 7 USCS 2014</p> <p><b>Regulation:</b> Included in resources:</p> <ul style="list-style-type: none"> <li>• liquid resources</li> <li>• non-liquid resources</li> </ul> <p><b>Exclusions:</b></p> <ul style="list-style-type: none"> <li>• home and surrounding property</li> <li>• household goods, personal effects</li> <li>• cash value of life insurance policies</li> <li>• burial plot</li> <li>• funeral agreement</li> <li>• cash value of pension plans (except KEOGHs)</li> <li>• licensed vehicles</li> <li>• property which annually produces income</li> <li>• installment contracts for the sale of land</li> <li>• government payments for home restoration</li> <li>• irrevocable trust funds</li> <li>• Indian lands held jointly with the Tribe</li> <li>• Earned Income Tax Credits</li> </ul>	<p><b>Alignment:</b></p> <ul style="list-style-type: none"> <li>• Non-MAGI and TANF asset test aligned.</li> <li>• Child Care silent allowing for potential alignment.</li> </ul> <p><b>Differences:</b></p> <ul style="list-style-type: none"> <li>• Medicaid MAGI/ CHIP do not apply an asset test.</li> <li>• Non-MAGI, TANF and SNAP apply a resource test.</li> </ul>

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<p><b>Budget Periods</b></p>	<p><b>Statute:</b> Point in time. ACA §2002(a)</p> <p><b>Regulation:</b> (1) New or current beneficiaries: Current monthly income; (2) For current beneficiaries: option to employ projected annual income; (3) For determining current or projected annual income: option to employ reasonably predictable fluctuations in income methodology.</p> <p>If use of current monthly income results in ineligibility for Medicaid and household income based on IRS household rules is below 100% FPL, then Medicaid financial eligibility will be based on IRS financial methodologies. 42 CFR. §435.603(h).</p>	<p><b>Statute:</b> None</p> <p><b>Regulation:</b> CHIP shall apply the standards set forth in §435.603 [includes budget periods] in determining financial eligibility. 42 CFR §315.</p>	<p><b>Statute:</b> Point in time. ACA §2002(a)</p> <p><b>Regulation:</b> (1) New or current beneficiaries: Current monthly income. 42 CFR §435.603(h)(1)</p>	<p><b>Statute:</b> None</p> <p><b>Regulation:</b> Eligibility based on income in the month for which the assistance payment is made. 45 CFR §233.22.</p>		<p><b>Statute:</b> For the first month (or first and second, if state chooses), the state shall determine eligibility and the amount of benefits based on the household income and other relevant circumstances in such first or second month. 7 42 USC. §201(f)(2)</p> <p><b>Regulation:</b> Eligibility shall be determined for the month of application considering household circumstances for the entire month of application. 7 CFR §273.10(a).</p>	<p><b>Alignment:</b></p> <ul style="list-style-type: none"> <li>• Use of current monthly income across all programs.</li> <li>• Child Care silent allowing for potential alignment</li> </ul> <p><b>Differences:</b></p> <ul style="list-style-type: none"> <li>• Medicaid MAGI/CHIP allow for budget adjustments using reasonably predictable changes. For current beneficiaries Medicaid MAGI/CHIP allow for use of projected annual income.</li> </ul>
<p><b>Income Verification</b></p>	<p><b>Statute:</b> Each state shall establish, verify, and update eligibility for participation in the program using data matching. ACA §1413</p> <p><b>Regulation:</b> If information provided by individual (at application or renewal) is reasonably compatible with data base verification, the agency must determine or renew eligibility.</p>	<p><b>Statute:</b> NA</p> <p><b>Regulation:</b> If the state does not accept attestation of income, the State must verify the income of an individual using the Medicaid data sources, standards and procedures for verifying financial eligibility. 42 CFR §457.380</p>		<p><b>Statute:</b> The state must verify income eligibility using wage and other income databases using the SSA, IRS, wage reporting systems, SWICA. 42 USC §1320b-7.</p> <p><b>Regulation:</b> Same database verification requirements as in statute. 45 CFR §205.55, 205.56.</p>		<p><b>Statute:</b> The state shall verify income through the use of information (if any) obtained using the applicant's social security numbers, as provided to determine eligibility for food stamps. 7 USC. §2020(e).</p>	<p>Alignment:</p> <ul style="list-style-type: none"> <li>• Verification of income eligibility using third party databases required for Medicaid MAGI, CHIP, TANF and SNAP.</li> <li>• No federal documentation requirements for Medicaid MAGI, CHIP, and TANF.</li> <li>• Child Care silent allowing for potential alignment.</li> </ul>

