

CALIFORNIA DEPARTMENT OF HEALTH SERVICES DRA CITIZENSHIP ACWDL COMMENTS

HIGH LEVEL ISSUES

CDHS received comments from 50-60 organizations. Several significant issues arose from stakeholder comment on the draft ACWDL for the DRA Citizenship Requirements. Some of the key issues are summarized below.

- **The list of acceptable documents is not exhaustive.**
- **Provide immediate coverage to otherwise eligible citizens.**
- **Provide full scope coverage to citizens who fail to provide evidence of citizenship but who are otherwise eligible for Medi-cal.**
- **Persons providing an affidavit on behalf of a Medi-Cal applicant or beneficiary should not be required to prove citizenship and identity.**
- **Foster children and former foster children should be exempt.**

- **Exempt deemed eligible Infants.**
- **The Letter needs more specific information about how the requirement is applied to Minor Consent.**
- **Define good faith effort as broadly as possible and provide examples of good faith effort.**
- **Provide more guidance to the county on how to assist applicants and beneficiaries with meeting the evidence of citizenship and identity requirements and obtaining documentation.**
- **The Department should pay the costs of obtaining the required documents or waive State fees for acceptable documents.**

- **Place more emphasis on who is not affected by the evidence of citizenship requirements such as immigrants and other exempted groups.**
- **Persons other than eligibility workers should be allowed to accept evidence of citizenship.**
- **Implement a process to track citizens who receive restricted Medi-Cal because they fail to meet the evidence of citizenship requirements.**
- **The State should provide procedures to counties regarding collecting and returning original documents.**
- **Expand the Use of Data Matches.**

- **Clarify on notices and materials that citizenship and identity requirements do not apply to persons that are not on Medi-Cal.**
- **Re-determination packets should inform the beneficiary of a successful birth record match.**
- **Notices must be translated into threshold languages and must be at an appropriate literacy level.**
- **Targeted Outreach to those who are required to provide documents.**
- **Health plans need more information about the impact that evidence of citizenship will have on them.**

- **The All County Letter needs to address the requirements for retroactive eligibility.**
- **The reasonable opportunity period needs further clarification.**
- **Counties do not have adequate time to implement the evidence of citizenship and Identity requirements.**