

MA Health Care Training Forum  
Understanding Immigration Requirements and Application Completion for Health Insurance Coverage in Massachusetts: Part 2 Transcription

Sue Kane: Good morning, everyone. It's 10:00. We're going to get started with the Understanding Immigration Requirements and Application Completion for Health Insurance Coverage in Massachusetts - Part 2. Thank you for joining us today.

I'm Sue Kane from the Massachusetts Health Care Training Forum team, and I'll be facilitating today's meeting. Our presenters today are Kara Chiev, Manager of MassHealth External Training and Communications, and Sarah Buonopane, the Associate Director of Community Assistance Programs at the Health Connector.

Subject matter experts joining us for the Q&A portion of the meeting are Lynn Finstein, MassHealth's Senior Manager of Eligibility Policy, and Sage Shah, Manager of Member Enrollment and Retention at the Health Connector. Now, I'm going to turn the meeting over to Kara Chiev to start.

[Understanding Citizenship and Immigration Requirements for Health Connector]

Kara Chiev: Thanks, Sue. Good morning, everyone. Glad to see you. And it looks like we've got a good turnout for this morning's event.

[MA Health Care Learning Series]

To those newer to our MTF community and the Massachusetts Health Care Learning Series event, this event provides regular updates and presentation from both MassHealth and the Health Connector teams to educate those who help residents apply for, get, and keep their health care coverage through MassHealth, the Health Connector and the Health Safety Net via our [MAhealthconnector.org](http://MAhealthconnector.org) online application, which is a joint application.

So, for this morning, as Sue mentioned, I will be going through this webinar series. This is the second of our series for Understanding Citizenship and Immigration Requirements for Health Care Coverage. Going on to the next slide. Keep going. Okay.

[Webinar Objectives]

So, for this session our objective is really to provide you with a description of citizenship and non-citizens.

So, after the event you'll be able to understand those categories for the purpose of health care coverage offered by MassHealth and the Health Connector.

[Agenda]

As for today's agenda we'll look at coverage options and eligibility criteria for MassHealth and the Health Connector.

And then really go through scenarios, scenarios that we've noticed from Certified Assistants, those questions that they've submitted to us and then we'll provide you some resources before we get to the Q&A session.

[Coverage Options and Eligibility Criteria]

For those that are attending this session for the first time, our Part 1 of this series is available on the MTF website. And that really dived into the different categories of citizenship and non-citizens a little bit deeper, with additional information on the types of documents applicants may come with.

[Coverage Options]

So, as I mentioned for this webinar, we will review the categories of immigration for the purpose of health care coverage offered by MassHealth and the Health Connector.

We'll speak to applicants; we'll specifically speak to applicants and members that are younger than 65 and seeking coverage using the ACA-3 application or the Massachusetts Application for Health and Dental Coverage and Help Paying Costs.

We will mostly use screenshots from the online application as a way to show you where and how the immigration questions are displayed.

Okay, MassHealth has three different applications; the ACA-3 for those younger than 65, the SACA-2 or the senior application for those over 65 and there is a Medicare

Savings Program application for those that are Medicare beneficiaries looking to get help paying for their Medicare premiums, copays and coinsurance.

So listed here are the complete list of coverage for MassHealth eligible applicants and members. Under the MassHealth program we have MassHealth Standard, which provides a full range of health care benefits; MassHealth CommonHealth offers benefits similar to MassHealth Standard to certain disabled adults and disabled children who are not eligible for Standard; MassHealth CarePlus offers a broad range of health care benefits to adults who are not otherwise eligible for MassHealth Standard; MassHealth Family Assistance, if you are a Massachusetts residents and are not eligible for MassHealth Standard, you may be eligible for Family Assistance; MassHealth Limited provides emergency health services to people who have an immigration status that keeps them from getting more services; the Children's Medical Security Plan, or CMSP, is for children under the age of 19 who are Massachusetts residents at any income level, who do not qualify for any other MassHealth types of coverage; and Medicare Savings Program, as I mentioned, MSP provides cost sharing benefits to Medicare beneficiaries.

Next, the Health Connector coverage. The Massachusetts Health Connector provides individuals, families, and small businesses, under 50 employees, with access to Qualified Health Plans and Qualified Dental Plans.

And then we have the Health Safety Net. The Health Safety Net reimburses hospitals and community health centers for services provided to low-income patients, those up to 400% of the federal poverty level who are not eligible for other MassHealth or Health Connector programs.

I just want to note that the star next to Limited, CMSP, Medicare Savings Program and HSN, those are coverage types that are not considered as insurance for tax purposes.

So, we looked at the eligibility, the coverage types, now let's go to the next slide.

[Eligibility Criteria]

And what are the criterias that MassHealth and the Health Connector use when an

individual submits an application.

Eligibility criteria must be verified for anyone seeking coverage through [Mahealthconnector.org](http://Mahealthconnector.org) for subsidized or unsubsidized programs. The first one is citizenship. This criteria verifies that the applicant or a member is a citizen, national, or non-citizen who is lawfully present. And for today's webinar, we are going to specifically focus on this category. We also look at incarceration status, that verifies the applicant or member is not incarcerated. We look at residence, residency, verifying that the applicant or member is a resident or intends to reside in Massachusetts. In addition to these criteria, if you go to the next slide.

[Additional Eligibility Criteria]

Here are additional criterias that must be verified for anyone seeking subsidized coverage or Advanced Premium Tax Credits.

American Indian or Alaska Native status: There are some cost sharing rules for American Indians and Alaska Native, they can also enroll in coverage or change their health plan on a monthly basis throughout the year.

Income and Family Size: that determines countable income and family size based on Modified Adjusted Gross Income, or MAGI that factors in IRS income tax rules.

Eligible for or enrolled in Government Sponsored Insurance: that includes MassHealth, Medicare, Veterans benefits, etc. and we also look to see if the individual is eligible for or enroll in other GSI benefits.

