



TOBY DOUGLAS  
Director

State of California—Health and Human Services Agency  
Department of Health Care Services



EDMUND G. BROWN JR.  
Governor

SEP 03 2014

Hye Sun Lee  
Acting Associate Regional Administrator  
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Centers for Medicare and Medicaid Services  
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**STATE PLAN AMENDMENT (SPA) 13-0022-MM2 Modified Adjusted Gross  
Income-Based Eligibility – Single Streamlined Application**

Dear Ms. Lee:

This letter is the Department of Health Care Services' (DHCS) responses to the Center for Medicare and Medicaid Services (CMS) Request for Additional Information concerning California's state plan amendment (SPA) 13-0022-MM2. On December 10, 2013, CMS approved SPA 13-0022-MM2, which included the use of an interim online alternative application used to apply for multiple human services programs, an alternative single streamlined online application, and an interim alternative single streamlined paper application. As outlined in the companion letter, which was issued with the SPA approval, California agreed to implement a revised online alternative application used to apply for multiple human services programs and an alternative single streamlined paper application by July 1, 2014, as well as a revised online alternative single streamlined paper application by December 31, 2014.

The following is an update on the status of revisions and DHCS' progress toward meeting the timeline outlined in the companion letter.

## **Alternative Online Application Used to Apply for Multiple Human Services Programs**

### CMS Requirement

The state must revise the application to meet the standards as outlined in 42 CFR 435.907 and guidance on alternative applications released by CMS on June 19, 2013.

### DHCS Response

CMS requested the screenshots of the full online Statewide Automated Welfare Systems (SAWS) applications from the three county automated SAWS consortia to determine if requirements in 42 CFR 435.907 are being met. Enclosed for CMS review and approval are: 1) electronic copy of the online application for the Los Angeles Eligibility, Automated Determination Replacement (LEADER) system reflecting requested changes; 2) electronic copy of the online application for the C4 Yourself (C-IV) system; and 3) electronic copy of the online application for the CalWIN system. In addition to the screenshots of the online SAWS applications, DHCS is providing a .pdf of the paper SAWS 2 PLUS application used to apply for multiple human services programs, which also reflects changes to comply with requirements in 42 CFR 435.907.

## **Alternative Single Streamlined Online Application:**

### CMS Requirement

The following questions will not appear on the online application.

- Questions regarding the prior year tax return.

### DHCS Response

DHCS has submitted a Change Request (CR) to implement this required change. This change is currently scheduled to be completed no later than December 2014. We will provide a final screenshot of this change upon completion.

### CMS Requirement

The following questions will not appear for household members not seeking any benefits:

- The non-Modified Adjusted Gross Income screening questions related to disability, long-term care and Medicare.
- All citizenship and immigration questions.

### DHCS Response

DHCS has submitted a CR to implement this required change. Due to competing priorities for needed system changes within CalHEERS, this change is not currently scheduled to be completed in 2014. DHCS expects this change to be prioritized for completion in 2015 and DHCS will provide a screenshot of this change upon completion.

CMS Requirement

Applicants who are asked questions for Advanced Premium Tax Credit eligibility will be asked about the lowest-cost premium they are offered, not the premium for the plan in which they are currently enrolled.

DHCS Response

DHCS has submitted a CR to implement this required change. This change is currently scheduled to be completed no later than December 2014. DHCS will provide a screenshot of this change upon completion.

CMS Requirement

Applicants will have the opportunity to identify themselves as American Indians and Alaska Natives for purposes of Medicaid and Children's Health Insurance Program (CHIP) cost-sharing protections, and identify American Indian and Alaska Native income not countable for Medicaid and CHIP income determinations.

DHCS Response

DHCS has submitted a CR to implement this required change. Due to competing priorities for needed system changes within CalHEERS, this change is not currently scheduled to be completed in 2014. DHCS expects this change to be prioritized for completion in 2015 and DHCS will provide a screenshot of this change upon completion.

CMS Requirement

Only applicants who do not appear eligible for Medicaid and CHIP based on income attestation will be asked information about access to employer-sponsored coverage, beyond what is needed for Medicaid and CHIP.

DHCS Response

DHCS has submitted a CR to address this requirement. As previously discussed with CMS last year and in recent conference calls, this requested revision is not feasible within 2014. This will be a difficult change for the California Healthcare Eligibility, Enrollment and Retention System (CalHEERS) to make as it would require a complete overhaul to the current CalHEERS programming. The change would require CalHEERS to do preliminary income screening within the application process to determine who should respond to these questions. CalHEERS is designed to require the applicant go through the whole application, answer all required questions, and click "submit" before the business rules engine (BRE) uses any of the information provided. Having the BRE use information within the application process itself would be too large of a change for 2014. Considering it is not a viable option to make this change, DHCS is proposing an alternative solution to message the applicant about how the questions are optional, if you appear Medi-Cal eligible based on the Federal Poverty Level chart. DHCS requests CMS feedback on this proposed alternative solution. Due to competing priorities for needed system changes within CalHEERS, the interim solution could likely not be implemented until 2015.

**Alternative Single Streamlined Paper Application**

CMS Requirement

Language in the application that describes newborns, who are deemed eligible, will be revised to reflect the new process for transitioning Access for Infants and Mothers-linked infants into Medicaid as implemented through SPA 13-005.

DHCS Response

DHCS has developed language to address this revision, which will be incorporated in the revisions to the single streamlined paper application currently in process. These revisions are targeted for completion by November 2014. DHCS will provide a mock-up of this revised single streamlined paper application for approval once developed.

The requested revisions and final approval of SPA 13-022-MM2, alternative single streamlined application, remain a high priority for DHCS. DHCS remains committed to completing the necessary revisions and providing verifications as noted in this response.

If you have any questions, or if we can provide further information, please contact Ms. Tara Naisbitt, Chief, Medi-Cal Eligibility Division, at (916) 552-9450 or by email at [tara.naisbitt@dhcs.ca.gov](mailto:tara.naisbitt@dhcs.ca.gov).

Sincerely

**Original Signed**

Toby Douglas  
Director

Enclosures

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