

DEPARTMENT OF CHILDREN  
AND FAMILIES  
Secretary Reggie Bicha  
201 East Washington Avenue, Room G200  
P.O. Box 8916  
Madison, WI 53708-8916  
Telephone: 608-266-8684  
Fax: 608-261-6972  
www.dcf.wisconsin.gov



State of Wisconsin  
Governor Jim Doyle

DEPARTMENT OF HEALTH SERVICES  
Secretary Karen E. Timberlake  
1 West Wilson Street  
P.O. Box 7850  
Madison, WI 53707-7850  
Telephone: (608) 266-9622  
FAX: (608) 266-7882  
www.dhfs.wisconsin.gov

TO: **Income Maintenance Supervisors**  
**Income Maintenance Lead Workers**  
**Income Maintenance Staff**  
**W-2 Agencies**  
**Workforce Development Boards**  
**Job Center Leads and Managers**  
**Training Staff**  
**Child Care Coordinators**

FROM: Vicki Jessup, Policy Section Chief  
Bureau of Enrollment Policy & Systems  
Division of Health Care Access and Accountability

<b>BEPS/DFS OPERATIONS MEMO</b>					
No: 10-75					
DATE: 10/25/2010 AMENDED					
FS	<input checked="" type="checkbox"/>	MA	<input checked="" type="checkbox"/>	BC+	<input checked="" type="checkbox"/>
SC	<input type="checkbox"/>	CTS	<input checked="" type="checkbox"/>	FSET	<input type="checkbox"/>
BC+ Basic	<input type="checkbox"/>	BC+ CORE	<input checked="" type="checkbox"/>		
CC	<input type="checkbox"/>	W-2	<input checked="" type="checkbox"/>	EA	<input type="checkbox"/>
CF	<input type="checkbox"/>	JAL	<input type="checkbox"/>	JC	<input type="checkbox"/>
RAP	<input type="checkbox"/>	WIA	<input type="checkbox"/>	Other	<input type="checkbox"/> *
				EP	

**SUBJECT: Citizenship and Identity Auto Update in CARES**

**CROSS REFERENCE:** BadgerCare Plus Handbook 4.2  
Medicaid Handbook 7.2  
Caretaker Supplement Handbook 3.1.15  
FoodShare Handbook 1.2.3.1  
CWW Process Help Chapter 68

**EFFECTIVE DATE:** November 08, 2010

**PURPOSE:**

The purpose of this memo is to announce a change to the process for verifying citizenship and identity for Medicaid (MA) and BadgerCare Plus (BCP) applicants. This change for MA/BCP impacts how FoodShare (FS), Caretaker Supplement (CTS), Child Care (CC) and Wisconsin Works (W-2) process verification of citizenship and identity. It also changes the alerts workers receive.

**BACKGROUND:**

Federal law requires individuals declaring to be US citizens or nationals to verify their US citizenship and identity in order to receive, or continue to receive, Medicaid and BCP. Effective January 1, 2010, the Social Security Act was amended to provide a new option for documenting

the citizenship and identity of applicants declaring to be US citizens or nationals. This option allows states to use a data match with Social Security to meet the citizenship and identity verification requirements for these programs. In an effort to reduce workload associated with verification requirements for citizenship and identity, Wisconsin has opted to use the existing State Verification and Exchange System (SVES), used to verify SSN, name and date of birth to verify citizenship and identity for Medicaid and BCP applicants and members.

### ***PROCESS/POLICY CHANGE:***

The current process for verifying citizenship and identity requires the applicant/member to submit the verification to the local agency, or requires the worker to verify using available resources such as birth query, DMV match, etc.

Under the new process the state will submit a file to SSA, with the person's name, verified Social Security Number (SSN) and date of birth for comparison to SSA's data. If SSA is able to match the individual to its files and verify the declaration of citizenship, no further verification is required. Verification of citizenship received from SSA through this process is the equivalent of Level 1 documentation verifying both citizenship and identity for Medicaid and BCP applicants.

The citizenship/identity verification requirements outlined in this memo apply to applicants for Medicaid and BCP. However, verification of citizenship and identity that is returned from SSA will also meet the verification requirements for the FoodShare, Caretaker Supplement, Child Care and W-2 programs. SeniorCare and BadgerCare Plus Basic Plan applicants will not be included in this process.

