

Changes to Income Eligibility Checks

In June 2025, CMS finalized its Program Integrity Rule. The rule focuses on preventing fraud, waste, and abuse in the individual market.

The final rule includes three key changes to income eligibility checks:

1. Data Matching Issues (DMIs) will be triggered when:

- a. Applicants self-attest to prospective income above 100% FPL, CMS checks its trusted data sources (e.g., IRS, Social Security) **and finds that 2024 income for the applicant is below 100% FPL.**
 - i. For reference, 100% FPL for a one-person household in 2025 is \$15.7K. 2026 FPL levels have not been determined yet.
- b. If there is a DMI, applicants will see their eligibility is temporary and must submit documentation to verify their prospective income within 90 days. The 90-day period starts once the member receives the notice of temporary eligibility, which is normally at the point of enrollment.
- c. As finalized, this provision will be in effect for OEP 2026 and continue through PY 2026. The provision will sunset at the end of PY 2026.
- d. [We provide a detailed case study of a DMI trigger and resolution in this document.](#)

2. Exchanges require the verification of household income with CMS approved sources when tax return data for that household is unavailable.

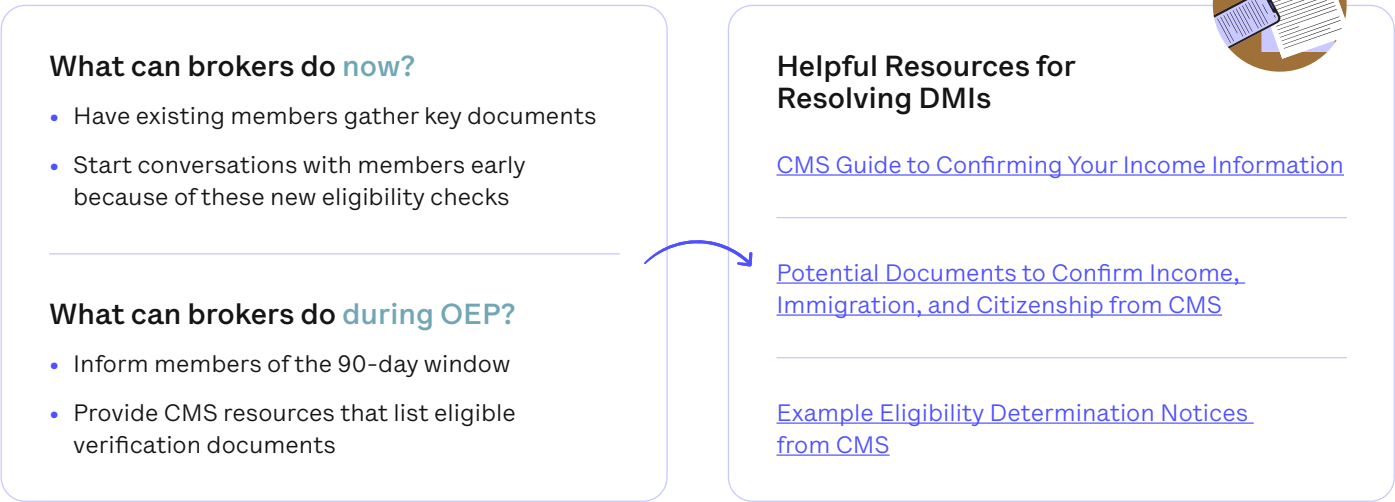
- a. Previously, applicants could attest to prospective income without triggering an income DMI when (1) the Exchange requests tax return data from the IRS to verify income, and (2) the IRS confirms there is no such tax return data available.
- b. As finalized, this provision will be in effect for OEP 2026 and continue through PY 2026. The provision will sunset at the end of PY 2026.

3. End the automatic 60-day extension, in addition to the 90-day period, to provide income verification documents.

- a. This means the total period to provide income verification documents will be reduced from 150 days to 90. The 90-day period starts once the member receives the notice of temporary eligibility, which is normally at the point of enrollment.



