



DAVID MAXWELL-JOLLY
Director

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



ARNOLD SCHWARZENEGGER
Governor

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TO: ALL COUNTY WELFARE DIRECTORS Letter No.: 09-65
ALL COUNTY WELFARE ADMINISTRATIVE OFFICERS
ALL COUNTY MEDI-CAL PROGRAM SPECIALISTS/LIAISONS
ALL COUNTY HEALTH EXECUTIVES
ALL COUNTY MENTAL HEALTH DIRECTORS
ALL COUNTY MEDS LIAISONS

SUBJECT: SOCIAL SECURITY NUMBER DATA MATCH FOR VERIFICATION OF
CITIZENSHIP AND IDENTITY FOR PURPOSES OF MEDI-CAL
ELIGIBILITY

Effective January 4, 2010, the Department of Health Care Services (DHCS) is implementing a Social Security Number (SSN) matching process to verify the citizenship and identity of Medi-Cal applicants and beneficiaries who are subject to the citizenship/identity requirements of the federal Deficit Reduction Act of 2005 (DRA). A successful match fulfills the DRA's Citizenship and Identity requirements and no further documentation is needed from the applicant or beneficiary for this purpose. Thus, counties will see savings in administrative costs and staff time needed for DRA compliance. Further, most applicants and beneficiaries are spared the effort and expense of having to locate or obtain acceptable documentation.

BACKGROUND

Unless otherwise exempted, Medi-Cal applicants and beneficiaries who declare that they are a United States (U.S.) citizen or U.S. national must provide acceptable evidence of their U.S. citizenship and identity under the DRA. Currently, DRA compliance is done through the provision of acceptable documentation by applicants and beneficiaries or by a birth records match for those clients born in California. Section 211 of the federal Children's Health Insurance Program Reauthorization Act of 2009 (CHIPRA) gives states the option to use an SSN matching process for verification of citizenship and identity of applicants and beneficiaries in the Medi-Cal and Healthy

Families programs. CHIPRA does not authorize use of this SSN data match for any other program, such as CalWORKs or Food Stamps. The matching process described in CHIPRA, is incorporated in state law under section 14011.2 of the Welfare and Institutions Code.

OVERVIEW OF SSN VALIDATION PROCESS TO VERIFY CITIZENSHIP/IDENTITY

With this option, DHCS will request citizenship verification as part of the existing daily validation of SSNs with the Social Security Administration (SSA). This is done using Medi-Cal Eligibility Data System (MEDS) data submitted by DHCS to the SSA's State Verification Exchange System (SVES) each night. The SSA returns SSN validation results and, if applicable, citizenship/identity verification results two business days later for display in MEDS. The two business day turnaround time starts from when the SSA receives data from MEDS. MEDS will display the results in two ways:

- MEDS Alerts (Alerts 9044 through 9054). The new alerts will be delivered to counties via the same channels used for all other MEDS alerts.
- A new DRA document type visible on the MEDS INQE screen (document code 2Z) when citizenship/identity is verified by the SSA.

1. How will DHCS determine which records to submit for Citizenship/Identity Verification via SSA SVES?

There are two "paths" or sets of criteria governing whether an SSA Citizenship/Identity Verification request would be sent by MEDS to the SSA.

Path 1: SSN Validation and SSA Citizenship/Identity Verification

Path 1 involves changes to key data (SSN, name, date of birth) that triggers an SSN Validation request and if applicable, a request for SSA Citizenship/Identity Verification. As part of its overnight processing, MEDS identifies those records that are either new or had key data changed (SSN, name, date of birth). Incoming MEDS transactions (online or batch) that provide new records or changes to key data on existing records, act as the trigger for the evaluation of whether to request SSN Validation or SSN Validation and Citizenship/Identity Verification from the SSA. There is a separate set of conditions for SSN Validation and another set of conditions for Citizenship/Identity Verification. Both sets of conditions must be met for a Citizenship/Identity Verification request to be made to SSA under Path 1.

The SSN data match process is not triggered by specific county transactions. Rather, MEDS will evaluate all of its records that are either new or had key data changed for the two sets of conditions described below.

- The transaction acts as the trigger for the evaluation of whether MEDS will need to request SSN Validation OR SSN Validation and SSA Citizenship/Identity Verification.

Conditions for SSN Validation

On September 25, 2009, DHCS implemented SSN Validation requests via SSA/SVES on a daily basis. Daily updates to MEDS are evaluated to determine if SSN Validation should be requested from SSA. Regardless of the type of transaction, one of the following three conditions currently triggers a SVES SSN Validation request:

1. Newly reported SSNs or
2. Updates to SSNs that have not yet been submitted for SSN Validation or
3. Birth date or name changes for SSNs that have previously failed SSN Validation.

