

Table 1: Services and Funding for Medi-Cal's Non-Citizen Population

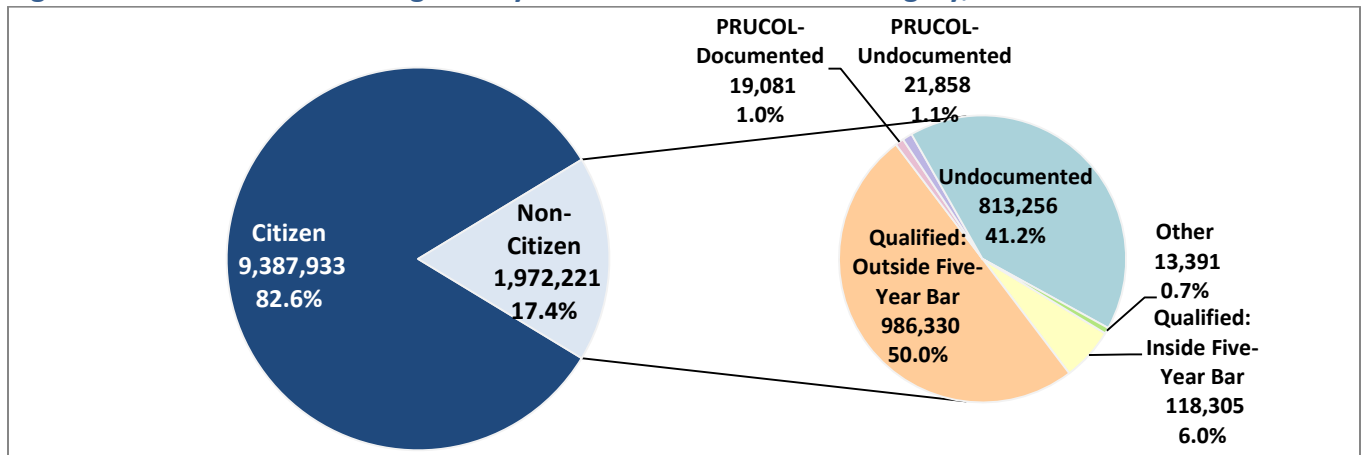
Non-Citizen Status	Qualified	Qualified	Non-Qualified	Non-Qualified	Non-Qualified	Non-Qualified
Non-Citizen Category	Inside the Five-Year Bar	Outside the Five-Year Bar	PRUCOL-Documented	PRUCOL-Undocumented	Undocumented	Other
Eligibility						
Restricted-Scope Services (Emergency/Pregnancy Only)	Yes	Yes	Yes	Yes	Yes	Yes
Full-Scope Services	Yes	Yes	Yes	Yes	No**	No
Funding						
Restricted-Scope Services (Emergency/Pregnancy Only)	Federal/State at state's applicable FMAP rate	Federal/State at state's applicable FMAP rate	Federal/State at state's applicable FMAP rate	Federal/State at state's applicable FMAP rate	Federal/State at state's applicable FMAP rate	Federal/State at state's applicable FMAP rate
Full-Scope Services	State-funded*	Federal/State at state's applicable FMAP rate	State-funded*	State-funded	N/A**	N/A*

Source: Created by DHCS RASD. Note: Qualified and non-qualified lawfully residing non-citizen children and pregnant women are eligible for federally funded full-scope Medi-Cal (CA State Plan Amendment (SPA) [09-014](#)).²⁶

*Note: Pursuant to federal statute, states may elect to cover pregnant women and children and receive federal funds for full-scope Medi-Cal services. California has elected this option and receives federal funds for providing full-scope health care services to pregnant women and children within the five-year bar.

**Note: Pursuant to [Senate Bill \(SB\) 4](#), which amends §14007.8 of the Welfare and Institutions Code, full-scope Medi-Cal benefits will be extended to undocumented children ages 0-18 who are lacking SIS but are otherwise eligible for the program following DHCS system implementation, but no sooner than May 1, 2016. Benefits for this population, other than emergency and pregnancy-related services, are funded by the state.

Figure 2: Medi-Cal Certified Eligibles by Non-Citizen Status and Category, June 2014



Source: Prepared by RASD using MIS/DSS Data Warehouse data. Counts represent certified eligibles as of May 2015 based on June 2014 month-of-eligibility.