And lastly, Eligible for or enrolled in affordable Employer Sponsored Insurance: that meets federal minimum value and affordability requirements. So, we are looking to see if the individual applying is also eligible for Employer Sponsored Insurance.

[The Application]

So here is the image of the application, specifically the ACA-3 application and a screenshot of the [MaHealthConnector.org](http://MaHealthConnector.org) web page. This is where a person seeking to apply can go and get started. The, this page links to the online application. That's the

image of the Mahealthconnector.org site. The sign in button is found at the top right-hand corner of that web page. There's a lot of resources on this site.

For those unsure of how to get started, a guide is available that's also found at the top right-hand corner. It's the Getting Started selection that will help guide someone new through the application and the types of documents they should have on hand as they apply for coverage.

The how to box here, that's from the paper application, is a snapshot and guides someone who's using this application, if they should be using this application or if they should be using our senior application. The paper application and the online application is the same. When MassHealth receives a completed paper application that application will be entered into the online system by our staffs.

[Data Matching]

So, going on to the next slide, Data Matching. Now what happens when the information is entered into the online application? The online application uses data matches to help quickly verify and validate information applicants and members provide or submit, such as citizenship or immigration status. If electronic data, electronic data sources are unavailable to verify the self-attested information, documentation will be required from the applicant or the member and they will be sent, requests for information.

Going on to the next slide.

[Request for Information Notice (RFI)]

Here's a little bit of detail related to the RFI notice. This notice is sent when there is a discrepancy in the self-attested information and the information the system receives from data matches.

For example, if the citizenship or immigration status entered on the application does not match with the electronic data that's available this, an RFI notice will be sent to the applicant listing all requested verifications required and the submission deadline of those verifications.

The individual may have up to 90 days of a reasonable opportunity period from the date of the RFI notice to provide all required verifications. In some cases, this can be extended for an additional 90 days if the request is made to MassHealth before the initial 90 days expires.

Going on to the next slide.

[Request for Information Notice (RFI) Valid Document Not Received Within 90 Days]

Looking at valid documents that's not received within that 90-day timeframe. If valid documentation is not received, the system will attempt to determine if the individual is eligible for benefits based on the data the, the data matches we have available. If the information provided by data sources is different than the self-attested information, or if no information is available, the individual may be redetermined for a different benefit or denied benefits.

If the person submits the required documentation after the RFI due date, but within a year of the original application, they will be redetermined for benefits. For example, if they submitted the new determination if we weren't able to get the information from the applicant or the member within that 90 days as I mentioned, the system may redetermine them for a different benefit.

So, in this example it may end a member's QHP eligibility and in turn end their enrollment. In the case of a MassHealth member it could change a MassHealth member's benefit type and result in possible lesser coverage types.

So, it's really important for an individual that's applying that receives a notice requesting additional benefits, I mean, additional information, that they do submit all of those verifications before the 90-day deadline.

Moving on to the next slide.

[Request for Information Notice (RFI): Documentation Received But Does Not Match]

If documentation is received within 90 days, but it doesn't match the self-attested or electronic data sources, the information will be manually verified. Once a document is

received it's uploaded and another attempt to match with the electronic data sources is performed. If the individual cannot be verified electronically with the documentation that was submitted, the documentation will be used to manually verify the status.

If the information sent is different, the information on the application will be updated to include the information that the individual provided, provided us on their verification documentation.

Going onto the next slide.

[Reasonable Opportunity Extension: MassHealth]

Reasonable Opportunity Extension for MassHealth. Applicants who have made a good faith effort to resolve inconsistencies to obtain verification of immigration status they may ask and receive a 90-day extension if more time is needed to locate and retrieve the documents. This is only for immigration requests, all other requests for information does not qualify for a 90-day extension.

The request for a reasonable opportunity extension must be made before the expiration of the initial 90-day verification period. If all other required verification have been received, the applicant may receive benefits during the extended reasonable opportunity period.

Moving on to the next slide.

[Reasonable Opportunity Extension: Health Connector]

For Health Connector consumers there is no time period outlined in the Affordable Care Act for health consumer coverage. An individual can request an extension which may be granted on a case-by-case basis.

[Immigration Categories]

As we move into the next slide, here we're going to talk about the different categories for immigration. So, we have first U.S. Citizens and U.S. Nationals. Then we have under Noncitizens, that includes Lawfully Present Immigrants, Protected Noncitizens and

PRUCOLs or Persons Residing Under Color of Law. A lawfully present immigrant is a person who lives in the United States with a valid immigration status.

There are three types of Lawfully Present Immigrants that includes: a Qualified Noncitizen, that's a person in a special immigration group. These groups include Asylum, Refugee, Cuban and Haitian Entrants, or a person who has had legal permanent residency for more than five years; Under Lawfully Present category is also a Qualified Noncitizens Barred, which is a person who has had legal permanent residency for less than five years; and the last category under Lawfully Present Immigrant is a Nonqualified Individual Lawfully Present, which is a person with a valid nonimmigrant visa such as a B1 or a B2, that's a tourism, and a work visa or a J-1, that's an exchange or an F1, that's a student visa or employment authorization documents.

For PRUCOLs, that's an individual with an immigration status not described as lawfully present, but they have applied for an adjustment of status through the US Citizenship and Immigration Services.

PRUCOL status may also be relevant for individuals who have not applied for an adjustment for status. Example, people with an indefinite stay of deportation or an indefinite voluntary departure.

Just noting that many undocumented people will fall into the PRUCOL status provided they have applied for an immigration status. Only people with no documentation that have not applied for status or are residing in the US under the knowledge and consent of the Department of Homeland Security, or expired documentation that have not applied for an extension of their status will fall into Other Noncitizens.

And going on to the next slide.

[DACA Rule Overview]

I'm going to hand this off to my colleague, Sarah, to go over the DACA rule overview.

