



May 31, 2017

Dear Mr. Welsh,

On behalf of the Oregon Health Authority's Reproductive Health (RH) Program, I appreciate the opportunity to respond to the press release "Oregon Health Authority Uses False SS# To Enroll Medicaid Applicants" dated May 31, 2017.

The RH Program administers Oregon ContraceptiveCare (CCare), an 1115 family planning demonstration waiver from the Centers for Medicare and Medicaid Services (CMS). The purpose of the program is to expand Medicaid coverage for family planning services to all men and women of reproductive age not enrolled in the Oregon Health Plan and with household incomes at or below 250% of the federal poverty level (FPL). As a Medicaid program, applicants are required to provide such information as name, date of birth, income, household size, Social Security number (SSN), and US citizenship or eligible immigration status for the purposes of determining program eligibility. CMS is well aware that CCare has maintained a long-standing policy permitting individuals under the age of 20 to enroll in the program without providing their SSN if they don't know or are unable to access it. The RH Program then tries to identify the applicants' SSN, in addition to their US citizenship or eligible immigration status, through alternate means. Eligibility for applicants for whom citizenship or immigration status cannot be verified is terminated following the state's reasonable opportunity period.

When the RH Program developed its web-based eligibility database for CCare client enrollment, we created what we thought of as a "dummy" SSN that would bypass the database's edit requiring that an SSN be entered. We did not realize that this dummy SSN was, in fact, a real SSN assigned to someone. In late October 2015, the RH Program was contacted by an agent of the Social Security Administration's Office of Inspector General informing us of the issue. We quickly realized the scope of the issue and the significance of our oversight. Within one week of learning of the issue, and in conjunction with our CMS Project Officer, we removed all dummy SSNs assigned to clients in the CCare eligibility database. Additionally, we enacted a new process by which enrolling staff were able to leave the SSN field in the CCare eligibility database blank for new applicants under the age of 20 unable to provide their SSN. Furthermore, the following sections of the [Reproductive Health Program Manual](#) – Section C: Oregon ContraceptiveCare and Exhibit C-1: CCare Eligibility Database Instructions – were immediately updated to reflect these changes.

The Reproductive Health Program takes seriously its obligation to state and federal funders, as well as to Oregon taxpayers, to assure compliance with program regulations. As such, we worked to remediate the issue rapidly. The issue was resolved to both CMS and the Social Security Administration's satisfaction.

Thank you again for providing me with opportunity to respond to your press release. If in the future you have additional questions, please don't hesitate to reach out to me directly.

Sincerely,

A handwritten signature in black ink, appearing to read 'HR', with a stylized flourish extending to the right.

Helene Rimberg, PsyD
Adolescent, Genetics, and Reproductive Health Section Manager
Public Health Division
Oregon Health Authority