

# **Impact of the New Citizenship Requirements on Receipt of Medicaid in Vulnerable Populations**

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# Disclosure Statement

**Deirdre A. Byrne**

**The following personal financial relationships with commercial interests relevant to this presentation existed during the past 12 months:**

**No Relationships to Disclose**



# Deficit Reduction Act 2005

The Federal Deficit Reduction Act of 2005 placed new requirements on Medicaid enrollees for enrollment to the program, including requiring applicants to provide original citizenship and identification documents (DRA, P.L. 107-71)

- Applicable as of July 1, 2006
- Does not apply to SCHIP, although some states use the same enrollment procedure for all Medicaid and SCHIP applicants.

## Background

- Since 1986, states have been required to obtain a written declaration of citizenship, under penalty of perjury, from individuals applying for Medicaid benefits.
- To be eligible for full benefits offered by Medicaid, an individual must be a citizen or national of the United States
- Emergency Medicaid is available to non-qualified aliens



# Concerns

## Newborns

- Initially, children born to women on emergency Medicaid would not be deemed automatically eligible, reversing years of past state policy and establishing the need for a Medicaid application for the newborn
- July 2007 - CMS changed initial rule and allowed newborns born by emergency Medicaid financed births be deemed eligible at birth. Upon redetermination, citizenship and identification must be verified again.

## Homeless Children and Families

- Lack documentation, fees for birth certificates are too expensive for families
- States must assist individuals to secure satisfactory documentary evidence of citizenship when because of incapacity of mind or body the individual would be unable to comply with the requirement to present satisfactory documentary evidence of citizenship in a timely manner and the individual lacks a representative to assist him/her.

## Foster Children

- Initially were not exempt from requirement
- CMS Final Rule exempts all children in foster care, including children who receive foster care or adoption assistance under Title IV-E and Title IV-B



# Initial Reports

- 22 of 44 states reported declines in enrollment due to the new citizenship documentation requirement (GAO-07-889, June 2007)
- 13 States reported significant negative impact on enrollment and another 24 states report a modest impact (Kaiser Commission on Medicaid and the Uninsured, October 2007)
- Among states surveyed by Center on Budget and Policy Priorities, only Wisconsin had a data system capable of accounting for terminations of Medicaid coverage based on citizenship and identification requirements
- 19,000 were denied Medicaid between July 21, 2006 and March 1, 2007



# Methodology

This study was intended to quantify and qualify the nature and extent of documentation and identification barriers to enrollment in Medicaid

The Children's Health Fund developed a survey instrument with the Mailman School of Public Health

- Seven-question survey to be administered over a month at 4 sites simultaneously
- Complications with IRB approval process at 4 independent academic institutions delayed administration of survey
- Survey administered from March to April, 2008.

Issues covered in questionnaire included:

- Whether parents applied for Medicaid; if so whether they were denied or granted coverage;
- Whether parents were aware of the new policy; and if so whether the policy discouraged them from applying.



# Methodology

## Study Sites

### Dallas, Texas

- Large uninsured, homeless and immigrant population in a large urban area

### Mississippi Gulf Coast

- Population recovering from Hurricane Katrina, in a suburban and rural setting in a state with strict Medicaid regulations

### Washington DC

- Majority citizen population in city that has made a large effort to enroll children and families in Medicaid and SCHIP

