

## 8.7 ENUMERATION

### A. THE ENUMERATION REQUIREMENT

Enumeration is the requirement which mandates that assistance group members furnish their Social Security number (SSN) to the Department.

#### 1. SNAP Benefits

The SSN must be verified and entered into eRAPIDS to satisfy the enumeration requirement.

**NOTE:** The enumeration requirement is presumed to be met if the SNAP assistance group is Categorically Eligible and the AG member is currently receiving a benefit which required the SSN to be verified. If not, the SSN must be verified.

#### 2. WV WORKS And Medicaid

The SSN must be provided and entered into eRAPIDS to satisfy the enumeration requirement. Verification is not routinely required.

**NOTE:** Medicaid applications may not be delayed or denied while the eligible individual verifies his SSN.

Once the SSN is obtained and verified, if appropriate, the client must not be required to provide or verify it again unless the identity of the individual or the validity of the number is questionable.

At the time of application, or when an individual requests to be added to an existing AG, the Worker must explain both the eligibility requirement of enumeration and the penalty for failure to comply with the requirement.

WV WORKS applicants must not be required to be enumerated as a condition of eligibility prior to approval. Enumeration requirement must be addressed on the PRC. See Section 24.4.

**B. WHO MUST BE REFERRED TO APPLY FOR A SSN**

All individuals included in the SNAP, WV WORKS, or Medicaid assistance group must be referred to SSA to apply for an SSN if:

- A number has never been assigned to the individual; or
- A number was assigned, but the individual does not have the number.

A child eligible for Medicaid as a CEN is not required, as a condition of eligibility, to be enumerated. However, the mother should be encouraged to apply for an SSN for the child. Upon attaining age one, the child is required to be enumerated

An illegal/ineligible alien who applies for Emergency Medicaid is not required, as a condition of eligibility, to be enumerated. However, an alien who is enumerated must provide his SSN.

## C. REFERRAL PROCEDURES

The individual is referred to SSA, using either SSA's Enumeration at Birth Project form or an SSA/DHS-3.

### 1. Enumeration At Birth Project

When the referral is made through the Enumeration at Birth Project, the application for an SSN is taken while the newborn is still in the hospital. Participants in this Project receive form SSA-2853, Message From the Social Security Administration, which states that SSA is processing the newborn's application for an SSN.

### 2. SSA/DHS-3

When the referral is made using the SSA/DHS-3, the Worker:

- Completes the SSA/DHS-3. A separate form must be completed for each individual who is being referred. The state identification number (510) and case number, eRAPIDS or RFA number, if available, must be entered on the form. If there is no case number, the Worker enters seven 9's and the county number.
- Discusses the sources of verification of age, identity and citizenship, listed on the back of the SSA/DHS-3, that the individual must present to the SSA office. If necessary, the Worker assists the individual in obtaining these verifications.
- Asks the individual to hand-carry the SSA/DHS-3 to the SSA office, unless other arrangements have been agreed upon, through consultation between the Community Services Manager, or his designee, and the SSA District Office Manager.

When the individual being referred is physically unable to visit the SSA office, the Worker must write a letter to SSA, listing the name and address of the individual being referred and the reason he cannot visit the office. A representative from that office contacts the individual and processes an application for a SSN.

- Records that the SSA/DHS-3 was completed.
- Ensures that the referral action is recorded on the local office enumeration log. Each local office must maintain a central log which lists the date of referral, case name, case number and name of the individual referred. This is necessary to assist in follow-up action.

#### D. TIME LIMITS

For SNAP benefits only, the application for the SSN must be made before eligibility is established. Those individuals who have an SSN must provide the number before eligibility is established. For WV WORKS, the application for the SSN is part of the PRC and is not necessarily required before eligibility is established. Those individuals who have an SSN must provide the number as part of the PRC.

For Medicaid, an application may not be delayed or denied while an otherwise eligible individual verifies his SSN.

**EXCEPTION:** SNAP Only - Individuals who are eligible for Expedited Service must apply for or furnish the number, whichever is appropriate, before the second issuance.

**NOTE:** Individuals who are not eligible for an SSN or do not have one and are only eligible for a non-work SSN need not provide proof of applying for one but must be given a Medicaid identification number in lieu of a SSN.

**EXAMPLE:** A mother and her child apply for Medicaid. Neither has an SSN. The application must be approved, if otherwise eligible.

**EXAMPLE:** A mother and her child apply for Medicaid. The child has an SSN, but the mother does not. The application is approved.

