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

FROM: Amy Mendel-Clemens
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BEM/DWS OPERATIONS MEMO					
No:	07-51				
DATE:	09/05/2007				
FS	<input type="checkbox"/>	MA	<input type="checkbox"/>	SC	<input type="checkbox"/>
CTS	<input type="checkbox"/>	CC	<input type="checkbox"/>	W-2	<input type="checkbox"/>
FSET	<input 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	EP	<input type="checkbox"/>	★
PRIORITY: HIGH					

SUBJECT: Citizenship and Identity Requirement – Paying for Documentation

EFFECTIVE DATE: Immediately

PURPOSE:

This memo provides policy and process for Income Maintenance (IM) agencies to follow when paying for citizenship or identity documentation for Medicaid (MA), BadgerCare (BC), or Family Planning Waiver Program (FPW) applicants or recipients.

BACKGROUND

A provision in the Deficit Reduction Act (DRA) requires MA/BC/FPW applicants and recipients to verify their citizenship and identity. Since implementation of the DRA, the Department (DHFS) has been considering different ways in which to alleviate the unintended negative consequences that the new law has had on access to MA/BC/FPW. Towards this effort, DHFS has developed policy and process guidelines outlined here for the payment of birth certificates and WI state identification (ID) cards for applicants and recipients who cannot afford them.

IM Agencies have access to funding that can be applied towards the payment of birth certificates and state ID cards. One time income augmentation funding of approximately \$1.8 million was approved by the Joint Finance Committee in December 2006. This funding was provided for administration costs associated with the implementation of the citizenship and

identity provision including paying for the costs of birth certificates and State ID cards for applicants and recipients when financial assistance is requested. This funding was distributed to all agencies.

POLICY

If an individual needs to verify citizenship and/or identity at the point of MA/BC/FPW application or renewal s/he should try to fulfill the requirement with proof s/he already has available. If an applicant/recipient contacts the agency, work with him/her to check Documentation Levels 1 through 6 to determine if anything on the list is readily available to the applicant/recipient. If an applicant/recipient was born in Wisconsin, use the online Birth Query to verify citizenship.

The worker can authorize payment for a birth certificate from the state where the applicant was born and/or a WI State ID card if an applicant/recipient:

- has no documentation from Levels 1-6;
- needs either an out of state birth certificate and/or has no identity documentation; and
- requests financial assistance.

If the individual was born in WI and not found in the WI online birth query, agencies may authorize payment for a WI birth certificate to verify citizenship.

DOCUMENT TYPES

In order to obtain birth certificates for applicants/recipients, agencies need to follow the guidelines outlined in the 'Process' section later in this memo. The type of birth certificate that should be requested is one of the following:

- certified copy
- certified informational copy

Certified copies are the most widely accepted for any official or legal business or to establish citizenship and identity. Certified informational copies are, as the name implies, informational only and while acceptable to meet the MA citizenship requirement are not necessarily useful for the applicant/recipient to use in other capacities. A certified copy may cost slightly more than a certified informational copy. Each state's vital records website will contain information about each document type offered and the cost of each.

The IM agency can determine which type of document it would like to request for the applicant/recipient. However, the IM agency should inform the applicant/recipient as to what type of document is being requested. The agency may choose how to accomplish this. One example is to attach a note or letter explaining the type of document the IM agency requested when the IM agency sends the original document to the applicant/recipient. Verbal communication with the applicant/recipient is also sufficient.

ELIGIBILITY PROCESSING

Citizenship Verification

When the agency is obtaining and paying for documentation for an individual, IM workers should not wait until the document comes back to confirm the individual's eligibility. With the agency involved in obtaining the documentation, there is a high likelihood that the verification will be obtained, and MA eligibility can be confirmed.

The following new codes have been added to the MA Citizenship and Identity Verification field tables in CWW and should be used by workers when the agency paid for the documentation:

- <PB> - birth certificate paid by IM agency
- <PI> - state ID card paid by IM agency

The addition of these codes will be helpful in distinguishing when an IM agency has paid for the documentation and can assist the Department in tracking and gathering data.

Since it is important to track when and if a birth certificate actually does come in to the IM agency, the IM worker should set a CARES alert on ACEC for twelve weeks from the date of request. A review of states' vital records processes showed that the average number of weeks for birth certificate processing is six to eight weeks, however there are some states that take up to 10 or 12 weeks.