Conditions for SSA Citizenship/Identity Verification (SSN Validation Request Also Involved)

Beginning January 4, 2010, applicants and beneficiaries meeting the following conditions will automatically have their social security numbers submitted for Citizenship/Identity verification via SSA/SVES on a daily basis. Regardless of the type of transaction submitted by the county, if an SSN Validation request is triggered as described above, the following conditions will also trigger an SSA Citizenship/Identity verification request for new applicants or existing beneficiaries. All three conditions must be met to trigger a request for SSA Citizenship/Identity Verification.

1. Medi-Cal is indicated via the AID-CODE and,
2. U.S. Citizenship is indicated via the CITIZEN-ALIEN-INDICATOR (previously known as REFUGEE-ALIEN-IND) with the following values: A, B, N, Q, 5.

And,

3. Citizenship documentation in the CITIZENSHIP-DOC-TYPE field is not present or present at Tier 3 or below.

- For example, if this field contained citizenship document type 3C (Religious record showing a U.S. place of birth recorded within three months of birth) or document type 7W (written affidavit), a Citizenship/Identity request will be triggered.
- For example, if this field contained citizenship document type 1A (U.S. passport) or 2A (U.S. public birth record), a Citizenship/Identity request would not be triggered.

Path 2: Daily MEDS Updates and SSA Citizenship/Identity Verification

In Path 2, any daily MEDS update transaction initiated by county or state users can trigger SSA Citizenship/Identity Verification if a person's MEDS record meets the conditions described below and DHCS has not received any prior SSA Citizenship/Identity Verification for that person. Monthly MEDS renewal and quarterly MEDS reconciliation processes do not trigger SSA Citizenship/Verification requests.

- If a MEDS update transaction involves key data such as SSN, name, and date of birth, this transaction would fall under Path 1 (an SSN Validation request would be generated and if applicable, an SSA Citizenship/Identity Verification request as well).

Beginning January 4, 2010, applicants and beneficiaries meeting the following conditions will automatically have their social security numbers submitted for Citizenship/Identity verification via SSA/SVES on a daily basis. Daily updates to MEDS are evaluated to determine if Citizenship/Identity Verification should be requested from SSA. Regardless of the type of update transaction submitted by the county, the following conditions will trigger an SSA Citizenship/Identity verification request for new applicants or existing beneficiaries. All four conditions must be met to trigger a request for SSA Citizenship/Identity Verification under Path 2.

1. Medi-Cal is indicated via the AID-CODE and,
 2. U.S. Citizenship is indicated via the CITIZEN-ALIEN-INDICATOR (previously known as REFUGEE-ALIEN-IND) with the following values: A, B, N, Q, 5. And,
 3. Citizenship documentation in the CITIZENSHIP-DOC-TYPE field is not present or present at Tier 3 or below.
- For example, if this field contained citizenship document type 3C (Religious record showing a U.S. place of birth recorded within three

months of birth) or document type 7W (written affidavit), a Citizenship/Identity request will be triggered.

- For example, if this field contained citizenship document type 1A (U.S. passport) or 2A (U.S. public birth record), a Citizenship/Identity request would not be triggered.

4. DHCS has not previously received any prior SSA Citizenship/Identity Verification result for this record. If DHCS has received a prior “Unverified” or “Verified” result from the SSA for this record (see below), this condition (#4) will not have been met and no new SSA Citizenship/Identity Verification Request will be sent to the SSA.

2. How does SSA’s SSN Validation process impact Citizenship/Identity Verification?

SSA will attempt to verify citizenship/identity only if the SSN can be validated at the highest level (MEDS SSN-VER code of A, C, or E). This includes successfully matching the following to the SSA’s Numident database: SSN, first seven letters of the last name, first letter of the first name, middle initial (if available) and date of birth (plus or minus one year). SSA provides SSN Validation at various levels which are reflected in the MEDS SSN-VER codes. For Citizenship/Identity Verification, SSA will only respond when the validation level is equivalent to MEDS SSN-VER codes A, C, or E.

For further information about the Daily SSN Validation process, please review the MEDS Processing section of the MEDS Manual (MEDS Home Page website).

The following table summarizes the SSN Validation responses, the corresponding SSN verification codes (SSN-VER field), and the possible SSA Citizenship/Identity response. As discussed below, a successful SSA Citizenship/Identity Verification is shown in MEDS as a new DRA citizenship/identity document type. County staff will not see a MEDS data value labeled “Verified”, “Unverified”, “Validated”, “Validated at lower levels”, or “Unvalidated.” These values are ONLY used to help readers understand the SSN data match and illustrate the table below, and are not meant to communicate the exact values that county staff will see on MEDS.

