

Attachment 3

DRA Citizenship Documentation Requirement for Medicaid: States Can Use Computer Matching of Existing Records to Document Citizenship in Medicaid

Beginning on July 1, states will be faced with implementing the new requirement contained in the Deficit Reduction Act (DRA) that citizens applying for or renewing their eligibility for Medicaid document their citizenship.¹ To date, CMS has not provided any instructions or guidance to states on how they should go about administering the new requirement and we do not know when guidance will be forthcoming.

The Problem

Many applicants for Medicaid — as well as beneficiaries seeking to renew their eligibility — will not have the documents they need readily available, and the necessary documents may be difficult to obtain. Individuals may spend considerable time and money attempting to obtain the documents — or they may forgo completing an application or renewal form if it is too daunting — when, in fact, the state may be able to obtain some or all of the necessary documents by searching existing state databases.

Procedures for States to Consider

State or local Medicaid eligibility agencies may be able to find satisfactory evidence of U.S. citizenship through computer matching of existing records. This could substantially reduce administrative burdens because one matching effort could provide proof of citizenship for thousands of individuals, without creating additional paperwork burdens for individuals applying for or renewing coverage. On a case-by-base basis, computer matching can be used to find citizenship information for individuals who do not readily have a birth certificate, passport or similar document available.

At least three different types of computer matching can be used:

- (1) *Vital Records Data.* Many states have automated vital records systems, which retain birth certificate data for persons born in that state. In many cases, access to this online data base can be provided to eligibility workers, who can check if an individual was born in that state and is therefore a native-born U.S. citizen. Even if the eligibility workers cannot directly access these data, the eligibility agency may be able to transmit a list of Medicaid beneficiaries and other relevant data (e.g., date of birth, place of birth) to the vital records agency which can match those data. In general, vital records agencies can only check for births in that state, not for births in other states. There is no cross-state vital records system yet.
- (2) *SSI Data.* SSI State Data Exchange (SDX) data files are frequently shared between the Social Security Administration and state eligibility agencies. The SDX file includes an “Alien

¹ Section 6036 of the DRA, P.L. 109-171.

Indicator Code” (position 578) that indicates whether a given SSI recipient is a U.S. citizen or a non-citizen immigrant. These data could be matched on a batch basis against a list of disabled and aged Medicaid beneficiaries and used to check thousands of people at a time or could be checked on a case-by-case basis.

- (3) *Other Social Security data.* The Social Security Administration maintains a very large file (the NUMIDENT file) for all persons who have Social Security numbers. The NUMIDENT file contains partial information on citizenship and relatively complete information on each person’s place of birth. (Information on citizenship began to be collected in the 1980s, but date and place of birth data have been collected for much longer.) These data could be matched with Medicaid eligibility data (e.g., name, Social Security number and date of birth) to indicate which Medicaid beneficiaries are U.S. born and therefore native citizens, and in some cases, may provide other evidence of citizenship. State or federal agencies could arrange with the Social Security Administration to match lists of Medicaid beneficiaries or certain groups of beneficiaries (e.g., dual eligibles) with these Social Security records.

Computer matching of records could be considered as proof that someone is a citizen, but should not be considered proof that someone is not a citizen. For example, names may not match because of spelling or other input errors or names may match but the computerized records may be incomplete or out of date. Someone born outside the U.S. may have become a naturalized citizen since the information in an SSA data base was last updated. In the event that a computer match does not provide proof that an individual *is* a citizen, the eligibility agency should attempt to examine other information.