

DATE: October 22, 2026

Medi-Cal Eligibility Division Information

Letter No.: I 26-28

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY ADMINISTRATIVE OFFICERS
ALL COUNTY MEDI-CAL PROGRAM SPECIALISTS/LIASONS

SUBJECT: SOCIAL SECURITY NUMBER REQUIREMENTS FOR MEDI-CAL

Supersedes & Obsoletes: [MEDIL I 23-57](#)

Purpose

The purpose of this Medi-Cal Eligibility Division Information Letter (MEDIL) is to clarify existing Medi-Cal policy regarding when a Social Security Number (SSN) may be requested or required, including applicable exceptions to the SSN requirement for Medi-Cal applicants and members. This letter also clarifies SSN requirements for individuals who are included in a Medi-Cal application or household but are not applying for Medi-Cal for themselves (non-applicants). A non-applicant's SSN cannot be required as a condition of another individual's Medi-Cal eligibility.

This letter does not address the SSN requirements for California Work Opportunity and Responsibility to Kids (CalWORKs) or CalFresh. For additional information on SSN requirements for these programs, counties should refer to the guidance provided by each program.

Background

Under current Medi-Cal policy, applicants with satisfactory immigration status (SIS) are subject to the Medi-Cal SSN requirement unless an applicable exception applies. DHCS has been advised by the Social Security Administration (SSA) that some noncitizen Medi-Cal applicants are requesting non-work SSNs for Medi-Cal eligibility purposes.

Individuals Who May Qualify for an SSN

According to Title 20, Code of Federal Regulations (CFR) § 422.104, the following individuals can qualify for an SSN:

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- United States citizens;
- Noncitizens who are lawfully admitted to the United States (U.S.) for permanent residence or under other authority of law permitting them to work in the U.S.; and
- Noncitizens who cannot provide evidence of lawful admission to the U.S., or noncitizens who have evidence of lawful admission but do not have authorization to work, if they meet the requirements for an SSN based on a valid nonwork reason under Title 20 CFR § 422.104(a)(3).

SSN Requirements as a Condition of Medi-Cal Eligibility

California Code of Regulations (CCR) § 50187 provides that Medi-Cal applicants and members must, as a condition of eligibility, apply for and provide an SSN if:

- They are requesting or already have Medi-Cal benefits; and
- They declare they are a citizen or national of the United States, or that they have SIS.

SSN Requirements for Non-Applicants

For purposes of the Medi-Cal SSN requirement, a non-applicant is an individual who is not seeking a Medi-Cal eligibility determination for themselves, but whose information is included in an applicant's or member's household to determine the applicant's or member's eligibility.

A county must not require a non-applicant to provide an SSN as a condition of another individual's Medi-Cal eligibility. A non-applicant's failure to provide an SSN must not delay, deny, or otherwise adversely affect the Medi-Cal eligibility determination of an individual who is applying for Medi-Cal.

Pursuant to Title 42 CFR § 435.907(e)(3), a county may request a non-applicant's SSN if all the following conditions are met:

- Providing the SSN is voluntary;
- The SSN will be used only to determine an applicant's or member's eligibility for Medi-Cal or another insurance affordability program, or for a purpose directly connected with administration of the Medi-Cal program; and
- The county clearly informs the individual that providing the SSN is voluntary and explains how the SSN will be used.

Nonwork SSNs and Medi-Cal Eligibility

Federal regulations (Title 42, Code of Federal Regulations § 435.910(h)(1)(ii)) provide that noncitizens who do not have an SSN and who may only be issued an SSN for a valid nonwork reason are **not** required to provide an SSN as a condition of Medi-Cal eligibility.

For purposes of Title 20 CFR § 422.104(a)(3), a valid nonwork reason exists when an individual needs an SSN to satisfy a federal statute or regulation that requires an SSN to receive a federally funded benefit to which the individual has otherwise established entitlement, or when an individual needs an SSN to receive public assistance benefits to which the individual has otherwise established entitlement and the individual is legally in the U.S.