Sarah Buonopane: Thank you. Good morning, everyone. I'm going to discuss a change to for individuals who have a DACA status.



So back in May of 2024, the Centers for Medicare and Medicaid Services, CMS, published a rule that Deferred Action for Childhood Arrivals, also known as DACA recipients, along with some other noncitizen types will newly be considered lawfully present for Marketplace coverage as of November 1st. The other statuses are listed here. You can, you can read through them, to know which ones are also being considered lawfully present.

[Impacted Population]

Okay. So, just for some context on the impacted population. There are approximately 5,000 individuals in Massachusetts that have DACA currently and about 350 individuals that are in our system that may now be eligible for Health Connector plans because of their DACA attestation. And just to note that these changes for DACA recipients do not apply to MassHealth eligibility.

And as a reminder, DACA recipients with income under 300% of the FPL may currently be qualifying or eligible for MassHealth. So, DACA recipients above 300% can access coverage through the Health Connector either with subsidies or unsubsidized plans. And that was, you know, has already been in effect and so they could have a coverage date beginning as early as November for, I'm sorry, December 1st.

Okay. Can move ahead.

[DACA Eligibility Process for the Online Application]

So, we've discussed that this applies for Marketplace coverage only and not MassHealth coverage. But as a result of that fact, the individuals who have a DACA status with income above 300% are going to need to go through a workaround process in the online application. And that's because, again, our joint eligibility system already consumes a code for DACA as it relates to MassHealth eligibility and so what's going to happen is individuals who come in who attest to having a DACA status and are otherwise eligible for a Health Connector plan will initially see a denial. And then overnight there'll be the workaround applied and then the following day they'll be able to see an approval online; they'll receive an approval notice in the mail. They will not receive a denial notice in the mail.

So, that is just a really important point to remember if you are working with a person who has a DACA status, that, that initial denial should be overturned if they're otherwise eligible for a Health Connector plan. So again, make sure you're advising them or helping them to go back in the following day and then enroll in a plan after they're able to do so.

Okay. Let's go to the next slide.

[High-Level Timeline]

This is just a visual timeline. So, in May this final rule was published, and then come November the eligibility through marketplace, including the Health Connector's plans for DACA recipients opened up, they'll receive a special enrollment period to enroll, that will be 60 days following this change in eligibility.

So, on December 1st, DACA recipients can actually begin their coverage, but they can continue to come in and apply and receive benefits for a later date including January if they would like to. And then of course after that 60-day Special Enrollment Period, we'll continue to be in Open Enrollment through, through January 23rd. So, if somebody misses those 60 days, they would have until the end of Open Enrollment to get a plan that could begin in February or March even.

Okay. I believe I am giving this back to Kara now.

Kara Chiev: Thanks, Sarah.

[Scenarios]

So, let's take a look at some of the scenarios we brought to you today and we're going to ask you to participate through these scenarios.

So, as I mentioned earlier these scenarios are really from Certified Assisters that were having a lot of, they were having a hard time identifying documents and also understanding what to select within the online application from the dropdown options.

Okay. So, let's move ahead.

[Scenario]

Here we've got an example of Jamie. Jamie is 35 years old. He recently moved to Massachusetts with an offer of employment from Thailand at ABC company. Settling in, he met with Jen, a financial counselor at Happy Health Center about how to get health insurance. Jen is helping Jamie complete the ACA-3 application online, as he is younger than 65, and plans to upload a copy of his employment card to the system. So that is what this screenshot of the employment card is what Jamie has to provide to Jen.

So, our first question.

[Question 1]

What do we know about Jamie? Can Jamie apply for health benefits? Yes, or No?

Deb Raymond: Let me just pull up that scenario, and we will launch the poll.

Kara Chiev: Great. So, great job. The majority 94% of folks responded, yes. And that's correct.

[Answer 1]

Any individual that is looking or seeking coverage, health care coverage, can apply for MassHealth or the Health Connector and see if they're eligible for any level of coverage. So, regardless of immigration status they can apply for, for coverage. Now let's move to the next question.

[Question 2]

And if you can pull up that second poll.

Deb Raymond: There we go.

Kara Chiev: The question ask, Is Jamie potentially eligible for coverage? Yes - He has an, an employment card; or No - He doesn't have any valid immigration status; or You're just not sure.

This is great.

Deb Raymond: I think we've leveled off, so I'm going to end the poll and share the results.

Kara Chiev: Awesome, so we've got 88, the majority of folks at 88% responded, Yes, because he's got an employment visa. A couple of folks responded, No, you don't think that he has a valid immigration status? And 9% were just not sure what the answer was.

So, the correct answer is Yes.

[Answer 2]

Jamie is potentially eligible for coverage because he does have an employment card which shows that he has some level of immigration status.

Let's go to our next polling question.

[Question 3]

So, Jamie is potentially eligible for coverage based on the information that we have about him. What is his immigration status? What do you think his immigration status is? Is it a) a Nonqualified Individual Lawfully Present; b) a Qualified Noncitizen; c) Does he have a PRUCOL status, that's a Person Residing Under College of Law; d) He's undocumented, he does not have any immigration status; e) He's a Citizen; or you're not sure.

Deb Raymond: Looks like we're slowing down on answers. I'm going to end the poll share the results.

Kara Chiev: Okay, this is good. So, we've got a couple of folks that selected a) 30% selected Nonqualified Individual Lawfully Present; Good majority, 60% said that he's a Qualified Noncitizen; 5% said that he has a PRUCOL status; About 2% noted Undocumented; and 4% were just not sure. So, the correct answer is a) He's a Nonqualified Individual Lawfully Present.

[Answer 3]

When we started the webinar, we talked about the different categories of Lawfully Present. For a Nonqualified Individual Lawfully Present, that's a person with a valid Nonimmigrant Visa. So, he has a visa. So, you can see somebody who has a B1 or B2 visa, a J-1 Exchange Visa, a Student Visa, or in this example, an Employment Authorization Visa. So, he does have documents and he would fall under the category of Nonqualified Individual Lawfully Present.