Table 5: Distribution of Medi-Cal Certified Eligibles by California Geographic Region of Residence and Non-Citizen Status, June 2014

Region	Undocumented	All Other Non-Citizens	Citizen	Grand Total
Bay Area	7.2%	12.7%	80.1%	100.0%
Central Coast	9.5%	9.2%	81.3%	100.0%
Central Valley	7.1%	9.6%	83.3%	100.0%
Far North	0.9%	1.9%	97.2%	100.0%
Los Angeles	9.7%	10.4%	80.0%	100.0%
North Coast	2.8%	3.1%	94.1%	100.0%
Sacramento Valley	3.4%	9.3%	87.3%	100.0%
Sierra Range/Foothills	2.3%	3.3%	94.4%	100.0%
Southern California	5.2%	10.3%	84.5%	100.0%
Grand Total	7.2%	10.2%	82.6%	100.0%

Source: Prepared by RASD using MIS/DSS Data Warehouse data. Counts represent certified eligibles as of May 2015 based on June 2014 month-of-eligibility.

Conclusion

Medi-Cal’s non-citizen population is a unique group of individuals that can be separated into six subgroups based on immigration status and benefit coverage. Medi-Cal’s non-citizen subgroups are influenced by U.S. immigration policy, and in many cases the demographic make-up is reflective of these policies. Like Medi-Cal’s citizen population, Medi-Cal’s non-citizen population experienced acceleration in enrollment after the implementation of the ACA in January 2014.

When comparing Medi-Cal’s non-citizen population to Medi-Cal’s citizen population, RASD found significant variation in population demographics. Medi-Cal’s overall non-citizen population had a greater proportion of females than males (59% vs. 41%). Among Medi-Cal’s citizen population, females represented 53% of the population and males constituted 47%. Females constituted 61% of the Undocumented subgroup.

Adults comprised 88% of Medi-Cal’s non-citizen population, while children constituted only 12%. In contrast, Medi-Cal’s citizen population revealed that adults constituted 49% of the population, and children represented 51%.

Overall, roughly two-thirds of Medi-Cal’s non-citizen population was Hispanic, while another 19% were classified as Asian. Among Medi-Cal’s citizens, less than half of the population was Hispanic. Medi-Cal’s citizen population also displayed a far greater proportion of White and African-American eligibles than was seen among Medi-Cal’s non-citizen population. Among non-citizen subgroups, PRUCOL and Undocumented subpopulations had the highest percentages of Hispanic eligibles (between 74% and 89%), while Qualified Non-Citizens and Other Non-Citizens had the highest percentages of Asian eligibles (constituting roughly one-third of these subpopulations).

Medi-Cal's non-citizen population had a far greater proportion of primary Spanish speakers than Medi-Cal's citizen population (62% vs. 24%). Conversely, the proportion of English speakers was significantly greater among Medi-Cal's citizens (69%) than Medi-Cal's non-citizen population (21%). Among Medi-Cal's overall non-citizen population, Spanish was the most commonly spoken primary language (62%), with the exception of the Other Non-Citizen subgroup which had a large proportion of English speakers (48%). Notably, 86% of eligibles in the Undocumented subgroup were primary Spanish speakers. When comparing Qualified Non-Citizens and the Undocumented subgroup, it was found that close to one-third of the Qualified Non-Citizens were English speakers, while only 12% of the Undocumented subgroup were English speakers. The Qualified Non-Citizen (i.e., inside and outside the five-year bar) and Other Non-Citizen subgroups revealed a broader mix of languages, with Chinese and Vietnamese languages more commonly spoken than among other non-citizen and citizen subgroups.

Finally, RASD found that Medi-Cal's non-citizen population was more likely to participate in Medi-Cal's traditional FFS delivery system than managed care (63% vs. 37%). This is primarily the result of the fact that undocumented individuals almost exclusively participated in Medi-Cal's traditional FFS system. In contrast, Medi-Cal's citizen population was more likely to participate in Medi-Cal's managed care delivery system than the traditional FFS system (73% vs. 27%). In general, the proportion of each Medi-Cal non-citizen subgroup's population participating in managed care was found to be lower than that of Medi-Cal's citizen population. Non-citizen subgroups that were afforded full-scope Medi-Cal coverage displayed Medi-Cal managed care participation rates of between 56% and 67%. Individuals classified as Undocumented were found to participate almost entirely in the FFS delivery system (99.8%).