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	<p>An individual must not be required to provide additional information or documentation unless information can not be obtained electronically or such information obtained is not reasonably compatible.</p> <p>Attestation and database verification shall be considered reasonably compatible if both are either above or below the applicable income standard.</p> <p>If information is not reasonably compatible, the agency must seek additional information including: (i) a statement which explains discrepancy; (ii) other information (which may include documentation); (iii) individual must provide a reasonable period to furnish additional information. 42 CFR. §435.952.</p>					<p><b>Regulation:</b> Gross nonexempt income must be verified prior to certification; documentation or contact with a third party must be used to confirm the accuracy of the information. Households have 10 days to provide verification, except in expedited services cases.</p> <p>The state may obtain information through IVES to verify eligibility, however, before making any decision that negatively impacts benefits based on information from IVES, states shall independently verify the information.</p> <p>If the state chooses to use IVES to verify income, it must notify applicants (and applicants for recertification) that IVES will be used. 7 CFR. §273.2(b)(2) and (f).</p> <p>Verification is the use of documentation or a contact with a third party to confirm accuracy. The State agency must give households 10 days to provide required verification. 7 CFR §273.2.</p>	<p><b>Differences:</b></p> <ul style="list-style-type: none"> <li>• SNAP requires verification by documentation or contact with third party.</li> <li>• Verification requirements for Medicaid MAGI and CHIP do not apply to Non-MAGI. However, federal requirements are silent allowing for potential alignment.</li> </ul>

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<b>Residency</b>							
<b>Residency</b>	<p><b>Regulation:</b> Adults (≥ 21): Where individual is living and: (i) intends to reside, including without a fixed address; (ii) has entered state with a job commitment or seeking employment.</p> <p>For individuals residing in an institution, residence is where the individual is living and intends to reside.</p> <p>For individuals not residing in an institution and not capable of stating intent, residency is where the individual is living.</p> <p>Children (≤ 21): (i) For emancipated or married, apply adult residency definition; (ii) otherwise where the individual resides, including without a fixed address; or where the individual's parent/ caretaker has entered the state with a job commitment or seeking employment, with whom individual resides. 42 CFR. §435.403.</p> <p>Medicaid regulation do not change states' current flexibility to determine whether students "reside" in a state, as long as each individual has the opportunity to provide evidence of actual residence. Medicaid NPRM Commentary II.C.2.</p>	<p><b>Regulation:</b> Apply Medicaid residency definition under §435.403 to CHIP. May not apply durational requirement. 42 CFR. §457.320</p>	<p><b>Regulation:</b> Adults (≥ 21): Where individual is living and: (i) intends to reside, including without a fixed address; (ii) has entered state with a job commitment or seeking employment.</p> <p>For individuals residing in an institution, residence is where the individual is living and intends to reside.</p> <p>For individuals not residing in an institution and not capable of stating intent, residency is where the individual is living.</p> <p>Children (≤ 21): (i) For emancipated or married, apply adult residency definition; (ii) otherwise where the individual resides, including without a fixed address; or where the individual's parent/caretaker has entered the state with a job commitment or seeking employment, with whom individual resides. 42 CFR. §435.403.