STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
714/744 P STREET
SACRAMENTO, CA 95814

November 20, 1987

TO: All County Welfare Directors
All County Administrative Officers

Letter: 87 - 56

SUBJECT: IMPLEMENTATION OF OBRA AND IRCA-86
(DATA PROCESSING CHANGES)

This letter is to provide counties with information necessary to begin preparation for implementation of the Omnibus Budget Reconciliation Act of 1986 (OBRA) and the Immigration Reform and Control Act of 1986 (IRCA).

Effective January 1, 1988, counties will be required to identify and track certain groups of aliens for the purpose of reporting this information to the Medi-Cal Eligibility Data System (MEDS). This letter only addresses the information required to identify these individuals and to begin modifying county computer systems for transmission of OBRA/IRCA eligibility information to MEDS. Another All County Welfare Director's Letter, ACWDL 87-55 has been released addressing eligibility issues.

Background

The OBRA and IRCA legislation extends medical services to aliens who were not previously eligible because of their immigration status. This legislation also provides for the restriction of Medi-Cal benefits to aliens who do not have documentation of satisfactory immigration status with the Immigration and Naturalization Service (INS). Currently, the state does not have the statutory authority to limit the scope of services to aliens as required by this federal law. Therefore, to fully implement OBRA/IRCA, a change in State law is required. A new Senate Bill (SB 175) has been introduced in the State legislature which will accord the State the authority to conform to Federal law. The bill will be heard in the January 1988 legislative session. If SB 175 or such other enabling legislation is passed, counties will be informed of the implementation date of OBRA/IRCA as soon as this information is available.

New Aid Codes

The Department has established new aid codes to identify the different categories of OBRA/IRCA aliens. These aid codes will enable the

Department to claim additional federal financial reimbursement for medical services provided to these individuals. Additionally, the new aid codes will indicate the scope of services (full or limited) to which these individuals are entitled. Following is a list of the new aid codes and their definitions:

AID CODE	DEFINITION
50	CMSP IRCA Aliens - Individuals who are eligible for the full scope of County Medical Services Program, CMSP benefits.
51	IRCA Amnesty Aliens - Individuals qualifying for Medi-Cal as temporary or permanent residents who are either: 1. Aged, blind or disabled; 2. Children under 18 years of age. These individuals are eligible for the full scope of Medi-Cal benefits.
52	IRCA Amnesty Aliens (Limited Services) - Individuals eligible for Medi-Cal who do not fall into the above described category, (Aid code 51). These individuals are eligible for emergency and/or pregnancy related medical benefits only.
56	IRCA Special Agricultural Workers (SAWs) - Aliens qualifying for Medi-Cal as temporary or permanent residents who are either: 1. Aged, blind or disabled or 2. Children under 18 years of age. These individuals are eligible for the full scope of Medi-Cal benefits.
57	IRCA SAWs Aliens (Limited Services) - Individuals qualifying for Medi-Cal as temporary or permanent residents who are not aged, blind or disabled or children under 18 years. These individuals are eligible for emergency and/or pregnancy related medical benefits only.
58	OBRA Aliens - Individuals who are undocumented. These individuals are eligible for emergency and/or pregnancy related medical benefits only.

Please note, there are two groups of new aliens that are excluded from this special identification process: Cuban Haitian entrants who have applied for adjustment from temporary to permanent resident status and Pre-1972 entrants whose status has been adjusted from illegal to permanent resident. These two groups of aliens should not be identified using the IRCA aid codes listed above. These individuals would fall under the normal Medi-Cal reporting procedures.

County Action (Current Procedures)

Effective January 1, 1988, county welfare departments are instructed to identify and track all individuals who may be eligible for Medi-Cal benefits under OBRA/IRCA (see ACWDL 87-55). Counties may submit the appropriate OBRA/IRCA aid code to MEDS via an online or batch transaction. If counties are unable to submit OBRA/IRCA eligibility information to MEDS at this time, they may track the information manually for reporting to MEDS at a later date.

Counties that choose to track the OBRA/IRCA information manually, must do so for January 1988 month of eligibility and continuing until the month in which the ongoing system is implemented. Counties will be notified at a later date of when to report the eligibility for these months to MEDS.