And I also want to note that if you're working with somebody, you're trying to complete their application, but you're unable to move forward because we can't verify their information, if you have an expired visa, that can be used to submit to MassHealth to unlock their account so that they can complete identity proofing to get you to those core questions.

[Question 4]

Okay, so here's the next question. As Jen begins to start Jamie's application, she's unable to move forward beyond account creation. So, for identity proofing, what can Jen submit to manually identity proof Jamie so that she can unlock the account and move forward?

Is it a) A Green Card; b) Expired V1 Employment Visa; c) Notice of Action; d) Employment Visa; or e) None of the above.

Deb Raymond: It looks like we slowed down, going to end the poll and share the results.

Kara Chiev: So, when we started with this example, we said Jamie had an Employment Visa and that's exactly what Jen can use to unlock Jamie's account. The Employment Visa has a picture image of the applicant, it has his date of birth and a couple of other information about the applicant so, that is what the, what Jen can use to submit to unlock his account.

So, 60% of folks selected Employment Visa. He doesn't have a Green Card, we never noted that he had a Green Card so, he wouldn't have that available on hand to unlock his account. The expired Employment Visa that can be used to unlock an account as of

the first of this month we updated the identity proofing documents, the type of documents individuals can submit to unlock their account and now, if he had an expired Employment Visa he could have used that. We didn't mention that he had a Notice of Action so, in this example, he wouldn't have used a Notice of Action for, to unlock the account.

All right. Awesome job folks. So, let's keep moving.

[Sample Document]

Okay, here's a screenshot of the Employment Visa this is what we know about Jamie and his immigration status. So, going on to the next slide.

[Question 5]

Now, from that document let's pull out some key information that we need about him that needs to be inputted into the online application. And the screenshot next to the set of questions is what you will see, what the applicant will see, when they are online submitting the application and this question will come up under the Family and Household screen for immigration status.

So, for Jamie he's got his Employment Authorization card. What is the Alien Number on that card? Is it a) 000000725; is it b) SRC000000725; is it c ) SRC with the last three digit of 703; or d) C09; e) None of the above; or you're not sure.

Deb Raymond: Kara, do you want me to go back to the slide with the

Kara Chiev: Yeah.

Deb Raymond: Make sure just that might be helpful for some folks.

Kara Chiev: That would be great.

[Sample Document]

And we are looking for the Alien Number. On this card. What can you decipher as the A-Number?

Deb Raymond: Okay. It looks like we're slowing down, so I'm going to end this poll and share the results.

Kara Chiev: Okay, so we've got responses across the board. The majority, 52% of folks selected a) the last digit of 725; 18% selected b) that starts with SRC and then the last two, the last three digit of 725; a couple of folks noted SRC 703; and 8% said it's none of the above; and we've got a couple of folks that weren't sure where to find this information.

So, as you can see from this card the USCIS number that is going to be his A-Number, that's the Alien Number that he was assigned. So, a) would be the correct answer to this question.

[Answer 5]

And noting where do you put that information when you're in the application. So, this is where you would put that information on the right-hand side where the first red arrow indicates that information, there is a drop down as far as document types that Jamie has, and employment authorization card is one of the options. So, you would select that and enter the, the A-Number that ends in 725.

Now going on to the next question.

[Question 6]

From that card, when does the authorization expire? Does it expire a) 2/25 in 2020; b) 1/1 of 2023; or c) 5/1 of 2030?

[Sample Document]

Deb Raymond: Sorry Kara, that was my fault, sorry.

Kara Chiev: No worries. So again, here's the card. just to give you that visual.

Deb Raymond: Okay looks like we've slowed down, so I'm going to end the poll and share the results.

Kara Chiev: Awesome job. It is 5/1 of 2030. That is when his employment authorization card expires. So, if we move into, keep going, there we go. Nope.

Deb Raymond: Sorry.

Kara Chiev: If you go one back.

[Answer 6]

As far as the online application, that is where that information is going to, to be asked. Same set of questions. What's his Employment Visa? What's his A-Number? When is it going to expire? And the other question of that card number. So, the receipt in the card number, that SRC number that is also, we need that information. So, any time you see a red star next to the question, those are required information. You won't be able to move forward without providing that information.

Okay, let's keep moving.

[Sample Document]

So, here is really the diagram of where you'll find all of the numbers that you'll need to enter into, whether you're completing it by paper or online, that's the information that you'll need for, for this applicant. Okay. Keep moving.

[Scenario]

Okay. Let's go to the next scenario.

[Scenario]

Here we have Paulina, age 67. She arrives in the US for assignment from Somalia in 2022. She went to see Kate at Sunshine Elder Services to get help with applying for health care coverage. She told Kate she needs daily personal care help. Paulina showed Kate her Green Card that's dated January of 2024, and helped Paulina complete the senior application as she's over 65. In her application, she answered "yes" to the question of do you have an injury, illness or disability that has lasted or is expected to



last for at least 12 months? Additionally, Kate helped Paulina submit a Personal Care Attendant form. So now, going into the poll, what do we know about, Paulina.

[Question 7]

So, can Paulina apply for health benefits? Yes, or No?

Deb Raymond: Looks like we're slowing down. End the poll and share the results.

Kara Chiev: The majority, 95%, said that she can apply for health benefits, and that's exactly it.

[Answer 7]

Whether an individual has documents or not, if they need health care benefits, they should submit an application.

Deb Raymond: The next slide.

[Question 8]

Kara Chiev: And now the next question is; Is Paulina potentially eligible for coverage? Yes. Because she has a green card; Or No, she doesn't have any valid immigration status; Or you're just not sure.

Deb Raymond: And we're slowing down, so we'll end the poll and share the results.