</p>	<p><b>Regulation:</b> A resident is one who is living in the state voluntarily with the intent to make his or her home there and not for a temporary purpose. A child is a resident of the state in which he or she is living other than on a temporary basis. 45 CFR §233.40.</p>		<p><b>Regulation:</b> A household shall live in the state in which it files an application for participation. The state agency may also require a household to file an application for participation in a specific project area. Residency shall not require an intent to reside permanently. 7 CFR §273.3.</p>	<p><b>Alignment:</b></p> <ul style="list-style-type: none"> <li>• Definition of residency as "where individual is living or intends to reside" aligned across all programs.</li> <li>• Child Care silent allowing for potential alignment.</li> </ul> <p><b>Differences:</b></p> <ul style="list-style-type: none"> <li>• None</li> </ul>



Eligibility and Enrollment Criteria	Medicaid MAGI Statute/Regulation Summary	CHIP Statute/Regulation Summary	Non-MAGI (Aged, Blind, Disabled) Statute/Regulation Summary	TANF Federal Statute/Regulation Summary	Child Care Assistance Program Statute/Regulation Summary	SNAP Federal Statute/Regulation Summary	Alignment and Differences
<b>Residency Verification</b>	<p><b>Regulation:</b> May accept attestation or verify through other reasonable verification processes. Evidence of immigration status may not be used to determine an individual is not a State resident. 42 CFR. §435.956(c)</p>	<p><b>Regulation:</b> If the state does not accept self-attestation of residency, the state must verify residency in accordance with Medicaid verification procedures. 42 CFR. §457.380</p>				<p><b>Statute:</b> The state shall verify such other eligibility factors as the Secretary determines necessary. 7 USC § 2020(e)(3).</p> <p><b>Regulation:</b> Residency shall be verified (except for homeless individuals, migrant farm workers, or newly arrived) by accepting documents including but not limited to proof of rent and mortgage payments, utility expenses and identity. Any documents or collateral contacts establishing residency must be accepted. 7 CFR §273.2(f).</p>	<p><b>Alignment:</b></p> <ul style="list-style-type: none"> <li>• Medicaid MAGI and CHIP allow for attestation of residency (and at state option, electronic verification using data bases).</li> <li>• TANF and Child Care statute and regulation are silent allowing for potential alignment with Medicaid and CHIP.</li> </ul> <p><b>Differences:</b></p> <ul style="list-style-type: none"> <li>• SNAP requires residency be verified with documentation, with limited exceptions.</li> <li>• Verification requirements for Medicaid MAGI and CHIP do not apply to Non-MAGI. However, federal requirements are silent allowing for potential alignment.</li> </ul>
<b>Pregnancy</b>							
<b>Pregnancy Verification</b>	<p><b>Regulation:</b> Agency must accept self-attestation unless information the state has is not reasonably compatible. 42 CFR §435.956(e).</p>	<p><b>Regulation:</b> Agency must accept self-attestation unless information the state has is not reasonably compatible. Medicaid 42 CFR §457.380(e).</p>		<p><b>Regulation:</b> It must be medically verified that a child is expected to be born in the months such payments are to be made. 45 CFR §233.90(c)(2).</p>		<p><b>Regulation:</b> A state may elect to verify any other factor that affects household eligibility. 7 CFR §273.2(f)(l)(xiv)(3).</p>	<p><b>Alignment:</b></p> <ul style="list-style-type: none"> <li>• Medicaid MAGI and CHIP rely on self attestation;</li> <li>• SNAP permits, but does not require states to rely on self attestation.</li> <li>• Child Care silent allowing for potential alignment.</li> </ul> <p><b>Differences:</b></p> <ul style="list-style-type: none"> <li>• TANF requires pregnancy to be medically verified.</li> <li>• Verification requirements for Medicaid MAGI and CHIP do not apply to Non-MAGI. However, federal requirements are silent allowing for potential alignment.</li> </ul>

Eligibility and Enrollment Criteria	Medicaid MAGI Statute/Regulation Summary	CHIP Statute/Regulation Summary	Non-MAGI (Aged, Blind, Disabled) Statute/Regulation Summary	TANF Federal Statute/Regulation Summary	Child Care Assistance Program Statute/Regulation Summary	SNAP Federal Statute/Regulation Summary	Alignment and Differences