	If SSA returns this as the <u>SSN</u> Validation Response:	MEDS SSN-VER Code may update to:	And SSA <u>Citizenship/Identity</u> Verification may be:
a	Validated	A, C, E	Verified
b	Validated	A, C, E	Unverified (Even with a validated SSN, SSA may not be able to verify citizenship/identity based on the information in their database. This is an SSA decision.)
c	Validated at lower levels	B, D, F – K	Unverified (SSA Citizenship Verification was not attempted)
d	Unvalidated	N - !	Unverified (SSA Citizenship Verification was not attempted)

At a high level, the above table shows the following “rules” regarding anticipated SSA citizenship/identity responses:

- a. Citizenship/Identity may be verified only if the SSN is validated at the highest level.
- b. Citizenship/Identity might not be verified even if the SSN is validated at the highest level as the SSA may decline to do so. (see question 5).
- c. SSA will not attempt to verify Citizenship/Identity when the SSN is validated at a lower level.
- d. SSA will not attempt to verify Citizenship/Identity when the SSN is unvalidated.

3. How will SSA’s Citizenship/Identity response be updated and communicated on MEDS?

First, the new Citizenship and Identity Document Type for SSA verified citizenship/identity is “2Z” (SSA confirmed U.S. Citizenship consistent with SSA data via State Verification Exchange System (SVES). The new Citizenship and Identity Document Source for SSA verified citizenship/identity is “SS” (Citizenship documentation reported by SSA based on verification of the SSN). These are MEDS generated codes.

DHCS will automatically update MEDS with SSA’s response if the current Citizenship or Identity Document Type code is blank or is a code lower than 2Z. For example, a successful SSN data match result for citizenship/identity will replace a document type code of 9Z (“New applicant who has not yet provided required citizenship/identity information”) or 4H (medical record showing U.S. place of birth), but it will not replace 1A (U.S. passport) or 2E (Certification of Birth Abroad).

- An unverified SSN data match result (the SSN is validated or unvalidated, but the Citizenship/Identity is unverified) will not update the DRA document type fields on MEDS. Any existing DRA document type code in these fields will remain unchanged.

Further documentation on DRA document type codes can be found in the Data Element Dictionary section of the MEDS manual, located on the MEDS web site.

Second, MEDS worker alerts will be generated based on SSA updates to MEDS Citizenship/Identity Data Elements.

Like all MEDS alerts, the documentation for the SSA Citizenship/Identity alerts may also be found under the "Appendices: Batch Messages" section in the MEDS Manual on the MEDS web site. A summary of the SSA citizenship/identity related worker alerts is listed below.

Alert #(ext)	Message
# 9044	SSA CITIZENSHIP VERIFIED VIA SSA DATA MATCH, POSTED TO MEDS ACTION: No further documentation is needed from the applicant or beneficiary for purposes of complying with the DRA.
# 9045 *	SSA CITIZENSHIP VERIFIED, UPDATED TO MEDS AS HIGHER STATUS ACTION: Lower level documentation is superseded by SSA Citizenship verification. No further documentation is needed from the applicant or beneficiary for purposes of complying with the DRA.
# 9046 **	SSA CITIZENSHIP VERIFIED, NOT POSTED DUE TO HIGHER VERIFICATION STATUS PRESENT ACTION: Higher level documentation is already present. No further documentation is needed from the applicant or beneficiary for purposes of complying with the DRA.
# 9047	SSA IDENTITY VERIFIED VIA SSA DATA MATCH, POSTED TO MEDS ACTION: No further documentation is needed from the applicant or beneficiary for purposes of complying with the DRA