**EXAMPLE:** A mother and her child apply for WV WORKS on January 3rd. Neither has an SSN. The Worker includes application for SSN's on the PRC. The mother is scheduled for kidney transplant on January 6th. She is busy trying to work out child care arrangements for her recovery period. She agrees that she will be able to apply for the SSN and return with verification of the application by February 15th. The client is otherwise eligible and the application is approved.

#### E. FOLLOW-UP PROCEDURES

##### 1. SNAP Benefits

If the client does not report his SSN within 30 days of the first day of the first full month of participation, the Worker contacts him about the status of his SSN.

## Common Eligibility Requirements

## a. Client Has SSN

The Worker obtains the SSN from the client and enters it into the data system. Verification of the SSN is required at the next redetermination if the number is not matched by eRAPIDS with SSA's records.

## b. Client Does Not Have SSN

## (1) Application For SSN Was Not Made

If an individual who is to be included in the AG does not have an SSN, application for one must be made before eligibility is established. If the client can show good cause for not applying for an SSN in a timely manner, that client must be allowed to participate for one month, in addition to the month of application. If the client is unable to obtain documents required by the SSA, the Worker must assist him in obtaining such documents. Good cause for failure to apply for an SSN must be shown monthly for the client to continue to participate.

**NOTE:** Medicaid applications may not be delayed or denied while an eligible individual verifies his SSN.

## (2) Individual Applied For SSN, But Has Not Yet Received Number

The Worker determines if the individual has good cause for not providing the SSN. If good cause exists, the individual remains eligible. When the individual has applied for but not yet received the SSN, good cause exists.

## c. Determination of Good Cause

Generally, the individual has good cause if, due to his religious beliefs or circumstances beyond his control, he is unable to comply with the requirement.

Good cause includes, but is not limited to, lack of documentary or collateral evidence needed by SSA, as long as the client has made every effort to provide the information, or simply a delay in receipt of an SSN.

Good cause does not include delays due to illness, lack of transportation or temporary absences, because SSA has provisions for mail-in applications.

## Common Eligibility Requirements

## 2. Medicaid

The Worker contacts the client at thirty-day intervals until the SSN is received. Since application for an SSN is made before case or individual eligibility is established, any delay in the receipt of the SSN is assumed to be a delay at SSA. After receipt of the SSN, the client is issued an ES-6 which specifies the length of time in which he is to provide the number. The time limit is 10 days.

The individual has good cause for not complying with the requirement due to his religious beliefs.

## 3. WV WORKS

When the client does not provide proof of application for an SSN, according to the plan established by the PRC and does not have good cause, a sanction is applied, after proper notice.

When the client provides proof of application for an SSN, according to the plan established by the PRC, the PRC is then modified to show the date by which he must provide the SSN to the Worker.

Failure, without good cause, to provide the SSN, according to the plan established by the PRC, results in application of a sanction, after proper notice.

The sanction is the same used for all instances of failure to comply with the terms of the PRC as found in Chapter 13.

## F. ENUMERATION CONTROLS

eRAPIDS sends an alert to the Worker showing invalid SSNs. This is generated daily.

See the eRAPIDS User Guide for further instructions.

## G. PENALTY FOR FAILURE TO COMPLY WITH ENUMERATION REQUIREMENT

The penalty varies by program, as follows:

## 1. SNAP Benefits

If an individual fails without good cause to comply with the enumeration requirements, he is excluded from the AG. If a specified relative fails to comply with the requirements for a child, that child only is excluded from the AG. If all AG members are involved, the application is denied or the case closed, whichever is appropriate.

The individual may negate the penalty only by providing the SSN to the Department.

**EXCEPTION:** Under the CEN Medicaid coverage group, the newborn is not required to be enumerated as a condition of eligibility. However, the mother should be encouraged to apply for an SSN for the child. See Chapter 16. The child must be enumerated when he reaches age 1.

## 2. WV WORKS

When the client does not provide proof of application for an SSN, according to the plan established by the PRC and does not have good cause, a sanction is applied, after proper notice.

When the client provides proof of application for an SSN, according to the plan established by the PRC, the PRC is then modified to show the date by which he must provide the SSN to the Worker. Failure, without good cause, to provide the SSN, according to the plan established by the PRC, results in application of a sanction, after proper notice.

The sanction is the same used for all instances of failure to comply with the terms of the PRC. This sanction is found in Chapter 13.