Preparing to help members resolve DMIs



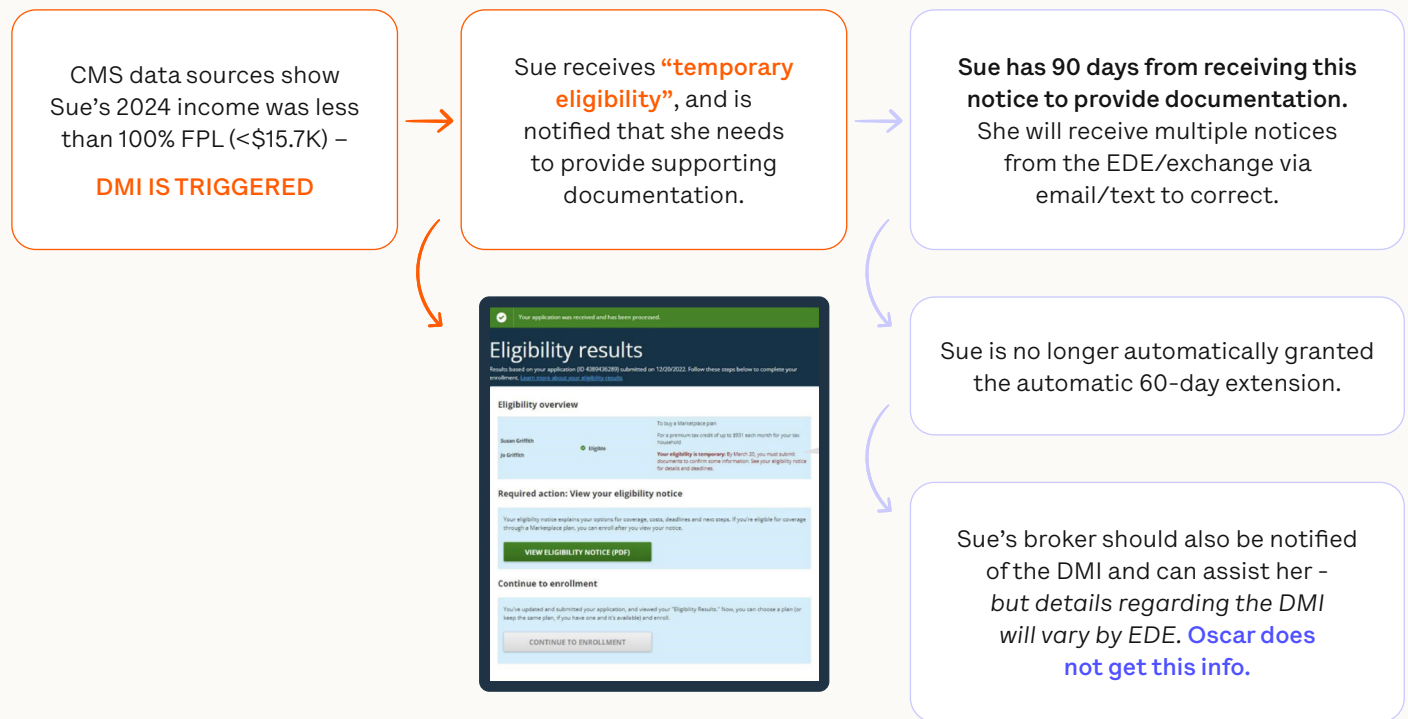
Process flow of an income-driven DMI

Process flow of an income-driven DMI – Triggering a DMI



*\$15.7K is from the HHS Poverty Guidelines for 2025 and for a one-person household. 2026 FPL levels may return a different figure.

Process flow of an income-driven DMI – Resolving a DMI



Compiling income verification documents

CMS has several resources to help identify which documents can be used to verify prospective income.

1. CMS will provide the member with information on which documents they can submit to verify their prospective income in their eligibility notice. See different [eligibility determination notices from CMS](#).
2. The [CMS Guide to Confirming Your Income Information](#) provides helpful examples on how to verify prospective income.
3. CMS also lists [potential documents to confirm your income](#) on their website.

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Health Insurance Marketplace [Date]

Application ID: XXXXXXXX
Application date: [Date]

2025 Marketplace Eligibility Notice
Remember to update your application during the year with any changes.
[Name 1]
[Last, first MI]

Results

Document	Name 1	Name 2
Applied for coverage	•	•
Eligible to enroll in a Marketplace plan until January 15, 2025.	•	•
Eligible to use the premium tax credit to pay for a Marketplace plan. Can use up to \$1,402/month for this household.	•	•
Eligible for extra savings (cost sharing reductions). Will pay less for copayments, coinsurance, and deductibles when you're enrolled in a Silver plan.	•	•
The Marketplace reads documents that confirm information in your application. (Details below.)	•	•

ACTION: Next steps

Document	Name 1	Name 2
By December 15, choose a Marketplace plan for coverage to start January 15. See Eligibility Guide , page 4.	•	•
By [Date], submit documents to confirm household income. See Submitting Documents , attached.	•	•
By [Date], submit documents to confirm citizenship. See Submitting Documents , attached.	•	•
Choose a Silver plan to get extra savings.	•	•
Take steps to make sure you get the right amount of Financial help. See Eligibility Guide , page 6.	•	•

See next pages to learn why you may not have qualified for other programs.
To learn when and how you can appeal, see [Eligibility Guide](#), page 6.
Questions about results or next steps? See the [Eligibility Guide](#) included with this notice.

