



OPERATIONAL MEMO

TITLE:	WORK NUMBER VERIFICATION AND RELATED EXPENDITURES FOR MEDICAL ASSISTANCE-ONLY
SUPERSEDES NUMBER:	N/A
EFFECTIVE DATE:	JANUARY 1, 2020
DIVISION AND OFFICE:	MEDICAID OPERATIONS OFFICE AND POLICY, COMMUNICATIONS AND ADMINISTRATION OFFICE
PROGRAM AREA:	ELIGIBILITY AND COUNTY RELATIONS AND ADMINISTRATION
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Purpose and Audience:

The purpose of this Operational Memo is to inform county departments of human/social services of operational instructions relating to the use of the Work Number income verification system for Medical Assistance-only cases and provide direction if the expenditures related to these verifications are eligible for Federal Financial Participation (FFP) and reimbursement with State funds.

Information:

At implementation of the Affordable Care Act, the Centers for Medicare and Medicaid Services (CMS) approved Colorado's Verification Plan that details the eligibility criteria to be used in determining Medicaid eligibility. Colorado's approved methodology for income verification includes self-attestation at initial application and the usage of State electronic databases post-eligibility to verify income eligibility. Other acceptable methods of income verification include a self-employment ledger for self-employed individuals and paper documentation for individuals whose income was unable to be

verified through electronic data sources, or if they do not have a social security number to verify income information electronically.

Guidance on acceptable sources of verification for Medical Assistance can be found in [10 CCR 2505-10 8.100](#) or training documentation offered by the [Staff Development Center](#).

The Colorado Department of Human Services (CDHS) provides access to county departments of human/social services to the Work Number income verification system available through Equifax. Counties currently use this system to verify income for various public assistance programs, including the Supplemental Nutrition Assistance Program (SNAP). It has been determined that eligibility sites have used the Work Number verification system for eligibility determination of Medical Assistance-only cases.

The Department of Health Care Policy and Financing (the Department) has reviewed this process and determined that use of the Work Number income verification system for Medical Assistance-only cases is not an approved method for income eligibility determination per Colorado's Verification Plan with CMS. As a result, these expenditures do not qualify for FFP or State funding. **Beginning January 1, 2020, the Department will no longer allow any expenditures relating to Work Number income verification for Medical Assistance-only cases to be charged to county administration funding.** The Department will allow expenditures related to Work Number expenditures for those cases where Medical Assistance is part of the determination for multiple public assistance programs.

Counties are encouraged to review approved Medical Assistance eligibility determination criteria as found in [10 CCR 2505-10 8.100](#) and [SDC trainings](#) for verifying Medical Assistance-only eligibility.

Note: Expenditures for Work Number verification for MA-only cases using county-only funds are also not allowed due to the potential for over-verification of eligibility.

Attachment(s):

None

Department Contact:

Medicaid.eligibility@state.co.us – for questions regarding verification of eligibility criteria
HCPFCountyRelations@state.co.us – for questions relating to county administration/FFP