Alert #(ext)	Message
# 9048 *	<p>SSA IDENTITY VERIFIED, UPDATED TO MEDS AS HIGHER STATUS</p> <p>ACTION: Lower level documentation is superseded by SSA Citizenship verification. No further documentation is needed from the applicant or beneficiary for purposes of complying with the DRA.</p>
# 9049 **	<p>SSA IDENTITY VERIFIED, NOT POSTED DUE TO HIGHER VERIFICATION STATUS PRESENT</p> <p>ACTION: Higher level documentation is already present. No further documentation is needed from the applicant or beneficiary for purposes of complying with the DRA.</p>
# 9050	<p>CITIZENSHIP/IDENTITY NOT VERIFIED VIA SSA DATA MATCH</p> <p>ACTION: First, counties should make a reasonable effort to address the mismatch by checking for and correcting any errors in the name, date of birth, SSN, or declaration of citizenship fields (Citizen/Alien-Ind field). If the client's information is updated or corrected, the county should wait at least two business days in order for the SSN data match process to repeat and then review the data match results for the updated or corrected data.</p> <p>Second, for those applicants and beneficiaries whose citizenship/identity cannot be verified by the SSA, who are not exempt from the DRA, and whose mismatch cannot be resolved as described above, the counties will need to request that the applicant or beneficiary either provide acceptable DRA documentation of citizenship and identity or resolve the inconsistency with the SSA.</p>
# 9051	<p>SSA DID NOT ATTEMPT CITIZENSHIP/IDENTITY DATA MATCH</p> <p>ACTION: First, counties should make a reasonable effort to address the mismatch by checking for and correcting any errors in the name, date of birth, SSN, or declaration of citizenship fields (Citizen/Alien-Ind field). If the client's information is updated or corrected, the county should wait at least two business days in order for the SSN data match process to repeat and then review the data match results for the updated or corrected data.</p> <p>Second, for those applicants and beneficiaries whose citizenship/identity cannot be verified by the SSA, who are not exempt from the DRA, and whose mismatch cannot be resolved as described above, the counties will need to request that the applicant or beneficiary either provide acceptable DRA documentation of citizenship and identity or resolve the inconsistency with the SSA.</p>

Alert #(ext)	Message
# 9052	<p>CITIZEN STATUS CHANGED TO NON CITIZEN WHILE CITVER PENDING</p> <p>ACTION: SSA only provides citizenship/identity verification if an applicant or beneficiary declares that he or she is a citizen. First, counties should verify that the citizenship declaration (CITIZEN/ALIEN-INDICATOR) is accurate. If the client's information is updated or corrected to indicate citizenship, the county should wait at least two business days in order for the SSN data match process to repeat and then review the data match results for the updated or corrected data.</p> <p>If the applicant or beneficiary does not declare that he or she is a citizen, then the DRA citizenship/identity requirements do not apply to this client.</p>
# 9053	This alert is not currently used. Reserved for future use.
# 9054	<p>SSN VERIFICATION REMOVAL ALSO REMOVED SSA CITIZENSHIP/IDENTITY VERIFICATION</p> <p>This message indicates that SSN Verification has been removed by a user. This, in turn, removes SSA Citizenship Verification as it is linked to validation of an SSN. The SSA only provides citizenship/identity verification when it can fully validate an SSN and the name and date of birth associated with this SSN.</p> <p>ACTION: It is possible that a subsequent SSN, name or birth date change has resulted in an additional SSN and Citizenship Verification request to the SSA. MEDS will automatically request SSN and Citizenship verification (when eligible to do so) if SSN, name or birth date is changed following SSN Verification removal.</p>

* Indicates this alert is optional; counties may suppress these alerts.

** Indicates that this alert will be suppressed from distribution to the counties as no changes are made to citizenship/identity fields on MEDS. Counties may opt to receive them.

The following table shows alerts and updates to MEDS based on a successful SSA Citizenship/Identity Verification and the status of citizenship/identity documentation in MEDS at the time SSA's response is received.

MEDS Citizenship and Identity Data Elements on MEDS INQE screen	MEDS Worker Alerts that are generated
If citizenship and/or identity are not present , MEDS INQE screen will be updated.	# 9044 alert for Citizenship ("SSA CITIZENSHIP VERIFIED VIA SSA DATA MATCH, POSTED TO MEDS") and # 9047 alert for Identity ("SSA IDENTITY VERIFIED VIA SSA DATA MATCH, POSTED TO MEDS")
If citizenship and/or identity are already verified at a lower level than SSA's citizenship/identity verification, MEDS INQE screen will be updated.	# 9045 alert for Citizenship ("SSA CITIZENSHIP VERIFIED, UPDATED TO MEDS AS HIGHER STATUS") and # 9048 alert for Identity ("SSA IDENTITY VERIFIED, UPDATED TO MEDS AS HIGHER STATUS")
If citizenship and/or identity are already verified at a higher level than SSA's citizenship/identity verification, MEDS INQE screen will not be updated.	# 9046 alert for Citizenship ("SSA CITIZENSHIP VERIFIED, NOT POSTED DUE TO HIGHER VERIFICATION STATUS PRESENT") and # 9049 alert for Identity ("SSA IDENTITY VERIFIED, NOT POSTED DUE TO HIGHER VERIFICATION STATUS PRESENT")

The following table shows sample updates to MEDS and their effect on alerts generated:

