

Health Care Finance and Administration	Section: Non-Financial Eligibility Requirements
Policy Manual Number: 005.020	Chapter: Enumeration

## ENUMERATION

**Legal Authority:** 42 CFR 435.910

### 1. Policy Statement

Enumeration is the procedure by which the Social Security Administration (SSA) assigns and verifies Social Security Numbers (SSNs). As a condition of eligibility for TennCare Medicaid and CoverKids, applicants who are eligible to receive an SSN must provide HCFA with:

- A valid SSN; or
- The SSN application date, if the individual's SSN is unknown or a number has never been issued.

Benefits will not be delayed or denied to otherwise eligible individuals pending issuance or verification of an SSN by the SSA.

By law, non-applicants are not required to provide their SSN. HCFA can request a non-applicant's SSN under the following conditions:

- When provision of the SSN is voluntary; and
- HCFA provides clear notice to the individual that provision of the non-applicant's SSN is voluntary and information about how the SSN will be used.

### 2. Notification of the Enumeration Requirement

Individuals will receive notification of the regulation requiring that they furnish an SSN when applying for TennCare Medicaid and CoverKids and how the SSN will be used. Individuals will be informed that:

- They are only required to furnish an SSN for the individuals in their household applying for benefits. Provision of a non-applicant's SSN is voluntary;
- Each applicant's SSN will be used to verify program eligibility, income and the amount of medical assistance payments received;
- This is a requirement of the state and federal government;
- Failure to furnish an SSN or proof that the individual has applied can result in that individual's ineligibility.

If an applicant does not have an SSN or the SSN is questionable, the agency will provide the individual with information about how to obtain an SSN through the SSA.

### 3. Children Less than 1 Year of Age

A newborn can be added to their mother's case without waiting for the enumeration process to conclude. In most situations, the enumeration process (completion of SS-5 application, which is the

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application for a Social Security card) now occurs for newborns at the hospital. Newborns must be enumerated by age one, or before they can be approved in another TennCare Medicaid or CoverKids category, whichever occurs first.

#### **4. Refusal to Obtain as SSN**

If an applicant fails or refuses to provide an SSN, then that individual is not eligible to receive benefits, unless he or she meets an exception or is a legal alien who is not eligible for an SSN.

##### **a. Exceptions**

##### **i. Religious Objection**

An applicant may refuse to obtain an SSN because of a well-established religious objection. A well-established religious objection means that the applicant:

- Is a member of a recognized religious sect or division of that sect; and
- Adheres to the teachings of the sect or division of that sect and for that reason is opposed to applying for or using an SSN.

HCFA will provide a Medicaid identification number to an applicant who refuses to obtain an SSN due to a well-established religious objection. The Medicaid identification number will not be able to be used for eligibility verification purposes.

#### **5. Enumeration of Legal Immigrants**

The Affordable Care Act amended the enumeration requirement for individuals who are not eligible for a regular SSN. Legal immigrants who are ineligible for a work-related or regular SSN are not required to obtain a non-work SSN for the purpose of TennCare Medicaid or CoverKids eligibility. The SSA will continue to issue SSNs for people who do have work authorization when an SSN is required to obtain other program benefits. However, a non-work SSN cannot be used to obtain data from other programs or agencies to verify eligibility for TennCare Medicaid or CoverKids.

Legal immigrants who are not eligible for a regular SSN must still meet the citizenship and immigration requirements, as well as all other conditions of eligibility, in order to receive TennCare Medicaid or CoverKids benefits.

#### **6. Verification**

##### **a. Individuals With an SSN**

SSNs will be verified by the SSA via the Federal Data Services Hub (the Hub). If the Hub is unavailable, the state will verify the SSN using the State Verification Exchange System (SVES)

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daily interface. If the Hub or another electronic data source, such as the State On-Line Query (SOLQ), is unable to verify an individual's SSN or validates the SSN as someone else's SSN, the state must first address any possible discrepancies with the SSN that was entered. If the individual's SSN cannot be verified, the state will notify the applicant and request a copy of the individual's Social Security card in order to verify the individual's SSN.

**b. Individuals Without an SSN**

Individuals who report not having an SSN, but who are eligible to obtain a work-related SSN must apply for an SSN prior to approval for TennCare Medicaid or CoverKids. Acceptable verification of an application for an SSN is a copy of Form SS-5.

**c. Individuals Ineligible for a Work-Related SSN**

If an individual attests that he or she is ineligible for a work-related SSN and the U.S. Department of Homeland Security has verified his or her immigration status, the Eligibility Specialist will make note of the exception in the individual's case record. Non-work SSNs should not be used when applying for TennCare Medicaid or CoverKids since these cannot be used for verification.