More Information on the Medi-Cal Population

The DHCS RASD performed the analysis for this report. RASD compiles official statistics and performs analytical studies to assist DHCS in achieving its mission and goals. More information regarding Medi-Cal enrollment, program expenditures, and other relevant topics is available at the RASD [website](#).

Subscribe to the RASD Mailing List

Click [here](#) to receive email notifications when new statistical content is added to the RASD website. The RASD website is updated regularly with graphics, pivot tables and statistical briefs describing the Medi-Cal population, Medi-Cal enrollment trends, and other issues relevant to the Medi-Cal program and its stakeholders.

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PLEASE NOTE:

This document provides a brief summary of complex subjects and should be used only as an overview and general guide to the Medi-Cal program. The views expressed herein do not necessarily reflect the policies or legal positions of the California Health and Human Services Agency (CHHS) or the California Department of Health Care Services (DHCS). These summaries do not render any legal, accounting, or other professional advice, nor are they intended to explain fully all of the provisions or exclusions of the relevant laws, regulations, and rulings of the Medicare and Medicaid programs. Original sources of authority should be researched and utilized.

Appendix A: Federally Qualified Non-Citizens – Classification Authority and Eligibility Status

Federally Qualified Non-Citizens	
Classification Authority	Eligibility Status
Lawful Permanent Resident (LPR) [8 USC §1641(b)(1)]	<ul style="list-style-type: none"> * Ineligible for five years from entry date [8 USC §1613(a)] * Eligible at state option after five years [8 USC §1612(b)(1)] * Eligible if worked 40 qualifying quarters (10 years) [8 USC §1612(b)(2)(B)]
Asylee [8 USC §1641(b)(2)]	<ul style="list-style-type: none"> * Exempt from five-year ineligibility period [8 USC §1613(b)(1)(B)] * Eligible for seven years [8 USC §1612(b)(2)(A)(i)(II)] * Eligible at state option after seven years [8 USC §1612(b)(1)]
Refugee [8 USC §1641(b)(3)]	<ul style="list-style-type: none"> * Exempt from five-year ineligibility period [8 USC §1613(b)(1)(A)] * Eligible for seven years [8 USC §1612(b)(2)(A)(i)(I)] * Eligible at state option after seven years [8 USC §1612(b)(1)]
Parolee (at least 1 yr.) [8 USC §1641(b)(4)]	<ul style="list-style-type: none"> * Ineligible for five years from entry date [8 USC §1613(a)] * Eligible at state option after five years [8 USC §1612(b)(1)]
Deportation Withholdee [8 USC §1641(b)(5)]	<ul style="list-style-type: none"> * Exempt from five-year ineligibility period [8 USC §1613(b)(1)(C)] * Eligible for seven years [8 USC §1612(b)(2)(A)(i)(III)] * Eligible at state option after seven years [8 USC §1612(b)(1)]
Conditional entrée [8 USC §1641(b)(6)]	<ul style="list-style-type: none"> * Ineligible for five years from entry date [8 USC §1613(a)] * Eligible at state option after five years [8 USC §1612(b)(1)]
Batteree [8 USC §1641(c)(1)-(3)]	<ul style="list-style-type: none"> * Ineligible for five years from date of entry [8 USC §1613(a)] * Eligible at state option after five years [8 USC §1612(b)(1)]
Cuban/Haitian Entrée [8 USC §1641(b)(7)]	<ul style="list-style-type: none"> * Exempt from five-year ineligibility period [8 USC §1613(b)(1)(D)] * Eligible for seven years [8 USC §1612(b)(2)(A)(i)(IV)] * Eligible at state option after seven years [8 USC §1612(b)(1)]
Nonimmigrant Victim of Trafficking [8 USC §1641(c)(4)] (Victims of Trafficking and Violence Protection Act of 2000 [PL 106-386] Eligible same as Refugees [22 USC 7105(b)])	<ul style="list-style-type: none"> * Exempt from five-year ineligibility period [8 USC §1613(b)(1)(A)] * Eligible for seven years [8 USC §1612(b)(2)(A)(i)(I)] * Eligible at state option after seven years [8 USC §1612(b)(1)]
Amerasian Immigrant [8 USC §1101 note]	<ul style="list-style-type: none"> * Exempt from five-year ineligibility period [8 USC §1613(b)(1)(E)] * Eligible for seven years [8 USC §1612(b)(2)(A)(i)(V)] * Eligible at state option after seven years [8 USC §1612(b)(1)]
Veteran/Active-Duty Military [38 USC §101 et seq.]	<ul style="list-style-type: none"> * Exempt from five-year ineligibility period [8 USC §1613(b)(2)] * Eligible [8 USC §1612(b)(2)(C)]
American Indian Born in Canada [8 USC §1359]; or Member of an Indian Tribe [25 USC §450b(e)]	<ul style="list-style-type: none"> * Exempt from five-year ineligibility period [8 USC §1613(d)(1)] * Eligible [8 USC §1612(b)(2)(E)]