If MEDS and SSA Response is:			Then MEDS will be updated as shown below:					
MEDS CITIZENSHIP-DOCUMENT- TYPE	MEDS IDENTITY-DOCUMENT- TYPE	SSA's Citizenship/Identity Response		MEDS CITIZENSHIP-DOCUMENT- TYPE WILL UPDATE TO:	MEDS IDENTITY-DOCUMENT- TYPE WILL UPDATE TO:	VERIFIED CITIZENSHIP ALERT #	VERIFIED IDENTITY ALERT #	UNVERIFIED ALERT
blank	blank	Verified		2Z	2Z	9044	9047	---
blank	7W	Verified		2Z	2Z	9044	9048	---
blank	2E	Verified		2Z	2E	9044	9049	---
8Q	blank	Verified		2Z	2Z	9045	9047	---
9Z	7Z	Verified		2Z	2Z	9045	9048	---
3B	2E	Verified		2Z	2E	9045	9049	---
2A	blank	Verified		2A	2Z	9046	9047	---
2A	7W	Verified		2A	2Z	9046	9048	---
2A	1A	Verified		2A	1A	9046	9049	---
any	any	Unverified		Remains same	Remains same	---	---	9050
any	any	Unverified		Remains same	Remains same	---	---	9051

4. What might cause SSA to return a Citizenship/Identity Verification request as “Unverified”?

- Inaccurate reporting by the client or inaccurate updating by the counties and the state, of a client’s SSN and the full name and date of birth associated with that SSN. This includes the first name, middle name or initial, and last name. The SSA will only provide citizenship and identity verification for SSNs which are fully validated during the SSA’s data matching process.
- Lack of citizenship information for that SSN within SSA’s records. According to the SSA, the agency is more likely to have citizenship information for more recently issued SSNs than for those issued to older individuals.
- Whether the SSA has the most current information for that person. According to the SSA, the data match only verifies that the allegation of citizenship is consistent with the SSA’s records. For example, a Medi-Cal client who was a legal resident when he or she received an SSN, may have become a U.S. citizen since then. However, that newer information may not be reflected in the SSA database.

5. What changes can be made to the Citizenship or Identity Document Type if SSA has provided Citizenship/Identity Verification (DRA document type code 2Z)?

If Citizenship/Identity is already verified by SSA, the Citizenship/Identity Document Type may only be updated to a higher level of verification (a higher document type code). For example, it may be updated from 2Z to 1A (U.S. passport) or 2K (U.S. military record). However, the document type code may not be updated from 2Z to a lower tier document type code. For example, from 2Z to 3B (Life or health insurance record) or 7W (written affidavit).

If SSA’s Citizenship/Identity verification is incorrect, the approved method to update MEDS is to remove the SSN Validation code and provide updated or corrected information (SSN, name, date of birth, citizen/alien-indicator). This will trigger a new request to SSA for SSN Validation and Citizenship/Identity verification.

Currently counties may submit an EW30 transaction to remove SSN Validation. This in turn will update the Citizenship and Identity data elements when they are based on SSA citizenship/identity verification. It maybe necessary to remove SSN Validation to allow for correction of exception situations. For example, when a county has information confirming that SSA has issued a new SSN to a person. Or, for example, if there is an indication that this SSN belongs to someone else.

- SSN Validation removal will also remove the SSA Citizenship/Identity Verification from MEDS. The SSA Citizenship/Identity Verification is dependent on a validated SSN. MEDS will change the Citizenship and Identity Document Type Code from 2Z to 9S (“SSN Verification also removed SSA Citizenship/Identity verification”) and a worker alert will be produced (alert #9054: “SSN VERIFICATION REMOVAL ALSO REMOVED SSA CITIZENSHIP/IDENTITY VERIFICATION”).
- Also, the CITIZENSHIP-DOCUMENT-SOURCE and IDENTITY-DOCUMENT-SOURCE fields will update to the county number of the county submitting the EW30 transaction.

6. When the DRA document type changes to 9S (“SSN Validation Removal Also Removed SSA Citizenship/Identity Verification”), is that going to trigger a reduction in the beneficiary’s benefits? Will that affect benefit levels at all?

No, it will not trigger a reduction in benefits by MEDS. However, DRA compliance is still required if the applicant or beneficiary is not exempt from the DRA.

The removal means that the DRA document type field should be treated as a blank field. The applicant or beneficiary now has a reasonable opportunity period to provide acceptable DRA documentation. This period remains in effect as long as the person is making a good faith effort (it is not limited to 90 days as would be the case for an unsuccessful SSN data match, as discussed below in the section “Responding To Mismatches”). If the person’s file includes acceptable DRA documentation of citizenship and identity, the county should update SAWS and MEDS with this information. For example, if the file includes a Tier 3 or lower document that was earlier indicated on MEDS and later replaced by the SSA Citizenship/Identity Verification (now removed). MEDS should be updated to reflect the acceptable DRA documents that are in the person’s file.

