



Policy Clarification 2025-09-01

Title: Shared DCF Non-Citizen Verification

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Program(s) Impacted: All Medical Programs

The purpose of this document is to clarify the use of shared non-citizenship records for verification of immigration status. The direction below aligns with existing verification policies approved by the Centers of Medicare and Medicaid Services (CMS). Related policy manual references will be updated with the next scheduled revision.

A. Background

As indicated in [PM2017-08-02](#), non-citizenship records are currently shared between the Kansas Department of Health and Environment (KDHE) and the Department of Children and Families (DCF). As such, there are times when a non-citizenship record is verified in KEES by DCF staff (on the non-medical or PPS case) prior to the Clearinghouse processing the request on the medical case. Verification policies and processes for verification of immigration status differ between agencies, as KDHE utilizes the Verify Lawful Presence (VLP) interface while DCF relies primarily on documentation and utilizes the SAVE interface for verification of immigration status.

Currently, as indicated in [PM2019-06-01](#), all non-citizenship verification calls must be initiated through the Federal Hub's VLP interface. While this requirement is not changing and will continue, there are special circumstances in which staff may rely upon shared non-citizenship records that have been previously verified by DCF.

B. Shared Non-Citizen Verification

This document indicates special circumstances in which staff may rely upon shared non-citizenship records that have been previously verified by DCF for verification of immigration status.

This document clarifies that in situations when:

- 1) A non-citizen record has already been verified by DCF for a new applicant, 2) The DCF verified record results in an eligible alien status, and 3) The immigration status has not changed, this record will be considered verified for purposes of Medicaid and CHIP eligibility processing. Staff are not required to run VLP to reverify the non-citizenship status

for the applicant in this circumstance. As this would be considered a Tier 1 verification, further research/verification through the tiered process would not be needed.

If a DCF-verified non-citizenship record exists but results in an ineligible alien status, staff must proceed with verification through the tiered verification process, including using the VLP interface. This will ensure the immigration status is accurate and up to date in the event that the individual's status has changed since the DCF verification was made.

Likewise, if the medical application reflects a change in immigration status from the DCF-verified non-citizenship record, staff will need to reverify the non-citizenship record as indicated in section C, and the process outlined above would not apply.

C. Other Considerations

Immigration status is not an eligibility category that is considered likely to change on a regular basis. For this reason, it is not necessary, nor is it appropriate, to reverify the non-citizen record with each new determination. The exceptions are 1) We have reason to believe the status has changed, or 2) The previously verified status was non-qualifying for medical benefits, and the individual has reapplied.

NOTE: According to current VLP logic, when a non-citizen record has already been verified or has attempted verification through the VLP, that record cannot be re-sent for an updated status. If reverification is necessary, the record must be deleted, and a new record must be created.

If DCF has already completed the non-citizenship page at the time KDHE is processing the application, but the record is still pending or unverified, it would be appropriate for eligibility staff to update the record and complete verification through the VLP interface, due to DCF's verification is not yet complete to verify non-citizenship status.

For questions or concerns related to this document, please contact the KDHE Medical Policy Staff at KDHE.MedicaidEligibilityPolicy@ks.gov.

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Questions regarding any KEES issues are directed to the KEES Help Desk at KEES.HelpDesk@ks.gov.