



STATE OF WISCONSIN

Date: February 15, 2019

DMS, DECE, and DFES Operations Memo 19-J3

**Amendment 1 March 1, 2019**

**Amendment 2 April 8, 2019**

To: Income Maintenance Supervisors  
 Income Maintenance Lead Workers  
 Income Maintenance Staff  
 Workforce Development Boards  
 W-2 Agencies  
 Child Care Eligibility and  
 Authorization Supervisors and Workers  
 Child Care Coordinators  
 Training Staff

From: Rebecca McAtee, Bureau Director  
 Bureau of Enrollment Policy and Systems  
 Division of Medicaid Services  
 Department of Health Services

Kath McGurk, Director  
 Bureau of Early Learning and Policy  
 Division of Early Care and Education  
 Department of Children and Families

Margaret McMahon, Director  
 Bureau of Working Families  
 Division of Family and Economic Security  
 Department of Children and Families

Affected Programs:	
<input checked="" type="checkbox"/>	BadgerCare Plus
<input checked="" type="checkbox"/>	Caretaker Supplement
<input type="checkbox"/>	Children First
<input type="checkbox"/>	Emergency Assistance
<input checked="" type="checkbox"/>	FoodShare
<input type="checkbox"/>	FoodShare Employment and Training
<input type="checkbox"/>	Job Access Loan
<input type="checkbox"/>	Job Center Programs
<input checked="" type="checkbox"/>	Medicaid
<input type="checkbox"/>	Other Employment Programs
<input type="checkbox"/>	Refugee Assistance Program
<input type="checkbox"/>	SeniorCare
<input checked="" type="checkbox"/>	Wisconsin Shares Child Care
<input checked="" type="checkbox"/>	Wisconsin Works
<input type="checkbox"/>	Workforce Innovation and Opportunity Act

**Enhancements to Citizenship, Identity, Social Security Number, and  
 Immigration Verification**

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## CROSS REFERENCE

- BadgerCare Plus Eligibility Handbook, [Chapter 4 Citizenship and Immigration Status, Section 6.1.1 Social Security Number Requirements, Section 9.1 Verification, Section 9.9.1 Social Security Number, and Section 9.9.2 Immigrant Status](#)
- FoodShare Wisconsin Handbook, [Section 1.2.3.3 Immigrant Eligibility Verification, Section 1.2.6 Suggested Verification Sources, and Section 3.12.1 Citizenship and Immigration Status](#)
- Medicaid Eligibility Handbook, [Chapter 7 U.S. Citizen or Qualifying Immigrant](#) and [Section 20.3 Mandatory Verification Items](#)
- Wisconsin Works (W-2) Manual, [Section 2.4.1.1 SAVE, Section 2.7.1 Providing Social Security Numbers, Section 4.1.2 Information Requiring Eligibility Verification, and Appendix – Non-Citizen Eligibility Documentation](#)
- Wisconsin Shares Child Care Policy and Process Handbook, [Section 1.3.5 U.S. Citizen or Qualified Immigrant, Section 1.3.6 Social Security Numbers \(SSN\), Section 1.5.10 Non-Financial Eligibility Verification, and Section 1.5.10.2 Verify Only Once](#)
- SSI Caretaker Supplement (CTS) Handbook, [Section 3.1.12 SSN Requirement and Section 3.1.15 Verification](#)
- Process Help, [Chapter 44 Data Exchange, Chapter 58 Customer Correspondence, Chapter 68 Citizenship and Identity Verification, and Chapter 82 SAVE](#)
- Department of Health Services Operations Memo [18-19](#)
- Bureau of Working Families Operations Memos [15-04, 16-14, and 17-02](#)

## PURPOSE

This operations memo announces policy changes and enhancements to CARES Worker Web (CWW) to support verification of citizenship, identity, Social Security number (SSN), and immigration status. This memo also announces the implementation of a 95-day reasonable opportunity period for health care applicants to verify their immigration status. In addition, this memo describes systems changes required by the Federal Data Services Hub (FDSH), which provides real-time verification of immigration status for individuals requesting health care.

## **BACKGROUND**

Verified citizenship, identity, SSN, and immigration status are critical to ensuring accurate eligibility determinations, and SSNs in particular are required for use of data exchanges to verify income, assets, and other information.

Verification of these items is a complex process involving multiple data exchanges, extensive program-specific automation in CARES, and hierarchies of rules for workers to consider. As a result, these fundamental verification requirements can be both time consuming and error prone. Recent quality control reviews and legislative audits have identified errors in how these items have been entered and verified, including situations in which individuals have been asked more than once to verify “one-time” verification items. In addition, agencies have identified the lack of alignment across program areas as a source of complexity and workload.

The policy changes and system enhancements described in this memo are intended to:

- Better align policy and process related to citizenship, identity, SSN, and immigration status across health care, FoodShare, Wisconsin Shares Child Care Subsidy Program, Caretaker Supplement, and Wisconsin Works (W-2).
- Ensure correct eligibility decisions based on each program’s requirements for citizenship, identity, SSN, and immigration status.
- Prevent situations in which individuals are asked to provide documentation of citizenship, identity, or immigration status when these factors can be verified through data exchanges.
- Prevent situations in which citizenship, identity, or SSN for a given person is verified more than once.
- Minimize agency workload by streamlining and simplifying entry and verification processes for these elements.
- Reduce errors and improve future legislative audit findings related to entry and verification of these elements.

As part of these enhancements, the Wisconsin Department of Health Services (DHS) will also implement a 95-day reasonable opportunity period for health care applicants to verify their immigration status. This process is similar to the 95-day reasonable opportunity period granted to health care applicants for verifying their U.S. citizenship. This reasonable opportunity period is required by federal regulations at 42 C.F.R. § 435.956(b).

## **CITIZENSHIP AND IDENTITY**

### ***POLICY***

Verification of citizenship and identity are one-time-verifications for all programs; meaning they should only be verified once for any one individual.

### ***HEALTH CARE***

Current policy for verification of citizenship and identity for health care, as described in [BadgerCare Plus Eligibility Handbook, Section 4.2 Documenting Citizenship](#), and [Medicaid Eligibility Handbook, Section 7.1 US Citizens and Nationals](#), will not be changed by the enhancements described in this memo. Individuals applying for or receiving Medicaid, BadgerCare Plus, or Family Planning Only

Services (FPOS) benefits must provide documentation of their U.S. citizenship if all of the following are true:

- They have declared that they are a U.S. citizen.
- Their citizenship cannot be verified by the Social Security Administration (SSA) through a data exchange.
- They are not exempt from this requirement.

Individuals who must document their citizenship can provide any stand-alone document or separate documents verifying U.S. citizenship and identity. See [attachment 1 of this memo](#) for acceptable documentation for health care programs.

### *FOODSHARE*

Current policy for verification of citizenship and identity for FoodShare, as described in the [FoodShare Wisconsin Handbook, Section 1.2.3 Non-Financial Verification](#), and [Section 1.2.6.3 Suggested Verification Sources](#), will not be changed by the enhancements described in this memo. Citizenship is often verified by data exchange, SSA, or another program. However, for FoodShare, citizenship does not require verification unless found questionable. If an applicant or member's citizenship is found questionable, agencies should request citizenship verification.

Verification of identity is required for the primary person for FoodShare. Identity can be verified in a number of ways, including a data match with SSA (see [FoodShare Wisconsin Handbook, Section 1.2.3.1 Identity Verification](#), and [Section 1.2.6 Suggested Verification Sources](#), and [Process Help, Section 44.3.5 Citizenship/Identity \[Real-time and Batch Process\]](#)). If the primary person's identity has been verified through another program of assistance, no additional verification is required.

### *WISCONSIN SHARES CHILD CARE SUBSIDY PROGRAM*

Identity of the applicant and all parents in the assistance group must be verified as described in the [Wisconsin Shares Child Care Policy and Process Handbook, Section 1.5.10 Non-Financial Eligibility Verification](#). In addition to the existing methods and forms of identity verification, the Wisconsin DMV Driver's License Query along with the MV code will be added as an enhancement. Identity must be verified only for parents in the Wisconsin Shares assistance group.

The U.S. citizenship of children **for whom assistance is requested** must be verified. In addition to the existing methods and forms of citizenship verification of children, the NB (entered by worker) and NX (entered by CARES) codes may be used to verify U.S. citizenship for continuously eligible newborns. Citizenship of parents is not required for Wisconsin Shares eligibility.

### *WISCONSIN WORKS*

U.S. citizenship or qualified non-citizen status must be verified for all individuals in the W-2 group as described in the [Wisconsin Works \(W-2\) Manual, Section 2.4.1 Verifying U.S. Citizenship or Qualified Non-Citizen Status](#).

W-2 policy for verification of U.S. citizenship will be updated to allow the following items as sources of verification:

- NX – CONTINUOUSLY ELIGIBLE NEWBORN code when entered by CARES

- NB – CONTINUOUSLY ELIGIBLE NEWBORN code when entered by an income maintenance (IM) worker
- DE – DATA EXCHANGE code when entered by an IM worker
- U.S. passport
- Medical birth record that lists a U.S. place of birth
- Religious record that lists a U.S. place of birth
- Enhanced driver's license
- Citizenship documents issued by the U.S. Department of State to U.S. citizens born abroad
- Final adoption decree that lists a U.S. place of birth
- SAVE database
- U.S. Citizen ID card or Northern Mariana card

**Note:** An enhanced driver's license is a special type of driver's license issued by certain states. As of the date of publication, Wisconsin does not issue enhanced driver's licenses, but other states do. New residents who move to Wisconsin from these states may possess an enhanced driver's license that may verify U.S. citizenship.

W-2 policy is further updated to clarify the following items:

- A baptismal certificate or hospital birth record must list a U.S. place of birth to be used as a verification source of U.S. citizenship.
- The DX – DATA EXCHANGE code indicates that CARES obtained citizenship verification using the SSA data exchange.

Policy now disallows the use of the SC – SSI-MA OR MEDICARE RECIPIENT code when entered by an IM worker as verification of U.S. citizenship for W-2 eligibility.