Kara Chiev: Okay, so a good majority of folks selected a) Yes - She has a green card, a couple of folks noted No, she doesn't have a valid immigration status and a few who weren't sure. So, this is a good, a good place to really bring back that Paulina did provide a green card to Kate that was dated January of 2024. So, she has a valid immigration status,

[Answer 8]

and she is potentially eligible for, for some level of coverage. So, the answer is, is Yes - She has a green card.

So, let's go to the next question.

[Question 9]

So, based on the information we do know about Paulina, she is eligible for coverage, for health care coverage. Now what do you think her immigration status is? We talked about a couple of the categories for immigration status. Is she: a Nonqualified Individual Lawfully Present; is she b) a Qualified Noncitizens Barred; c) a Qualified Noncitizen; d) does she fall into the PRUCOL category, Person Residing Under Color of Law; e) is she Undocumented; or f) she's a Citizen; and then the last is you're not sure?

Okay, let's just give it another moment, we still have some answers coming in. Okay. I'm going to end the poll and share the results.

Kara Chiev: Okay. We also, let's go to the next slide with the answer.

[Answer 9]

Okay. So, we had responses across the board: a couple of folks, 16%, said that she's a Qualified Non, a Nonqualified Individual Lawfully Present; 17% selected Qualified Noncitizen Barred; a lot of folks, the majority, selected Qualified Noncitizen; a couple of folks selected PRUCOL.

So, the correct answer is actually b) she's a Qualified Noncitizen Barred because as we noted in the description for Paulina, she just got her green card issued the beginning of, of this year so, she would be, she has Permanent Legal Residency, but for less than five years. So, the correct answer is that she's a Qualified Noncitizens Barred.

And again, just to note that Qualified Noncitizens, the last option, is really a person in a special immigration group. They would include those that are Asylum Seekers, Refugees, Cuban/Haitian Entrants, or a person who has had Legal Permanent Residency for more than five years. For Paulina's case that, that's not the case where her immigration is at.

Okay. So, let's go to the next slide.

[Question 10]

So, as Kate begins to start Paulina's application, she's unable to move beyond the account creation. Paulina's identity was not verified. What can Kate submit to manually identity proof Paulina to unlock her account?

So, this is a tricky question. Remember, we've got two separate applications, the ACA-3 application is for those younger than 65 and we also have another application for, for those that are over 65. I know that there are a lot of Certified Assisters in the audience today so, let's see.

So, remember we're just asking about Paulina's scenario.

Deb Raymond: We still have some answers coming in quickly so, I'll give everybody another moment. Okay, I'm going to end the poll and share the results.

Kara Chiev: All right, so primarily folks selected either a) a green card or e) Paulina is 67 years old and should be completing the SACA-2 application. So, as we talked about Paulina's case, she is over 65 years of age needing a lot of care. For that example, for this example, she would actually be completing the SACA application, the senior application.

[Answer 10]

That is not online so, in this situation we wouldn't need to actually unlock her account for identity proofing. The system is, is not the online application for the SACA is not the same as the integrated ACA-3 application at Mahealthconnector.org. So, Mahealthconnector.org is our only online system that would need to go through identity proofing.

So, the correct answer would be, would be, e) She only needs to complete the SACA-2 application; she doesn't need to identity proof or provide any documents to unlock her account as she wouldn't be using the online application.

And it's important to note we have received a, a lot of applications for those over the age of 65 through using MAhealthconnector.org, that is not the correct application for

those that are seniors that are over the age of 65 and they're not a caretaker relative of a child younger than 19. Okay. So, let's keep going.

[Scenario]

So, here is our next scenario. For this scenario we have Maria. Maria is 34 years; she applied for asylum on January 30th of 2024. She arrived in Massachusetts from Texas on July 15th. She is living at a shelter and met Pam who's a Certified Assister who works at Choice Health Center helping individuals apply for health care.

When Pam spoke with Maria, Maria indicated she had, she was told she has a year to stay in the country and will need to report to Texas January of 2025. She gave Pam this document. So, this document is an I-797A Notice of Action. So, let's move in to the question of what do we know about Maria? Can Maria apply for health benefits? Yes, or No?

[Question 11]

Deb Raymond: I'm going to end the poll and share the results.

Kara Chiev: Okay. So, a good majority, 90% responded Yes and a couple of folks said No. So, as I mentioned, anybody can apply for benefits whether they have, whatever their immigration status is, whether they have documents or not. If they need coverage they should complete an ACA-3 application or a senior application, depending on their age and situation.

So, it would be, Yes, they, Maria can apply for health benefits.

[Answer 11]

Let's go to the next question. What else do we know about Maria?

[Question 12]

Is Maria potentially eligible for health care coverage? a) Yes. She provided Pam her I-797 Notice of Action; or No. She doesn't have a valid immigration status; or you're not sure.

Deb Raymond: Okay. Let me end the poll and share the results.

Kara Chiev: Okay. Awesome. The good majority selected, a) She is potentially eligible for benefits, she provided Pam her I-797 Notice of Action; a couple of folks selected, No - She doesn't have a valid immigration status; and a few weren't sure. So, for this scenario and what we talked about within each of the categories,

[Answer 12]

Pam is eligible, potentially eligible for coverage based on her immigration status because she does have that Notice of Action document from the federal department. So, she is potentially eligible.

Now, going on to the next polling question.

[Question 13]

So based on that document, what is her immigration status? So which category is she most likely to fall into? Is she Nonqualified Individual Lawfully Present; a Qualified Noncitizen; a PRUCOL, a Person Residing Under Color of Law; is she undocumented; is she a Citizen; or are you just not sure?

Deb Raymond: Okay, looks like we're slowing down. So, I will end the poll and share the results.

Kara Chiev: So again, we've got, across the board, a couple of folks noting that she's a Qualified Individual Lawfully Present; 13% noted she's a Qualified Noncitizen; the good majority, 48%, selected PRUCOL status; a couple of folks said that she doesn't have any documents; and 5% weren't, weren't sure at all. So, the correct answer for this, if Deb you want to go to the next slide, is PRUCOL.