### West Virginia

- Citizen population in rural area



# Survey Respondents

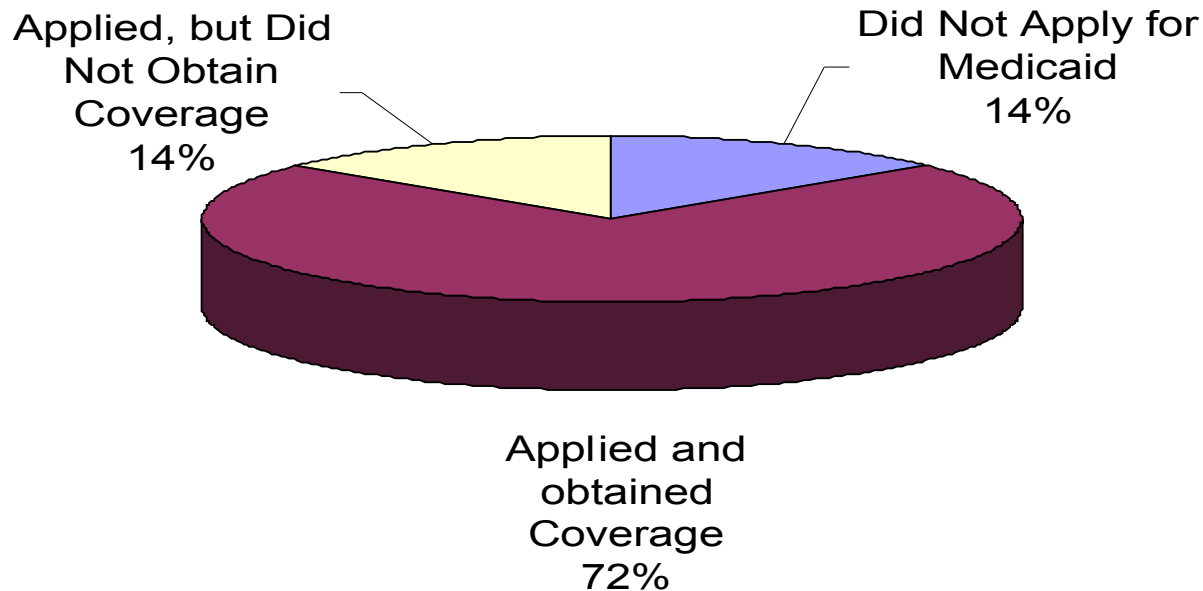
Site	Black	Hispanic	White Non- Hispanic	Other
DC	110	3	0	0
TX	39	51	12	3
MS	14	5	8	0
Total N=245	163	59	20	3



# Findings

## Percentage of Respondents by Application Status Survey Respondents were asked

*Since July 2006 have you applied or reapplied for your child's Medicaid?  
Did your child get Medicaid?*



# Response Dialogue

211 out of 245 respondents applied for Medicaid for their child  
35 out of 211 did not get Medicaid  
176 out of 211 did get Medicaid

Perceived reasons for not obtaining coverage:

- 13 Pending - Waiting for response from Medicaid
- 12 Income Too High
- 3 Missing Documents (including birth certificate)
- 2 Immigrant Status of child

At least one respondent gave the following reason: Issues with Paperwork, Had Copies, Not Originals, Newborn, Just moved to State, No appt, No Response Lack proof of income, and Language Barrier



# Reasons for Not Applying

34 out of 245 did not apply to Medicaid for the following reasons:

- 14 No Need, Medicaid not due for renewal
- 7 No Need, Have other insurance coverage
- 3 Gave no reason
- 2 Did not have originals of documents
- 2 Newborn child