Counties that opt to have MEDS track the records must submit the OBRA/IRCA aid code in the newly developed "Original Aid Code", ("Orig-Aid") field which is now available for online and batch input. When transmitting OBRA/IRCA aid codes using online transactions, EW05 - "Transfer County of Responsibility", EW15 - "Request Immediate Need Card Issuance", EW20 - "Add New Recipient Record" or EW30 - "Modify Existing MEDS Record (Individual)", input the OBRA/IRCA aid code in the "Orig-Aid" field on the transaction screen. If you will be transmitting OBRA/IRCA aid codes via your batch system, the appropriate OBRA/IRCA aid code must be submitted in data element 1249, "Orig-Aid" field.

Input of the OBRA/IRCA aid codes in this field will continue to be allowed pending passage of enabling legislation and installation of the final MEDS changes. Counties that modify their batch programs for this short term tracking, must keep in mind that there will be MEDS edits to prevent acceptance of the OBRA/IRCA aid codes in the "Orig-Aid" field, once the ongoing system is implemented.

Again, until such time as legislation is passed, counties have a choice of developing a manual system or using MEDS online or batch systems, whichever is less complicated for county implementation. However, all counties must be prepared to implement the ongoing procedures described below upon notification from this Department that legislation has passed.

County Action Following Passage of Legislation

The final system changes will be installed at MEDS renewal, the month following the month in which the legislation is passed. At that time counties will be sent a paper listing or tape of all identified OBRA/IRCA records. Upon receipt of this listing/tape, counties will be instructed to submit transactions to update the pending month county identification fields with the OBRA/IRCA aid codes and the "Orig-Aid" fields with the corresponding Medi-Cal aid codes. Counties will be required to complete this action by the following month's renewal. At this time, an "Orig-Aid" field will not appear on the pending segment. Counties may submit an original aid code; however, until such time as a field is created, the "Orig-Aid" input by the county will be ignored when processing county batch transactions for the pending segment. At renewal when MEDS processes the pending segment, the system will take the previous "County-ID Per-MEDS" aid code and move it into the "Orig-Aid" field. Counties may submit an EW30 transaction subsequent to that renewal to modify the "Orig-Aid" field if the original aid code has changed.

If after receipt of the tape/listing, the county fails to update MEDS with the appropriate aid code by the following renewal, those records will be placed in a hold status pending county action. Counties will receive MEDS renewal messages on all records that are placed in hold.

Below is an example of the time frames described above. The actual dates are unknown at this time.

Legislation:	January 15, 1988
MEDS Changes Installed:	February 21, 1988
Listing/Tape Mailed:	February 23, 1988
County Action Completed for April MOE:	March 24, 1988
Hold Status Generated for April MOE:	March 25, 1988
MEDS Renewal Messages Mailed:	March 29, 1988

County Online Procedures

Upon notification from this Department that legislation has passed and the MEDS changes have been installed, counties may submit online transactions (EW05, EW15, EW20 or EW30), to MEDS to report an OBRA/IRCA alien's Medi-Cal eligibility. The aid code which must be submitted in the "County-ID Per-MEDS" field, is the OBRA/IRCA aid code. The original aid code to which the alien is linked must be entered in the newly created "Orig-Aid" field.

Once the online transaction has updated MEDS, the original aid code will be stored in the "Orig-Aid" field located on the MEDS "Pending

Medi-Cal and Miscellaneous" inquiry screen. Below is an example of this process.

OBRA alien categorically linked as aid code 35:

MEDS Field	County Enters	MEDS Shows
County-ID Per-MEDS	01-58-1234567-1-01	01-58-1234567-1-01
Orig-Aid	35	35 on the Medi-Cal Pending and Misc. Inquiry Screen

In previous meetings with county staff the alternatives of either requiring counties to issue restricted Medi-Cal cards on an as needed basis or allowing counties to establish ongoing restricted eligibility for OBRA aliens was discussed. In response to county concerns regarding the additional workload which would be necessitated by the first option, we will be allowing counties to establish ongoing eligibility for OBRA aliens. Therefore, counties will follow current procedures to confirm eligibility on MEDS when an EW15 transaction is used to establish eligibility.

County Batch Procedures

In conjunction with the online procedures indicated above, once notified that legislation has passed, and the MEDS changes have been installed, counties may report eligibility for OBRA/IRCA beneficiaries via a batch process. The OBRA/IRCA aid code will be submitted as the aid code in the "County-ID Per-MEDS" field. The original aid code to which the OBRA/IRCA beneficiary is linked will be submitted in the "Orig-Aid" field data element 1249. For example: OBRA alien, aid code 58, was determined eligible as an aged Medically Needy, no share of cost individual - aid code 64. The aid code used in the "County-ID Per-MEDS" would be aid code 58, the "Original Aid Code" would be aid code 64. Data element, 1249, is available for use with the EW05, EW20 or EW30 transactions.

