



Policy Directive 2022-10-02

Title: SSN Exception for Non-citizens

Date: October 21, 2022

From: Erin Kelley, Senior Manager

Program(s) impacted: All Medical Programs

The purpose of this document is to provide updated guidance regarding the Social Security Number (SSN) requirement for non-citizen applicants. The direction provided here is effective upon release and may be applied retroactively as needed. This guidance supersedes information found in [PD2022-07-01](#).

A. Background

Per current policy found in Medical KEESM 2130 and KFMAM 1333.01, an applicant is required to supply their SSN or verification of application for the required SSN as a condition of eligibility unless the individual claims and validates an exception for Good Cause, see Medical KEESM 2133 and KFMAM 2033. Non-citizen applicants have also been held to these requirements in the past.

B. Policy

Qualifying non-citizens with a status of Legal Permanent Resident (also referred to as Green-Card Holders and subject to the 5-year waiting period for medical coverage) are automatically permitted to work in the United States and will qualify for an SSN for work purposes without having to apply for one separately. Other non-citizen entrants such as refugees and asylees may qualify for a "non-work" SSN but through a separate process. Those individuals who do not have an SSN and may only be issued an SSN for a valid non-work reason are exempt from the requirement to apply for an SSN in order to be approved for Medicaid.

Going forward, when a non-citizen applicant meets all other eligibility criteria other than supplying an SSN, and they have a qualifying immigration status that only qualifies them for a non-work SSN, coverage should be granted without further delay. Refugees, asylees, and groups eligible to the same extent as refugees (such as Cuban/Haitian Entrants, Afghan and Ukrainian Humanitarian Parolees) can be assumed to qualify for this exception without further verification. If it is unclear from the documentation on file whether the applicant meets the exception and it is necessary to reach out for additional information, self-attestation will be accepted. A letter or collateral contact from the Social Security Administration (SSA) may also be used to clarify the individual's SSN status if needed.

C. Processing in KEES

Non-citizens exempt from the SSN requirement will be considered covered through the Good Cause provision for participation without an SSN, and they will remain eligible under this provision with no requirement to provide an SSN as a condition of eligibility. Staff will need to document the SSN exemption in the journal. Append language will need to be added to the approval Notice of Action (NOA) indicating that if/when the applicant obtains an SSN, they should provide it to the agency. (**Note:** This language can be found on the Standard Copy and Paste (SCP) under “Non-Citizen Approval without SSN.”)

While there is no requirement for the consumer to provide an SSN for coverage to continue, staff should, as best practice, follow up at review on any exempt non-citizen approved under Good Cause for participation without an SSN and attempt to determine if they are able to provide one for recipients and/or wage-earners on the case.

For questions or concerns related to this document, please contact the KDHE Medical Policy Staff at KDHE.MedicaidEligibilityPolicy@ks.gov.

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Questions regarding any KEES issues are directed to the KEES Help Desk at KEES.HelpDesk@ks.gov.