Identity must be verified only for all adults in the W-2 group as described in [Wisconsin Works \(W-2\) Manual, Section 4.1.2 Information Requiring Eligibility Verification](#). W-2 policy for verifying identity is updated to allow the following items as sources of verification:

- ~~NX – CONTINUOUSLY ELIGIBLE NEWBORN code when entered by CARES~~
- ~~NB – CONTINUOUSLY ELIGIBLE NEWBORN code when entered by an IM worker~~
- DE – DATA EXCHANGE code when entered by an IM worker
- Enhanced driver's license
- SAVE database

W-2 policy is further updated to clarify the following items:

- The SC – SSI 1619b SSDI OR MEDICARE code entered by an IM worker has been updated to clarify that it means individuals who receive Social Security Disability Insurance (SSDI) or have continued Medicaid eligibility based on previous receipt of Supplemental Security Income (SSI) in addition to individuals who receive SSI or Medicare.
- The DX – DATA EXCHANGE code indicates that CARES obtained verification using the SSA data exchange.

See [attachment 2 of this memo](#) for updates to W-2 Manual, Section 4.1.2 Information Requiring Eligibility Verification.

**CARETAKER SUPPLEMENT**

To be eligible for Caretaker Supplement, an individual declaring U.S. citizenship must provide proof of citizenship. Effective March 2, 2019, there are two exceptions to this requirement:

- Citizenship verified by the SSA data exchange is considered sufficient verification for Caretaker Supplement applicants and members.
- SSI recipients have already verified their citizenship to SSA and do not need to verify citizenship status for Caretaker Supplement.

Verification of citizenship may no longer be required for individuals meeting either of these exceptions.

**CARES**

CWW will be updated on March 2, 2019, to support the citizenship and identity policy for all programs.

**CITIZENSHIP VERIFICATION CHANGES**

**Changes to Verification Codes**

<b>Code</b>	<b>Modification</b>
BR – US AMENDED BIRTH RECORD	Use BC – BIRTH CERTIFICATE after the effective date.
ED – EDUCATIONAL DOCUMENT	Clarification: This refers only to educational records that provide an individual’s birthplace and is only to be used for verifying citizenship.
EX – EXEMPTED	This is automatically populated by CARES and is removed automatically as appropriate.  The code indicates that CARES has verified the person is a recipient of SSDI, Medicare, or SSI, or is considered an SSI recipient because of his or her 1619(b) status.
FC – FOSTER CARE OR ADOPTION ASSISTANCE	This has been added to the US Citizenship and US Citizenship MA verification drop-downs.  The code indicates children who are receiving foster care or adoption assistance and are exempt from the citizenship and identity verification requirement for health care programs.
MR – MEDICAL RECORDS	Use MD – MEDICAL RECORDS after the effective date.
PB – BIRTH CERTIFICATE PAID BY IM AGENCY	Use BC – BIRTH CERTIFICATE after the effective date.
SN – SENECA/NAVAHO INDIAN CENSUS RECORD	Use TR – TRIBAL RECORDS after the effective date.

Each verification code will have program-specific eligibility logic based on whether it is valid for a given program of assistance. For a full list of drop-down codes by verification field, as well as the eligibility result for the code by program, see Table 1 and Table 2 in [attachment 3 of this memo](#). The eligibility result for each code by program can also be viewed by clicking the Reference Table Viewer button next to each verification field.

When a worker changes a valid code for the US Citizenship or US Citizenship MA Verification field to ?, FN, GF, PN, Q?, NV, QV, or WN or changes a valid code to one that is not considered valid for at least one program, a yellow warning message will display. The message will alert the worker that he or she is about to change a valid verification code to a code that pends or fails one or more programs.

**Note:** The same warning message will be used for US citizenship (non-Medicaid and Medicaid), identity (non-Medicaid and Medicaid), immigration registration status, arrival date, continuous presence, work quarters, and military service verification fields.

### **Automation of Verification Codes**

Enhancements will be made to prevent agencies from requesting verification from individuals who are exempt or from requesting verification before attempting to verify citizenship through the data exchange with SSA or Vital Records.

Whenever possible, citizenship must be verified for health care using the real-time data exchange with SSA. If citizenship is verified through this method, DX – DATA EXCHANGE will be populated automatically in verification fields for both the U.S. Citizenship Verification field **and** the U.S. Citizenship MA Verification field on the Permanent Demographics page. Because citizenship should be verified only once for a given person, workers will see a yellow warning message when removing DX – DATA EXCHANGE (or any valid verification code that passes for all programs) from either field.

For health care, CARES will be enhanced to automatically populate the US Citizenship MA Verification field with EX-EXEMPTED for individuals who are on file in CARES as receiving SSI, SSDI, 1619b, or Medicare. This code may not be entered by workers. If an individual is exempt from Medicaid citizenship verification requirements because he or she is receiving SSI, SSDI, 1619b, or Medicare but the EX is not automatically populated, workers should enter SC - SSI 1619b SSDI OR MEDICARE. If an individual is exempt from these verification requirements because he or she is in foster care or receiving adoption assistance, workers should enter the new code FC - FOSTER CARE OR ADOPTION ASSISTANCE. This code remains valid as long as the individual is still in foster care or receiving adoption assistance. If the individual no longer meets one of these criteria, the worker should seek verification of citizenship through the data exchange with SSA. If this is not successful, CARES will send the 95-day verification request letter for citizenship and identity verification.

If, during any driver flow, CARES determines that the individual is no longer receiving SSI, SSDI, 1619b, or Medicare, the EX-EXEMPTED code will be removed automatically from the US Citizenship MA Verification and Identity MA Verification fields. If this happens, the worker should seek verification of citizenship through the data exchange with SSA. If this is not successful, CARES will send the 95-day verification request letter for citizenship and identity verification.

CARES will be enhanced to automatically populate the US Citizenship MA Verification and US Citizenship Verification fields with NX – CONTINUOUSLY ELIGIBLE NEWBORN when an individual is certified eligible for BadgerCare Plus by CARES as a continuously eligible newborn with an assistance group type of MAGB. Like DX – DATA EXCHANGE, this code should not be changed once it has been populated by CARES. If the person has been determined eligible as a continuously eligible newborn prior to the implementation date, workers may enter NB – CONTINUOUSLY ELIGIBLE NEWBORN.

As described in [BadgerCare Plus Eligibility Handbook, Section 4.2 Documenting Citizenship](#), and [Medicaid Eligibility Handbook, Section 7.1 US Citizens and Nationals](#), certain types of documents are considered “stand-alone” documents that verify both citizenship and identity for health care programs. CARES will be enhanced so that if a stand-alone document code is selected for either the US

Citizenship MA Verification field or the Identity MA Verification field, the same code will be automatically populated in the other verification field. This will not occur if a valid verification code already exists in the other field. This will also occur for codes that identify exemptions from citizenship and identity requirements or verification through data exchanges. The codes include:

- CI – CITIZENSHIP PAPERS
- DE - DATA EXCHANGE
- DX - DATA EXCHANGE
- EN - ENHANCED DRIVER'S LICENSE
- EX - EXEMPTED
- FC - FOSTER CARE OR ADOPTION ASSISTANCE (new code)
- GF - GOOD FAITH PERIOD
- NX - CONTINUOUSLY ELIGIBLE NEWBORN
- NB – CONTINUOUSLY ELIGIBLE NEWBORN
- PP - PASSPORT
- SC - SSI 1619b SSDI OR MEDICARE
- TR - TRIBAL RECORDS

For Wisconsin Shares, CWW has also been enhanced to not require a response to the citizenship question for adults. If Wisconsin Shares is the only program open or requested, the worker may leave the citizenship field blank for adults. If other programs are open or requested, pending and failing values will not cause Wisconsin Shares to pend or fail for adults in the Wisconsin Shares assistance group. The citizenship field and corresponding verification field will continue to apply to children in the assistance group.

### **Birth Query**

A State File Number field will be added to the Permanent Demographics page. This field is required when BQ - BIRTH RECORD QUERY is used for US Citizenship Verification or US Citizenship MA Verification. If workers complete a Birth Query search using the new button on the Permanent Demographics page, the page will automatically populate the state file number on the Permanent Demographics page. If a worker completes a Birth Query search from the Data Exchange Query page, the worker must copy the state file number, which appears with the Birth Query record, and enter it on the Permanent Demographics page.

The screenshot shows a web form titled "Individual Demographic Information". It has several sections: "Effective Period" with "Last Updated: 01/16/2019"; "Individual Details" with fields for "Individual:", "Language:" (set to "E - ENGLISH"), "Are you a US citizen:" (set to "Yes"), "Birth Place:", "Date Of Death:" (MM/DD/YYYY), "Alert Flag 1:", and "Alert Flag 2:". On the right side, there are fields for "US Citizenship Verification:" (set to "? - NOT YET VERIFIED"), "US Citizenship MA Verification:", "State File Number:" (with a "Birth Query" button next to it), and "Source:". The "State File Number" field and the "Birth Query" button are highlighted with a red rectangular box.

Figure 1 Permanent Demographics Page: State File Number Field and Birth Query Button

In most cases, workers will no longer need to initiate a Birth Query outside of the case. The Permanent Demographics page will include a Birth Query button to complete a birth query for that person directly from the page.

The Birth Query button will be enabled when all three of the following conditions are met:

- The verification code selected for either US Citizenship Verification or US Citizenship MA Verification will result in eligibility for at least one program to pend or fail.
- The real-time data exchange with SSA has already been initiated for this individual (if applicable). Unlike the data exchange with SSA, which can be used to verify both citizenship and identity, the birth query can only be used to verify citizenship. It should not be used prior to the SSA data exchange if the individual has requested health care.
- The birthplace is WI or blank. Birth query cannot be used to verify citizenship for individuals who were born outside Wisconsin.

