Identity Proofing & Verification

For Medi-Cal there are two layers of identity checks:

A. <u>**Identity Proofing**</u> – a process to ensure that a person who is applying, or acting on behalf of another individual, is who they say they are. Identity Proofing is required to allow an application to be submitted for adjudication (e.g., to run EDBC or to complete a CalHEERS online application) or to allow certain record changes to be made (e.g., CalHEERS Primary Contact information changes).

B. <u>**Identity Verification**</u> – a process to meet identity verification requirements as a condition of eligibility for Medi-Cal. These verification requirements include DRA requirements.

<u>Identity Proofing</u>

There are three options for Identity Proofing:

1. **Signature** – The applicant can complete and send or deliver a paper application to the county or the Covered California Service Center for processing. The applicant's signature on an application qualifies as proof of identity when a Service Center Representative (SCR), other CalHEERS user, or county eligibility staff processes the application.

2. **Visual Verification** – The applicant can mail in or upload a digital copy of an identity verification document, which a SAWS or CalHEERS user can then visually verify (this is also known as Administrative User Attestation). Or, if in person, the SAWS or CalHEERS user can scan and upload the document received from the applicant. Visual Verification can be accomplished via the "Medi-Cal Identification" process described under "Identity Verification" below.

3. **Remote Identity Proofing** – (CalHEERS ONLY) This process is used when using the electronic/phone signature process (e.g., while applying online via CalHEERS or over the phone via Covered CA). Either the applicant or the CalHEERS user can use the Remote Identity Proofing (RIDP) service to which CalHEERS connects through the Federal Data Services Hub (FDSH).

   a. To complete the RIDP process for phone and online applications, do the following:

      ✓ Consumer will complete an electronic check through Experian using CalHEERS

      ✓ County "completes an ex parte review of any prior case or current CalFresh case in the county system to determine if acceptable identity documentation is on file to serve as Proof of Identity. If so, the Identity Proofing requirement is met."

      ✓ Consumer provides a copy of acceptable ID documentation, in person, by mail, or other means.

   b. A telephonic or electronic application can be submitted to SAWS systems without Identity Proofing. However, Identity proofing must be completed prior to running EDBC.

<u>Identity Verification</u>

There are three options for Identity Verification:

1. **CalHEERS Business Rules Engine (BRE) –** The CalHEERS BRE verifies identity and citizenship by employing the Federal Data Services Hub during a determination of eligibility (e.g., during an adjudication of an application). This process includes verifying an SSA match.

   a. If identity and U.S. citizenship are verified through an SSA match (e.g., through the Federal Data Services Hub), both the original Medi-Cal Identification requirement (Title 22 of California Code of

Regulations 50167(a)(6)) and DRA requirements are met, and remain met without subsequent verification.

2. **Medi-Cal Identification** - Original Medi-Cal regulations (Title 22 of California Code of Regulations 50167(a)(6)) require counties to verify the identity of a consumer. This verification is required from the primary applicant at every application. The idea is that the consumer verifies who they say they are. Verification can be at a low level (unless questionable).
   a. This requirement is met by SSA Match which verifies citizenship (e.g., through the Federal Data Services Hub).
   b. The following, or any other document that the County Welfare Director deems acceptable, can be used to verify identity:

   - ✓ CA Driver's License or ID card issued by the DMV
   - ✓ US citizenship or Alien Status document (e.g., passport)
   - ✓ Social Security Card
   - ✓ Church Membership or Baptism/ Confirmation Record
   - ✓ Marriage Record
   - ✓ Work Badge
   - ✓ School Identification Card
   - ✓ Birth Certificate

   c. Requirement <u>can be</u> met with a photocopied document
   d. Current and old information <u>can be</u> matched up: for example, there is an old picture ID in the case, and the signature on the current Statement of Facts matches.

