



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



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November 2, 2009

Medi-Cal Eligibility Division Information Letter No.: I 09-04

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

SUBJECT: Social Security Number Data Match For Verification of Citizenship
and Identity for Purposes of Medi-Cal Eligibility

This Medi-Cal Eligibility Division Information Letter (MEDIL) is to inform the counties that Section 211 of the federal Children's Health Insurance Program Reauthorization Act of 2009 (CHIPRA) gives States the option to use a Social Security Number (SSN) matching process for verification of citizenship and identity. 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 or U.S. national status and identity under the federal Deficit Reduction Act of 2005 (DRA).

- The Department of Health Care Services (DHCS) is preparing to implement this new verification process by January 1, 2010, the effective date for this option specified in the federal law.

This MEDIL is for informational purposes only. This MEDIL does not make any policy changes to the Medi-Cal program or to the Medi-Cal Eligibility Data System (MEDS). Counties do not need to take any action at this time. Instructions will be provided in a subsequent All County Welfare Directors Letter (ACWDL).

The federal Centers for Medicare and Medicaid Services (CMS) and the federal Social Security Administration (SSA) have provided preliminary details of this option through several conference calls with State Medicaid agencies, and CMS plans to issue written instructions in the near future. DHCS is moving ahead with the development of MEDS changes necessary to implement this option beginning in January 2010. With this option, DHCS will request citizenship/identity verification as part of the existing daily validation of SSNs (using MEDS data submitted by DHCS to the SSA). The SSA returns verification results the following business day for display in MEDS. MEDS will also generate alerts for these results to inform counties of the outcome. Successful verification depends on the following:

- Accurate collection, by the counties and the state, of a client's SSN and the full name and date of birth associated with that SSN. The SSA will only provide citizenship and identity verification for SSNs which are fully validated during the SSA data matching process.
- The presence 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.

Applicants and beneficiaries whose citizenship and identity is verified by the SSA do not need to provide any further evidence of their citizenship or identity for purposes of compliance with the DRA. Based on information provided by the SSA, we anticipate that this will cover over 90% of citizen applicants.

For those applicants and beneficiaries who cannot be verified by the SSA, the counties will request acceptable DRA documentation of citizenship and identity. Under this CHIPRA option, Medi-Cal applicants and beneficiaries will have 90 days to resolve these mismatches by providing acceptable DRA documentation or by contacting the SSA directly to resolve the mismatch. DHCS is preparing an ACWDL that will provide detailed instructions on the SSN validation process for verification of citizenship. Counties must continue to follow current policy on DRA citizenship and identity verification until the additional policy instructions are released in a subsequent ACWDL.

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Original signed by

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