



JENNIFER KENT  
DIRECTOR

State of California—Health and Human Services Agency  
Department of Health Care Services



EDMUND G. BROWN JR.  
GOVERNOR

October 16, 2018

TO: ALL COUNTY WELFARE DIRECTORS Letter No: 18-23

ALL COUNTY ADMINISTRATIVE OFFICERS  
ALL COUNTY MEDI-CAL PROGRAM SPECIALISTS/LIAISONS  
ALL COUNTY MENTAL HEALTH DIRECTORS  
CALIFORNIA DEPARTMENT OF SOCIAL SERVICES  
FOSTER CARE PROGRAM MANAGERS  
STATE AUTOMATED WELFARE SYSTEMS  
ALL PROBATION DIRECTORS

SUBJECT: MEDI-CAL SOCIAL SECURITY NUMBER and MEDI-CAL ELIGIBILITY  
DATA SYSTEM POLICY (References: All County Welfare Directors  
Letters 91-66 and 95-53, and supersedes 83-34 to the extent it conflicts.)

The purpose of this All County Welfare Directors Letter (ACWDL) is to provide clarification and direction to county social services agencies on the California Department of Health Care Services' (DHCS) policy and procedures regarding the use of social security numbers (SSNs) in the Medi-Cal Eligibility Data System (MEDS) relating to pre-adoptive and post-adoptive records, including foster care.

### **Background**

California Welfare and Institutions (W&I) Code, Section (§) 14011.2 requires that, as a condition of eligibility, an applicant for Medi-Cal, including a child, must provide their SSN to receive full scope Medi-Cal benefits. Access and use of the SSN within MEDS is subject to strict privacy and confidentiality rules under the Health Insurance Portability and Accountability Act (HIPAA). California W&I Code, § 14100.2(a) further requires that beneficiary information "shall be confidential, and shall not be open to examination other than for purposes directly connected with the administration of the Medi-Cal program."

Concerns over the confidentiality of SSNs in post-adoptive records has led to inconsistency in how counties enter and maintain these children's records in MEDS. Previously, ACWDL 83-34 stated that it would be permissible for counties to continue to create and enter pseudo-SSNs for adoption cases and the procedural error created by entering pseudo-SSNs into MEDS for these cases would be disregarded. However,

later ACWDLs 91-66 and 95-53 updated that direction, stating that the use of pseudo-SSNs in MEDS was only permissible for newborn infants who had not yet obtained a SSN.

Over the years, counties have addressed the use of SSNs in adoption and foster care records in different ways to ensure the confidentiality and protection of the child is maintained. For instance, some counties remove the SSNs from post-adoptive records, create a new record in the Statewide Automated Welfare System (SAWS) and request a new Client Index Number (CIN) for the post-adoptive child, and use a pseudo-SSN in MEDS for the new active record. Conversely, some counties retain the child's original SSN, while other counties only do so if the child is a teenager and both the adoptive parent and the child want to keep it. These inconsistencies in process have created system problems and duplicate records within MEDS, indicating a need for clear guidance on this issue.

### **County Action Moving Forward**

Moving forward, counties are to use the child's existing SSN (if available) and CIN in MEDS throughout the child's history in the child welfare system. Counties shall not enter pseudo-SSNs into SAWS and/or MEDS for children that have an existing SSN, as this creates duplicate records in MEDS. In the event of an adoption, the County Eligibility Worker (CEW) or Foster Care Eligibility Worker (FCEW) shall work with their respective SAWS to utilize security functionality to ensure that confidentiality is maintained for the pre-adoptive child within the Foster Care, Kinship Guardianship Assistance Payment, California Work Opportunity and Responsibility to Kids, and/or Medi-Cal case. Again, the child's record within MEDS is to stay consistent using the child's existing SSN and CIN. As the child's record is maintained in MEDS, the confidentiality of the child's personal information will be protected by HIPAA and Medi-Cal confidentiality rules and standards.

### **In Cases of Changing SSN**

If the adoptive parents change the child's SSN, the new SSN is to be used in the child's MEDS record and the child's CIN is to remain the same. In the event of a child being assigned a new SSN, the child's previous SSN should be replaced with the new SSN on the child's pre-adoption MEDS record, and the child's CIN is to remain the same in order to keep historical records accurate and to ensure claims are processed properly. DHCS would like to emphasize that this change in procedure will be done prospectively, and emphasizes that there should be no need to consolidate or change previous cases that were handled prior to this change.

### **SSN Example Scenarios**

Counties should use the child's existing SSN for all adoption and foster care records in MEDS. Once the adoption is finalized, remove the Social Security Administration (SSA) verification and complete a name change in MEDS, if necessary. This will trigger the MEDS SSN verification process with the SSA.

The following provides guidance for two scenarios counties may encounter of an adopted child retaining their existing SSN or receiving a new SSN. In both scenarios, the child shall maintain the same CIN in MEDS, whether a new SSN is obtained or not.

#### *Adopted Child Retains Existing SSN*

At birth, parents can apply for the newborn's SSN at the time they apply for a birth certificate. Counties shall use a child's existing SSN for adoption and foster care cases and should not input a pseudo-SSN or leave the SSN field blank in the case of an adoption or post-foster care record in MEDS.

It is not required for a newborn to have a SSN to receive Medi-Cal within the first 12 months after birth. During that first 12 months, per ACWDL 95-44, MEDS will assign a pseudo-SSN for the newborn. Once a new SSN is obtained for the newborn, the CEW/FCEW will update the child's MEDS record with the new SSN and still maintain the same CIN.

#### *Adopted Child Receives New SSN*

If a child receives a new SSN and/or new name after an adoption occurs, then the child's new SSN and/or name will be used in the child's MEDS record.

The child's previous SSN should be replaced with the new SSN on the child's pre-adoption MEDS record and the child's CIN is to remain the same in order to keep historical records accurate and to ensure that claims are processed properly.

### **Adopted Child is Already Known by a Pseudo-SSN**

If a child is already enrolled in foster care and is only known by a pseudo-SSN, the CEW/FCEW should follow the current process and procedures to assign a new SSN to that child. In the event that the child is adopted before a new SSN can be assigned, the CEW/FCEW should maintain the child's CIN in their MEDS record, and update the record with the new SSN when it is available.

All County Welfare Directors Letter No.: 18-23  
Page 4  
October 16, 2018

In accordance with existing guidance, counties are to use existing confidentiality guidelines in line with their SAWS consortium functionality to ensure the security and privacy of the Medi-Cal Personally Identifiable Information. Adhering to these guidelines will prevent adopted/foster care children from being located and/or identified by unauthorized persons.

DHCS appreciates the efforts our county partners have taken to increase access to health care for children exiting foster care into adoptive homes.

If you have any questions, or if we can provide further information, please contact Ms. Dee Paull, by phone at (916) 345-8093 or by email at [dee.paull@dhcs.ca.gov](mailto:dee.paull@dhcs.ca.gov).

Sandra Williams, Chief  
Medi-Cal Eligibility Division