3. **Deficit Reduction Act (DRA): Citizenship and Identity Verification -** The DRA passed in 2005 and in 2007 California introduced the requirement that every applicant alleging US Citizenship, adult and child, must prove Citizenship and Identity. In 2009, the SSA match was introduced so most individuals are verified electronically and only a few must provide the high level original documentation that is acceptable to meet DRA requirements when documentation of citizenship is required.

   a. Always check MEDS to see if the DRA citizenship and identity requirements have already been met.
   b. Do not pend for verification of citizenship and identity until an SSA match is attempted, per DHCS ACWDL 09-65 "The SSN Data match results should be used…prior to requesting acceptable documents."
   c. Once DRA is met, it remains met. If the INQE screen shows that DRA requirements are met, keep a copy of INQE screen in the case record.
   d. Photocopies are not acceptable; in cases where the SSA match fails, and DRA requirements were not otherwise met, the customer must present original documents to verify ID (and Citizenship) based on DRA citizenship and/or identity requirements. To pend a case for verification of citizenship and identity after an unsuccessful SSA match, use MC 239 DRA-6 with appropriate instructions from your SAWS.

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In-Practice Scenarios

The following table summarizes examples of ID Proofing and ID Verification actions for various consumer access channels combined with citizenship and service support (e.g., self-service or assisted).

Channel	Citizen	Service	ID Proofing	ID Verification
CalHEERS	Yes	Self	✓ Consumer performs RIDP ✓ If RIDP Fails... follow alternative Proofing paths	✓ BRE Call verifies Identity ✓ DRA is met by BRE SSA citizenship verification
CalHEERS	No	Self	✓ Consumer fails RIDP; Clicks on CalHEERS Link to find CEC nearby ✓ CEC helps Consumer Scan/Submit required document to complete ID Proofing	✓ BRE Call pends for Citizenship ✓ Perform Medi-Cal Identification ✓ DRA is not appropriate for non-citizen
Paper App to CovCA	Yes	Self	✓ Signature on Paper App is sufficient	✓ BRE Call verifies Identity ✓ DRA is met by BRE SSA citizenship verification
Paper App to CovCA	No	Self	✓ Signature on Paper App is sufficient	✓ BRE Call pends for Identity and Citizenship ✓ Perform Medi-Cal Identification ✓ DRA is not appropriate for non-citizen
Paper App to County	Yes	Self	✓ Signature on Paper App is sufficient	✓ BRE Call verifies Identity ✓ DRA is met by BRE SSA citizenship verification
Paper App to County	No	Self	✓ Signature on Paper App is sufficient	✓ BRE Call pends for Identity and Citizenship ✓ Perform Medi-Cal Identification ✓ DRA is not appropriate for non-citizen
SAWS Portal App	Yes	Assist	✓ EW Visual Verification	✓ BRE Call verifies Identity ✓ DRA is met by BRE SSA citizenship verification
SAWS Portal App	No	Assist	✓ EW Visual Verification	✓ BRE Call pends for Citizenship ✓ Medi-Cal Identification completed with Visual Verification at ID Proofing ✓ DRA is not appropriate for non-citizen
Phone Call to CovCA	Yes	Self	✓ Consumer performs RIDP ✓ If RIDP Fails... follow alternative Proofing paths	✓ BRE Call verifies Identity ✓ DRA is met by BRE SSA citizenship verification

Identity Proofing & Verification

Channel	Citizen	Service	ID Proofing	ID Verification
Phone Call to CovCA	No	Self	✓ Consumer performs RIDP ✓ If RIDP Fails... follow alternative Proofing paths	✓ BRE Call pends for Identity and Citizenship ✓ Perform Medi-Cal Identification ✓ DRA is not appropriate for non-citizen
Phone Call to County	Yes	Assist	✓ Phone Signature is sufficient ✓ If No Phone Signature, follow Visual Verification proofing paths.	✓ BRE Call verifies Identity ✓ DRA is met by BRE SSA citizenship verification
Phone Call to County	No	Assist	✓ Phone Signature is sufficient ✓ If No Phone Signature, follow Visual Verification proofing paths.	✓ BRE Call pends for Identity and Citizenship ✓ Perform Medi-Cal Identification ✓ DRA is not appropriate for non-citizen