[Answer 13]

So, her status because she has that Notice of Action, she would fall under the category of PRUCOL or Person Residing Under Color of Law. It really is that immigration status that is not described as Lawfully Present, so she wouldn't fall into the bucket of a) or b),

but she did apply for an adjustment to her status with USCIS. With that Notice of Action she's connected with the federal government, she's looking to update her status, her immigration status. So, in this instance she would fall under the category of PRUCOL. She does have immigration status, the federal government is aware she is in the country and looking to, to change her immigration status.

So PRUCOL is correct. Okay. Let's go to the next question.

[Question 14]

Now, as Pam begins to start Maria's application, she's unable to move beyond account creation. Maria's identity was not verified. What can Pam submit to manually identity proof Maria to unlock her account. Is it: a) Green card; b) an expired V1 Employment Visa; c) her Notice of Action document; d) an Employment Visa; or e) none of the above.

So, this question is really particular to Maria's application.

Deb Raymond: Looks like we've slowed down. I'm going to end the poll and share the results.

Kara Chiev: Okay. So, the majority of folks, 73%, selected Notice of Action, her I-797 document can be used; a couple of folks noted a green card or the expired V1 Employment Visa, or Employment Visa. So, from a) to d) those are correct you can now submit those to unlock an account. But in this scenario we're talking about Maria's application.

So, for Maria we only have her Notice of Action that is the immigration document that she provided Pam.

[Answer 14]

So, it would be the Notice of Action that can be submitted to manually identity proof and unlock her online account.

So, let's go to the next question.

[Online Application]

Oh, so it's actually the screenshot of the online application. As I mentioned, under the questions of, Does Maria have an eligible immigration status? We noted Yes, she does have an immigration status. Specifically, one of the dropdowns is the Notice of Action so that is what you would select to provide the document that, that the applicant has. So, once that's selected, additional information will come up, will be asked, related to the information on that document.

I'm just going to note under the Notice of Action is another selection, it says, "I have an eligible immigration status, but my immigration documents is not available at this time and I need more time to provide this information, or my immigration document is not listed above, or my immigration document does not have the required information".

So, this is also an option. And it's an option for those applicants, individuals that do have some immigration status, but they don't have that document with them. If that is selected, an RFI will go out to that applicant requiring them to submit that additional document. So, this is an option for those that have started the process of changing their immigration status, but they don't have the paperwork on hand to provide.

So, only select that if you are working with an individual that have started that process of updating their immigration document, their immigration status, but they don't have that document with them because an RFI will require them to provide the immigration document to be eligible for, for coverage.

[Online Application: Citizenship/Immigration Status]

So again, here is the next set of questions. Looking at that Notice of Action, what additional information do we need about, about the applicant, about Maria? We're going to ask if she has an Alien Number and here that number is going to be required. So, in that Notice of Action, you would be able to find that A-Number.

You'll also may be able to find when the document expires. So, as you can see in the other set of dropdowns those are optional. Some documents may not have all of that

information, but at most they should have an A-Number. So, make sure to review that I-797 document to locate that that Alien Number.

And I'll also point out under, all of the selection box, there is a radio button. that says I would like to continue completing the application without answering this question. I understand that if I don't answer it. Maria may not qualify for some programs. So this is the selection in which you would make if the individual does not have any immigration documents, with them, they, they, they've never connected with the federal offices to change their immigration status.

They're undocumented. So, in this instance, for that example, you would select that that last radio button, so that you can continue without filling out any of the, that information.

So, if you selected, No, Maria does not have an immigration status. that would be all that you need to, to complete for, for this set of questions.

Okay. So, let's keep moving.

[Scenario]

Here's a last example as far as the MassHealth example. Here we have Jose. Jose is 45, is Haitian and lives in Massachusetts since May 14th. Jose submits an online application on July 9th. As he's starting his application, he has his driver's license with his picture from Haiti and a temporary I-551 stamp on his passport. There's no data available from electronic data sources to verify his identity. Now let's see what we, what do we know about Jose?

[Question 15]

So, the online system provided the following message, "The federal identification proofing services cannot provide your identity. To continue applying, you need to send proof of your identity". What can Jose submit for IDP? Is it: a) an unexpired foreign passport; b) his driver's license from Haiti with this picture; c) either A or B is correct; d) he doesn't have documents; or e) you're not sure, you don't know?



Kara Chiev: Deb is the poll up?

Deb Raymond: It is. You don't see it?

Kara Chiev: No, I'm not seeing it. Sorry.

Deb Raymond: Well, people are answering, so I think they're seeing it which is great. All right, let's see. And we slowed down. So, I'm going to end the poll and share the results. Can you see the results?

Kara Chiev: Yes.

Deb Raymond: Oh, good. Okay.

Kara Chiev: Awesome. So, a couple of folks selected the unexpired foreign passport, which is correct. A few folks selected the driver's license, which is also correct. But for this scenario, it would be, the correct answer is c) either of those documents can be submitted to IDP and unlock his account.

[Answer 15]

Let's keep going.

[Question 16]

Okay. So, Jose uploaded his driver's license with his picture and calls MassHealth two hours later, MassHealth was able to verify his identity, unlocked his online account, so Jose continues through the application and is asked about his immigration status. What should Jose select from the dropdown options for document type? Is it: a) I have an eligible immigration status, but my immigration document is not available at this time and I need more time to provide this information, or my immigration document is not listed above, or my immigration document doesn't have the required information; or is it b) the unexpired foreign passport; c) his driver's license; d) a J-1 visa; e) none of the above, as he's considered undocumented; or f) I don't know.

Deb Raymond: Okay, we'll give, give folks just a few moments on this? The responses are coming in slowly, so I think people are having to read and think.

Kara Chiev: Absolutely.