### ***CITIZENSHIP/IDENTITY AUTO-UPDATE PROCESS***

Only persons meeting all of the following criteria will be selected for the SSA Citizenship Auto-Update:

- Applying for Medicaid, BadgerCare Plus or Family Planning Only Services (whether or not they are simultaneously applying for other benefits such as FoodShare), and
- Declaring to be a US citizen or national, and
- Provides an SSN, and
- Is not a member of an exempt population as defined in MEH 7.2.1.2, and
- Citizenship/nationality (including identity) has not already been verified through other means.

Non-exempt Medicaid and BCP applicants/members who do not provide an SSN or whose SSN cannot be verified, must meet the citizenship/identity verification requirement by providing verification as defined in MEH 7.2.4.1 and BC+H 4.2. These individuals, like those subject to the SSA Citizenship Auto-Update, must be given a reasonable opportunity to verify citizenship/nationality as described in the reminder below.

The Department anticipates that 95% of the requests submitted to SSA will be returned with a match within 3 business days, requiring no further action by the applicant/member or worker to verify citizenship/identity.

If SSA is not able to verify citizenship the IM worker must make a reasonable effort to resolve any obvious issues such as misspelled names, transposed SSNs, SSN mismatches, etc. If the discrepancy cannot be resolved by the IM worker, the individual must be provided a reasonable amount of time in which to provide verification to the local agency and to resolve any issues directly with SSA that prevented SSA from verifying the information.

**REMINDER:** By law, the state must proceed with enrolling otherwise eligible individuals in Medicaid and BCP while verification of citizenship/identity is occurring. This means that persons meeting the eligibility requirements of these programs (except that their citizenship and identity is being verified) must be made eligible even before verification is received. Their eligibility may not be delayed, denied or terminated for reasons related to citizenship verification pending the receipt of verification. The timeframe for verifying citizenship/identity for Medicaid and BCP applicants, whether it is through the SS update or the worker, is 90 days. That policy has not changed with this new process.

### **CARES:**

#### **Permanent/Current Demographics pages**

The verification fields for the “U.S. Citizenship MA” question on the Permanent Demographics page and the “Identification MA Verification” question on the Current Demographics page will default to the “GF” code for all MA applicants who do not have a valid verification code entered in those fields. A new code (EX) has been added for individuals exempt from the verification requirement (MEH 7.2.1.2). The worker will have to enter the “EX” code for exempt individuals as well as the appropriate verification code in the non MA verification fields.

The CN and GF codes entered in these fields will drop out at renewal. Workers will not be able to enter GF after the 90 day reasonable opportunity period has passed and the applicant has been sent the Notice of Needed Proof/90 day letter. If the worker tries to enter the GF code after the 90 day reasonable opportunity has passed s/he will receive the message: “GL229: GF code not allowed: Good Faith period expired.”

**Note:** When the Current and Permanent Demographics pages are not scheduled in a driver flow for a new applicant who has not previously verified citizenship/identity, the worker must navigate to those pages to update the verification codes to trigger the SSA verification process.

**CARES Worker Web** User ID: JX2189 User Name: GANNYAPU Quick Select: CASE/RFA Go Help Logout  
 Primary Person: JESSICA PHILIP 41F PP Case: 2000936920 Status: Pending Mode: Intake v3.1 09/09/2010  
 Action Items (3) Documents (0)

**Navigation Menu**  
 Search  
 CARES Home  
 Search  
 Unsubmitted Requests  
 Inbox Search  
 Unlinked Documents  
 SeniorCare  
 RFA / Case  
 Client Registration (0)  
 Case Summary  
 Case Comments  
 Application Entry (2)  
 Case Information  
 Individual Demographics  
 Summary  
 Permanent Demo  
 Current Demo  
 Alien / Refugee  
 Benefits/School  
 Individual Non Financial  
 Other Health Care Programs  
 Asset Information  
 Employment / Unemployment Queues  
 Employment  
 Unearned Income  
 Expenses  
 Medical  
 W-2/Child-Care  
 Generate Summary