<b>Age/Date of Birth/Identity</b>							
<b>Age/Date of Birth Verification</b>	<p><b>Regulation:</b> Attestation may be accepted. Agency may verify date of birth through reasonable verification procedures. 42 CFR §435.956(f).</p>	<p><b>Regulation:</b> Attestation may be accepted. Agency may verify date of birth through reasonable verification procedures. 42 CFR §457.380(e).</p>	<p><b>Regulation:</b> Attestation may be accepted. Agency may verify date of birth through reasonable verification procedures. 42 CFR §435.956(f).</p>			<p><b>Regulation:</b> Identity may be verified through readily available documentary evidence (e.g., driver's license, work or school ID, voter registration, benefits ID, wage stubs or birth certificate) or if this is unavailable through a collateral contact. 7 CFR §273.2(f)(1)(vii).</p>	<p><b>Alignment:</b></p> <ul style="list-style-type: none"> <li>• Medicaid MAGI, CHIP and Non-MAGI allow for attestation of identity.</li> <li>• TANF and Child Care are silent on verification permitting alignment across the programs.</li> </ul> <p><b>Differences:</b></p> <ul style="list-style-type: none"> <li>• SNAP requires documentation of identity or collateral contact verification.</li> </ul>
<b>Citizenship/Immigration Status Verification</b>							
<b>Citizenship/Immigration Status Verification</b>	<p><b>Statute:</b> State shall use federal hub for verifying citizenship/immigration status with SSA and DHS. ACA §1411(c).</p> <p><b>Regulation:</b> To the extent that information is available through the federal hub, the state must obtain such information. If match is not reasonably compatible, existing documentation rules shall apply. 42 CFR. §435.949.</p>	<p><b>Statute:</b> State shall use federal hub for verifying citizenship/immigration status with SSA and DHS. ACA §1411(c).</p> <p><b>Regulation:</b> To the extent that information is available through the federal hub, the State must obtain such information. 42 CFR. §435.949.</p>	<p>Original documentation required. Special citizenship verification rules also apply to institutionalized individuals. 42 CFR §435.407.</p>	<p><b>Statute:</b> Satisfactory documentary evidence required for immigration. Data base verification of immigration status with INS. 42 USC §1320b-7.</p> <p><b>Regulation:</b> NA</p>		<p><b>Statute:</b> NA</p> <p><b>Regulation:</b> Acceptable documentation required for verification of immigration status. Data base verification of immigration status with INS. 7 CFR §273.2(f)(1)(xiv)(2)(ii).</p>	<p><b>Alignment:</b></p> <ul style="list-style-type: none"> <li>• Medicaid MAGI, CHIP, TANF, and SNAP require database verification for citizenship/immigration status.</li> <li>• Child Care silent allowing for potential alignment.</li> </ul> <p><b>Differences:</b></p> <ul style="list-style-type: none"> <li>• TANF and SNAP require documentation of immigration status.</li> <li>• Verification requirements for Medicaid MAGI and CHIP do not apply to Non-MAGI. However, federal requirements are silent allowing for potential alignment.</li> <li>• Special citizenship verification rules apply for Non-MAGI applicants who are institutionalized.</li> </ul>

Eligibility and Enrollment Criteria	Medicaid MAGI Statute/Regulation Summary	CHIP Statute/Regulation Summary	Non-MAGI (Aged, Blind, Disabled) Statute/Regulation Summary	TANF Federal Statute/Regulation Summary	Child Care Assistance Program Statute/Regulation Summary	SNAP Federal Statute/Regulation Summary	Alignment and Differences
<b>Social Security Number (SSN)</b>							
<p><b>Social Security Number (SSN)</b></p>	<p><b>Statute:</b> Exchanges are authorized to collect and use SSNs. ACA §1414(a)(2).</p> <p><b>Regulation:</b> Agency must verify SSNs with SSA. 42 CFR. §435.956.</p> <p>The agency must require, as a condition of eligibility, that each individual (including children) provide a SSN. Exceptions for individuals: (i) who are not eligible to receive an SSN; (ii) do not have an SSN or only issued for a valid non-work reason; (iii) refuses to obtain an SSN because of well-established religious objections. 42 CFR. §435.910.</p>	<p><b>Statute:</b> Exchanges are authorized to collect and use social security numbers. ACA §1414(a)(2).