

## COVERED CALIFORNIA IDENTITY PROOFING APPROACH

### SUMMARY

Federal policy requires that individuals applying for health coverage through Covered California provide assurance that they are in fact who they say they are. While Covered California has procedures in place today to verify the identity of applicants (referred to as “identity proofing”) in both the individual and SHOP exchanges, the federal reviews of Covered California’s enrollment website have identified enhancements of the existing system that must be made for non-paper applications for the individual exchange.

This brief clarifies acceptable forms of identity verification for both paper and non-paper applications including future federally-required enhancements and recommends that the Board adopt regulations at the November 21, 2013 Board meeting to formalize the obligations and options of individual applicants to verify their identity.

### ISSUE

The Centers for Medicare and Medicaid Services has established policies related to establishing the identity of consumers and those assisting consumers using State-Based Marketplaces. According to federal guidance published in June, continued use of the federal data services hub for verification of income and social security data will require establishment of remote identity proofing for our customers who apply online and over the phone. Covered California has developed an approach for modifications to existing procedures and system processes to integrate the federally-required Remote Identity Proofing service and processes as required.

### CURRENT IDENTITY PROOFING PROCEDURES

Covered California provides rigorous system features and procedures that ensure that individuals who apply for coverage or who provide enrollment assistance are who they say they are:

- **Individual exchange applicants:** Individuals who apply in person either through a Covered California Certified Insurance Agent, Certified Enrollment Counselor, or at a county human services office are required to verify their identity with a photo identification card or other acceptable proof of identity. Individuals who apply through an unassisted online application or who apply over the phone are also required to sign the application or authorize its submittal acknowledging that the information provided on the applications is true and that the signature or verification is under penalty of perjury.
- **SHOP applicants:** An employer seeking coverage for his/her employees is required to provide documentation establishing his/her identity to Covered California. The employer also provides each employee unique identification numbers prior to the employee’s online enrollment, which the employee then uses to verify his/her identity.
- **Enrollment assistance personnel:** As part of the certification process for all enrollment assistance personnel (Certified Insurance Agents, Certified Enrollment Assistants, etc), Covered California requires documentation that provides verification of identity.

**ONGOING IDENTITY PROOFING PROCEDURES**

As stated above, federal guidance outlines the requirements for establishing the identity of customers of the state based exchanges in order to ensure the privacy of personal information including the use of a federally-sponsored service offered through the federal data services hub that provides remote identity proofing for online and phone applicants prior to their submitting applications. Beginning December 1, 2013, Covered California will augment current identity proofing procedures to integrate the federal remote identify proofing service as shown in Table 1. Use of this service will allow Covered California to more easily verify the identity of applicants online or over the phone. Identity proofing processes are within the scope of the CalHEERS project and would be provided in the functionality of the CalHEERS system.

<b>Table 1. Identity Proofing Implementation – Individual Market</b>		
<b>Application Type</b>	<b>Current Identity Proofing Procedures</b>	<b>Ongoing Identify Proofing Procedures – beginning December 1, 2013</b>
<b>Paper Application</b>	Signature under penalty of perjury	Signature under penalty of perjury
<b>Non-paper Application</b>	Electronic signature under penalty of perjury (online applications) <b>OR</b> In-person proof of identity (in-person applications) <b>OR</b> Recorded attestation of consumer’s identity (phone applications)	Federal Data Services Hub Remote Identity Proofing Process <b>OR</b> In-person proof of identity <b>OR</b> Mail or electronic transmission of proof of identity

**RECOMMENDATION**

Covered California staff recommend that the Board adopt regulations at the November 21, 2013 Board meeting to formalize the obligations and options of individual applicants to verify their identity.

Comments on the accompanying regulations should be submitted to [info@covered.ca.gov](mailto:info@covered.ca.gov) by **Friday, November 1, 2013.**