

DATE: September 21, 2026

TO: ALL COUNTY WELFARE DIRECTORS Letter No.:26-18
ALL COUNTY WELFARE ADMINISTRATIVE OFFICERS
ALL COUNTY MEDI-CAL PROGRAM SPECIALISTS/LIAISONS
ALL COUNTY HEALTH EXECUTIVES
ALL COUNTY MENTAL HEALTH DIRECTORS
ALL COUNTY MEDS LIAISONS

SUBJECT: IMPLEMENTATION OF EQUIFAX SERVICE AND TRUV THROUGH THE
CALIFORNIA HEALTHCARE ELIGIBILITY, ENROLLMENT, AND RETENTION
SYSTEM (CalHEERS) FOR VERIFICATION OF INCOME AND WORK AND
COMMUNITY ENGAGEMENT REQUIREMENTS
(Reference: All County Welfare Directors Letter Nos. [25-30](#), [22-08](#), [18-21](#),
[26-01](#), [25-21](#), [21-04](#), [20-17E](#), [21-23](#), [08-07](#), [18-25](#), [21-12](#) and Medi-Cal
Eligibility Division Information Letter Nos [24-29](#), [20-13](#), [21-36](#))

Purpose

The purpose of this All County Welfare Director's Letter (ACWDL) is for the Department of Health Care Services (DHCS) to provide counties with the policies and procedures regarding the implementation of Equifax's electronic verification of work and community engagement rules (WCER) and Truv income through the California Healthcare Eligibility, Enrollment, and Retention System (CalHEERS), via Change Request (CR) 323639 and CR 312102. These changes are set to be implemented by September 21, 2026, in release 26.9.

Background

The Affordable Care Act (ACA) introduced the use of electronic sources to verify income when determining Modified Adjusted Gross Income (MAGI) Medi-Cal eligibility, essentially minimizing the need of applicants and members to submit paper documentation ([CFR 42 § 435.949](#)). Currently, CalHEERS can electronically verify income through federal and state agencies, such as the Internal Revenue Service (IRS), Social Security Administration (SSA), Employment Development Department (EDD), and the Franchise Tax Board (FTB).

In early 2022, DHCS implemented Equifax's Verify Current Income (VCI) service with the Centers for Medicare and Medicaid Services (CMS) authorization. However, due to significant costs, the VCI service was subsequently discontinued at the end of 2024. Refer to [MEDIL 24-29](#) for additional guidance on discontinuance of VCI service. While the new Equifax service will closely mirror the functionality previously provided by VCI, this ACWDL obsoletes ACWDL 22-08 and formally replaces the VCI service with Equifax Instant Client Insights (Equifax).

On July 4, 2025, H.R.1 (Public Law 119-21) was signed into law. Section 71119 of H.R. 1 requires states to verify work hours as part of the WCER for individuals in the MAGI New Adult group. Effective January 1, 2027, individuals enrolled in the MAGI New Adult group must comply with WCER as a condition of Medi-Cal eligibility unless they qualify for an allowable exemption or short-term hardship. To support the federal verification requirements, DHCS is implementing Equifax to assist with verifying income and work hours, like the previous VCI process. Additionally, DHCS is integrating an income and employment verification platform, Truv. Truv is a consumer permissioned platform that provides real time verification of income and employment through payroll providers, including gig economy platforms, such as Uber or Lyft, and financial institutions like banks. Equifax and Truv do not provide verification for any community engagement activities, i.e., education, or volunteering.

DHCS is currently exploring additional options to support applicants and members in meeting this portion of the requirement and will issue further guidance once it is available. For more information on WCER, county eligibility workers (CEW) can review [ACWDL 25-30](#).

Truv and Equifax for CalFresh and CalWORKs

The California Department of Social Services (CDSS) will be releasing updated guidance on use of The Work Number separately. The Work Number is currently used by CEWs to secure verification of income and hours worked when necessary to determine initial and ongoing eligibility and/or program integrity.

To streamline income and employment verification information from Equifax, CDSS is currently working with the California Statewide Automated Welfare System (CalSAWS) on integration of The Work Number. This will allow counties to access the service without using a separate web portal for the purposes of eligibility determinations.

When a County Eligibility Worker (CEW) receives an Equifax Service response through CalHEERS and that Equifax response is generated prior to The Work Number response in CalSAWS, the CEW shall use the Equifax Service response received from CalHEERS.

CalSAWS automation will prevent a duplicate request from The Work Number when an Equifax Service response has already been received from CalHEERS.

Once the Equifax information is stored in the case file, it is considered known to the county and must be applied to all relevant programs. As noted above, CDSS will be releasing guidance in the future.

For more information on the use of Truv, CEWs can refer to [All County Letter \(ACL\) 26-11](#) and [ACL 26-37](#).