<p>SSI/SSP Recipients [42 USC §§1381 et seq. & 1382e(a)]</p>	<p>* Eligible [8 USC §1612(b)(2)(F)]</p>
<p>Afghani/Iraqi Special Immigrants [8 USC §1101(a)(27)] (Department of Defense Appropriations Act, 2010 [PL 111-118] Eligible same as Refugees)</p>	<p>* Exempt from five-year ineligibility period [8USC §1613 (b)(1)(A)]</p> <p>* Eligible for seven years [8 USC §1612(b)(2)(A)(i)(I)]</p> <p>* Eligible at state option after seven years 8 USC §1612(b)(1)]</p>
<p>Children/Pregnant Women [42 USC §1396b(v)(4)(A)] (Children’s Health Insurance Program Reauthorization Act of 2009 [PL 111-3])</p>	<p>* Exempt from five-year ineligibility period</p> <p>* Eligible at state option</p> <p>* Qualified and nonqualified lawfully residing noncitizens [CA Title XIX State Plan Amendment 09-014]</p>

End Notes

- ¹ Pew Research Center. (2014, May 14). *15 States with the Largest Share of Immigrants in their Population*. Retrieved from <http://www.pewresearch.org/fact-tank/2014/05/14/15-states-with-the-highest-share-of-immigrants-in-their-population/>
- ² U.S. Citizenship and Immigration Services, Glossary. Retrieved from <http://www.uscis.gov/e-verify/customer-support/glossary>
- ³ Cornell University Law School. (ND) *8 U.S. Code §1101 – Definitions*. Retrieved from http://www.law.cornell.edu/uscode/text/8/1101*
- *Note: For purposes of this brief, the term “non-citizen” has the same meaning as described in 8 USC 1101(a)(3).
- ⁴ U.S.HHS. (2009, February 25). *Summary of Immigrant Eligibility Restrictions Under Current Law*. Retrieved from <http://aspe.hhs.gov/hsp/immigration/restrictions-sum.shtml>
- ⁵ DHCS. (ND). R-15-98E, *Criteria for Emergency and Pregnancy-Related Services for Persons Entitled to Restricted Benefits Only*. Retrieved from http://www.dhcs.ca.gov/services/medi-cal/Documents/ManCriteria_06_EmergPreg.htm
- ⁶ California State Plan Under Title XIX of the Social Security Act. (Revised 2014, October 31). *Eligibility Conditions and Requirements*. Retrieved from <http://www.dhcs.ca.gov/formsandpubs/laws/Documents/Attachment%202.6-A.pdf>
- ⁷ Ibid.
- ⁸ Cornell University Law School. (ND) *8 U.S. Code §1641 – Definitions*. Retrieved from <https://www.law.cornell.edu/uscode/text/8/1641>
- ⁹ Note: These may include: victims of trafficking [22 USC [7105\(b\)](#)], members of a federally recognized Indian tribe [25 USC [450b\(e\)](#)] or American Indians born in Canada [8 USC [1359](#)]; [8 USC [1612\(b\)\(2\)\(E\)](#)], Amerasian immigrants [8 USC [1612\(b\)\(2\)\(A\)\(i\)\(V\)](#)], Iraqi and Afghan special immigrants [8 USC [§1101\(a\)\(27\)](#)], lawfully residing non-citizen; with a military connection (active duty military personnel, honorably discharged veterans, and their immediate family) [8 USC [1612\(b\)\(2\)\(C\)](#)], children and pregnant woman [42 USC [1396b\(v\)\(4\)\(A\)](#)], and supplemental security income recipients [8 USC [1612\(b\)\(2\)\(F\)](#)].
- ¹⁰ Cornell University Law School. *8 U.S. Code § 1613 - Five-year limited eligibility of qualified aliens for Federal means-tested public benefit*. Retrieved from <https://www.law.cornell.edu/uscode/text/8/1613>
- *Note: Federal law does provide exemptions from the five-year waiting period for some categories of qualified non-citizens.
- ¹¹ California Legislative Information, Welfare and Institutions Code, DIVISION 9. PUBLIC SOCIAL SERVICES, PART 3. AID AND MEDICAL ASSISTANCE, CHAPTER 7. BASIC HEALTH CARE, Article 1. General Provisions, §§ 14000-14042. Retrieved from <http://www.leginfo.ca.gov/cgi-bin/displaycode?section=wic&group=13001-14000&file=14000-14042>
- ¹² Op cit., U.S.HHS
- ¹³ Op cit., California State Plan
- *Note: The 08/22/96 date refers to the implementation of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) [[P.L. 104–193](#)], which imposed greater restrictions on access to public benefits. Those who enter the U.S. on or after this date (with some exceptions) are subject to this law.
- ¹⁴ Op cit., U.S.HHS
- ¹⁵ Cornell University Law School. (ND) *42 CFR 435.406 - Citizenship and alienage*. Retrieved from <https://www.law.cornell.edu/cfr/text/42/435.406>
- ¹⁶ CA Code of Regulations (CCR), Title 22, Section 50301.3. Documentation of Status as an Alien Permanently Residing in the United States Under Color of Law (PRUCOL). Retrieved from