</p> <p><b>Regulation:</b> Medicaid rules re: SSNs apply. 42 CFR. §457.340.</p>	<p>The agency must require, as a condition of eligibility, that each individual (including children) provide a SSN. Exceptions for individuals: (i) who are not eligible to receive an SSN; (ii) do not have an SSN or only issued for a valid non-work reason; (iii) refuses to obtain an SSN because of well-established religious objections. 42 CFR. §435.910.</p>	<p><b>Statute:</b> State shall require as a condition of eligibility a SSN for each recipient of benefits. 42 USC 1320b-7(a)(1).</p> <p><b>Regulation:</b> As a condition of eligibility each applicant shall furnish a social security number. 45 CFR §205.52.</p>		<p><b>Statute:</b> Each household member shall furnish a social security number. 7 § USC 2025(e).</p> <p><b>Regulation:</b> A SSN is required for each applying household member. 7 CFR 273.6(a).</p>	<p><b>Alignment:</b></p> <ul style="list-style-type: none"> <li>• SSNs are required of all applicants for Medicaid MAGI, CHIP, Non-MAGI, TANF and SNAP.</li> <li>• Child Care silent allowing for potential alignment.</li> </ul> <p><b>Differences:</b></p> <ul style="list-style-type: none"> <li>• None</li> </ul>

Eligibility and Enrollment Criteria	Medicaid MAGI Statute/Regulation Summary	CHIP Statute/Regulation Summary	Non-MAGI (Aged, Blind, Disabled) Statute/Regulation Summary	TANF Federal Statute/Regulation Summary	Child Care Assistance Program Statute/Regulation Summary	SNAP Federal Statute/Regulation Summary	Alignment and Differences
<b>Application and Submission</b>							
<p><b>Application and Submission</b></p>	<p><b>Statute:</b> Single streamlined form to be filed online, in person, by mail or by telephone, or by facsimile. ACA §1413(a)(1).</p> <p><b>Regulation:</b> Single streamlined form for all Insurance Affordability Programs to be filed online, in person, by mail, by telephone or other commonly available electronic means.</p> <p>The agency may not require an in-person interview as part of the application process. 42 CFR. §435.907.</p>	<p><b>Statute:</b> Single, streamlined form to be filed online, in person, by mail, by telephone or by facsimile. ACA §1413(a)(1).</p> <p><b>Regulation:</b> Medicaid application submission rules apply to CHIP.</p>		<p><b>Regulation:</b> At least one face-to-face redetermination must be conducted in each case once in every 12 months. 45 CFR § 206.109(a)(9).</p>		<p><b>Statute:</b> State shall make application available and shall permit applicant household to apply on the same day that the household first contacts SNAP office in person. 7 USC 2020(e)(2)(B).</p> <p><b>Regulation:</b> Household may file an application by submitting forms to the food stamp office in person, by fax or other electronic submission, by mail, or by completing an online application. 7 CFR §273.2(b)-(c).</p> <p>Personal interview required. 7 CFR §273.2(d) and (e).</p>	<p><b>Alignment:</b></p> <ul style="list-style-type: none"> <li>• Medicaid MAGI, CHIP and SNAP allow applications to be submitted in-person, by mail, online or by other electronic means.</li> <li>• TANF, Non-MAGI and Child Care silent allowing for potential alignment.</li> </ul> <p><b>Differences:</b></p> <ul style="list-style-type: none"> <li>• SNAP does not allow for telephone applications.</li> <li>• TANF and SNAP require personal interviews.</li> </ul>
<p><b>Application Processing Timeframes</b></p>	<p><b>Regulation:</b> The agency must promptly and without undue delay furnish Medicaid. Determination of Medicaid may not exceed 90 days for those applying on the basis of a disability; 45 days for all other applicants. 42 CFR §435.912.</p>	<p><b>Regulation:</b> Medicaid eligibility rules apply.</p>	<p><b>Regulation:</b> The agency must promptly and without undue delay furnish Medicaid.</p> <p>Determination of Medicaid may not exceed 90 days for those applying on the basis of a disability; 45 days for all other applicants. 42 CFR §435.912.</p>	<p><b>Statute:</b> 30 days processing time frame. 42 USC 608(b).</p> <p><b>Regulation:</b> 30 days processing time frame from date of application. 45 CFR §206.10(a)(6)(i).</p>		<p><b>Statute:</b> State must promptly determine eligibility.</p> <p><b>Regulation:</b> 30 day processing time frame. Expedited processing timeframe for applicants with incomes less than \$150 and resources less than \$100.</p>	<p><b>Alignment:</b></p> <ul style="list-style-type: none"> <li>• TANF and SNAP require processing timeframes within 30 days.</li> <li>• Child Care is silent allowing for potential alignment.</li> </ul> <p><b>Differences:</b></p> <ul style="list-style-type: none"> <li>• Medicaid MAGI and CHIP eligibility determinations are to be in near real time with 45 days as the outer limit for MAGI populations.</li> <li>• Non-MAGI disability determinations are to be within 90 days.</li> </ul>