### Query Results

If **When** a birth query search is initiated directly from the Permanent Demographics page and only one match is found, the search detail will display. Workers will be able to select the record in the search detail and return to the Permanent Demographics page. When the worker clicks Select, ~~the Permanent Demographics page will be automatically populated with the State File Number, the BQ-BIRTH RECORD QUERY verification code, and a birthplace of Wisconsin~~ **will automatically populate on the Permanent Demographics page.** When a worker clicks Back to Search and only one match was found, Birth Query search criteria will display. To return to the Permanent Demographics page without selecting the record, click the Return to Permanent Demographics button at the top of the Navigation menu.

**Note:** If there is not currently a health care request on the case, BQ-BIRTH RECORD QUERY will only populate the US Citizenship Verification field not the US Citizenship MA Verification field. If a health care request is added to the case later, the worker should assess whether valid verification of identity was also previously provided. If so, the worker should record BQ-BIRTH RECORD QUERY in the US Citizenship MA Verification field and record the relevant identity verification in the Identity MA Verification field. If identity has not already been verified on the case, the worker must first attempt to

verify both citizenship and identity through the real-time data exchange with SSA before requesting verification of identity from the member.

The screenshot shows a web application interface with a 'Navigation Menu' on the left and a 'Birth Query Details' section on the right. The 'Navigation Menu' includes a 'Return to Permanent Demographics' button highlighted with a red box. The 'Birth Query Details' section contains a 'Birth Query Search Criteria' table with the following data:

Birth Query Search Criteria	
State File Number:	2010000057
State File Date:	10/18/2010
Legacy State File Number:	

Below the search criteria, there is a warning message: "BIRTH FACTS CERTIFIED BY STATE REGISTRAR FOR PUBLIC ASSISTANCE APPLICATIONS ONLY. BIRTH QUERY ARTIFACTS CANNOT BE USED FOR ANY OTHER PURPOSES." The 'Individual Information' section includes fields for Name, Date of Birth, Gender (FEMALE), City/Village/Township of Birth, County of Birth, and Deceased? (No). The 'Parent Information' section includes fields for Mother's Maiden Name, Mother's Name at Child's Birth, Father's Maiden Name, and Father's Name at Child's Birth. The 'Other Information' section includes fields for Mother's Residence County, Marital/Paternity Status (UNKNOWN), and Date of Last Paternity. At the bottom, there is an 'Amendments' table with columns for Amendment Code, Amendment Data, Date Amended, and Authority. A 'Back to Search' button and a 'Select' button are located at the bottom right of the page.

Figure 2 Birth Query Initiated from Permanent Demographics Page: One Record Found

If multiple results are returned by the query, each result will show the state file number, first name, last name, and county of birth for the individual, along with a link that will allow workers to view the corresponding detail page with additional information about the record. Workers will be able to select the record by clicking Select, and will return to the Permanent Demographics page.

If no matches are found, an error message will display indicating that no potential matches were found.

The screenshot shows a web application interface with a 'Navigation Menu' on the left and a 'Data Exchange Query' section on the right. The 'Navigation Menu' includes a 'Return to Permanent Demographics' button highlighted with a red box. The 'Data Exchange Query' section contains a red banner with the message: "The following events have occurred: WT070: 0 records are found for the specified criteria." Below the banner, there is a 'Reset' button. The 'Birth Query' section includes fields for First Name, Last Name, Birth Date (Year Required), and Pin / Case / RFA / Tracking Number. There are radio buttons for 'Starts With' and 'Exact' search options. A 'Go' button is located at the bottom right of the search criteria section.

Figure 3 Birth Query Initiated from Permanent Demographics Page: No Records Found

When no match is found, workers will be able to modify the search criteria in the First Name, Last Name, Date of Birth, and PIN / Case / RFA / Tracking Number fields and rerun the search if appropriate. Workers will also have the option to exit the search without selecting a record and return to

the Permanent Demographics page by clicking Return to Permanent Demographics in the Navigation Menu.

**Note:** Workers should not search for other individuals without first returning to the Permanent Demographics page and selecting another individual. When the birth query is started from the Permanent Demographics page, the query only applies to the individual whose name is displayed on that page. If a worker runs a birth query that does not find a record and then changes the search criteria to match a different individual, selecting that record may incorrectly update the verification field for the original individual. A warning message will display when a worker changes the criteria and clicks Select; however, CWW will allow this action.

### *IDENTITY VERIFICATION CHANGES*

#### **Verification Codes**

Similar to the citizenship verification fields on the Permanent Demographics page, enhancements will be made to both the Identity Verification and the Identity MA Verification drop-down options on the Current Demographics page.

To simplify the process of verifying identity, verification types that are not valid for any program have been removed from the drop-down lists for Identity Verification and Identity MA Verification. If a removed code has previously been entered, it will continue to display and will continue to be treated as a valid verification code, but can no longer be selected from the drop-down. The following codes will be modified.

#### ***Changes to Verification Codes***

<b>Code</b>	<b>Modification</b>
BR – US AMENDED BIRTH RECORD	Use BC – BIRTH CERTIFICATE after implementation.
CD – US CITIZEN/N MARIANA ID CARD	Clarification: This was renamed to clarify that the code should be used only for individuals with U.S. Citizen ID cards or documents indicating their citizenship based on birth in the Commonwealth of the Northern Mariana Islands. This code previously included a reference to Native Americans. Agencies should use TR – TRIBAL RECORDS after implementation for verification based on tribal membership.
ED - EDUCATIONAL DOCUMENT	Use SR – SCHOOL RECORDS after implementation.
EX – EXEMPTED	This is automatically populated by CARES and is removed automatically as appropriate.  The code indicates that CARES has verified the individual is a recipient of SSDI, Medicare, or SSI or is considered an SSI recipient because of his or her 1619(b) status.
FC – FOSTER CARE OR ADOPTION ASSISTANCE	This code has been added to Identity and Identity MA verification drop-downs.  The code indicates that a child is receiving foster care or adoption assistance. Receipt of foster care or adoption assistance exempts children from the citizenship and identity verification requirement for health care programs.

Code	Modification
LR – LEGAL RECORD	This had been added to Identity verification drop-down only.  This code indicates that an individual presented legal documents as proof of identity.
MB - MEDICAID BIRTH CLAIM	Use MD - MEDICAL RECORDS after implementation if such records provide proof of identity.
MR – MEDICAL RECORDS	Use MD – MEDICAL RECORDS after implementation.
PB – BIRTH CERTIFICATE PAID BY IM AGENCY	Use BC – BIRTH CERTIFICATE after implementation.
PI - STATE ID PAID BY IM AGENCY	Use GI - GOVERNMENT ID:FED/ST/LOCAL after implementation
SN – SENECA/NAVAHO INDIAN CENSUS RECORD	Use TR – TRIBAL RECORDS after implementation.
SR - SCHOOL RECORDS	This has been added.  This code indicates school records providing the name and other identifying information for children under age 19. School records would include, but not be limited to, report cards, daycare, or nursery school records.

Each verification code will have program-specific eligibility logic based on whether it is valid for a given program of assistance. For a full list of the new drop-down codes, as well as the eligibility result for the code by program, see Tables 3 and 4 in [attachment 3 of this memo](#). The eligibility result for each code by program can also be viewed by clicking the Reference Table Viewer button next to each verification field.

For Wisconsin Shares, CWW has also been enhanced to not require a response to the Identity Verification field for children. If Wisconsin Shares is the only program open or requested, the worker may leave the Identity Verification field blank for children in the assistance group. If other programs are open or requested, pending and failing values will not cause Wisconsin Shares to pend or fail for children in the Wisconsin Shares assistance group. The Identity Verification field will continue to apply to adults in the assistance group.

Also similar to the citizenship verification fields, a yellow warning message will display when a valid code is replaced with one of these codes: ?, FN, GF, PN, Q?, NV, QV, or WN. (See the [Changes to Verification Codes](#) for more information.)

## SOCIAL SECURITY NUMBER

### *POLICY*

All programs of assistance require that individuals provide an SSN, but different programs have different exceptions to this policy. The programs also differ in how much time they allow individuals to provide an SSN and whether eligibility will be granted when an SSN, SSN application date, or proof of an SSN application has not yet been provided. For all programs, verification of an SSN is a one-time verification process.

## *HEALTH CARE*

All individuals requesting Medicaid, BadgerCare Plus, or FPOS benefits must provide an SSN or be willing to apply for one, unless they are exempt. Exemptions include:

- Individuals who refuse to obtain an SSN for religious reasons.
- Undocumented immigrants who are applying for Emergency Services or the BadgerCare Plus Prenatal Program.
- Continuously eligible newborns who have not yet turned age 1.

Effective March 2, 2019, health care eligibility must not be delayed if an individual is otherwise eligible for benefits and any of the following are true:

- The individual has provided an SSN, even if the SSN has not yet been verified.
- The individual has requested assistance with applying for an SSN.
- The individual has verified that he or she has applied for an SSN.

In cases where an application for an SSN has been filed with SSA, an SSN must be provided by the time of the next health care renewal for the case, or eligibility will be terminated. In addition, if eligibility for another program pends for provision of an SSN and the SSN application date on file is six months old or older, eligibility for health care will also pend. Members must be given a minimum of 10 days to provide an SSN, but if they do not, health care eligibility must be terminated.

Even when citizenship cannot be verified due to a lack of a verified SSN, health care benefits should not be pended for lack of an SSN during the reasonable opportunity period for verification of citizenship.

Agencies must assist any household that requests help with applying for an SSN for any applicant or member who does not have one. Assistance may include helping with filing the Application for a Social Security card (SS-5 form), obtaining a birth certificate on behalf of the applicant or member, or assisting with obtaining another document needed to apply for an SSN.

## *FOODSHARE*

All individuals requesting FoodShare must provide an SSN or be willing to apply for one, unless the person refuses to obtain one for religious reasons or the individual is a child younger than 13 months old.

If an application for an SSN has been filed with SSA, the member must provide the SSN to the agency by the time of the next FoodShare renewal, or eligibility will be terminated. In addition, if eligibility for another program pends for provision of an SSN and the SSN application date on file is six months old or older, eligibility for FoodShare will also pend. Members will be given a minimum of 10 days to provide an SSN, but if they do not, FoodShare eligibility will be terminated for that individual.