<https://govt.westlaw.com/calregs/Document/I81D56350D4B811DE8879F88E8B0DAAAE?viewType=FullText&originContext=documenttoc&transitionType=CategoryPageItem&contextData=%28sc.Default%29=>

¹⁷ Op cit., California Legislative Information, Welfare and Institutions Code

¹⁸ DHCS (MC 13 December 2009). Statement of Citizenship, Alienage, and Immigration Status. Retrieved from <http://www.dhcs.ca.gov/formsandpubs/forms/Forms/mc13.pdf>

¹⁹ Note: Subsequent to the implementation of the ACA, the DHCS Medi-Cal Eligibility Division issued guidance to the counties on instances where the MC-13 is not required of applicants. Medi-Cal applicants are no longer required to submit paper documentation substantiating their citizenship or immigration status to complete their application (for a more detailed discussion of this guidance see Medi-Cal Eligibility Division Information Letter No. [I 14-21](#)).

²⁰ DHCS. (2000, May 5). *All County Welfare Director's Letter (ACWDL) # 00-28*. Retrieved from <http://www.dhcs.ca.gov/services/medi-cal/eligibility/Documents/c00-28.pdf> *

*Note: See MEPM Section 50257. (2002, January 4). *Manual Letter #25624E-6*. Retrieved from <http://www.dhcs.ca.gov/services/medi-cal/eligibility/Documents/Article24-RefugeeMedicalAsstProgram.pdf>

²¹ DHCS. (2014, March 25). *Medi-Cal Eligibility Division Information Letter (MEDIL) I 14-21*. Retrieved from <http://www.dhcs.ca.gov/services/medi-cal/eligibility/Documents/MEDIL2014/MEDILI14-21.pdf>,

²² DHCS (2014, January 21). *MEDIL I 14-08*. Retrieved from <http://www.dhcs.ca.gov/services/medi-cal/eligibility/Documents/MEDIL2014/MEDILI14-08.pdf>

²³ Op cit., DHCS, R-15-98E. *

*Note: Included in emergency services are acute, ongoing, and maintenance renal dialysis services not related to an organ transplant procedure; and long-term care services. Pregnancy-related services include routine prenatal care, labor and delivery, and routine post-partum services for 60-days and family planning services.