For Medi-Cal eligibility purposes, an applicant or member who meets an exception under Title 42 CFR § 435.910(h) is not required to obtain or provide an SSN as a condition of Medi-Cal eligibility. Counties must not refer an individual to SSA to obtain a nonwork SSN when the individual meets an exception to the SSN requirement.

Applicants and members who are otherwise subject to the Medi-Cal SSN requirement must provide or apply for an SSN unless an applicable exception under Title 42 CFR § 435.910(h) applies.

Exceptions to the SSN Requirement

The SSN requirement does not apply to an individual who:

- Is not eligible to receive an SSN;
- Does not have an SSN and may only be issued an SSN for a valid nonwork reason in accordance with Title 20 CFR § 422.104; or
- Refuses to obtain an SSN because of well-established religious objections.

For purposes of this exception, “well-established religious objections” means that the individual is a member of a recognized religious sect or division of a sect, adheres to its tenets or teachings, and for that reason is conscientiously opposed to applying for or using a national identification number.

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An otherwise eligible individual must not be denied or have services delayed while issuance or verification of an SSN by SSA is pending or when an exception above applies.

Use of the MC 194 Form

An MC 194 form may be used for individuals who need to verify that they have applied for an SSN at SSA and the application is being processed. The MC 194 form is useful as a referral provided by the County to assist an applicant or member who needs to apply for an SSN for Medi-Cal eligibility purposes.

The MC 194 must not be used to refer an individual to SSA solely to obtain a nonwork SSN when the individual meets an exception identified in the "Exceptions to the SSN Requirement" section of this letter. The MC 194 form is also not required for a non-applicant who is not applying for Medi-Cal for themselves.

The MC 194 form is divided into two parts. Part I is to be completed by the County Welfare Department and requests the following information:

- A. Complete County Welfare office name and address
- B. Social Security Office Information
- C. Service required by the County (i.e. original SSN card; information that needs to be verified or corrected, etc.)
- D. Applicant/Recipient Information
- E. Eligibility Worker Information
- F. Any additional comments needed for verification purposes.

Part II is to be completed by the Social Security Administration District/Regional Office.

SSNs Are Not Required for PRUCOL Immigrants Who Are Not Lawfully Present, Immigrants Whose Status is Unknown, or Undocumented Immigrants.

For Medi-Cal eligibility purposes, PRUCOL immigrants include individuals who are in one of the PRUCOL immigration statuses that are not considered to be lawfully present in the United States. (See ACWDL 18-09 for information on state-funded PRUCOL statuses). PRUCOL immigrants who are not lawfully present, immigrants whose status is

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unknown, and undocumented immigrants are not required to provide an SSN or to apply for an SSN if they do not already have one.

SSN Reminders

- CDSS requires CalWORKs applicants to provide an SSN or verification of a completed application for an SSN, subject to applicable program requirements. [CDS ACL 24-44](#) provides current guidance regarding the GEN 2101 for assisting certain noncitizen CalWORKs applicants with obtaining a nonwork SSN. CalWORKs SSN requirements are separate from the Medi-Cal SSN requirements described in this letter.
- Counties must not refer a Medi-Cal applicant to SSA solely to obtain a nonwork SSN for Medi-Cal eligibility purposes when the applicant is exempt from the SSN requirement.
- A full SSN should never be included on any form that is mailed to Medi-Cal applicants and members, including the MC 194. Only the last four digits of the SSN are permitted.
- For additional guidance regarding non-compliance with an applicable Medi-Cal SSN requirement, counties may refer to [ACWDL 25-03](#).

If you have any questions regarding the information provided in this letter, please contact the Immigration Unit at MCEDImmigrationUnit@dhcs.ca.gov. County questions regarding policy guidance should be sent to MCED-Policy@dhcs.ca.gov.

Sincerely,

Sarah Crow, Chief
Medi-Cal Eligibility Division
Department of Health Care Services