As described in the health care policy section, agencies must assist any household that requests help with applying for an SSN for any applicant or member who does not have one.

## *WISCONSIN SHARES CHILD CARE SUBSIDY PROGRAM*

The SSN or proof of an application for an SSN are required for all children for whom Wisconsin Shares assistance is requested. Any child who does not have an SSN or proof of application for one will not be

eligible. There are no exceptions to this requirement. Parents are not required to provide an SSN as a condition of eligibility.

Effective March 2, 2019, if an applicant has provided verification that he or she applied for an SSN for a child, the SSN must be provided to the agency when the number is received **or when the SSN verification is requested. The worker must request verification when the alert is generated six full months after the SSN application date and no later than the following annual eligibility renewal** ~~and no later than six full months after the SSN application date.~~

If a child's SSN is not provided at this time, this child will be counted as an "Included Child" in the assistance group, but not an "Eligible Child." If there is an authorization for that child, ~~it must be ended~~ **the authorization will be ended systematically on the last day of the last month that the child is an "Eligible Child" in the Wisconsin Shares assistance group.** Eligibility and authorization may continue for other children in the Wisconsin Shares assistance group for whom a valid SSN has been provided (see [Wisconsin Shares Child Care Policy and Process Handbook, Section 1.3.6 Social Security Numbers \[SSN\]](#)).

### *WISCONSIN WORKS*

Effective March 2, 2019, individuals who have a verified SSN application date have at least six full calendar months from the SSN application date to provide the SSN. The SSN must be provided by the end of the 13<sup>th</sup> full calendar month after the month of the SSN application date. The Financial and Employment Planner (FEP) worker may collect the SSN at any point beginning in the 7<sup>th</sup> full calendar month and ending in the 13<sup>th</sup> full calendar month. All individuals in a W-2 group must provide an SSN or provide proof that they have applied for one, unless the individual is initially exempt (see [Wisconsin Works \(W-2\) Manual, Section 2.7.1 Providing Social Security Numbers](#)).

Qualified non-citizens who are initially exempt will have at least six full calendar months following the month of the W-2 Initial Exemption Date in CWW to provide an SSN. The SSN must be provided by the end of the 13<sup>th</sup> full calendar month after the month of the W-2 Initial Exemption Date in CWW.

As a reminder, the agency must assist the individual in applying for an SSN if the individual requires assistance, and the agency may extend the verification due date if extenuating circumstances exist that make the verification requirements unduly burdensome (see [Wisconsin Works \(W-2\) Manual, Section 4.1.3 Requesting Verification from W-2 Participants](#)).

See [attachment 2 of this memo](#) for the updates to Wisconsin Works (W-2) Manual, Section 2.7.1 Providing Social Security Numbers.

### *CARETAKER SUPPLEMENT*

All members of a Caretaker Supplement household must provide an SSN or be willing to apply for one, unless they are an infant less than six months old.

Effective March 2, 2019, Caretaker Supplement eligibility may not be delayed if the individual is otherwise eligible for benefits and any of the following are true:

- The individual has provided an SSN, even if the SSN has not yet been verified.
- The individual has requested assistance with applying for an SSN.

- The individual has verified that he or she has applied for an SSN.

If an application for an SSN has been filed with SSA, an SSN must be provided by the time of the next Caretaker Supplement renewal for the case, or eligibility will be terminated. In addition, if eligibility for another program pends for provision of an SSN and the SSN application date on file is six months old or older, eligibility for Caretaker Supplement will also pend. Members will be given a minimum of 10 days to provide an SSN, but if they do not, Caretaker Supplement eligibility will be terminated.

### ***CARES***

CWW will be updated on March 2, 2019, to support the SSN policy for all programs.

Enhancements will be made to the Household Members, Permanent Demographics, and Current Demographics pages, as well as to how eligibility is determined.

### ***RESTRICTION OF SSA-VERIFIED SOCIAL SECURITY NUMBERS***

After SSA has verified an individual's SSN, CWW will update the SSA Verification field to V - VERIFIED. To prevent accidental changes that may affect eligibility, once a V - VERIFIED code has been populated, the field will be read only. CARES coordinators will need to contact the DHS CARES Call Center if an SSN error is discovered after the field has been populated with V - VERIFIED and is read only.

### ***PAGE CHANGES***

The SSN Override Verification field will be moved from the Household Members page to a new section, SSN Information, which will be added to the Permanent Demographics page. Workers will continue to enter the SSN and the SSA Verification code on the Household Members page, and these values will display for worker reference on the Permanent Demographics page as read-only fields. If an SSN has not been provided, Not Provided will display in the read-only SSN field on the Permanent Demographics page.

The screenshot shows a web-based form titled "Individual Demographic Information". The form is divided into several sections: "Effective Period" (Last Updated: 01/16/2019), "Individual Details", "SSN Information", "Ethnicity", "Race", "Tribal Member Information", "Federally Recognized Tribe", and "Obsolete Information". The "SSN Information" section is highlighted with a red border and contains the following fields: "SSN:" (Not Provided), "SSA Verification:", "SSN Exemption:" (dropdown), "W-2 Initial Exemption:" (dropdown), "W-2 Initial Exemption Date:" (MM/DD/YYYY), "SSN Application Date:" (MM/DD/YYYY), "SSN Override Verification:" (dropdown), and "Verification:" (dropdown). A mouse cursor is hovering over the "SSN Override Verification" dropdown, which shows a list of options: "? - NOT YET PROVIDED", "F - FAILED TO PROVIDE INFORMATION", and "WN - NOT VERIFIED W-2 OR CHILDCARE". The "Ethnicity" section includes "Hispanic or Latino:" (dropdown). The "Race" section includes "American Indian / Alaskan:", "Asian:", "Black / African American:", "Hawaiian / Other Pacific Islander:", and "White:" (all dropdowns). The "Tribal Member Information" section includes three questions with dropdowns and verification fields. The "Federally Recognized Tribe" section includes "Are you a member of a federally recognized tribe:", "Do you want to receive FSET services through your tribe?", "Tribe Name:", and "Tribal Processing FSET Referral:". The "Obsolete Information" section includes "Verification (Date of Death):" (dropdown). At the bottom of the form, there is a navigation bar with "Add Case Comment", "Cancel", "Previous", and "Next" buttons. A search bar at the bottom contains "Individual", "Updated on or before", and "Go" buttons.

Figure 4 Permanent Demographics: SSN Override

A new field in the SSN Information section, SSN Exemption, will allow the codes R – RELIGIOUS and E – EMERGENCY SERVICES OR BC+ PRENATAL. These codes will be removed from the SSN Override Verification drop-down list. The new field will allow CARES to apply these exemptions only for health care and FoodShare.

Two new fields in the SSN Information section, W-2 Initial Exemption and W-2 Initial Exemption Date, will be updateable only by the FEP and only when the individual is not a U.S. citizen.

The SSN Information section on the Permanent Demographics page will display the SSN-related fields as shown in Figure 4.

### *PROCESSING AN SSN*

The process for recording an SSN provided by an individual and seeking verification from SSA has not changed. Workers will continue to enter the SSN on the Household Members page, and the data exchange will be initiated automatically.

The following sections describe how workers should take action when SSA returns a discrepancy, the individual qualifies for an exemption, the individual requests assistance in applying for an SSN, or the individual provides or verifies an SSN application date.

**Note:** The rules for pending and failing eligibility described in these sections only apply to individuals for whom an SSN is required per each program's policies. For example, eligibility will only pend or fail for Wisconsin Shares for a child who does not meet the SSN requirements; not the parents or other members of the assistance group.

### *SSN DISCREPANCIES*

When the data exchange returns a discrepancy on a self-reported SSN, the worker should follow the current process to determine whether the discrepancy is due to a data entry error or if the provided SSN appears to be invalid.

If the SSN discrepancy is not due to a data entry error, the worker should enter a ? in the SSN Override Verification field on the Permanent Demographics page to issue a Verification Checklist.

To fail the individual if a valid SSN, SSN application date, exemption reason, or request for help in applying for an SSN is not provided within the required timeframes, workers should enter F – FAILED TO PROVIDE INFORMATION and re-run eligibility. If multiple programs are pending for SSN and W-2 and/or Wisconsin Shares have earlier due dates, workers should enter WN – NOT VERIFIED W-2 OR CHILDCARE to fail W-2 and Wisconsin Shares for the due dates of these programs and continue to pend for health care, FoodShare, and/or Caretaker Supplement. **For Wisconsin Shares, entering WN-NOT VERIFIED W-2 OR CHILDCARE will not fail the Wisconsin Shares assistance group; it will only change the individual child's status from an "Eligible Child" to an "Included Child."**

To ensure that SSN discrepancies do not remain on file for an extended period of time, CWW will schedule the Household Members page in all driver flows to prompt the worker to resolve the following discrepancies:

- \* - NAME MATCH, SSN MISMATCH
- 1 - SSN NOT ON FILE
- 3 - NAME MATCH, DOB MISMATCH
- 5 - NAME MISMATCH; DOB CHECKED

### *RECORDING AND PROCESSING SSN EXEMPTIONS*

If the individual has a religious exemption, the worker should enter R-RELIGIOUS in the SSN Exemption field on the Permanent Demographics page. The individual will be eligible for health care

and FoodShare without providing an SSN or SSN application date. This exemption does not apply to any other programs.

If the individual is an undocumented immigrant applying only for Emergency Services or the BadgerCare Plus Prenatal Program, the worker should enter E – EMERGENCY SERVICES OR BC+ PRENATAL in the SSN Exemption field on the Permanent Demographics page. The individual will be eligible for health care without an SSN or SSN application date. This exemption does not apply to any other programs.

