

**Department of Health and Human Services
Centers for Medicare & Medicaid Services**



Current Sources of Income and Employment Verification Service

Request for Information - 230160

September 27, 2021

1. Purpose of Notice

This notice is a REQUEST FOR INFORMATION (RFI) and, as such, is for the purpose of planning and market research. This RFI does not constitute a Request for Proposal (RFP) or solicitation announcement and is not to be construed as a commitment by the Government. The information provided in this RFI is subject to change and is not binding on the Government.

2. Background

The Affordable Care Act (ACA) was enacted to assist millions of Americans in obtaining affordable health care coverage through Exchanges. An Exchange is a competitive marketplace through which individuals and small businesses are able to purchase affordable private health insurance. Exchanges serve as a one-stop shop where individuals are able to get information on their health insurance options, enroll in the plan of their choice, and be determined or assessed for eligibility for public programs/benefits, including Medicaid and the Children's Health Insurance Program (CHIP), and for advance payments of the premium tax credit (APTC) and cost-sharing reductions (CSRs) to help lower the cost of private health insurance. (In some cases "Exchanges" may be referred to as "Marketplaces." For purposes of this document, the terms may be used interchangeably.)

To make eligibility determinations as accurately as possible, Exchanges verify applicant information with entities that hold authoritative data sources. These entities include Federal and State agencies as well as commercial entities. Exchanges verify applicant information including information related to citizenship/immigration status, residency, access to minimum essential coverage, and income. Specifically, related to the verification of income, Section 1902(e)(14)(H) of the Social Security Act, as added by Section 2002 of the ACA, specifies that Medicaid eligibility will continue to be based on "point-in-time," or current monthly income, while eligibility for APTC and CSRs is based on projected annual income. For determining eligibility for APTC/CSRs, Exchanges use Social Security Administration (SSA) Title II Income information and Internal Revenue Service (IRS) tax data. Exchanges, State Medicaid/CHIP Agencies and the Basic Health Program (BHP), if applicable, use current monthly income to support eligibility determinations for APTC/CSRs, Medicaid/CHIP, and BHP. In addition, these agencies may check throughout the year for income information to determine if an individual's income has changed.

CMS is requesting information on contractors' capabilities to perform individual and household income verification ("current income verification") for CMS. Current income verifications shall be from employer-reported income and job status data that is provided and updated for each employer payroll period (weekly, bi-weekly, monthly, etc.) and shall be used to support eligibility determinations for APTC/CSRs, Medicaid, CHIP, and BHP, if applicable. The work includes income and employment data as well as the necessary infrastructure to enable delivery of quality data in a timely fashion per request by CMS and other authorized requestor entities. The current income information will be provided through the existing Federal Data Services Hub, ("the Hub") which has connections with many states and some federal entities, for the purpose of submitting and sharing data to support eligibility determinations, including information needed to resolve data matching issues and adjudicate appeals for Exchange coverage and financial help.

3. Information Requests and Questions

In response to this RFI, CMS is seeking responses to the following questions and information requests listed below. Interested parties with qualified capabilities and experience providing similar services should submit responses that include pertinent details of how you provided similar services to Federal Government clients or clients of similar scale (include contract number, date of award, dollar value, contract type, period of performance, and explanation of how capabilities and experience relates to the potential requirements stipulated within this notice), if available. The contractor community is merely asked to provide information that demonstrates their expertise and capacity as a prime contractor, or with subcontractors as they deem necessary. Responding contractors must identify their role—sub, prime, or any other role—when describing their own experience. If the responding contractor was a subcontractor, please provide the roles/responsibilities on the contract. Identify the organization that the work was with (CMS, DOD, VA, States, etc.) Also, please include the contract number. Please also include any teaming partner’s experience/capabilities as it relates to this RFI.

For purposes of responding to this notice, **please use the Appendix A Response Template** to address the questions and information requests based on your knowledge and experience.

4. Responding to the RFI

Please submit your responses no later than **October 12, 2021**, to Lakisha Holly, Contract Specialist at Lakisha.Holly@cms.hhs.gov and cc: Matthew Waskiewicz, Contracting Officer at Matthew.Waskiewicz@cms.hhs.gov in the following format:

- Please include the RFI number and title in the subject line of the email.
- The following file naming convention should be used: **RFI 230160_Company Name.docx**.
- Microsoft Word (or PDF) document with page size 8.5 by 11 inches, with a minimum of 1” margins.
- Calibri Font Size 11 with no less than single spacing between lines.
- Submissions shall not exceed 11 pages. Cover Page is included in the total page count.