Deb Raymond: Okay, we've slowed down, so I will end the poll and share the results.

Kara Chiev: Okay. So, we do have couple of responses across the board. Deb, can you change the side to the next slide?

Deb Raymond: Sure.

[Answer 16]

Kara Chiev: All right. So, the correct answer is the unexpired foreign passport. That's what Jose has on hand and that is the document he should submit as well as the dropdown selection for documents he has.

He won't select the first one because he does have documents on hand, to verify his, his immigration status. A driver's license, that is not, as part of an immigration status for the purpose of verifying his immigration, he wouldn't use a driver's license, he'd actually use that unexpired foreign passport. For driver's license and the visa, he can use those if he has a visa, we did note that he had a visa for, for this scenario for IDP. He wouldn't be considered undocumented because he does have the unexpired passport with a lot of information on it as well.

Okay. So going on to the next question.

[Question 17]

For the document here. What information should Jose included related to his immigration status? So here you've got the screenshot of the other page of his passport. Lot of information here. What should you tease out? Is it: a) EW1SOJAC, is that what he should be entering; b) the A123456789 number; d) I-90 pending; e) you don't know; c) it's that 000 number.

So, here's a situation that you may encounter if you are a Certified Assister or just somebody helping an applicant apply and complete an application.

Okay, so let's keep moving.

Deb Raymond: I'll end the poll and share the results.

Kara Chiev: Yeah, I know we're getting short on time too.

[Answer 17]

So, the correct answer is, is b), it's that A-number that is the Alien Number which indicates he has status. Right? This unexpired foreign passport, he has a lot of information here which means that he's connected with the federal government to change and update his status.

Okay. So going on to the next question.

[Example of Temporary I-551 Document]

For this slide really shows the information and where you would enter that information online or on the paper application. Again, our paper ACA-3 application and the online application aligns in the questions asked. So, I'm just noting where that information from this passport would be entered, the temporary information, the temporary I-551 selection and then the, the A-Number. Going on to the next slide.

[DACA Scenario 1]

Okay. So now I'm going to hand it over to Sarah who'll go over the DACA scenarios.

Sarah Buonopane: Thanks Kara. Okay. So, this first scenario, we have John who creates an application and he did it back in October and attested to having DACA. And he receives a DACA code back from our Hub to check his immigration status. His FPL is 315%.

So, he is determined not eligible. However, back in November, earlier this month, when that workaround for DACA is applied, John is picked up because of that DACA code and his income. His eligibility is rerun to get the latest verifications.

[DACA Scenario 1 – Question]

All right. Let's move to the question. Will John be eligible for ConnectCare coverage with an income of 315% of the FPL and a DACA status.

Deb Raymond: Okay. Looks like we're leveling out. So, I'm going to end the poll. Share the results.

Sarah Buonopane: Okay. So about 90% of people said, Yes. And that is correct.

[DACA Scenario 1 – Answer]

If we move to the next slide. So, John will be eligible for ConnectorCare. His eligibility will be overridden based on that rerun of his account. He'll receive an Eligibility Approval Notice with this new eligibility for ConnectorCare and then he'll have that Special Enrollment Period or SEP, and he can enroll in coverage starting on December 1st or any time during Open Enrollment. Okay.

[DACA Scenario 2]

So, in this second scenario Jane creates an application in December so, next month. She attests to having DACA and received the DACA code from the Hub. She has an FPL of 426%. Okay, let's go to the next slide.

[DACA Scenario 2 – Question]

So, when she submits her application, is she going to receive a denial notice from the Health Connector.

Deb Raymond: This is really split. Give it another moment. Okay, I will end the poll and share the results.

Sarah Buonopane: Okay. So, it was pretty split. So, is she going to receive a denial notice?

[DACA Scenario 2 – Answer]

No, she will not receive a denial notice.

[DACA Scenario 2]

However, she will receive a denial online. Okay, so see the distinction.

When she submits her application, she'll be told online she's not eligible, but she will not receive a denial notice. That notice gets suppressed by us. That workaround will run overnight. So, on the 16th, when she comes back in, she will be eligible for ConnectorCare and then she will receive only an Eligibility Approval Notice. With that determination. And then in this case, she'd be able to enroll in coverage for January.

[DACA Scenario 3]

Okay. And then let's go to our last scenario. Ramon creates an application again on 12/15. He attests to having DACA but did not get a DACA code back from the Hub. He has an FPL a 521%.

I don't know why Yes and No is coming back. Oh, you switched the slide okay. So, will Ramon be denied from a Health Connector plan because the Health Connector did not receive a code back verifying his DACA status?

Deb Raymond: Okay. It looks like we've stopped getting answers, I'm going to end the poll and share the results. Sarah.

Sarah Buonopane: Okay. So, the correct answer is No.

[DACA Scenario 3 – Answer]

He will not be denied because we don't receive a code back. So, if we move to the next slide.

[DACA Scenario 3]

He'll submit his application. He'll be told he's not eligible, but he won't receive a denial notice. We'll run the workaround. He'll see that he is eligible for a plan with Advance Premium Tax Credit to get that notice. And then he can enroll for January 1st. However, because the Hub did not verify his DACA status, he will get an immigration RFI and then he has 90 days to submit proof of his DACA status.

So basically, in this situation he's getting a Presumptive Eligibility Determination because he attests to having DACA. We don't get that code back; we give him the eligibility while he is in this period to submit his RFI. If he submits that information that we require, he's all set and he will move forward with his coverage if he does not provide sufficient documentation, his coverage will be terminated.

[How to Prove Identity]

Okay. I think that concludes it for our DACA scenarios. And Kara's going to take us through proving identity.

Kara Chiev: Thanks Sarah. So, the next couple of slides, we talked about identity, identity proofing.

[Documents to Prove Identity]

We asked the question of IDP. The online application is going to be the fastest way an individual seeking health care coverage and is younger than 65 get through that application and will get a real time program determination.