If the individual applying for W-2 is a non-citizen meeting the exemption criteria and is not yet permitted to apply for an SSN, the FEP should enter a Yes in the W-2 Initial Exemption field and enter the date the exemption was granted in the W-2 Initial Exemption Date field. The individual will be eligible for W-2 without an SSN or SSN application date for at least six calendar months following the month in which the exemption was granted. This exemption does not apply to any other program. This exemption code will be removed at the next W-2 eligibility review or IM program renewal that occurs at least six months after the month of the exemption date.

In addition to the exemptions described above, certain individuals are exempt from providing an SSN or an SSN application date based on their age or status as a continuously eligible newborn. These exemptions will continue to be applied automatically in the eligibility determination process and do not need to be entered by the worker. They include:

- If the individual is eligible in CARES as a continuously eligible newborn, he or she will be eligible for health care without an SSN or SSN application date until he or she turns 1 year old. This exemption does not apply to other programs.
- If the individual is less than 13 months old, he or she will be eligible for FoodShare without an SSN or SSN application date. This exemption does not apply to other programs.
- If the individual is less than 6 months old, he or she will be eligible for Caretaker Supplement without an SSN or SSN application date. This exemption does not apply to other programs.

### *ASSISTING MEMBERS WITH APPLYING FOR AN SSN*

As described in the [Health Care policy section](#), agencies must assist any household that applies for health care, FoodShare, or Caretaker Supplement and requests help with applying for an SSN for any applicant or member who does not have one. Assistance may include helping with filing the Application for a Social Security card (SS-5 form), obtaining a birth certificate on behalf of the applicant or member, or assisting with obtaining another document needed to apply for an SSN.

If an individual requests help, the worker should indicate this by selecting Help requested in the SSN Cooperation field on the Current Demographics page.

A value of Help requested will allow an individual to receive health care, FoodShare, or Caretaker Supplement benefits (if otherwise eligible) without providing an SSN or SSN application date. A value of No will cause the individual's eligibility to fail for failing to cooperate with SSN requirements. A value of Yes should be used when the individual is cooperating with SSN requirements but has not requested assistance, or the individual previously requested assistance but has now supplied an SSN application date. The Help requested value will be cleared at the next renewal.

The value selected in the SSN Cooperation field does not affect eligibility for W-2 and Wisconsin Shares.

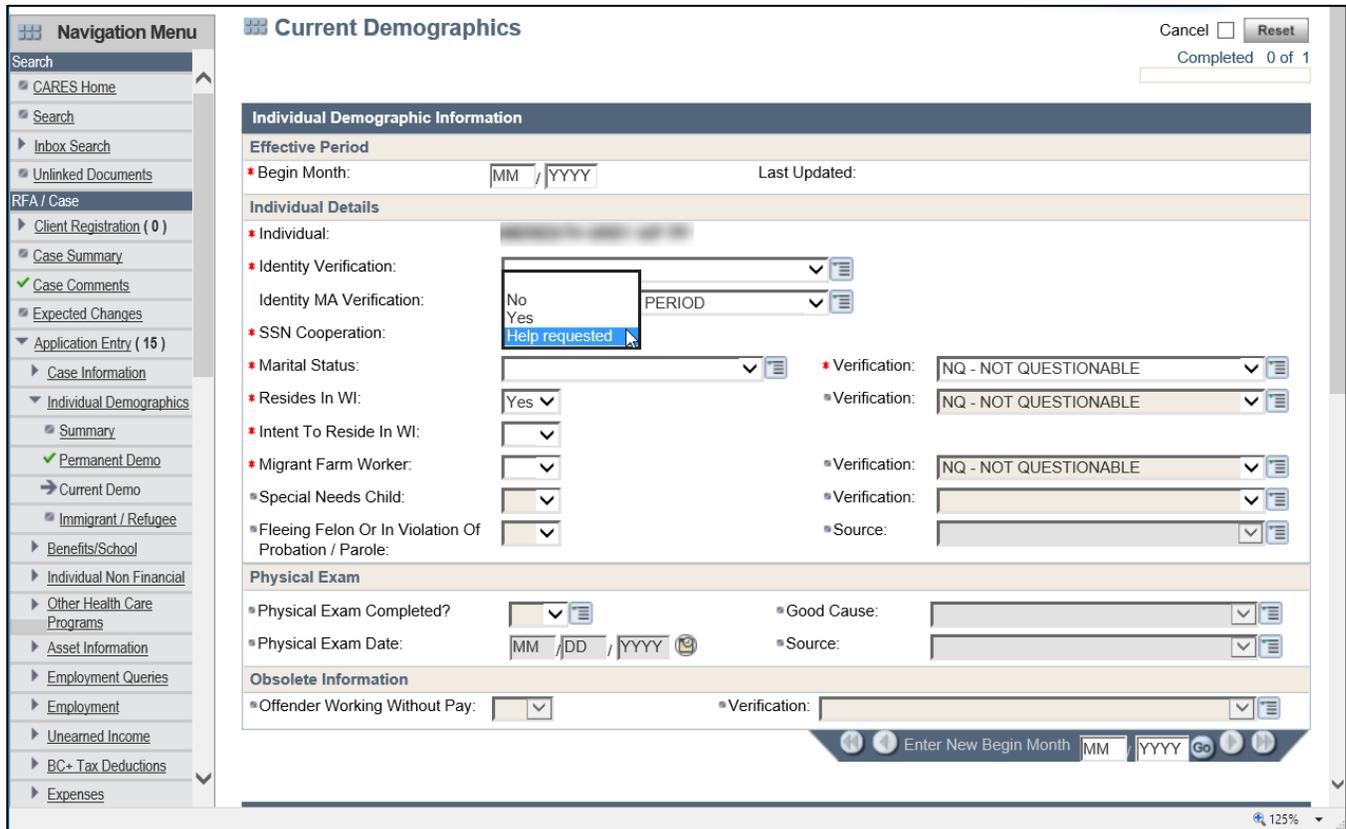


Figure 5 Current Demographics Page: SSN Cooperation

### REQUIRING AN SSN OR SSN APPLICATION DATE

If neither an SSN nor SSN application date has been provided, the worker should enter a ? in the SSN Override Verification field on the Permanent Demographics page and issue a Verification Checklist to request the SSN or proof of application for an SSN. The applicant will be notified through the Verification Checklist that if he or she has a reason for not getting an SSN or needs help with applying for one, he or she should contact the agency.

**Note:** For Wisconsin Shares, the SSN application date is a required field only when a child's SSN is not provided and not pending for an SSN, and when the worker has not entered an SSN application date, CWW will display a yellow warning message indicating that the child will not be eligible for Wisconsin Shares. If the parent is requesting assistance for the child, the worker will need to pend for SSN application date. If assistance is not requested for the child, the worker will be able to navigate off the page without entering an SSN application date.

For W-2, the SSN application date is a required field for any individual in the W-2 group who is not initially exempt only when the individual's SSN is not provided and is not pending for an SSN. For W-2 initially exempted individuals, FEPs must enter a Yes in the W-2 Initial Exemption field to make the SSN application date an optional field (i.e., not required).

If an SSN application date has been provided but not verified, the worker should enter a ? in the SSN Application Date verification field to pend all programs and issue a Verification Checklist requesting verification of the SSN application date. If the individual previously requested assistance with applying, the worker must change the Help requested value to a Yes in the SSN Cooperation field on the Current Demographics page to ensure that health care, FoodShare, and Caretaker Supplement will pend.

If **an individual has not provided an SSN and** verification of the SSN application date is not **received** by the due date(s) identified on the Verification Checklist, the worker should enter NV in the verification field **and run eligibility. Eligibility will fail for that individual for all programs except Wisconsin Shares. For Wisconsin Shares, NV will cause the individual child's status to change from "Eligible Child" to "Included Child." Eligibility will not fail for the Wisconsin Shares assistance group.**

However, if multiple programs are pending and W-2 or Wisconsin Shares have earlier due dates than health care, FoodShare, or Caretaker Supplement, workers should use the WN code to fail **the assistance group** for W-2 **and/or fail the individual child for** Wisconsin Shares and allow health care, FoodShare, and Caretaker Supplement to continue to pend.

When the Application Date Verification field **contains a failing** code and a worker runs eligibility, CWW will fail W-2 (except for temporarily exempt individuals) and Wisconsin Shares eligibility for the **individual** child.

When an SSN application date has been verified and the SSN not yet provided, CWW will require entry of a ? in the SSN Override Verification field to pend for an SSN in the following situations (if the individual is not exempt from SSN requirements):

- If the household is applying for Wisconsin Shares, CWW will require the worker to enter a child's SSN or enter an SSN override verification value for the child's SSN if the SSN application date is more than six months in the past, excluding the month of SSN application.

To support this process, the worker will receive an alert 561 SSN APP DATE GREATER THAN 6 MONTHS. The alert will be generated on the first Friday that falls on or after the 21<sup>st</sup> day of the sixth eligibility month (excluding the month of SSN application) after the SSN application date.

**Example 1:** For an individual with an SSN application date of March 8, 2019, the alert will be generated six months after March on September 27, 2019.

To resolve the alert and pend the case, workers should enter an SSN or enter ? – NOT YET PROVIDED in the SSN Override Verification field on the Permanent Demographics page and run eligibility.

To fail the case if verification is not provided within the required timeframes, workers should enter F – FAILED TO PROVIDE INFORMATION and re-run eligibility. If multiple programs are pending for SSN with earlier due dates for W-2 or Wisconsin Shares, workers should enter **FN WN** to fail **the assistance group for** W-2 and **fail the individual child for** Wisconsin Shares and continue to pend for health care, FoodShare, and/or Caretaker Supplement.

- For any other program, CWW will not prompt a worker to pend for an SSN until the program's next review or renewal. For W-2, which requires a review every six months, the individual must provide the SSN at the eligibility review that occurs at least six full calendar months after the month of the

SSN application date. At this time, workers will be required to enter an SSN or an SSN override verification code.

- However, if any other program pends for an SSN prior to this point because of a review or renewal, program add, person add, or the alert described above, a given program will pend until six full calendar months have passed since the SSN application date. If the SSN is not provided at this time, then eligibility will end.