If the alert is generated but the documentation has not been received, contact the vital records office of the state where the applicant was born to inquire about the request. If the state returns the forms or the check saying something is not complete, try again to complete the forms and send them back to the state. Continue eligibility for the individual during the time a request is being re-submitted or while waiting for a response from the vital records office; an additional 12 week time is appropriate. If an IM agency is informed by the state that no one by that name is on record in that state, the agency may then terminate eligibility for the individual with the usual appropriate notice. An overpayment claim should not be pursued unless you have evidence that the individual has made a false claim to be a U.S. citizen.

Identity Verification

When an IM agency is paying for a WI State ID card for an applicant/recipient, follow the normal verification processing timeframe. Allow for either ten days or up to the end of the application processing period, whichever is later, before denying or terminating eligibility for the individual. Begin the "verification timeframe clock" from the day the applicant/recipient receives the agency check. An individual should be able to obtain a WI State ID card in this timeframe.

Example 1:

Jeanne applies for Medicaid on June 5. On June 12 she receives a verification checklist with an attachment describing the citizenship and identity verification she needs to provide. She sends in a copy of her driver license but does not have her birth certificate from Pennsylvania. She contacts her worker to discuss this. She does not have any other citizenship documentation on hand and cannot afford the \$30 fee for her PA birth certificate. The worker gathers the information to request the PA birth certificate and sends it out on June 22. The worker sets an alert for herself for September 14, (twelve weeks from June 20). Jeanne's eligibility is confirmed in CWW beginning in June. The code <PB> is used in the MA Citizenship Verification field. The birth certificate is received by the agency on August 17. Because eligibility has already been confirmed, there are no further changes needed to CWW when the birth certificate arrives. The IM worker enters the date the birth certificate was received in the new database tool used for internal tracking purposes and scans the birth certificate into the ECF. The agency then sends the certificate to the applicant/recipient. See the Recording and Tracking section later in this document.

PROCESS

OUT OF STATE BIRTH CERTIFICATE REQUEST

DHFS has developed a cover letter and form to be used for requesting out-of-state birth certificates. BEM staff researched other states' procedures and forms to inform the development of our policy and forms. The process outlined here reflects what BEM learned from other states and is designed to make it easier for IM Workers to request documentation from other states. Links to our documents are included at the end of this memo. Agencies will be able to download these and use as needed. Once the forms are completed it is advisable to make a photocopy of them and keep on file in case it becomes necessary to refer to them at a later date. Agencies can also scan the documents into the ECF if they choose.

1. Determine which state to send the request for a birth certificate. Direct the request to the state's Vital Records headquarters, not a county registrar's office. A link to the Centers for Disease Control (CDC) website can be found on the [Citizenship and Identity Resources page](#).
2. Prepare *Cover Letter* to the attention of the state the birth certificate is needed from. The agency personnel signing the letter must include a copy of their own photo ID. DHFS is recommending that IM agencies select one person to be the designated signatory.

NOTE ➤ The photo ID to be included with the cover letter does not have to be a driver license. The Department recommends that an employee ID card be used for this purpose. Some states require that an employee ID card indicate valid dates or an expiration date. If an IM agency ID card does not include these dates, affix a sticker with this information to the ID card prior to making the copy.

3. The applicant/recipient needs to sign the *Authorization to Request Birth Record form* giving the agency the authorization to obtain a birth certificate on his/her behalf. Be sure to complete the section titled "County Agency Use Only" so the state vital records office knows where to send the documents. Also note, this form needs to be notarized.

NOTE ➤ If an agency does not already have staff who are notaries, DHFS encourages agencies to have at least one staff person who is a notary. Notaries can also be found at banking institutions or city and county government offices. Check the Secretary of State's [website](#) for more information on becoming a notary.

4. The *Request for Birth Record form* needs to be completed by the applicant/recipient and agency.
5. If a state requires its own birth certificate request form be used, the applicant/recipient must complete that form instead of the *Request for Birth Record form* developed by DHFS.

NOTE ➤ Currently, we are aware of the following states' restrictions:

- [Pennsylvania](#) – Must use their form.
 - [South Dakota](#) – Must use their form.
 - Michigan will only issue birth certificates that are for administrative use only. Do not request a certified copy of a birth certificate from Michigan.
6. Gather copy of photo ID of applicant/recipient making the request. If the request is for a child under 18, a parent or guardian must include a copy of his/her ID. The ID does not

necessarily have to be a driver's license or state ID card. Another type of photo ID, such as a school or employment ID, may be used.