A complete response to the RFI should be in accordance with the response template found at Appendix A and should include answers to all the questions. Responses should follow a question-response format whereby a response is provided directly following each question and adheres to the order specified in the template. If the answer to a specific question cannot be provided, please mark “N/A” as the response. Responses should demonstrate capability, not merely affirm the respondent’s capability (i.e. the response must go beyond the statement that, “XYZ company can provide technical support”).

Respondents will not receive individualized feedback on any suggestions. No basis for claims against the United States Government shall arise as a result of a response to this request for information or from the United States Government’s use of such information.

Respondents shall provide a Cover Page that includes identifying information and the RFI number, title, and date of issuance. The remainder of the response shall be provided in accordance with the response template found at Appendix A.

5. Confidentiality

Proprietary information and trade secrets, if any, must be clearly marked on all materials. All information received in response to this RFI that is marked "Proprietary" will be handled accordingly. Please be advised that all submissions become Government property and will not be returned nor will receipt be confirmed.

6. Disclaimer and Other Information

In accordance with the Federal Acquisition Regulation (FAR) clause 52.215-3, *Request for Information or Soliciting for Planning Purposes*, please be advised that this RFI does not obligate the Government to award a contract nor to reimburse any cost associated with preparation and/or submission of a capabilities statement.

CMS will not formally answer questions received in response to this industry notification/request for information. The agency will not accept any telephone calls or requests for a bid package or solicitation at this time. In order to protect the integrity of any future procurement that may arise from this announcement, CMS will not provide information regarding technical points of contact. The Government will use responses to this notice to make appropriate acquisition decisions.

Appendix A – Response Template

Company Name	
Company Address	
Company Point of Contact and Contact Information	
Type of Company (e.g. large business, small business, small disadvantaged, women owned, HUBZone, and Service Disabled)	
DUNS	
Recommended NAICS codes	
NAICS code under which the company conducts business as validated via the System for Award Management (SAM). All potential offerors must be registered in SAM located https://www.sam.gov/portal/SAM/#1	
Current GSA Schedules Appropriate to this effort	
Current GWACs appropriate to this effort	
Do you have a Government approved accounting system? If so, please identify the agency that approved the system.	

Please provide a response following each question below, in the order specified:

1. Describe your experience providing employer-reported income and job status data, for current pay periods, to existing customers, via an automated data exchange (including, if available, the frequency of the data exchange, size of the files in terms of number of records, process(es) used to electronically exchange data, and the data elements you provided);
2. Describe the breadth of your employer-level data, including:
 - a. The quantity of employers, in total, and broken down by business sectors and company size, who currently report income to your company;
 - b. The total number of distinct employer EINs in your data;
 - c. The total number of distinct employer EINs that are associated with earnings for the most recent month in your data;
3. Describe any expected future agreements to obtain income data from additional employers, including expected dates of contract agreement with such companies;
4. Describe any existing agreements for income data with employers which will end within the next 12 months;
5. Describe the breadth of your employee-level data, including:
 - a. Approximate total number of employees whose income is reported to your company;

- b. The total number of employee-level records in your data;
 - c. The total number of employee-level records with earnings for the most recent month in your data;
6. Describe the length of time it may take to provide an automated response once you receive an income data request from a customer;
 7. Describe your error resolution process and response time;
 8. Describe your capabilities in regard to security and safeguarding the privacy of data;
 9. Respond to the following questions as they relate to the income data that your company can provide:
 - a. How recent/current is the income data?
 - b. How frequently is the income data updated?
 - c. How long do you store the income data?
 - d. From where does the income data originate (directly from employers, from other payroll data providers, or from some other source)?
 - e. Who extracts and compiles the income data?
 - f. What is your process for ensuring the accuracy of the income data?
 - g. How do you handle updates/corrections to previously reported income reports?
 - h. How do you handle unmatched records for income data?
 - i. How timely can you provide accurate income records within the close of the business month (e.g., 1 day, etc.)?
 10. The Government is considering the requirements below. Would any of these requirements limit your ability to perform this work? If so, which specific requirement(s) would be challenging to meet and why? Please suggest what a more reasonable requirement, for any which you would find to be challenging.
 - a. Data must be updated each employer payroll period (weekly, bi-weekly, monthly, etc.) and may not be more than 90 days old.
 - b. Data must be in a format and structure that does not require additional actions or modifications on the part of the Federal Data Services Hub (“the Hub”), the Exchanges, State Medicaid/CHIP agencies, and the BHP, if applicable.
 - c. The data must originate from at least 5,000 unique employers.
 - d. The data source must contain a minimum of 6 months of *historical* income and employment information for at least 5 million active employment records (pay period current).
 - e. The Contractor must respond to all Exchange income data queries regarding millions of applicants that come in through the Federal Data Services Hub (“the Hub”) from across all 50 states, the District of Columbia, and U.S. territories.
 - f. The Contractor must provide a web-based (synchronous) service that supports real-time income (within 1 second of receipt of query) verification processes on a 24x7 basis, throughout each year, including,
 1. Be capable of handling approximately 20-30 million requests per month