Eligibility and Enrollment Criteria	Medicaid MAGI Statute/Regulation Summary	CHIP Statute/Regulation Summary	Non-MAGI (Aged, Blind, Disabled) Statute/Regulation Summary	TANF Federal Statute/Regulation Summary	Child Care Assistance Program Statute/Regulation Summary	SNAP Federal Statute/Regulation Summary	Alignment and Differences
<p><b>Assistance with Application and Redetermination</b></p>	<p><b>Regulation:</b> Agency must provide assistance to any individual seeking help in-person, over the telephone and online in a way that is accessible to individuals with disabilities and LEP. 42 CFR §435.908.</p>	<p><b>Regulation:</b> A state must provide assistance to families in understanding and completing an application in person, over the telephone, and online in a way that is accessible to individuals with disabilities and LEP. 42 CFR §457.340.</p>				<p><b>Statute:</b> State shall assist applicant with application. 7 USC §2020(e).</p> <p><b>Regulation:</b> State shall assist applicant with application.</p>	<p><b>Alignment:</b></p> <ul style="list-style-type: none"> <li>• Medicaid MAGI, CHIP, TANF and SNAP all require the State to provide assistance with applications and renewals.</li> </ul> <p><b>Differences:</b></p> <ul style="list-style-type: none"> <li>• It is unclear whether Non-MAGI applications may be submitted by telephone and online.</li> </ul>
<b>Redetermination</b>							
<p><b>Redetermination</b></p>	<p><b>Regulation:</b> Administrative redetermination process. Eligibility verified through database matching.</p> <p>For individuals not eligible to be re-determined, state to send pre-populated renewal form. 42 CFR. §435.916(a) &amp; (b).</p>	<p><b>Regulation:</b> Medicaid redetermination process to apply to CHIP. 42 CFR. §457.343.</p>	<p><b>Regulation:</b> Administrative redetermination process. Eligibility verified through database matching. 42 CFR §435.916</p>	<p><b>Regulation:</b> For recipients of AFDC, all factors of eligibility will be redetermined at least every 6 months, with exceptions. At least one face-to-face redetermination must be conducted in each case once in every 12 months. 45 CFR §206.109(a)(9).</p>		<p><b>Statute:</b> State agency shall send notice of expiration of certification before the start of the last month of certification period, advising household to reapply. 7 USC. §2020(e)(4).</p> <p><b>Regulation:</b> State agencies are encouraged to send a recertification form with notice of expiration. The state must develop an application to be used for recertification (it may be the same as the initial application, or a simplified form). To recertify, an applicant must have an in-person interview, and all information provided must be verified. An applicant is required to submit verification of eligibility. 7 CFR §273.14.</p>	<p><b>Alignment:</b></p> <ul style="list-style-type: none"> <li>• Child Care silent allowing for potential alignment.</li> </ul> <p><b>Differences:</b></p> <ul style="list-style-type: none"> <li>• Medicaid MAGI, CHIP and Non-MAGI allow for administrative renewal process every 12 months.</li> <li>• State option to send pre-populated recertification form to Non-MAGIs.</li> <li>• SNAP requires a recertification form, documentation verifying eligibility criteria and a personal interview.</li> <li>• TANF requires a new redetermination every 6 months and a personal interview at least every 12 months.</li> </ul>

Eligibility and Enrollment Criteria	Medicaid MAGI Statute/Regulation Summary	CHIP Statute/Regulation Summary	Non-MAGI (Aged, Blind, Disabled) Statute/Regulation Summary	TANF Federal Statute/Regulation Summary	Child Care Assistance Program Statute/Regulation Summary	SNAP Federal Statute/Regulation Summary	Alignment and Differences
