

DATE: December 4, 2023

Medi-Cal Eligibility Division Information

Letter No.: I 23-57

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

SUBJECT: SOCIAL SECURITY NUMBER REQUIREMENTS FOR MEDI-CAL

The purpose of this Medi-Cal Eligibility Division Information Letter (MEDIL) is to provide guidance on when a Social Security Number (SSN) is and is not required as a condition of eligibility for noncitizen Medi-Cal applicants and members. This letter does not address the SSN requirements for California Work Opportunity and Responsibility to Kids (CalWORKs) or CalFresh. For additional information on the SSN requirements for these programs, please refer to the guidance provided by each program.

Background

Under current Medi-Cal policy, applicants with satisfactory immigration status (SIS) are required to obtain an SSN as part of the Medi-Cal application process. 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.

Who can qualify for an SSN?

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

- United States citizens,
- Noncitizens who are lawfully admitted to the United States (U.S.) **and have authorization to work**, and
- Noncitizens who meet the requirements for a nonwork SSN.

Who needs an SSN 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.

Are nonwork SSNs required for 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 Medi-Cal eligibility purposes, this means that a noncitizen who does not have an SSN **and** does not have work authorization can receive federal full scope Medi-Cal without an SSN if otherwise eligible. In conclusion, there is no need to send noncitizen Medi-Cal applicants to SSA to request an SSN if they are not authorized to work. Noncitizen Medi-Cal applicants and members who do not have authorization to work are not required to apply for or provide an SSN as a condition of full scope Medi-Cal eligibility even if they claim to be in a satisfactory immigration status. This means that Medi-Cal applicants or members only need to provide or apply for an SSN as a condition of Medi-Cal eligibility if they already have an SSN, or if they do not have an SSN, but meet all the following conditions:

- They are a qualified noncitizen, or in a lawfully present immigration status, AND
- They have work authorization.

When is an MC 194 form used?

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 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 immigrants who are not lawfully present, but are PRUCOL or whose Status is Unknown

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](#)). Most of the former PRUCOL categories are now classified as Qualified Noncitizens or Lawfully present and are treated as such for Medi-Cal eligibility purposes. PRUCOL immigrants who are not lawfully present, immigrants whose status is 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 certain applicants to apply for a non-work SSN for some programs (such as CalWORKs). But this must not delay Medi-Cal eligibility if the individual wants Medi-Cal and is otherwise eligible.
- Under current Medi-Cal policy, counties may ask immigrants for an SSN regardless of immigration status. But counties must not require an applicant or Medi-Cal program member who is not in an SIS (either a Qualified Noncitizen or defined as lawfully present) to provide or apply for an SSN if they do not already have one.
- As discussed in this letter, do not require a Medi-Cal applicant or program member to provide or apply for an SSN if they do not already have one and do not have authorization to work in the United States.
- 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.

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Please direct questions or concerns related to the information in this letter to Karyna Roa by emailing Karyna.Roa@dhcs.ca.gov.

Sincerely,

Yingjia Huang
Assistant Deputy Director
Health Care and Benefits
Department of Health Care Service