As described above, if the SSN is not provided within required verification timeframes, workers should enter an ~~FN~~ ~~WN~~ to fail the individual child for Wisconsin Shares and the assistance group for W-2 only or an F to fail all programs. For Wisconsin Shares, entering F will only cause the individual child's status to change from an "Eligible Child" to an "Included Child"; it will not fail the Wisconsin Shares assistance group.

**Example 2:** An application for health care and FoodShare was received and processed on January 2, 2019. All individuals in the assistance group have an SSN except a 3-year-old child, and an application to obtain an SSN for the child was submitted on January 2 and verified by the agency. The child is confirmed open for health care and FoodShare.

W-2 is added to the case on April 5, 2019. Because six full calendar months have not passed since the SSN application date, W-2 will not pend for the child's SSN at W-2 application, and W-2 is confirmed open. The first W-2 eligibility review will occur in September 2019. At review, W-2 will pend for the child's SSN since the review will occur at least six full calendar months after the SSN application date. During this W-2 review, the child's SSN will also pend for health care and FoodShare. If the child's SSN is not provided by the Verification Checklist due dates, eligibility for all programs will be terminated.

**Note:** If W-2 is added to the case on or later than August 1, 2019, all programs will pend for the child's SSN at the time of W-2 application because six full calendar months will have passed since the child's SSN application date. If W-2 is never requested and the case is open only for health care and FoodShare, both programs will pend for the child's SSN at the renewal that occurs in December 2019.

**Example 3:** An application for health care, FoodShare, and Wisconsin Shares was received and processed on January 2, 2019. All individuals in the assistance groups have an SSN except a 3-year old child. An application to obtain an SSN for the child was submitted on January 2 and verified by the agency. The assistance groups are confirmed open for all programs. W-2 is added in January and is also confirmed open.

Because Wisconsin Shares is on the case, an alert will be generated on July 26, 2019, to prompt the IM worker to pend for the child's SSN. The IM worker pends the case on July 26. The child's SSN is now pending for all programs. To remain eligible for a specific program, the child's SSN must be provided by that program's verification due date. If the SSN is not provided by that program's due date, eligibility for that program will be terminated.

However, if there are other children in the Wisconsin Shares assistance group for which CWW has the SSN, the case will remain open and only the child without an SSN will become an "Included Child" for Wisconsin Shares and others will remain eligible.

## *CORRESPONDENCE*

The Verification Checklist for SSN verification will be updated to provide more targeted messaging about what information is needed based on the information already provided and the verification field marked as pending.

## **IMMIGRATION**

### ***POLICY***

#### ***HEALTH CARE***

The following changes are being made to immigration policy for all health care programs.

#### **Military Service**

Current policy requires certain types of immigrants to have been in their immigration status for five years before being eligible for health care benefits, unless they meet certain criteria. Meeting some of those criteria are individuals who are lawfully residing in Wisconsin and are:

- Honorably discharged veterans of the U.S. Armed Forces. This is defined as individuals who were honorably discharged after any of the following:
  - Serving for at least 24 months in the U.S. Armed Forces
  - Serving for the period for which the individual was called to active duty in the U.S. Armed Forces
  - Serving less than 24 months but discharged or released from active duty for a disability incurred or aggravated in line of duty
  - Serving less than 24 months but discharged for family hardship
  - Serving in the Philippine Commonwealth Army or as a Philippine Scout during World War II
- On active duty (other than active duty for training) in the U.S. Armed Forces
- The spouse, unmarried and non-emancipated child under age 18, or surviving spouse of either an honorably discharged veteran or an individual on active duty in the U.S. Armed Forces. A surviving spouse is defined as:
  - A spouse who was married to the deceased veteran for at least one year.
  - A spouse who was married to the deceased veteran before the end of a 15-year time span following the end of the period of military service.
  - A spouse who was married for any period of time to the deceased veteran and a child was born of the marriage or was born before the marriage and has not remarried since the marriage to the deceased veteran.

Effective for applications processed on or after March 2, 2019, DHS will accept as valid verification, a signed statement from an applicant attesting to being a veteran, surviving spouse, or dependent child. The Statement About U.S. Military Service, F-02431, is included with the reasonable opportunity letters requesting military service verification (see [attachment 5 of this memo](#) for an example). Military records may also serve as valid verification.

#### **Additional Documentation Required for Some Victims of Trafficking**

Under current health care policy, victims of trafficking are not required to wait five years before being eligible for health care benefits (known as the five-year bar).

Effective for applications processed on or after March 2, 2019, individuals who are claiming to be victims of trafficking (or have a Class of Admission [COA] code indicating that they are a victim: ST6 or T1), have not resided in the U.S. for at least five years, and are at least 18 years of age, must have a victim certification from the federal Office of Refugee Resettlement (ORR) in the Department of Health and Human Services to be treated like a refugee and be exempt from the five-year bar.

Individuals with a COA code indicating that they are a child, spouse, or parent of a trafficking victim (codes ST0, ST1, ST7, ST8, ST9, T2, T3, T4, T5, or T6) are exempt from the five-year bar and do not need certification from the ORR. Victims of trafficking who are under age 18 at the time they apply do not require a certification from ORR, nor will a certification be required after they turn 18. Victims of trafficking who are age 18 or older and do not have the certification will be subject to the five-year bar.

### **Reverification of Immigration Status**

Current health care policy only requires verification of immigration status one time.

Beginning with new applications submitted after March 2, 2019, and renewals due in April 2019, DHS will require reverification of immigration status, but only for certain immigrant children, youths under age 21 in an institution for mental disease (IMD), and pregnant women. The children, youths, and pregnant women subject to the reverification are those with a registration status code of 20: Lawfully Residing. Typically they will be those labelled with a “non-immigrant” status by the U.S. Citizenship and Immigration Services. Reverifications are not to be done for children and pregnant women with other registration status codes as those statuses are permanent. Likewise, reverification is not required for pregnant women eligible for the BadgerCare Plus Prenatal Program.

The reverification requirement is only to be applied at the time of subsequent applications, renewals, or when an agency receives information indicating that the member may no longer be lawfully residing in the U.S. For pregnant women, the reverification is not to occur until the renewal is done to determine the woman’s eligibility after the end of the 60-day postpartum period.

To re-verify immigration status for individuals described above, workers should follow the same process used for initial verification of immigration status. This includes clicking the Verify button to request verification through the FDSH and pursuing additional verification as needed.

### **FOODSHARE**

Under current FoodShare policy, an individual must be in a qualified immigration status to be considered for FoodShare eligibility, as defined in [FoodShare Wisconsin Handbook, Section 3.12.1 Citizenship and Immigration Status](#). Immigration status should be verified only once for FoodShare unless a member reports a change in immigration status. This includes individuals who are not subject to the five-year bar because they meet military service requirements, also described in FoodShare Wisconsin Handbook, Section 3.12.1 Citizenship and Immigration Status, and defined for health care above.

Effective March 2, 2019, DHS will accept as valid verification of military service, a signed statement from an applicant attesting to being a veteran, surviving spouse, or dependent child. Military records may also serve as valid verification.

Individuals who are trafficking victims are issued a Letter of Certification or Eligibility from ORR, the Department of Homeland Security, or a derivative T visa. This letter is sufficient verification of immigration status for FoodShare eligibility. Additional verification through SAVE is not required if the letter is presented.

### *WISCONSIN SHARES CHILD CARE SUBSIDY PROGRAM*

There is no change to Wisconsin Shares policy regarding the immigration status of children. The **immigration status of the child's immigration status for whom assistance is requested** must be verified using one of the sources listed in [Wisconsin Shares Child Care Policy and Process Handbook, Section 1.5.10 Non-Financial Eligibility Verification](#). The child's immigration status should be verified only once (see [Wisconsin Shares Child Care Policy and Process Handbook, Section 1.5.10.2 Verify Only Once](#), and [Section 1.3.5 U.S. Citizen or Qualified Immigrant](#)).

### *WISCONSIN WORKS*

As stated in [Wisconsin Works \(W-2\) Manual, Section 2.4.1 Verifying U.S. Citizenship or Qualified Non-Citizen Status](#), an individual's immigration or qualified non-citizen status must be verified only once for W-2.

[Wisconsin Works\(W-2\) Manual, Section 2.4.1.1 SAVE](#) will be updated to clarify that SAVE can be accessed via CWW and that not all FEPs will have access to the SAVE system. See [attachment 2 of this memo](#) for updates to Section 2.4.1.1.

The Non-Citizen Eligibility Documentation Appendix will be updated to include the 21 – VICTIMS OF TRAFFICKING SUBJECT TO 5YR BAR code. Individuals assigned to this registration status are qualified non-citizens for W-2 eligibility. Also, the 20 – LAWFULLY RESIDING code will be added to the Non-Citizen Eligibility Documentation Appendix. This is an existing code, and its addition to the appendix clarifies when existing verification sources listed in the appendix should be used. See [attachment 2 of this memo](#) for updates to the Non-Citizen Eligibility Documentation Appendix.

### *CARETAKER SUPPLEMENT*

There is no change to the immigration policy for Caretaker Supplement. Immigration status should be verified only once for Caretaker Supplement.

### *CARES*

CWW will be updated on March 2, 2019, to support the immigration policy for all programs.

### *VERIFICATION CODES*

Verification codes that are not valid for any program will be removed from the immigrant and refugee-related verification drop-down lists. If a removed code has previously been entered, it will continue to display and will continue to be treated as a valid verification type, but it cannot be selected from the drop-down.

**Note:** NQ-Not Questionable has been removed from the Registration Status Verification drop-down, but CARES will require workers to enter a verification code for individuals who have declared that they are an undocumented immigrant. If an individual has declared a registration status of 09-Undocumented or

10-Illegal Alien, workers should enter a registration status verification code of NV-Not Verified. This verification code will not result in a verification-related failure on the Notice of Decision or the Pending/Not Verified page.

