



KANSAS

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KANSAS HEALTH POLICY AUTHORITY

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MEMORANDUM

TO: SRS Staff
KHPA Staff

DATE: August 1, 2006

FROM: Scott Brunner, Medicaid Director

RE: Policy Change Regarding
Citizenship and Identify Verification

The purpose of this memo is to announce a policy change regarding the citizenship and identity verification requirements which became effective on July 1, 2006. The new policies outlined in this memo are effective upon receipt of this memo.

These changes are based on information included in the interim final rule, implementing these new verification requirements. The information was published in the Federal Register following finalization of the initial implementation material, therefore making it impossible to incorporate these provisions in the original guidance. Due to the significance of these changes, the new policy is being issued outside of the normal KEESM and KFMAM revision schedule. The material in this memo supercedes applicable KEESM and KFMAM sections. Both manuals will be updated with subsequent revisions.

The new policies are as follows:

- 1. Exclusion of Medicare Beneficiaries and SSI Recipients from Verification Requirements -** Medicare Beneficiaries and SSI recipients are exempt from both the citizenship and identify verification requirements.

The policy applies to both current and former Medicare beneficiaries and SSI recipients. Verification of receipt of either Medicare or SSI is required. Generally, a TPQY can be used for this purpose. A benefit letter, SSA-1610 or other communication from SSA is also sufficient.

The Record of Identity and Citizenship Documentation, the ES-3850 must be completed for these individuals. Instead of listing the documents used to verify citizenship and identity, note 'EXEMPT' on both the identity and citizenship fields. Under the Comment Section, list the reason for the exemption (e.g., Medicare Beneficiary). For the paper file, attach documentation of Medicare entitlement or SSI recipient status to the ES-3850 for retention.

A new Person Alert, entered on the KAECSES PRAP screen, has been created to capture information on individuals exempt from these requirements. Several PRAT codes related citizenship and identity verification were created earlier (see Implementation Instructions for

KEESM Revision 28 dated 07-06-06). Staff should make the following pen and ink change to page 23 of the KAECSES Code Card:

IE- Exempt From Citizenship and ID Verification - MC and SSI. This code is used for all plan members exempt from verification due to Medicare or SSI recipient status. Enter the code when Medicare beneficiary or SSI recipient status is verified.

The exemption is applicable to both children and adults as well as persons who subsequently lose either SSI or Medicare. All continue to be exempt from the verification requirements. It is critical that proper documentation be maintained in the case file.

Please note that the SDX verification process described in the Implementation Memo previously referenced may be useful on persons whose SSI benefits were denied. Although these individuals are not exempt from the verification requirements, the SDX record is considered acceptable documentation.

- 2. Verification Requirements for Continuously Eligible Newborns** - A child born to a recipient mother who qualifies for continuous eligibility is exempt from citizenship and identity verification requirements until the next redetermination of eligibility. Required documentation must be obtained, in order for coverage to continue beyond the redetermination. Reasonable opportunity periods, as previously defined, may also be exercised for newborn verification.

For Medicaid/Title XIX, the child is eligible through the month of his or her first birthday. For these newborns, the next redetermination occurs the month following the month of the first birthday. If a regular review is required prior to that date, verification may be requested at that time but is not enforced until the next redetermination.

For HealthWave XXI, the child is added to the mother's existing case and the existing review date is regarded as the next redetermination of eligibility. Verification requirements are enforced at the time of the first annual review following the child's birth.

Do not enter a Person Alert (PRAP code) regarding verification status until the newborn's case is reviewed. Unlike the Medicare/SSI exemption above, this exemption is time-limited and a temporary PRAP code may cause confusion.

Verification must be provided for all other newborns. This includes those born to non-recipient mothers as well as those born to SOBRA-eligible mothers. An application is required in order to determine eligibility for these children, therefore requiring verification.

KHPA staff continue to explore other sources that may be used in the future to document citizenship or identify. In addition, we continue to work with staff from other agencies to further develop utilizing existing verification. Additional information will be provided as it becomes available.

Thank you for the excellent work with this policy change. We understand implementation has been a challenge and we hope these changes will be welcome. If you have any questions about these changes, please contact KHPA policy staff at (785) 296- 3981.

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