**Current Demographics** Cancel [ ] Reset Total: 3

**Individual Demographic Information**  
 Effective Period  
 \* Begin Month: 09 / 2010 Last Updated: 09/09/2010

**Individual Details**  
 \* Individual: SUNNY TOM OM SON  
 \* Identification Verification: ? - NOT YET VERIFIED  
 Identification MA Verification: GF - GOOD FAITH EFFORT - RECIPIENT  
 \* SSN Cooperation: Yes  
 \* Marital Status: SI - SINGLE-NEVER MARRIED \* Verification: NV - NOT VERIFIED  
 \* Resides In WI: Yes \* Verification: AF - AGENCY FORM  
 \* Intent To Reside In WI: Yes  
 \* Migrant Farm Worker: No Verification: NQ - NOT QUESTIONABLE  
 \* Special Needs Child: No Verification:

**Physical Exam**  
 \* Physical Exam Completed? \* Good Cause:  
 \* Physical Exam Date: MM / DD / YYYY \* Source:

**Obsolete Information**  
 \* Offender Working Without Pay: \* Verification:

Enter New Begin Month MM / YYYY Go

**Living Arrangement Information**  
 Effective Period  
 \* Begin Month: 09 / 2010 Last Updated: 09/08/2010

**Living Arrangements**  
 \* Living Arrangement Type: 01 - INDEPENDENT (HOME/AP) \* Verification: NQ - NOT QUESTIONABLE  
 \* Living Arrangement Date: MM / DD / YYYY  
 Minor Parent Living Arrangement:

**Child Out of Home Details**  
 \* Is this a child living outside this home and in Foster Care or court-ordered Kinship Care? No  
 Are the parents / caretakers cooperating to re-unite with this child? Verification: NQ - NOT QUESTIONABLE

Enter New Begin Month: MM / YYYY Go

Individual SUNNY TOM OM SON Updated on or before MM / DD / YYYY Go

Add Case Comment Cancel [ ] Previous Next

If an applicant subject to the SSA Citizenship Auto-Update is pending for other verification in addition to citizenship/identity, the initial Verification Notice (VCL) will not display a request for citizenship verification for any program of assistance, even though the non-Medicaid/BCP programs may be pending for that verification. In this situation, verification for items other than citizenship/identity will be requested with the usual due date timeframes and the FYI section of the Verification Notice will include a statement that the agency is attempting to verify citizenship/identity directly with SSA. (See attachment 1)

Once the request is submitted to SSA a response will be sent within 3 business days. When a response is received from SSA, one of two things will happen:

**SSA SSN Match.** If SSA is able to match the applicant's/member's SSN against its files, SSA will return data to the state that will be used to update both the citizenship and ID verification fields in CWW. No further verification is required. The verification field for non MA programs will update to "DE". The MA verification fields will update to DX.

If SSA verifies the person's citizenship, **Alert #465**: "CIT/ID REC'D: RUN ELIG" will be generated and the worker must initiate eligibility.

**CARES Worker Web** | User ID: XCTJ38 | User Name: M ABDUL SALA | Quick Select: CASE/RFA | Go | Help | Logout

Primary Person: DEV MILTON 30F PP | Case: 4000937944 | Status: Open | Mode: Intake | 3.3 | 09/21/2010

Action Items (3) | Documents (0)

### Permanent Demographics

Cancel | Reset | Total: 3

#### Individual Demographic Information

Effective Period

Last Updated: 09/15/2010

#### Individual Details

Individual: JOHN MILTON 1M SON

Language: E - ENGLISH

Are you a US citizen: Yes

Verification: DE - DATA EXCHANGE

US Citizenship M...: DX - DATA EXCHANGE

Verification:

Birth Place:

Date Of Death: MM / DD / YYYY

SSN Application Date: MM / DD / YYYY

Alert Flag 1:

Alert Flag 2:

Source:

Verification:

#### Race

American Indian / Alaskan: No

Asian: No

Black / African American: No

Hawaiian / Other Pacific Islander: No

White: Yes

Populate unknown responses as No

#### Ethnicity

Hispanic: No

#### Tribal Member Information

Are you a member of a tribe? No

Verification:

Are you a child of a member of a tribe? No

Verification:

#### Obsolete Information

Verification (Date of Death):

Individual: JOHN MILTON 1M SON | Updated on or before: MM / DD / YYYY | Go

Add Case Comment | Previous | Next

**CARES Worker Web** UserID: XCTJ38 UserName: M ABDUL SALA Quick Select: CASE/RFA Go Help Logout

Primary Person: DEV MILTON 30F PP Case: 4000937944 Status: Open Mode: Intake 3,3 09/21/2010

Navigation Menu: Search, CARES Home, Search, Inbox Search, Unlinked Documents, RFA / Case, Client Registration (0), Case Summary, Case Comments, Application Entry (0), Case Information, Individual Demographics, Summary, Permanent Demo, Current Demo, Alien / Refugee, Benefits/School, Individual Non Financial, Other Health Care Programs, Asset Information, Employment/Unemployment Queries, Employment, Unearned Income, Expenses, Medical, W-2/Child-Care, Generate Summary, Initiate Eligibility Determination

### Current Demographics

Cancel [ ] Reset Total: 3

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#### Individual Demographic Information

Effective Period  
 \* Begin Month: 09 / 2010 Last Updated: 09/10/2010

Individual Details  
 \* Individual: JOHN MILTON 1M SON  
 \* Identification Verification: DE - DATA EXCHANGE  
 Identification MA Verification: DX - DATA EXCHANGE  
 \* SSN Cooperation: Yes  
 \* Marital Status: SI - SINGLE-NEVER MARRIED \* Verification: AF - AGENCY FORM  
 \* Resides In WI: Yes \* Verification:  
 \* Intent To Reside In WI: Yes  
 \* Migrant Farm Worker: No Verification: NQ - NOT QUESTIONABLE  
 \* Special Needs Child: Verification:

Physical Exam  
 \* Physical Exam Completed? \* Good Cause:  
 \* Physical Exam Date: MM / DD / YYYY \* Source:

Obsolete Information  
 \* Offender Working Without Pay: \* Verification:

Enter New Begin Month MM YYYY Go

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#### Living Arrangement Information

Effective Period  
 \* Begin Month: 09 / 2010 Last Updated: 09/10/2010

Living Arrangements  
 \* Living Arrangement Type: 01 - INDEPENDENT (HOME/AP1) \* Verification: BI - BILLS  
 \* Living Arrangement Date: MM / DD / YYYY  
 \* Minor Parent Living Arrangement:

Child Out of Home Details  
 \* Is this a child living outside this home and in Foster Care or court-ordered Kinship Care? No  
 Are the parents / caretakers cooperating to re-unite with this child? No Verification: NQ - NOT QUESTIONABLE

Enter New Begin Month MM YYYY Go

Individual: JOHN MILTON 1M SON Updated on or before MM / DD / YYYY Go

Add Case Comment Cancel [ ] Previous Next

**SSA SSN Mismatch.** If SSA is unable to match the applicant's/member's SSN against its files and cannot verify the person's citizenship one of the following alerts will be generated:

- **Alert #463:** NO CIT/ID RESPONSE: RUN ELIG or
- **Alert #466:** CIT/ID REC'D: RUN ELIG REQ VER.

The worker must run eligibility to pend any non MA programs requiring verification of this information and generate a VCL. For FoodShare, Child Care and W-2, the VCL will request proof of citizenship/identity (see attachment 2). Because the member has 90 days to provide verification for MA/BCP, those programs will pass. (See "Reasonable Opportunity Period for MA/BCP" section)

**NOTE:** Workers should still make a reasonable effort to resolve the SSN mismatch by confirming the accuracy of the information sent to SSA through the SVES process.

If the information is corrected prior to confirming MA/BCP open, the worker must update the GF code on either the Current Demographics or the Permanent Demographics page to ? or Q? to resend the request for citizenship/id verification to SSA. If MA/BCP has been confirmed open the worker will have to verify citizenship/id through other available resources such as birth query, DMV, etc or by requesting the verification from the applicant/member.

For MA/BCP, a Notice of Needed Proof/90 Day Letter (See attachment 3) will be automatically generated from CWW when SSA is unable to match the applicant's information against their records. This letter will be generated only after the Medicaid/BCP has been confirmed open for the individual and SSA has returned a mismatch. The Statement of Identity will also be included with this letter for individuals under 18.

