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August 20, 2025

### Instructions for States

It is CMS's expectation that states will utilize this data contained in the enrollment file to independently verify the U.S. citizenship status or immigration status of individuals who receive full Medicaid or CHIP coverage.

Throughout these instructions, we discuss steps for states to submit information to DHS's SAVE or the Social Security Administration (SSA) to verify an individual's citizenship or immigration status. We note that states have a number of pathways to use to accomplish this, including: (1) the Federal Data Services Hub (Hub) - which includes both SAVE and SSA data; (2) a direct connection between the state's eligibility system and SAVE; (3) SAVE's web-based Graphical User Interface (GUI); and (4) a direct connection with SSA. States can also use a combination of these pathways. Additionally, states can use SAVE's new [Bulk Upload Tool](#) – available via the GUI – to create cases in bulk and, subsequently, escalate multiple cases at a time.

**Step 1:** Evaluate if the individual listed in the enrollment file has a verified U.S. citizenship, satisfactory immigration status, or is receiving limited Medicaid services only for treatment of an emergency medical condition (often referred to as “emergency Medicaid”) through review of the state's records (e.g. maintained eligibility and enrollment system electronic records).

**Step 2:** If an individual listed in the enrollment file is receiving limited emergency Medicaid services in the state in accordance with section 1903(v)(2) and 1903(v)(3) of the Social Security Act (the Act), states should not submit the individual's information to SSA, SAVE or independently verify such individual's U.S. citizenship or satisfactory immigration status in accordance with section 1137(f) of the Act.

**Step 3:** If the individual is listed in the enrollment file and the state has records that it has already verified the individual's U.S. citizenship or a satisfactory immigration status that is not subject to change (e.g., a copy of a birth or naturalization certificate), this is sufficient to meet CMS's request that the state has independently verified their status. No further action should be taken.<sup>1</sup>

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<sup>1</sup> States may not reverify U.S. Citizenship unless the individual reports a change in citizenship or the state has received information indicating a potential change in the individual's U.S. citizenship. See 42.C.F.R. §§ 435.956(a)(4)(ii) and 457.380(b)(1)(i). States may only reverify immigration status at renewal for those statuses that are subject to change, such as noncitizens with Temporary Protected Status (TPS) or if a change is reported. See CMS Final Rule, “Medicaid and Children's Health Insurance Programs: Eligibility Notices, Fair Hearing and Appeal Processes for Medicaid and Other Provisions Related to Eligibility and Enrollment for Medicaid and CHIP” (81 FR 86428) November 30, 2016, available at: <https://www.federalregister.gov/documents/2016/11/30/2016-27844/medicaid-and-childrens-health-insuranceprograms-eligibility-notices-fair-hearing-and-appeal>

**Step 4:** If the individual is listed in the enrollment file, receives full Medicaid or CHIP benefits, and the state does not have records that it has already verified the individual’s U.S. citizenship or satisfactory immigration status, or if the individual has an immigration status that is subject to change, then the state should take the following additional steps:

- *Attempt to verify citizenship or immigration status electronically* – review the “Explanation of SAVE Response Codes” section, below, for specific steps that a state should take when reviewing and submitting the individual’s information to SSA or SAVE. We note that if an individual is receiving full Medicaid or CHIP benefits during a reasonable opportunity period (ROP), pending verification of U.S. citizenship or satisfactory immigration status, the state will continue to complete the verification process with SSA or SAVE and adhere to the state’s regular verification process.
- *Attempt to verify citizenship or immigration status with the individual* – if the state attempts to verify citizenship or immigration status electronically and is unable to verify citizenship or immigration status through SSA or SAVE, then the state must provide the individual with the opportunity to provide documentation to verify their status. The state should take appropriate action to act on a potential change in circumstances, and, if needed, redetermine eligibility based on the change, consistent with §§ [435.916\(d\)](#) and [457.343 \(2023\)](#). This includes providing the individual with an opportunity to furnish additional documentation to verify their status and considering eligibility on other bases before determining the individual is ineligible.
- *Provide appropriate notice to individuals who provided documentation to verify their status at the state’s request, and the state was subsequently successful in verifying the individual’s citizenship or immigration status* – if the state verifies the individual’s citizenship or immigration status, the state should send a notice informing the individual of their continued Medicaid or CHIP eligibility. States should retain the individual’s eligibility period unless the agency has sufficient information available to it to renew eligibility with respect to all eligibility criteria, consistent with §§ [435.916\(d\)\(ii\)](#) and [457.343 \(2023\)](#).
- *Consider eligibility on other bases and limited emergency Medicaid coverage for individuals without verified citizenship or immigration status* – if the state is unable to verify citizenship or immigration status, or if the state confirms the individual does not have U.S. citizenship or satisfactory immigration status, the state must consider eligibility on other bases before determining the individual is ineligible for full Medicaid or CHIP benefits. If the individual is not eligible for full Medicaid benefits due to lack of satisfactory immigration status, then their coverage is limited to care and services that are necessary for the treatment of an emergency medical condition and are not related to an organ transplant procedure (often referred to as “emergency Medicaid”), provided that the individual meets all other eligibility requirements for Medicaid. We note that states have flexibility in how they implement emergency Medicaid. If the individual is not eligible for full CHIP benefits, then the state would disenroll the individual. If the state determined the individual ineligible for full Medicaid or CHIP benefits, the state must take appropriate action to disenroll or reduce coverage for the individual, including provision of advanced notice and fair hearing rights.

## Explanation of SAVE Response Codes

See the description below for each SAVE response provided in your enrollment file.

### **Immigration Enumerator Required**

This response occurs when a Social Security Number (SSN) is used as the enumerator. SAVE located a record with the Social Security Administration (SSA) but requires an immigration enumerator to complete verification. This may occur, for example, when an individual is foreign born, has an SSN, but the SSA did not pass back the Alien Number (A-Number) to SAVE.

- If Step 2 applies – no additional action is required.
- If Step 3 applies – no additional action is required.
- If Step 4 applies – states should identify the immigration enumerator and create a new SAVE case to complete SAVE verification (see <https://www.uscis.gov/save/about-save/save-verification-process> for more information). States should not resubmit to SAVE using an SSN as the enumerator.

### **No Record Found with SSA - Resubmit with Additional Information**

This response occurs when an SSN is used as the enumerator. SAVE could not locate a record with the SSA using the SSN, name, or date of birth (DOB) provided. This may occur, for example, when there are data entry errors or an individual changed their name and did not update the SSA.

- If Step 2 applies – no additional action is required.
- If Step 3 applies – no additional action is required.
- If Step 4 applies – states should review the individual's information on the enrollment file against states records (e.g., SSN, name, DOB) and confirm that the information is accurate and up-to-date. The state can submit a new SAVE case with corrected information or with an immigration enumerator.

### **Institute Additional Verification (IAV)**

This response occurs when an immigration number is used as the enumerator. This is not a final SAVE response. SAVE could not confirm the immigration status through its initial verification process and further review is needed. This may occur, for example, when there is an issue electronically locating the records or additional verification may be required due to conflicting data or the nature of the individual's status.

- If Step 2 applies – no additional action is required.
- If Step 3 applies – no additional action is required.
- If Step 4 applies – states should review information on the enrollment data file and state records. The state should create a new SAVE case with the same information provided in the enrollment file and push the case to the additional verification stage using an immigration enumerator and

follow the SAVE verification procedures as outlined here: <https://www.uscis.gov/save/about-save/save-verification-process>.