2. Be capable of returning at least 12 million income verifications in the first year of operation
 3. Transmit responses to income verification requests within 1.0 seconds for 90% of the time and within 23 seconds for 100% of the time
 4. On a monthly basis, maintain 99.9% service availability (no more than 43 minutes of downtime)
- g. The Contractor must provide a batch (asynchronous) service to support Medicaid renewal activity and/or Exchange periodic checks. The asynchronous service must:
1. Process up to 125,000 records per day
 2. Return 90% of response files within 24 hours and 100% within 3-days
 3. On a monthly basis, maintain 99.9% service availability (no more than 43 minutes of downtime)
11. The Government is considering requiring the data elements outlined in Appendix B. Would the requirement to provide any of these data elements limit your ability to perform this work? If so, which specific data elements would be challenging to provide and why? Is there another data element or set of elements that could be provided in lieu of some of those specified in Appendix B that could serve a similar purpose and would provide equivalent or superior value to the Government?
12. Please provide any other recommendations for the Government to consider in the development of its requirements.

Appendix B – Data Elements

This appendix identifies the data elements the Government is considering requiring to be returned in response to queries for current income.

Element Name	Element Description	Min Length	Max Length	Type
AsOfDate	Date this record is effective Note: This is typically the pay date, but some employers may use pay end date or file creation date.	W3C Date Format	W3C Date Format	W3C Date Format
EmployeeInfo	N/A	N/A	N/A	Aggregate
SocialSecurityNumber	Applicant SSN	9	9	String
FirstName	Applicant first name	1	50	String
LastName	Applicant last name	1	50	String
DateOfBirth	Applicant DOB	W3C Date Format	W3C Date Format	W3C Date Format
EmployerInformation	N/A	N/A	N/A	Aggregate
EmployerName	Employer name Note: This field may display the division name if the Employer wants to display that on verifications instead of the corporate Employer name.	1	60	String
EmployerFEIN	Federal Employer Identification Number (FEIN) for individual Employer	8	10	String
EmployerStreet	Employer headquarters (HQ) address	1	30	String

Element Name	Element Description	Min Length	Max Length	Type
EmployerCity	Employer HQ city name Note: If the Employer chooses to display the division name, this is the division HQ city (also applies to EmployerStreet, EmployerStateCode, and EmployerZipCode).	1	20	String
EmployerStateCode	Employer HQ State two-character code Note: If the Employer chooses to display the division name, this is the division HQ State two-character code (also applies to EmployerStreet, EmployerCity, and EmployerZipCode).	2	2	String
EmployerZipCode	Employer HQ Zone Improvement Plan Code (ZIP) Code Note: If the Employer chooses to display the division name, this is the division HQ ZIP Code (also applies to EmployerStreet, EmployerCity, and EmployerStateCode).	4	10	String
EmploymentInfo	N/A	N/A	N/A	Aggregate
TerminationDate	Date Employee left service with Employer (where applicable)	W3C Date Format	W3C Date Format	W3C Date Format
BaseCompensationInfo	N/A	N/A	N/A	Aggregate
PayRate	Pay amount per pay frequency Example: If a person makes \$10.00 an hour, the system populates the PayRate field with 10.00 and the PayFrequencyCode field with Hourly.	1	13	Numeric

Element Name	Element Description	Min Length	Max Length	Type
PayFrequencyCode	Pay frequency code Employer provides Note: Requesters can use this code with the PayRate to determine the annual pay rate.	1	2	Integer
PayFrequencyMessage	Pay frequency description Employer provides Note: Requesters can use this description with the PayRate to determine the annual pay rate.	6	30	String
PayPeriodFrequencyCode	Code for how often Employee is paid	1	2	Integer
PayPeriodFrequencyMessage	Description for how often Employee is paid	6	12	String
Year	Year income represents (e.g., 2021)	4	4	Integer
PayPeriodInfo	Pay period information (up to 12 months)	N/A	N/A	Aggregate
PayPeriodEndDate	End date for pay period	W3C Date Format	W3C Date Format	W3C Date Format
PayDate	Pay date	W3C Date Format	W3C Date Format	W3C Date Format
GrossEarnings	Total earnings for pay period	1	13	Numeric