By the end of that application, they'll know if, which program, which coverage type they're potentially determined eligible for. The IDP piece here is just to give those that are not Assistors an understanding of the type of documents that we would need to prove their identity if they get stuck, when they get stuck after they created their account.

So, if you go to the next slide,

[Acceptable Identity Proofing Documents]

I won't go in detail, but here just noting that we've got a huge list of document types that an individual can submit to prove their identity. And noting that the star next to certain document types are the newer documents that can be submitted for this purpose. So, this is only to unlock the account and prove the individual is who they say they are.

So going on to the next slide.

[Acceptable Identity Proofing Documents]

Here is the additional list, newer documents that we are now accepting like the Notice of Action, Permit to Re-enter, Refugee Travel Document, so those are newer documents that we're accepting for Identity Proofing, and let's keep going to the next slide.

[Acceptable Identity Proofing Documents]

Still continued list of now acceptable document types. And let's keep moving

[Application Completion Best Practices]

to Best Practice.

[Citizenship and Immigration Information Necessary for Program Determination]

So, for those in the audience that are non-Assisters it's really important if you're helping somebody through the application, answering all of the questions is, is important to make sure that we're able to understand and verify their information through data sources.

So, we're looking at their immigration status. That information is required for, for us to, to understand what benefits they may qualify for. So going on to the next slide.

[Noncitizen: Application Requirements]

So, in the situation if a Noncitizen doesn't indicate their immigration status, they may still be eligible for MassHealth Limited, The Children's Medical Security Plan, or Health Safety Net coverage as I mentioned. Anyone seeking and needing health care coverage should apply for coverage as, if they're not eligible for comprehensive coverage they may be eligible for some level of MassHealth coverage.

If they are, they do have an immigration status, they have documents, they should indicate "Yes" to, to that immigration status. If they don't indicate that they have an, an immigration status, the system will not attempt to find or verify any immigration status.

If an individual has an eligible immigration status, but doesn't indicate it, the system will not look for any, any immigration status.

We won't be pinging any of the federal hubs to verify that information. So, it's important that if they do have some level of status, they indicate that information on the application. If they're not sure, submit the documents that they have access and available to them for us to be able to appropriately enter that information and so that we'd be able to understand and verify, their immigration status, as well as determine what coverage type, they're potentially eligible for.

So, going on to the next slide.

[Key Takeaways]

So, Key Takeaways. If you are a Certified Assister in the community, or if you're helping somebody complete an application, don't assume that you know the answer to a question on the application. Absolutely make sure you're asking all the questions and providing responses to those questions in the application. MassHealth and the Health Connector determines the benefits an applicant may qualify for based on Citizenship or Immigration status.

Immigration information that's provided by the applicant in addition to other factors that we'll look at to determine what coverage type, for what program, they're potentially eligible for. Immigration is just one piece of that bigger picture. Entering a response into the online or paper application about citizenship is required for every applicant. It doesn't matter if you're using the ACA-3 application or the senior application that question is asked for all applicants.

If we're unable to data match their immigration or citizenship information an RFI, a notice, will go out requesting for additional information asking them to verify their status with whatever documents that they have available. So, MassHealth and the Health Connector will attempt to verify the individual's citizenship or immigration electronically first. If we're not able to, that RFI will go out.



And just noting that if they are submitting an online application, after the they submit that application if we do need additional verification, the system wasn't able to verify it electronically, the RFI information is available in their account so, they will know what type of documents that we are looking for and what type of documents that they can submit. They don't need to wait for that notice. There is a way to submit documents in the online application to MassHealth and the Health Connector.

So, going forward.

[Resources]

Here it's resources. I won't go through them. You'll have this information. A lot of information is available in MassHealth's Member Booklet, list of the immigration documents and types is available there.

Here's the ACA-3 application and the member booklet going into the next slide

[Member Booklet: U.S. Citizenship and Immigration Rules]

is the screenshot of that member booklet for those younger than 65.

Going on to the next slide.

[SACA-2: Immigration Statues and Document Types]

Here's the screenshot of the SACA application for those seniors over the age of 65 and those needing long-term-care of any age they can, they should be completing the, the SACA-2 application.

Moving on.

[Senior Guide: U.S. Citizenship and Immigration Rules]

is the Senior Member Guide.

Going on to the next.

[Online Application]

Here is the online application. Again, individuals seeking health care coverage should complete the application and use the online application if they're younger than 65.

Going on to the next slide.

[Immigration Status – Massachusetts Health Connector]

And here is the Immigration Guide that is available at [MAhealthconnector.org](http://MAhealthconnector.org). So, if you are an, a newer, newer to helping individuals apply for coverage and you're just not sure what immigration status is available where you'd want to see images, you can go to the Immigration Status Guide here. It's a great guide to give you some ideas of document types and images of those documents.

So, let's keep on going.

[Resource: Immigration Toolkit]

Keep on going.

[Additional Helpful Resources]

And here are some additional resources that are available and you'll have this in your hand.

[Thank You]

Sue Kane: Doesn't look like we have anybody, any other questions right now. Is there any last bit of information Kara, Sarah that you want to share with the group.

Kara Chiev: Just say that those that are in the audience that are Certified Assisters, whether they're a Certified Application Counselor or Navigator, you do have a more detailed and in-depth course in your training materials. So, if you are newer and really just unsure about immigration, absolutely go back to the core training, it does dive a lot deeper into the documents, the categories.

We'll be updating all of this with these scenarios in your course materials. So, there's a lot more to come. But for those that are joining us through MTF, I want to thank you for attending this is the two-part series and we'll keep you informed as much as we can if any changes and updates come down the pike.

Sue Kane: Thank you, Kara, thank you Sarah and Sage and Lynn for answering some of the questions. And thank you for the members of the audience for attending today. I hope you have a great rest of your day. Bye-bye. Thanks everyone.