7. Prepare an agency check. Check the CDC vital records list for the cost of a birth certificate in each state. If an agency deals with a specific state or states frequently and wants to establish a unique method of payment that would be appropriate.
8. Mail out request packet. Packet must include these items:
 - a. Cover Letter (include a copy of agency staff ID)
 - b. Request for Birth Record Form and Authorization to Request Birth Records (double-sided form) *or* the state's form and the Authorization to Request Birth Records.
 - c. Copy of applicant/recipient photo ID
 - d. Stamped, addressed envelope
 - e. Payment
9. The birth certificates should be sent directly to the IM agency, not the applicant/recipient. Once received, make a photocopy of the document and mark the copy "For Administrative Use Only". Do not mark the original "For Administrative Use Only".

Scan the photocopied document into the Electronic Case File (ECF). Send the original document to the applicant/recipient after the agency has updated CWW and completed scanning.

OBTAINING A WISCONSIN STATE IDENTITY CARD

Check the Department of Transportation's [website](#) for information on obtaining a state ID card.

1. Determine whether the applicant/recipient has the information or documentation to obtain an ID card.
2. Prepare a check to the WI Dept of Transportation for ID card amount.
3. Give the check to the applicant/recipient and direct the applicant/recipient to the local DMV office to obtain the card.
4. The applicant/recipient may send in a photocopy of the ID card or bring the ID in person to the agency.
5. Photocopy the document (if not already a copy), mark the photocopy "For Administrative Use Only", then scan the photocopy into ECF and return original to applicant/recipient.

POLICY AND PROCESS CLARIFICATIONS

- If a recipient has obtained and already paid for his/her own documentation and later asks the IM agency for reimbursement of those costs, the IM agency should not provide reimbursement.
- If an individual has, on his/her own, requested and paid for documentation before applying for MA/BC/FPW but does not yet have the documentation, do not confirm program eligibility for this individual. Eligibility can only be granted once the individual receives documentation and provides it to the agency.

- IM agencies should pay for a birth certificate or state ID card before using the 'Special Populations' option (see Operations Memo 06-42). If there is an opportunity to obtain a document that meets federal guidelines then that should be pursued. The 'Special Populations' option is being retained, but should be considered the last resort.

However, when an applicant/recipient lacks any identity documentation to be able to apply for a birth certificate or lacks any citizenship documentation to be able to apply for an ID card, it is appropriate to consider using the Written Affidavit for citizenship and/or the 'Special Populations' policy.

RECORDING AND TRACKING

There is no separate CARS line to post expenses related to the payment of documentation since the funding allocated for this purpose was added to the IM administration allocation funding. However, for the state to properly claim federal funds for any costs paid for birth certificates and state ID cards, IM agencies must report these costs on the IM-RMS Direct Expenditure Report (DMT-600 IM-RMS). This is necessary in order to claim these costs directly to the appropriate benefit programs instead of them being cost allocated to inappropriate ones. A new IM-RMS Profile, 400030, has been created in order to report these costs.

IM agencies may want to separately record and track expenses of other items related to the new process. DHFS has created a tool in Access database software that can be used for this purpose. The use of this tool is not mandatory; however, the Department encourages all agencies to track what they can. Any data related to this process will help DHFS make a better argument in our funding request in the next state budget round. It may also show where any adjustments or changes in the policy or process may be needed in the future. Since tracking of these expenses, *except the birth certificate and state identification card costs*, is an optional task, DHFS will not require that IM agencies provide any specific data related to this and there will be no penalty for not recording data. However, DHFS may ask agencies who use the tool to share data as needed.

The Access database tool will be sent via a separate communication to each agency Policy Coordinator. This tool includes fields for agency information, applicant/recipient information, type of document requested, amount paid, requested date, and received date. Various reports can be generated from the database to assist in tracking the requests initiated by an IM agency. IM agencies may develop their own reports from the database according to their own needs.

RESOURCES

Medicaid Eligibility Handbook 3.0 (3.0.1 through 3.0.10)

[State Vital Records Cover Letter](#)

[Authorization to Request Birth Records](#)

CONTACTS

BEM CARES Information & Problem Resolution Center

★Program Categories – FS – FoodShare, MA – Medicaid, SC – Senior Care, CTS – Caretaker Supplement, CC – Child Care, W-2 – Wisconsin Works, FSET – Food Stamp Employment and Training, 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.

DHFS/DHCF/BEM/JE