



STATE OF DELAWARE

**DELAWARE HEALTH AND SOCIAL SERVICES
DIVISION OF MEDICAID & MEDICAL ASSISTANCE**

**PLANNING & Policy Unit
MEMORANDUM**

REPLY TO
ATTN. OF: Administrative Notice DMMA- A-05-2020

TO: All DMMA/DSS Staff

DATE 3/27/2020

SUBJECT: COVID-19 Emergency Declaration –
Self-Attestation and Eligibility Verification Requirements

BACKGROUND

The purpose of this notice is to provide guidance regarding eligibility verification for Medicaid cases effected by the COVID-19 Emergency.

On March 13, 2020, the President of the United States issued a proclamation that the COVID-19 outbreak in the United States constitutes a national emergency. As a result, states have certain flexibilities related to eligibility determinations and renewals.

DISCUSSION

Under current policy, DSSM 14800- Verification of Factors of Eligibility, and Delaware’s approved Verification Plan self-attestation is accepted, for most factors of eligibility at application, renewal, and for change in circumstance. Post-eligibility verification is obtained using the Federal Data Services Hub (FDSH) and other electronic sources. When additional information is needed to complete the eligibility determination, such as a reasonable explanation for a variance in income, the agency requests additional information from the individual. If the individual does not provide the information within thirty (30) days, eligibility is terminated.

Self-Attestation is not accepted for citizenship, immigration status, and Social Security Number (except those individuals that meet the requirements under DSSM 14105.1) and must be electronically verified. Per 42 CFR 435.956(b)(2)(B), and Delaware’s approved Verification Plan, if citizenship, immigrations status, and SSN number cannot be verified via the FDSH, individuals are provided a 90-day reasonable opportunity period to submit other documentation and may be found eligible during that time period. If the individual is making a good faith effort to obtain the documentation an additional 90-day reasonable opportunity period is allowed.

Currently, Per 42 CFR 435.952(c)(3) and DSSM 14800, exceptions to the verification requirements are permitted on a case-by-case basis when documentation does not exist or is not reasonably available, such as during a natural disaster or emergency, such as COVID-19. The exception does not apply to the verification requirements for citizenship and immigration status, however, timelines to furnish information can be extended during the emergency.

ACTION REQUIRED

During the COVID – 19 Disaster, until further notice, staff must

- Continue to follow policy in the Delaware Social Services Manual (DSSM) under the following sections, with the exceptions listed below:
 - DSSM 14800 Verification of Factors of Eligibility
 - DSSM 14105 Exception to Furnish a Social Security Number
- Permit exceptions to verification requirements if an individual is unable to provide additional information due to the COVID-19 disaster and extend the thirty (30) day requirement to the end of the emergency period.
 - Document the Case Comments section in Assist Worker Web, and cite this administrative notice document number and name.
- Permit an additional 90-day reasonable opportunity period if an individual is unable to provide documentation for citizenship, immigrations status, and SSN number that cannot be verified via the FDSH in the first 90-day reasonable opportunity period due to the COVID-19 disaster and is showing a good faith effort.
 - Document the Case Comments section in Assist Worker Web, and cite this administrative notice document number and name.

DIRECT INQUIRIES TO:
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3/27/2020

DATE



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