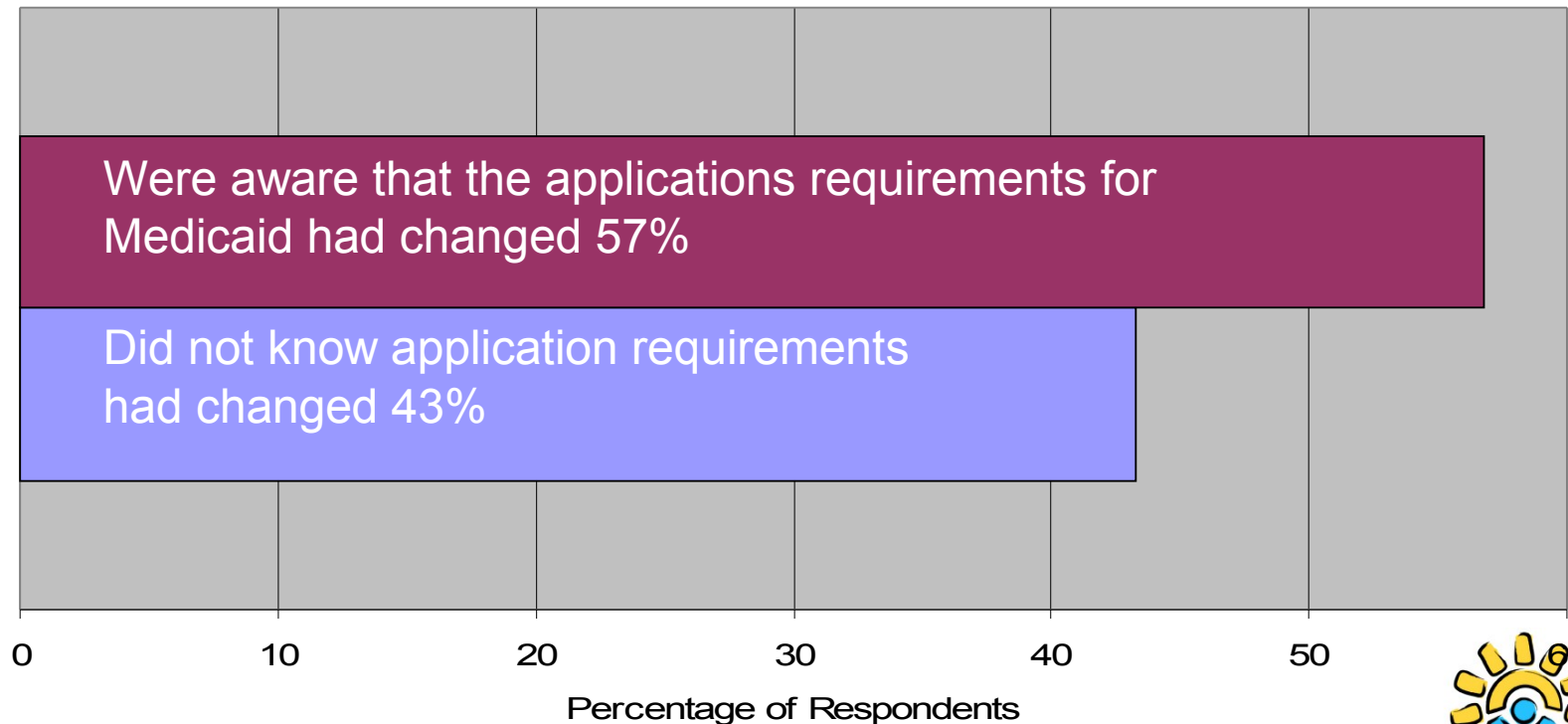
At least one respondent gave the following response: Didn't have documentation, Could not afford documents needed to apply, Just moved to the area, Foster system handles application, Didn't think I would qualify, Family Problems, not stable, Was at hospital when it was time to apply - missed application period



# Findings

## Perception of Medicaid Rule Change

*Question: You now have to show proof that your child is a U.S. Citizen or in the U.S. legally to enroll in Medicaid. Did you know the rules for Medicaid had changed?*



# Conclusion

A year and a half after new federal identification and citizenship verification regulations were placed on Medicaid applicants, patients linked into a medical home, with access to case management, are not having widespread problems with documentation requirements

Applicant narratives differ from state to state, in Texas, the main problem was waiting to hear from the Medicaid office on status of application, in Mississippi, face to face requirements and limited hours of Medicaid offices created a challenge for staff aiding patients obtain coverage. Washington, DC did not experience widespread difficulties because of a record of outreach to Medicaid eligible children and families

Many applicants are not aware of federal changes to Medicaid, creating an opportunity for confusion and increased uninsured children



# Recommendations

- Major changes to public insurance programs must be accompanied with outreach and enrollment efforts to ensure that enrollees do not lose coverage
- Cross-agency verification of citizen status and identification would ease enrollment and re-enrollment in Medicaid
- Face to face interviews for Medicaid at initial enrollment and re-determination is onerous for Medicaid applicants and social service providers
- Newborns, while exempt from initial identification requirements if the birth is paid for by Medicaid, must have identification and citizenship re-established at re-determination time, creating unnecessary duplication of documentation.