For a full list of drop-down codes by verification field, as well as the eligibility result for each code by program, refer to [attachment 3 of this memo](#) as follows:

- Immigration Registration Status Verification (Table 5)
- Immigration Arrival Date Verification (Table 6)
- Immigration Continuous Presence Verification (Table 7)
- Immigration Work Quarters Verification (Table 8)
- Immigration Military Requirements Verification (Table 9)

The eligibility result for each code by program can also be viewed by clicking the Reference Table Viewer button next to each verification field.

The Additional Information section on the Immigrant / Refugee Information page will include a link to direct workers to the SAVE website if additional verification is needed outside of CWW. If verification is obtained through the SAVE website, workers must enter this information into CWW. It will not be automatically populated. All workers with inquiry and update access can click this link to open a new window directly to the SAVE website (<https://save.uscis.gov/Web/>).

The Date of Entry field on the Immigrant / Refugee page has been renamed Date Status Granted and should be used to record when an individual obtained his or her current immigration status. Arrival date should continue to be used to record the date an individual came to the U.S.

The screenshot shows the 'Additional Information' section of a web form. It is divided into two columns. The left column contains fields for: Registration Status (dropdown), Country of Origin (dropdown), Date Status Granted (MM/DD/YYYY format, highlighted with a red box), Arrival Date (MM/DD/YYYY format), Does individual have an Employment Authorization Document? (dropdown), Continuously present in US since before 8/22/96?? (dropdown), Did individual meet the work quarters? (dropdown), Has this person met military service requirements? (dropdown), Is the Individual an adult member (born prior to 05/08/1975) of Hmong or highland Laotian tribe, or spouse or unmarried surviving spouse of the member? (dropdown), and Is the Individual unmarried dependent child of Hmong / highland Laotian tribe or dependent is under 18 years or full time student and under age 22? (dropdown). The right column contains: Registration Status Verification (dropdown), Verification Number (text input with a 'SAVE Website' link), Verification (dropdown), Does individual have a sponsor? (dropdown), and two more Verification (dropdown) fields.

Figure 6 Immigrant / Refugee Information Page: Additional Information Section

### IMMIGRANT / REFUGEE INFORMATION PAGE CHANGES

CARES will continue to automatically verify and update immigration status information with the Department of Homeland Security for health care applicants and members. This verification process takes place through a real-time interface with the FDSH. The FDSH is making some changes to the

process and the data provided to CARES, which will require some changes to the process used by workers.

### **New Immigration Registration Status Codes**

A new Immigration registration status code, 99 - UNKNOWN, has been added to CWW. Workers should select this code in any situation in which an individual has indicated that he or she is not a U.S. citizen but has not provided information about his or her immigration status. CWW will require a verification code of ?, Q?, NV, or QV when workers enter this status code.

As described above, some victims of trafficking are required to wait five years before being eligible for health care benefits (known as the five-year bar). A new Immigration Registration Status code, 21 – VICTIMS OF TRAFFICKING SUBJECT TO 5YR BAR, has been added to CARES.

For Wisconsin Shares, any pending or failing values entered on the Immigrant/Refugee page for an adult will not cause the Wisconsin Shares assistance group to pend or fail. Wisconsin Shares does not require parents to verify immigration and citizenship status. Immigration and citizenship status must be verified for only the children for whom assistance is requested.

### **Additional Verification for Victims of Trafficking**

When FDSH verifies the status of immigrants who are victims of trafficking or who are family members of a victim, CWW will provide a verified registration status code of 19 - VICTIMS OF TRAFFICKING. However, for some victims of trafficking, FDSH may not be able to verify whether the individual is exempt from the five-year bar. When that happens, FDSH will send a message explaining that additional verification is needed. CWW will still provide a registration status code of 19 - VICTIMS OF TRAFFICKING, but the verification field will show Q?.

The worker first needs to do secondary verification with SAVE to obtain the grant date. If SAVE reports the grant date is more than five years ago or the victim is under age 18, leave the registration status code as 19 and change the verification code from Q? to SV. If the grant date is less than five years ago and the victim is at least age 18, a worker must verify that the victim has a certification from ORR. To do that, add text to either a Verification Checklist or a manual reasonable opportunity period letter (see the [CARES section](#) below) requesting a copy of the victim's Letter of Certification or Eligibility from ORR.

If the documentation is not provided, the individual will be subject to the five-year bar. Workers should select registration status code 21 - VICTIM OF TRAFFICKING SUBJECT TO 5YR BAR and use the SV verification code.

### **Secondary Verification with SAVE**

Starting March 2, 2019, if FDSH cannot provide initial verification of an individual's immigration status and instructs the worker to institute secondary verification, the worker will need to go to SAVE to attempt initial verification. Due to changes in FDSH, workers will no longer be permitted to use the SAVE case number provided in the Immigration Results section to immediately request secondary verification. SAVE case numbers will no longer be displayed on the Immigrant / Refugee Information page by CARES if the immigration status is not verified by FDSH. When workers obtain secondary or third level verification from SAVE for an individual, they must enter the verification number from SAVE in the Additional Information section.

## **REASONABLE OPPORTUNITY PERIOD: HEALTH CARE ONLY**

### ***POLICY***

Currently, applicants who are otherwise eligible and are only pending for verification of citizenship (and identity when needed) must be certified for health care benefits within the normal application processing timeframe (30 days from the filing date). Workers must give applicants 95 days after requesting citizenship verification to provide the requested documentation. This 95-day period is known as a reasonable opportunity period (called ROP in CARES) and is required under federal law.

The following clarifications and policy changes are effective March 2, 2019.

### ***CLARIFICATION***

The reasonable opportunity period is actually 90 days long, starting on the day after the member receives the notice informing the member of the reasonable opportunity period. Federal regulations require allowing a five-day time frame for receiving notices, so the reasonable opportunity period end date is set automatically as 95 days after the date on the notice.

If a member shows that a notice was received more than five days after the date on the notice, extend the deadline to 90 days after the date the member received the notice. The earliest reasonable opportunity period end date that may be imposed is 95 days after the mailing date on the notice even if the member receives the notice earlier.

### ***NEW REASONABLE OPPORTUNITY PERIOD FOR IMMIGRATION STATUS***

Beginning with eligibility determinations made on March 2, 2019, applicants otherwise eligible for health care and for whom immigration status has not yet been verified will be granted up to 95 days of eligibility to allow a reasonable opportunity period for verification of immigration status. This includes verification of information needed to determine their eligibility as a qualifying immigrant, such as military service or the date of arrival in the U.S. The reasonable opportunity period applies to any individual requesting health care benefits at application or renewal, or when adding an individual to a health care case and verification is needed of the person's immigration status—if that individual has provided a declaration of satisfactory immigration status.

### ***DECLARATION OF IMMIGRATION STATUS***

Federal law requires every person who applies for or receives health care to declare (or to have an adult member of a household declare on his or her behalf), U.S. citizenship or satisfactory immigration status. There are two exceptions to this requirement. The first exception is when the person is applying for Emergency Services, and the second is when a pregnant woman is applying for the BadgerCare Plus Prenatal Program. Individuals who are not requesting benefits may not be required to make this declaration.

The declaration is normally provided when someone completes and signs an application for health care. However, in some cases, an individual may only indicate on his or her paper or ACCESS application that he or she is not a U.S. citizen and not provide any information about his or her immigration status. In such a situation, it is not known whether the person is indicating that he or she is lawfully present in the U.S. or that they are undocumented.

Federal law requires that agencies obtain a declaration of satisfactory immigration status before taking any action to verify an individual's immigration status, including granting eligibility during a reasonable opportunity period. To meet this requirement, everyone who indicates that he or she is not a U.S. citizen or national, must provide **one** of the following:

- His or her immigration status
- His or her immigration number (including an I-94, passport, SEVIS, or similar number)
- A signed declaration that says he or she has a satisfactory immigration status (see [attachment 4 of this memo](#))

Anyone who is required to and fails to provide immigration information or a declaration (or have an adult in the household provide it on his or her behalf) within standard verification timeframes must be denied health care benefits and should not be granted a reasonable opportunity period.

### *REASONABLE OPPORTUNITY TIMEFRAMES*

As is the case for citizens with a reasonable opportunity period, immigrants are not eligible for backdated health care benefits for the three months prior to the application filing date while still waiting for verification of their immigration status. Once verification is provided, the applicant's eligibility must then be determined for backdated health care benefits if they have been requested.

The reasonable opportunity period ends on the earlier of the date the IM agency verifies the individual's citizenship or immigration status or on the 95<sup>th</sup> day following the date the reasonable opportunity period notice was sent (unless the notice was delayed in the mail). **Even if a member indicates before the end of the reasonable opportunity period that they will not verify their immigration status, health care eligibility must not be discontinued for the refusal to verify their immigration status until after the end of the reasonable opportunity period.** The IM agency may extend the reasonable opportunity period beyond 90 days for individuals declaring to be in a satisfactory immigration status if:

- The agency determines that the individual is making a good faith effort to obtain any necessary documentation.
- The agency needs more time to verify the individual's status through other available electronic data sources.
- The agency needs to assist the individual in obtaining documents needed to verify his or her status.

Extensions of the reasonable opportunity period are no longer allowed for verification of U.S. citizenship except to allow for mailing delays.

If an applicant fails to provide the requested verification of U.S. citizenship or immigration by the end of the reasonable opportunity period, the IM agency must take action within 30 days of the end of the reasonable opportunity period to terminate health care eligibility for the person with timely notice. If the person later reapplies for health care benefits and verification of immigration status is still needed for the person, eligibility may not be granted until verification is provided, and the regular verification deadlines apply. They do not qualify for another reasonable opportunity period.

When an individual is terminated from health care benefits for failure to provide verification of citizenship or immigration status by the end of the reasonable opportunity period, they are not eligible to have their benefits continued if they request a fair hearing.

Benefits issued during a reasonable opportunity period to an individual otherwise eligible for Medicaid are not subject to recovery. Even if an immigrant turns out to have an immigration status that makes him or her ineligible for health care benefits, the benefits received during the reasonable opportunity period are not recoverable.