²⁴ Op cit., California Legislative Information, Welfare and Institutions Code *

*Note: Emergency and pregnancy-related services are dually financed by federal and state funds. Emergency medical services are defined as an "medical condition manifesting itself by acute symptoms of sufficient severity, including severe pain, such that the absence of immediate medical attention could reasonably be expected to result in any of the following: placing the patient's health in serious jeopardy; serious impairment to bodily functions; serious dysfunction to any bodily organ or part."

²⁵ Op cit., California State Plan.

²⁶ CMS. (updated 2014, March 24). *Medicaid and CHIP Coverage of Lawfully Residing Children and Pregnant Women*. Retrieved from <http://www.medicare.gov/medicaid-chip-program-information/by-topics/outreach-and-enrollment/lawfully-residing.html>

²⁷ Note: Placement into citizen/non-citizen categories was based on primary aid code, alien indicator, and alien eligibility code as reported in the MIS/DSS data warehouse. Individuals whose primary aid code was a code specific for persons without SIS, were grouped into the Non-Qualified Undocumented category. The remaining eligibles were then grouped as citizen or into a specific non-citizen category based on their alien indicator and alien eligibility code. In cases where there was a conflict between the aid code and the alien indicator, the aid code was used to determine which category would be selected. For example, in the statistics reported for the month of June 2014, there were 99,566 individuals enrolled in an Undocumented aid code without evidence of citizenship status in their eligibility record; these were grouped as Undocumented. The other group with conflicting information numbered 40,081; these individuals were flagged as undocumented by their alien indicator values, but were enrolled in non-undocumented aid codes and are categorized as citizens in this report.

²⁸ E Gorospe. *Elderly Immigrants: Emerging Challenge for the U.S. Healthcare System*. The Internet Journal of Healthcare Administration. 2005 Volume 4 Number 1. Retrieved from <https://ispub.com/IJHCA/4/1/13504>

²⁹ Pew Research Center. (2014). *Unauthorized Immigrant Totals Rise in 7 States, Fall in 14*. Retrieved from http://www.pewhispanic.org/files/2014/11/2014-11-18_unauthorized-immigration.pdf

*Note: The Pew Research Center defines Unauthorized Immigrants as “all foreign-born non-citizens residing in the country who are not “legal immigrants.” Legal Immigrants are defined as, “people who have been granted legal permanent residence; those granted asylum; people admitted as refugees; and people admitted to the U.S. under a set of specific authorized temporary statuses for longer-term residence and work.”

³⁰ Ibid.

³¹ Monger Randall, Yankay, James. *U.S. Lawful Permanent Residents: 2013*. Office of Immigration Statistics, Homeland Security, May 2014. Retrieved from http://www.dhs.gov/sites/default/files/publications/ois_lpr_fr_2013.pdf

³² DHCS. (2015, May 1). *Medi-Cal Managed Care Plans Mandatory or Voluntary Enrollment by Medi-Cal Aid Codes*. Retrieved from <http://www.dhcs.ca.gov/services/Documents/AidCodeChart.pdf> *

*Note: Napa, Solano and Yolo counties mandatorily enroll undocumented eligibles into County Organized Health Systems (COHS) managed care plans.

³³ Note: RASD’s geographic regions are categorized as follows: (1) Bay Area region includes Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma counties; (2) Central Coast region includes Monterey, San Benito, San Luis Obispo, Santa Barbara, Santa Cruz, and Ventura counties; (3) Central Valley region includes Fresno, Kern, Kings, Madera, Merced, San Joaquin, Stanislaus, and Tulare counties; (4) Far North region includes: Modoc, Shasta, Siskiyou, and Trinity counties; (5) Los Angeles region includes Los Angeles county; (6) North Coast region includes Del Norte, Humboldt, Lake, and Mendocino counties; (7) Sacramento region includes Butte, Colusa, Glenn, Sacramento, Sutter, Tehama, Yolo, and Yuba counties; (8) Sierra Ridge/Foothills region includes Alpine, Amador, Calaveras, El Dorado, Inyo, Lassen, Mariposa, Mono, Nevada, Placer, Plumas, Sierra, and Tuolumne counties; (9) Southern California region includes Imperial, Orange, Riverside, San Bernardino, and San Diego counties.