The Notice of Needed Proof/90 Day Letter will include all individuals who are pending for citizenship verification at the time the letter is generated. A separate letter will be sent if someone in the household is confirmed open or verification for that person is requested at a later date.

#### REASONABLE OPPORTUNITY PERIOD FOR MA/BCP

Members whose citizenship/identity has not been verified automatically and is not available to the worker through other resources such as the birth query, must be allowed 90 days to provide the verification to the local agency. If the SSN provided is not a valid SSN or the number belongs to another individual, the applicant/member must also be allowed 90 days to resolve the SSN issue with the Social Security Administration.

This 90 day period is applicable only to members who are confirmed open for Medicaid/BCP but have not verified their citizenship/identity because:

- a) A mismatch occurred with SSA preventing SSA from verifying the information, or
- b) The individual did not provide an SSN and therefore could not be part of the SSA verification process.

The verification due date will be set at 93 calendar days to allow for mailing time. Workers should continue to use the resources they have available to verify citizenship/identity (birth query, online motor vehicle query, etc) to verify the information. At the end of this timeframe, CARES will automatically update the verification code to "NV" in the MA verification fields. An alert will be generated to the worker to inform him or her that the code has been updated. The worker should evaluate whether or not verification was received, and if not, initiate eligibility to close the case. If the case is not run by the next adverse action, it will be triggered to run through the batch process to close.

If citizenship/identity remains unverified at the end of the reasonable opportunity period, but the member is making a good faith effort to comply, eligibility may continue for as long as the member is deemed by the IM worker to be making a good faith effort. The worker should extend the verification due date in CWW and enter case comments explaining the action. If, the member is not making a good faith effort to comply, eligibility should be terminated with adverse action notice.

Members granted a 90 day reasonable opportunity period who subsequently fail to comply and lose eligibility, will not be granted another 90 day period to verify citizenship/nationality if they reapply for benefits at a later date. They may be selected for the SSA Citizenship Auto-Update process. If SSA is unable to verify the information, the applicant must provide verification of citizenship/nationality in order to be found eligible.

### **NEW ALERTS:**

#### **463: NO CIT/ID VER REC'D: RUN ELIG**

This is set for MA only individuals after the 90 day reasonable opportunity period has expired and no verification has been received. The verification codes for citizenship/identity will be automatically updated with NV. The worker needs to run eligibility to close Medicaid/BCP. If the worker doesn't run by the next mass change/adverse action, it will be triggered to close.

#### **464: NO CIT/IDRESPONSE: RUN ELIG**

This is set for all programs when the State did not receive a response from SSA within 3 days. For non Medicaid/BCP programs, workers must run eligibility to pend the appropriate programs and generate a verification request for citizenship/identity. Medicaid/BCP programs will pass and the Notice of Needed Proof will be sent.

#### **465: CIT/ID REC'D: RUN ELIG**

This alert is generated on cases where CARES received a positive response from SSA on the citizenship/identity request. The verification codes will be updated to DX and DE.

#### **466: CIT/ID REC'D: RUN ELIG REQ VER**

This alert is generated when CARES received a negative response from SSA on the citizenship/identity request. The worker must run eligibility to pend the appropriate non-Medicaid/BCP programs and generate a verification request for those programs. Medicaid/BCP programs will pass and the Notice of Needed Proof will be sent.

### **CONTACTS:**

BEPS CARES Information & Problem Resolution Center

For W-2 Policy Related Questions: Operations Staff

For W-2 related CARES Processing Questions: W-2/CC Help Desk

\*Program Categories – FS – FoodShare, MA – Medicaid, BC+ – BadgerCare Plus, SC – Senior Care, CTS – Caretaker Supplement, CC – Child Care, W-2 – Wisconsin Works, FSET – FoodShare Employment and Training, BC+ Core – BadgerCare Plus Core, CF – Children First, EA – Emergency Assistance, JAL – Job Access Loan, JC - Job Center Programs, RAP – Refugee Assistance Program, WIA – Workforce Investment Act, Other EP – Other Employment Programs.

DHS/DHCAA/BEPS/SR