For more help: [HealthCare.gov](#) (800-318-2796) (TTY: 1-877-696-8422) [LocalHelp.HealthCare.gov](#) (for help in your area)

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Name	Income type	Document	Gross* amount	Multiply by how often this person gets the income		Total
				Monthly x12 Twice a month x24 Every 2 weeks x26	Monthly x12 Quarterly x4 Annually x1	
Aaron Turner	Job	Bank of America pay stub	\$600	x 26		\$15,000

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Documents to confirm your household income

The documents you submit to the Marketplace to confirm your household income must show a yearly income amount that closely matches the yearly income amount you entered on your application. For example, if you have a different job than you had last year, send the Marketplace recent pay stubs from your new job, instead of last year's tax return or W2.

- **1040 federal or state tax return.** Must contain your first and last name, income amount, and tax year. If you file Schedule 1, you must submit it with your 1040.
- **Wages and tax statement (W-2 and/or 1099).** Including 1099-MISC, 1099-C, 1099-NEC, 1099-SSA, 1099-INT, 1099-DIV, 1099-BEN. Must contain your first and last name, income amount, tax year, and employer name (if applicable).
- **Pay stub.** Must contain your first and last name, income amount, and pay period or frequency of pay with the date of payment. If a pay stub includes overtime, tell us the average overtime amount per paycheck.
- **Self-employment ledger documentation** (can be a Schedule C, the most recent quarterly or year-to-date profit and loss statement, or a self-employment ledger). Must contain your first and last name, company name, and income amount. If you're submitting a self-employment ledger, include the dates covered by the ledger, and the net income from profits/loss.
- **Social Security Administration Statement (Social Security Benefits Letter).** Must contain first and last name, benefit amount, and frequency of pay.
- **Unemployment Benefits Letter.** Must contain your first and last name, source/agency, benefits amount, and duration (start and end date, if applicable).
- **Or, complete a written explanation form (PDF, 128 KB).** To submit this form, select "Other" from the drop-down menu when you're on the upload screen in the application.

Non-exhaustive list of helpful resources from CMS:

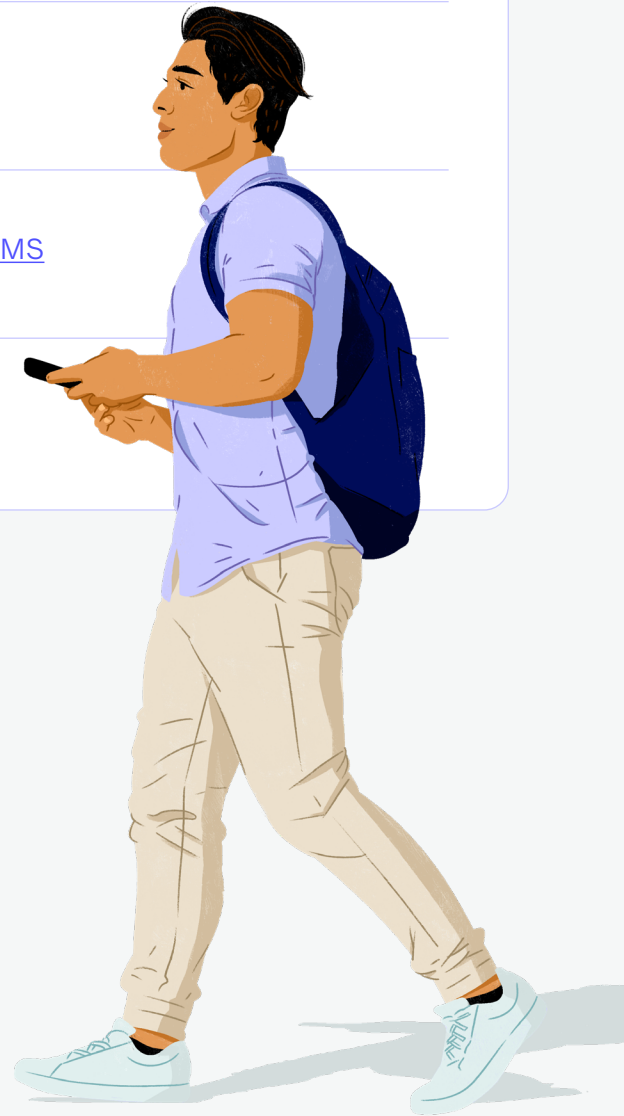
[CMS Guide to Confirming Your Income Information](#)

[Potential Documents to Confirm Income from CMS](#)

[Potential Documents to Confirm Citizenship from CMS](#)

[Potential Documents to Confirm Immigration Status from CMS](#)

[Example Eligibility Determination Notices from CMS](#)



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