Equifax Service and Truv for Medi-Cal Implementation Timelines

Equifax Service

Updates scheduled for release in September 2026 integrate the Equifax service into CalHEERS' existing e-verification process, allowing Equifax to be used alongside current data sources such as the IRS and SSA, when CalHEERS calls the Federal Data Services Hub (FDSH) to electronically verify attested work and employment income information.

Initially, Equifax data that allows for the verification of income will be available, followed by WCER verification information, beginning in January 2027, with the implementation of WCER. While this letter focuses primarily on income verification, it also provides high-level information on the use of Equifax for WCER verification. Comprehensive guidance specific to the Medi-Cal WCER for the New Adult group will be released in a future letter.

Truv

Truv specializes in verification of income and employment by connecting businesses to an individual's payroll or financial institution, like their bank. Truv operates through a consumer permissioned model and is an optional tool for individuals to use. When an applicant or member consents, Truv establishes a secure connection to the applicant's or member's payroll, bank, or gig economy accounts. It will

retrieve data such as pay stubs, employment history, income details, work hours, and account balances in real time.

This process reduces manual verification, ensures accuracy, and streamlines the financial eligibility and work hour requirement determination.

Although Truv is scheduled for release in CalHEERS as part of the September 2026 system update, its functionality will roll out in two phases:

- Phase 1 (effective January 2027): Truv will be used exclusively to verify whether an individual who is required to meet WCER satisfies either the \$580 income threshold or the minimum 80 hour requirement, to verify their WCER status.
- Phase 2 (effective February 2027): In the second phase, the Truv functionality will expand to assist in the income data collection and as an income verification source for all Medi-Cal applicants or members.

Both phases of Truv integration will require the individual to consent to Truv use.

Truv Functionality Phase 1

Phase 1 will provide Truv functionality specifically for individuals who need to meet the work requirement income and hours component. For CalHEERS to initiate a Truv request the following conditions must be met:

- The individual's work requirement could not be verified through the FDSH,
- The individual belongs to a household income composition in which another member has not met the work requirement,
- The individual has attested to income greater than zero dollars, and
- The individual has a verified social security number (SSN).
 - Individuals who do not have a verified SSN will not see Truv as an option to verify their WCER status and will continue with the application or renewal flow.

When a member's work requirement cannot be verified, all members in the same work-requirement household income budget composition are provided the opportunity to use Truv, even if some members are exempt or their work requirement status was already verified.

If the conditions above are met, individuals will be provided with the option to use Truv once the application has been signed and submitted through CalHEERS.

Truv Functionality Phase 2

In Phase 2, which will be released and available in February 2027, all Medi-Cal applicants or members will have the option to connect to Truv to assist with income data collection in CalHEERS at application, renewal or change in circumstance (CIC), regardless of whether they are required to meet WCER.

Truv Phase 2 will provide two main functions: income data collection and supporting manual income verification. Individuals in Phase 2 and beyond will not be required to have a verified SSN to consent to Truv.

Equifax Service and Truv Functionality

Equifax Service

When sending case data to the FDSH, CalHEERS will attempt to generate a request from Equifax for each applicable individual on the Medi-Cal case. Equifax will first attempt to identify a match using the applicant's or member's Social Security Number (SSN) if the SSN is present and verified. If the Medi-Cal applicant or member does not have an SSN or a verified SSN at the point when the service is called, Equifax will instead use other identified personal demographics fields sent in the eligibility determination request (EDR), which includes the individual's:

- First Name (FN)
- Middle Name (MN)
- Last Name (LN)
- Date of Birth (DOB)
- Mailing or Residential address

For applicants or members whose first name is "First Name Unknown" (FNU), when sent through the FDSH, the Equifax service will use the demographic details to attempt to match the individual. If multiple records match or no match is found, the response will be "employee not found."

Truv

Unlike the Equifax Service, the option of connecting to Truv will only be available when the individual has reported income, first name, last name, and employer name.

Individuals who consent to Truv will have the option to obtain income information from their own employer's payroll system, or their own bank or financial institution. When an individual consents to using Truv, the applicant or member will be navigated through the Truv workflow and will then be required to use their own log-in credentials for either their employer's payroll system or financial institution as they would in their own accounts.

Once logged into Truv, individuals may either manually enter their employer name or select their employer from Truv's available dropdown list. The employer name attested on the application does not need to match the employer name selected or entered within Truv, as Truv's verification is based on the connection to the employer's payroll or gig-work platform rather than the attested text field. After the income is retrieved, the applicant or member is brought back to the CalHEERS portal to complete their application or renewal.

When a Medi-Cal household has multiple members, each individual must provide their own consent to use Truv. Consent is not provided at a household level, and every person who chooses to use Truv for income and employment verification must consent separately during their application, renewal or CIC.