If the county sends updates for the person’s record (SSN, name, date of birth) that meets the conditions for a new SSN data match and a new SSN data match request is sent by DHCS, then the 90-day period for resolving mismatches does apply if there is a mismatch.

7. What is the effect of the SSN data match on Performance Standards and MEDS Reconciliation?

The new alerts are currently not part of the MEDS alerts covered by Performance Standards (ACWDL 08-09 contains the current information on which alerts are covered by performance standards). The DRA document type code fields are not part of MEDS Reconciliation, thus alerts are not generated if the county SAWS system is not updated to match successful SSA Citizenship/Identity Verification results on MEDS (the 2Z document type code). Also, alerts are not generated if the county SAWS system is not updated to match unsuccessful (unverified) SSA Citizenship/Identity Verification results.

8. Will the county receive alerts related to unverified SSA Citizenship/Identity requests even in instances where there is already DRA documentation on MEDS for that record?

Yes, as shown in the sample updates above, it is possible for 9050 alerts ("CITIZENSHIP/IDENTITY NOT VERIFIED VIA SSA DATA MATCH") and 9051 alerts ("SSA DID NOT ATTEMPT CITIZENSHIP/IDENTITY DATA MATCH") to be returned for records that already have DRA documentation. If this situation occurs, counties should not process these alerts as the applicant or beneficiary has already complied with the DRA's requirements. The alerts will not repeat if an SSN Validation and/or SSA Citizenship/Identity Verification request is not done for this record. Thus, if the trigger conditions for an SSN data match are not met, no request will be made. For example, if the person's key data such as their SSN, name, and date of birth does not change, an SSN data match request would not be generated. The "Unverified" result from the SSA will not replace any entry or blank space in the DRA document type code fields.

9. Will the county receive alerts related to SSA Citizenship/Identity requests, including those related to unverified results, even in instances where the person, according to information on MEDS, is exempt from the DRA?

Yes. If an exempt person's MEDS record meets the conditions for an SSN data match, MEDS will request SSN Validation and/or SSA Citizenship/Identity Verification. This is because the complex programming for the DRA exemption codes in MEDS is not yet complete. Thus, it is possible for the new alerts to be returned for records that are exempt from the DRA. If this situation occurs, counties should not process these alerts as the applicant or beneficiary is exempt from the DRA's requirements. As shown above, these are alerts 9044 through 9054. If the person no longer qualifies for an exemption from the DRA and these alerts are received for that person, then these alerts should be processed and counties must obtain acceptable DRA documentation if it has not already been provided.

The alerts will not appear or repeat if an SSN Validation and/or SSA Citizenship/Identity Verification request is not done for this record. Thus, if the trigger conditions for an SSN data match are not met, no request will be made. For example, if the person's key data such as their SSN, name, and date of birth does not change, an SSN data match request would not be generated. An "Unverified" result from the SSA will not replace any entry or blank space in the DRA document type code fields.

As a reminder, the following persons are exempt from the DRA. The DRA does not apply to U.S. citizens or nationals in any of these categories:

- Current beneficiaries of: Supplemental Security Income (SSI), Medicare, Social Security Disability Insurance (SSDI), or Social Security Retirement and Survivors Insurance (RSI – Title II) based on their own disability.
- Anyone under 21 asking for Minor Consent Services
- Babies born to women on Medi-Cal
- Children in Foster Care, Adoption Assistance, or Kin-GAP (Kinship Guardian Assistance Program)
- Babies in the Abandoned Baby Program
- CalWORKs (California Work Opportunity and Responsibility to Kids) Beneficiaries

10. If a person is in pending status on MEDS and the county is pending verification (prior to approval), will MEDS automatically batch this record for an SSN data match without approval of benefits?

Yes, the SSN data match will apply to any record that meets the trigger conditions, regardless of pending status. As a reminder, per ACWDL 09-27, otherwise eligible applicants, with pending or new applications, who declared under penalty of perjury that they are a U.S. citizen or U.S. national are to be provided full-scope Medi-Cal coverage while they obtain DRA citizenship/identity documentation. The requirement for the SSA Citizenship/Identity Verification changes this policy to include the time period required to process the SSN data match and to address any mismatch results.

11. Per the Medi-Cal Eligibility Procedures Manual (MEPM) Section 4M, the SSN for all applicants or beneficiaries must be verified within sixty (60) days of the date of the initial application unless: they are a newborn or applying for restricted benefits. In total, this ACWDL gives the applicant/beneficiary 97 days from the date of the notice to resolve the mismatch. Does this ACWDL change the requirement for the SSN to be verified within 60 days to 97 days?

No. This ACWDL does not change the SSN verification requirement in the MEPM.