<p><b>Reporting Changes</b></p>	<p><b>Regulation:</b> Agency must have procedures in place for beneficiaries to make timely and accurate reports of any change in circumstances.</p> <p>The agency must promptly re-determine eligibility whenever it receives information about a change in a beneficiary's circumstances that might affect eligibility. If the agency has enough information to renew eligibility, the agency may begin a 12 month renewal period. 42 CFR § (d) &amp; (e).</p>	<p><b>Regulation:</b> Medicaid change reporting rules shall apply to CHIP</p>	<p><b>Regulation:</b> Agency must have procedures in place for beneficiaries to make timely and accurate reports of any change in circumstances.</p> <p>The agency must promptly re-determine eligibility whenever it receives information about a change in a beneficiary's circumstances that might affect eligibility. If the agency has enough information to renew eligibility, the agency may begin a 12 month renewal period. 42 CFR. § (d) &amp; (e).</p>	<p><b>Regulation:</b> Caretaker relative or another designated person must submit any changes to income, resource or circumstances that could affect eligibility to the State agency. 45 CFR. §233.36.</p>		<p><b>Statute:</b> Households not required to file periodic reports must report changes in income or circumstances that would affect eligibility. 7 USC §2015(c)(1)(B).</p> <p><b>Regulation:</b> Households report monthly or quarterly changes: (1) more than \$50 in unearned income (except changes relating to public assistance or general assistance in areas where these cases are jointly processed with food stamps); (2) changes in source of income; and (3) one of a number of changes that may be determined by a State agency (i.e., change in household composition, change in residence, a more than \$100 per month increase in earned income), tailored to categories of households. Certified households must report changes within 10 days of learning of change. Applying households must report changes at certification interview. 7 CFR. §273.8.</p>	<p><b>Alignment:</b></p> <ul style="list-style-type: none"> <li>• Medicaid MAGI, CHIP, Non-MAGI, TANF and SNAP require beneficiaries to report changes or circumstances that would affect eligibility.</li> <li>• Child Care silent allowing for potential alignment.</li> </ul> <p><b>Differences:</b></p> <ul style="list-style-type: none"> <li>• None</li> </ul>

Eligibility and Enrollment Criteria	Medicaid MAGI Statute/Regulation Summary	CHIP Statute/Regulation Summary	Non-MAGI (Aged, Blind, Disabled) Statute/Regulation Summary	TANF Federal Statute/Regulation Summary	Child Care Assistance Program Statute/Regulation Summary	SNAP Federal Statute/Regulation Summary	Alignment and Differences
<b>Coordination of Eligibility and Enrollment</b>							
<p><b>Coordination of Eligibility and Enrollment</b></p>	<p><b>Statute:</b> State shall establish procedures for coordinating enrollment across Medicaid, CHIP, and Exchange. ACA §2201</p> <p><b>Regulation:</b> Exchanges must coordinate across Insurance Affordability Programs. If individuals are not eligible for Medicaid, must transfer information to screen for other insurance affordability programs, and transfer individual's account information to any other program the individual may be eligible for. Medicaid 42 CFR. §435.1200</p>	<p><b>Statute:</b> State shall establish procedures for coordinating enrollment across Medicaid, CHIP, and Exchange. ACA §1413.</p> <p><b>Regulation:</b> Exchanges must coordinate across Insurance Affordability Programs. If individuals are not eligible for CHIP, must transfer information to screen for other insurance affordability programs, and transfer individual's account information to any other program the individual may be eligible for. 42 CFR. §457.348 &amp; 457.350.</p>					<p><b>Alignment:</b></p> <ul style="list-style-type: none"> <li>• None</li> </ul> <p><b>Differences:</b></p> <ul style="list-style-type: none"> <li>• Medicaid and CHIP require coordination of eligibility determinations with eligibility for premium tax credits/cost-sharing reductions and with Basic Health Program (if State operates one).</li> <li>• TANF and SNAP do not require coordination of eligibility determinations with premium tax credits, cost-sharing reductions or a Basic Health Program.</li> </ul>