The original aid code will be stored in the "Orig-Aid" field located on the "Pending Medi-Cal and Miscellaneous" inquiry screen and subsequently used to determine future capitation rates for alien individuals who participate in dental and prepaid health plans. Counties are not required to retain the original aid code information on their county system as this field will not be included in the MEDS reconciliation process.

Counties are reminded that all required information pertaining to the original aid code, such as share of cost and long term care indicator,

must be submitted on the online/batch transactions, since that information effects the OBRA/IRCA eligibility status.

Counties are instructed to begin designing the necessary system/procedural changes but to hold the installation of those changes until further notice from this Department. The Department will time the installation of the MEDS changes to coincide with the passage of the required legislation, taking into consideration required state and county lead time.

HAS-2007 Procedures

The HAS-2007 form is used to report the issuance of hand typed cards whenever a county is unable to submit a transaction to "log" the card issuance on MEDS. (Please see attached form for reference.) When completing this form for OBRA/IRCA individuals, counties must enter the original aid code information. The aid code must be included in box #2, following the "Beneficiary ID". Please enclose the original aid code in parentheses to distinguish it from the rest of the county identification number, for example: 01-58-1234567-1-01 (35). Counties must make an additional copy of the HAS 2007 form and mail it to:

Department of Health Services
Medi-Cal Eligibility Branch
714 P Street, Room 1650
Sacramento, CA 95814
Attention: IRCA/OBRA Clerk

Only those forms which contain card issuance information on IRCA/OBRA individuals need to be copied and sent to the above address. The original aid code information on these forms, in addition to the information on MEDS, will be used to determine future capitation rates for alien individuals.

Medi-Cal Card Issuance

Upon implementation of the OBRA/IRCA provisions, Medi-Cal cards generated for individuals eligible under aid codes 52, 57 and 58 will have the following printed message, "VALID FOR EMERGENCY/PREGNANCY RELATED SERVICES". The Department will be notifying Medi-Cal providers of the restricted emergency and pregnancy related services allowed under these aid codes via the provider bulletin process. An informational copy of the provider bulletin will be sent to all counties.

Questions regarding the MEDS changes should be directed to your state MEDS liaison. IRCA/OBRA policy questions should be directed to Sandra Bierer at (916) 324-4971 or Tom Dickson at (916) 323-4124.

Thank you for your cooperation in implementing this legislation.

Sincerely,

Original signed by

Frank S. Martucci, Chief
Medi-Cal Eligibility Branch

Attachment

cc: Medi-Cal Liaisons
Medi-Cal Program Consultants
MEDS Liaisons

Expiration Date: August 1, 1988

STATE OF CALIFORNIA
MEDI-CAL ASSISTANCE PROGRAM

DEPARTMENT OF HEALTH SERVICES

CONTROL LOG FOR MC-301
(TEMPORARY CARD)

COUNTY OF ISSUANCE (NUMBER)

NAME OF ISSUER

MONTH OF ISSUANCE

CONTROL SERIAL NUMBER (1)	BENEFICIARY ID CO. AID. SERIAL, FSU. PER. (2)	BIRTH DATE MO-DA-YR (3)	SEX (4)	RESTORATION (C) (5)	F F P (6)	BENEFICIARY SSA NUMBER (7)	BENEFICIARY HIC/RR NUMBER (8)	ALIEN ID (9)	OTHER COVERAGE (10)	CO PAY STAT (11)	DISTRICT CODE (12)	CNTY USE FIELD (13)	REASON ISSUE CODE (A) (14)	TYPE CARD CODE (B) (15)	EFFECTIVE DATE MO-DA-YR (16)

(A) REASON OF ISSUANCE CODES:
1 = NEW ELIGIBLE
2 = LOST CARD
3 = LABELS USED UP
4 = MC-300 REQUESTED BUT NOT RECEIVED
5 = MC-300 HAD ERROR

(B) TYPE OF CARD CODES:
A = FULL COMPLEMENT
B = POE ONLY
C = OTHER (SPECIFY)

(C) RESTORATION CODES:
1 = RESTORED ELIGIBLE
2 = CONTINUING ELIGIBLE
3 = NEW ELIGIBLE

MAS 2007 (REV. 1 76)

Actual form size is 8½ x 14

Attachment