12. If SSA Citizenship/Identity Verification is removed and there was previously a lower tier DRA document code on the MEDS INQE screen (prior to the SSA Citizenship/Identity Verification), will the lower tier document information be returned to the INQE screen?

No. Counties should review the individual's case file for the DRA document copy that would have been made when the document was submitted and use that to update the DRA document codes in MEDS.

13. Is it the county's responsibility to notify the SSA when the county has more current citizenship/identity information for an individual?

It is not the county's responsibility to notify SSA if the county has more current citizenship/identity information for an individual.

14. When will the new worker alerts related to the SSA Citizenship/Identity Verification be produced?

DHCS plans to carefully review the first few SVES response files before updating MEDS and producing worker alerts related to SSA Citizenship/Identity Verification. We anticipate counties should begin to receive SSA citizenship/identity-related worker alerts beginning approximately January 15, 2010. There may be a delay depending on DHCS' review of the initial results from SSA.

Note: the existing alerts related to the DRA are still effective and will continue to be issued by MEDS when appropriate.

HOW TO USE THE SSN DATA MATCH FOR DRA COMPLIANCE

As explained above, the SSA Citizenship/Identity Verification will be triggered automatically if certain conditions are met. The SSN data match results should be used,

- After determining that the Medi-Cal applicant or beneficiary is not exempt from the DRA and has not yet complied with the DRA, but
- Prior to the current DRA compliance process of requesting acceptable documents

For example, after helping a non-exempt applicant with their Medi-Cal application and sending appropriate transactions to MEDS (example: reporting full scope eligibility if otherwise eligible), the county should review the SSN data match results available on MEDS two business days later before requesting acceptable DRA documentation from the applicant.

Counties can ascertain whether an applicant or beneficiary has a successful SSN data match by noting the MEDS alert or document type that appears two business days later and which contains the SSA response. Reviewing the MEDS INQE screen or worker alerts screen for the presence of a successful SSN Data match is a first step for DRA (after determining the person is not exempt). Applicants and beneficiaries whose citizenship and identity are verified by the SSA do not need to provide any further evidence of their citizenship or identity for purposes of compliance with the DRA. Counties are not required to issue a DHCS 0011 form ("Proof of Acceptable Citizenship or Identity Documents") to the applicant or beneficiary when there is a successful SSA Citizenship/Identity Verification.

However, if the applicant or beneficiary's DRA documentation is on hand and readily available, the county should enter this information into their SAWS system or MEDS. For example, if the applicant or beneficiary brought the DRA documentation with them at the initial intake interview. This will help the applicant or beneficiary, comply with the DRA if the SSA Citizenship/Identity Verification request is unsuccessful (since the SSA may not be able to return a successful Citizenship/Identity Verification for all of the requests submitted by DHCS).

- Optional: At any time, counties can request a birth records match for California-born individuals. This can be done before or after MEDS receives the SSN data match results. Birth records match results are available the next business day and a successful birth records match meets the DRA citizenship requirement. A successful birth records match will not be overwritten by a verified OR an unverified SSA Citizenship/Identity result. Again, this helps the individual comply with the DRA as the SSA may not return a successful Citizenship/Identity Verification in all cases.

RESPONDING TO MISMATCHES

Counties will need to assist non-exempt applicants and beneficiaries who are not successfully matched by the SSA and who have not yet complied with the DRA. First, counties should make a reasonable effort to address the mismatch by checking for correctable errors. For example:

- Checking for typographical or other clerical errors, and/or
- Verifying that the information provided matches the client's current social security card, and/or
- Contacting the client to confirm the accuracy of the SSN, the full name and date of birth associated with that SSN, and their intent to declare U.S. citizenship or national status, and/or
- If the client has changed their name due to marriage or other events, but their maiden or previous name is still reflected on the SSA's records, the MEDS Alias/SSA-Name field can be used to report the name that would be reflected on the SSA's records.
- If the county has documents in that person's case file that meet the DRA citizenship/identity requirement, then the county system and MEDS must be updated if necessary to reflect that information and the mismatch is considered resolved. In these circumstances, counties must not notify the applicant or beneficiary of the mismatch.

If the applicant or beneficiary's SSN, name, date of birth, or declaration of U.S. citizenship or national status, is updated or corrected by the county, the county should wait at least two business days in order for the SSN data match process to repeat and then review the data match results for the updated or corrected data.

Second, for those applicants and beneficiaries whose citizenship/identity cannot be verified by the SSA, who are not exempt from the DRA, and whose mismatch cannot be resolved as described above, the counties will need to request that the applicant or beneficiary either provide acceptable DRA documentation of citizenship and identity or resolve the inconsistency with the SSA.