Unlike an individual getting a reasonable opportunity period for citizenship, an immigrant may receive a reasonable opportunity period more than once in a lifetime. First, an immigrant may receive a reasonable opportunity period while verifying his or her immigration status. If the immigrant later becomes a U.S. citizen, he or she may receive a reasonable opportunity period for verification of citizenship. Second, an immigrant who must re-verify his or her immigration status at renewal may receive an additional reasonable opportunity period for each subsequent renewal, as long as he or she provided the requested verification during the previous reasonable opportunity period.

**Example 4:** Vladimir, who is age 12, is legally present in the U.S. on a visa and is applying for health care benefits with his parents. When verification is attempted through FDSH, the response requires the worker to submit a secondary verification request to SAVE. Vladimir is otherwise eligible for BadgerCare Plus, so the worker confirms BadgerCare Plus and a reasonable opportunity period letter is sent to the family while waiting for the SAVE response. A week later, SAVE verifies the child is legally present in the U.S. under a Temporary Protected Status and the reasonable opportunity period ends.

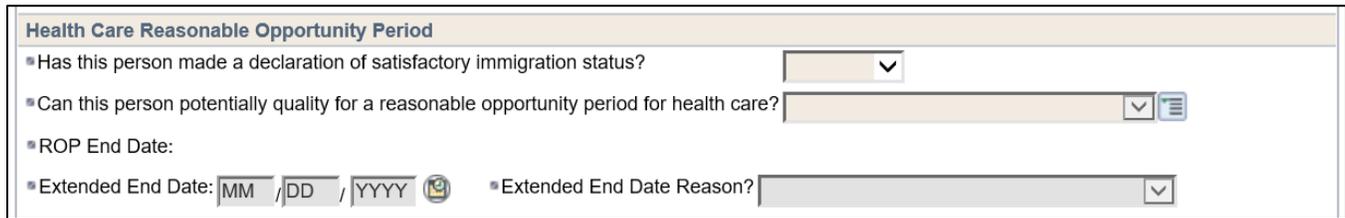
A year later, the case is up for renewal. Since Vladimir has a registration status code of 20 – LAWFULLY RESIDING, his immigration status must be verified again. Once more, FDSH informs the worker that verification of the child’s status must be done through SAVE. If Vladimir is otherwise eligible for BadgerCare Plus, the worker must again confirm eligibility without delay and a reasonable opportunity period letter is sent to the family. Again, Vladimir may be eligible for up to 90 days after receiving the notice while the worker is waiting to verify his immigration status.

## **CARES**

A new section on the Immigrant / Refugee Information page will be added to support automation of the immigration reasonable opportunity period. This Health Care Reasonable Opportunity Period section will identify whether an individual has met the requirements for a declaration of satisfactory immigration status, display the individual’s current reasonable opportunity period status, and identify the end date of the reasonable opportunity period.

CARES will automatically populate the declaration status as Yes when a valid immigration status has been entered or an immigration number has been provided **even if it has not previously been verified. In addition, a member who failed to verify their immigration status before March 2, 2019, and is now reapplying for health care may qualify for the reasonable opportunity period for this first time.**

If a status or number has not been provided, the person’s health care benefits will pend for declaration of satisfactory immigration status and a Verification Checklist will be issued with a Statement About Immigration Status form, F-02430. Normal verification timeframes will apply and eligibility may not be granted under a reasonable opportunity period until the form or other information that serves as a declaration of immigration status (for example, an individual’s immigration number or a copy of the immigration document) has been returned and the worker has entered a Yes in this field. When the form or other information is returned, the worker should enter a Yes in this field.



**Figure 7** Health Care Reasonable Opportunity Period Section on the Immigrant / Refugee Information Page

**Note:** A reasonable opportunity period will only be applied if an individual does not already have a verified, valid immigration status. Someone whose immigration status has been verified through FDSH and has reported military service, for example, does not need a reasonable opportunity period to verify military service if the individual is not subject to the five-year bar.

**Example 5:** Jean Luc applied for health care and was verified as lawfully admitted for permanent residence and has been in that status since 2010. He also indicated that he served in the U.S. military. Since a lawful permanent resident is eligible for health care benefits after being in that status for at least five years, Jean Luc does not need to be put into a reasonable opportunity period, nor is he required to verify that military service.

If the member has not already received a 95-day reasonable opportunity period, health care will pass and a reasonable opportunity period letter will be sent. Unlike citizenship, which requires only one version of the 95-day letter, there are five different system-generated reasonable opportunity period letters that could be sent:

System-Generated Reasonable Opportunity Period Letters	
Letter Name in CARES	Description
Imm ROP: No action	This letter is sent when immigration documents have been provided but a real-time response was not provided by FDSH. After secondary verification has been initiated, the worker must send a manual reasonable opportunity period letter if additional documentation is needed.
Imm ROP: Doc #'s	This letter is sent when immigration document numbers are needed before the Verify button can be used to obtain verification from FDSH. If document numbers are provided but additional information is later needed, the worker must send a manual reasonable opportunity period letter.
Imm ROP: Military	This letter is sent when an individual appears to be subject to the five-year bar but has indicated that he or she may have qualifying military service. This letter includes a form for declaring that the individual has met the military service requirement.
Imm ROP: Pres + Date	This letter is sent when the individual appears to be subject to the five-year bar but does not have a verified arrival date. This letter requests verification of arrival date and continuous presence and includes a form for attesting to continuous presence.
Imm ROP: Cont Pres	This letter is sent when the individual appears to be subject to the five-year bar but has indicated that they have an arrival date of before August 22, 1996. This letter includes a form for attesting to continuous presence.

Reasonable opportunity period letters will be sent to the primary person and will specify which case members are receiving a reasonable opportunity period. Only one system-generated letter will be sent per individual. If more than one individual on the case is being granted a reasonable opportunity period at the same time, the primary person will receive a single letter for all individuals to whom that letter

applies. A primary person could receive more than one letter if different case members have different requirements under the reasonable opportunity period.

Depending on what happens after the system-generated letter is sent, the worker may need to follow up with a manual letter. For example, an individual may receive a “no action needed” letter, but then the worker determines that the individual is subject to the five-year bar unless he or she verifies that he or she meets the military service requirements. Workers should use the Manual Letter Selection page in CWW to send one of four manual letters to obtain further information.

<b>Manual Reasonable Opportunity Period Letters</b>	
Letter Name in CARES	Description
Imm ROP: Info Needed	The worker should send this manual letter during the reasonable opportunity period if any additional information is needed other than verification of military service, continuous presence, or arrival date. In most cases, this will be sent when additional immigration documentation is needed, such as a SEVIS ID or a letter from the Department of Homeland Security. The worker must specify in the comments exactly which document is needed and for whom.
Imm ROP: Military	The worker should send this manual letter during the reasonable opportunity period after verifying immigration status and determining that the individual appears to be subject to the five-year bar and has indicated but not verified that they may meet the military service requirements. This letter is identical to the system-generated letter for military service described above, with a form for attesting that the individual has met the requirements.
Imm ROP: Pres + Date	The worker should send this manual letter during the reasonable opportunity period after verifying immigration status and determining when the individual appears to be subject to the five-year bar but does not have a verified arrival date. This letter requests verification of arrival date continuous presence and includes a form for attesting to continuous presence. It is identical to the system-generated letter for continuous presence and arrival date described above.
Imm ROP: Cont Pres	The worker should send this manual letter during the reasonable opportunity period after verifying immigration status and determining when the individual appears to be subject to the five-year bar, has a verified arrival date that is prior to August 22, 1996, but has not verified that he or she meets the requirements for continuous presence. This letter includes a form for attesting to continuous presence. It is identical to the system-generated letter for continuous presence described above.

When one of these manual letters is selected, CWW will prompt the worker to enter the reasonable opportunity period end date, the name of the individuals for whom this type of verification is required, and in some cases, the primary person’s name. Workers must obtain the reasonable opportunity period end date from the Immigration / Refugee Information page for that individual.

If verification is not received by the end of the reasonable opportunity period, workers will receive an alert 560 IMM ROP EXPIRED: RUN ELIG. If a worker does not run eligibility by the next adverse action, CWW will end health care eligibility for the person at adverse action. **If a worker changes the verification code to NV or QV before the reasonable opportunity period ends, health care eligibility will not be affected until after the end of the reasonable opportunity period.**

As a reminder, workers will be able to extend the due date for the immigration reasonable opportunity period when needed, as long as the reasonable opportunity period has not already expired. For example,

if the member experienced a mail delay in receiving the initial reasonable opportunity period letter, or a system error prevented the reasonable opportunity period letter from being sent.

A daily batch process will monitor cases for which immigration verification is missing. When the reasonable opportunity period expires, CWW will update the members' cases to indicate that immigration verification has not been received. Workers will need to take action by the next adverse action, or CWW will terminate these cases for health care eligibility.

When an individual's health care eligibility is terminated at the end of a reasonable opportunity period, a Notice of Decision will be sent informing him or her that health care has been terminated because immigration status was not verified.

## **ACCESS**

ACCESS will be enhanced to include a question that will allow an individual to provide information about completion of military service requirements that may exempt him or her from the five-year bar.

## **CONTACTS**

BEPS CARES Information and Problem Resolution Center

For Wisconsin Shares Child Care policy questions outside of Milwaukee County: Bureau of Regional Operations (BRO), Child Care Coordinators at [broccpolicyhelpdesk@wisconsin.gov](mailto:broccpolicyhelpdesk@wisconsin.gov)

For Child Care CARES/CWW and CSAW processing questions statewide and policy questions in Milwaukee County: Child Care Subsidy and Technical Assistance line at [childcare@wisconsin.gov](mailto:childcare@wisconsin.gov) or 608-422-7200

For W-2 Policy Questions in the Balance of State: Bureau of Regional Operations, W-2 Regional Coordinators

For W-2 Policy Questions in Milwaukee: Milwaukee Operations Section Regional Administrators

For W-2 CARES Processing Questions: W-2 Help Desk

DHS/DMS/BEPS/AA

DCF/DECE/BELP

DCF/DFES/BWF