- The current list of acceptable DRA documentation is in ACWDL 08-29 "Final Federal Rule Changes To The Citizenship/Identity Requirements For Medi-Cal Eligibility."
- The federal CHIPRA law that allows for the SSN data match, also specifies that Medi-Cal applicants and beneficiaries will have 90 days from the date they receive notice of the mismatch to resolve these mismatches by providing acceptable DRA documentation or by contacting the SSA directly to resolve the mismatch.

- To inform Medi-Cal applicants and beneficiaries about the SSA mismatch result, counties will need to send the attached Information Notice (“Unable to Verify U.S. Citizenship/Identity Through the Social Security Administration”) and one of the following DRA forms to applicants and beneficiaries.
 - For applicants, send “U.S. Citizens and Nationals Applying for Medi-Cal Must Show Proof of Citizenship and Identity” (DHCS 0001, last revised May 2009, see ACWDL 09-27).
 - For beneficiaries, send “Proof of Citizenship and Identity, New Requirements for Medi-Cal Beneficiaries Who Are U.S. Citizens or Nationals” (DHCS 0002, last revised January 2008, see ACWDL 08-29).

To allow adequate time for processing and mailing of the notice to the Medi-Cal applicant or beneficiary, the 90-day period shall start seven calendar days after the date of the Information Notice.

Note: DHCS will translate the Information Notice (“Unable to Verify U.S. Citizenship/Identity Through the Social Security Administration”) into the threshold languages within the next 60 days.

The applicant or beneficiary may contact the SSA directly to resolve mismatches. The SSA will update the persons’ SSA records according to the SSA’s policies and procedures. If the applicant or beneficiary reports that he or she has contacted the SSA and successfully resolved the mismatch, the county should ask him or her for the changes that were accepted by the SSA and then update their county system with these changes. Sending the update to MEDS should trigger another transaction to verify citizenship/identity.

MEDI-CAL ELIGIBILITY DURING THE SSN DATA MATCH PROCESS

If an applicant or beneficiary is otherwise eligible, counties must grant full scope Medi-Cal while SSA is processing the data match.

- Also, for those who are otherwise eligible but whose citizenship/identity is not verified by the SSA, counties must grant full-scope Medi-Cal while the county is making a reasonable effort to help the beneficiary correct errors on the submitted data and during the 90-day period for resolving the mismatch by providing acceptable DRA documentation or contacting the SSA directly, and/or providing corrected information to the county. The beneficiary’s full-scope Medi-Cal continues during this 90-day period as long as they continue to meet all other eligibility requirements.

If the applicant or beneficiary is unable to resolve the mismatch by providing acceptable DRA documentation or contacting the SSA directly, counties are to reduce the client's Medi-Cal eligibility from full scope to restricted scope within 30 days following the end of this 90-day period with timely and adequate notice to the applicant or beneficiary.

- Counties should use the Notices of Action published in ACWDL 09-27 for this (MC 239 DRA-3 [no share of cost] and MC 239 DRA-4 [share of cost], "Medi-Cal Notice of Action, Change To Limited Benefits").

If acceptable DRA documentation is not provided or the inconsistency is not resolved with the SSA within 90 days after the beneficiary receives notice of a mismatch, their benefits must be reduced to restricted scope Medi-Cal. If not otherwise eligible, a beneficiary must be discontinued from Medi-Cal.

The applicant or beneficiary may appeal the disenrollment and request a fair hearing in accordance with standard notice and fair hearing procedures.

The 90-day period for resolving mismatches changes the nature of the reasonable opportunity period by placing a limited time period for the beneficiary to provide acceptable DRA documentation when there is a mismatch of a request for SSA Citizenship/Identity Verification. Previously, the reasonable opportunity period continued as long as the individual continued to make a good faith effort toward obtaining acceptable DRA documentation. For example, if an applicant or beneficiary is:

- already in a reasonable opportunity period for DRA compliance (prior to the availability of the SSN data match option for DRA compliance) and
- an SSN data match is triggered and
- there is a mismatch result, then the 90-day period for resolving the mismatch takes precedence over the prior reasonable opportunity period.

Aside from the availability of the SSN data match and the 90-day period for resolving mismatches, all other existing DRA policy instructions issued in previous ACWDL's remain in effect.

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For questions regarding this letter, please contact Mr. Ken Louie at (916) 552-9515, or by e-mail: ken.louie@dhcs.ca.gov.

Original signed by

Robert Sugawara, Acting Chief
Medi-Cal Eligibility Division

Enclosures

Unable to Verify U.S. Citizenship/Identity Through The Social Security Administration

Office Hours:

This notice is required under Welfare and Institutions Code section 14011.2
MC 239 DRA-6 (Unable To Verify U.S. Citizenship/Identity Through SSA) (Rev. date 12-30-2009)