Income information retrieved from Truv will be sent to CalSAWS, depending upon which source the individual consents to use to obtain their income information:

- When an applicant or member consents to using Truv through their payroll source, the report is a Verification of Income and Employment report (VOIE).
- When an applicant or member consents to using Truv through their financial institution such as their bank, the report received is known as Income Insights Report.

Counties must accept the information as verified as though the individual submitted manual documentation. Counties must use the information for the financial and WCER eligibility determination as if the applicant or member submitted physical pay stubs or other form of verification directly to the county.

Medi-Cal applicants and members who are self-employed may use the Truv financial institutions option, enabling them to provide bank statement information as verification of income. Because self-employed earnings may be deposited directly into the individual's own bank account, these bank statements must be accepted as income verification. Truv allows gig economy employees, for example Uber or Lyft drivers, the ability to obtain income verification through the payroll source.

For applicants and members who receive wages through a traditional payroll platform, bank statements submitted through the financial institutions option reflect only net pay and therefore cannot be used as the primary form of income verification. In these situations, counties will need to request appropriate documentation to verify gross income.

Truv will also support Medi-Cal applicants and members who use CalHEERS at application, renewal, or CIC during the income data collection portion. Medi-Cal applicants and members will have the option of using Truv to auto-populate their income information. Those who decline to use Truv will simply continue with either manually entering their income information or uploading a document to CalHEERS. Those who do opt to use Truv will see a page that provides an overview of Truv and the applicable consent language. The individual has the option of proceeding with Truv or can skip and return to the previous income-entry page. Medi-Cal applicants or members who consent to Truv will navigate to Truv screens to authenticate their employment income using their payroll platform or their bank account. CalHEERS will auto-populate, or automatically fill in income details, retrieved from Truv into the CalHEERS income page.

Once Truv auto-populates the information, the applicant or member may modify the income information retrieved from Truv in CalHEERS . If the individual has modified the income that Truv auto-populates in the income data collection section, then the modified information is treated as a manual entry as if the information were manually entered without using Truv.

The ability to use Truv to auto-populate the income data collection screen will only be allowed at intake, renewal (only to add a new employer or income) and CIC (only to add a new employer or income).

Members may not use Truv to edit an existing income already entered in the income data collection screen.

Information Contained in Truv and Equifax Service Response

If an applicant or member is found within Truv or Equifax's database of employers, the Equifax Service Response, Truv VOIE, or Income Insights Report received in CalHEERS will then be sent back to CalSAWS through the Determination Eligibility Response (DER) via the electronic health information transfer (eHIT). The Equifax response data may include the following:

- **Identity or Demographic Information**
 - First name
 - Last Name
 - Middle Name (if applicable)
 - Date of birth
- **Employer Information**
 - Employer Name
 - Employer Address
 - Employee Status Code (active/inactive)
 - Hire Date/Most Recent Hire
 - Termination Date and Reason
- **Income and Work Hours**
 - Pay period start and end date
 - Date paid
 - Pay period gross earnings
 - Hours worked

The Equifax Service response may include up to 36 full calendar months of employment information that may be used to determine WCER and financial eligibility determinations. Truv can collect 12-months of historical income needed to support verification of the WCER look-back period and attestations of seasonal or fluctuating income. Counties must only use the required amount of income information needed to make the financial eligibility determination.

Use of Equifax Data, Truv, and Income

Equifax varies from other FDSH sources in that after the self-attested income is compared against the electronic sources, Equifax provides real-time information for any applicant and member found within Equifax. Other electronic sources only return a high-level result indicating whether the self-attested income was found to be reasonably compatible, whereas Equifax will send additional data, as detailed above.

Equifax and Truv data must be used in the ex parte process to support initial applications, changes in circumstance (CIC), and at renewal for:

- MAGI Medi-Cal,
- Individuals CalHEERS identifies as potentially eligible Non-MAGI Medi-Cal and sends to the county for a required Non-MAGI evaluation (Non-MAGI referral)
- Mixed Household cases run through the Business Rules Engine, and
- Covered California programs that offer financial assistance.

Truv provides payroll and bank information, but does not perform reasonable compatibility, like Equifax does. In other words, Truv is a tool to obtain income verification while the reasonable compatibility checks continue to be performed by the sources listed above in the *Background* section. Truv can be used the same way as the Equifax response for the ex parte process. Counties must use the VOIE information or Income Insights Report received as verification of income and WCER the same way as if the applicant or member submitted manual verification to the county.

At CIC or renewal, when members report changes or complete their renewal directly through CalHEERS, they will be presented with the option to provide consent for Truv. DHCS, in collaboration with CDSS, is actively working on an enhancement to BenefitsCal that will expand access to Truv at renewal. A new QR code will be included as a separate enclosure in the renewal packet. When scanned, the QR code will take the member to a Truv order page where they can provide consent to use Truv through BenefitsCal.

Use of Equifax, Truv, and the Work Requirement

As noted above, the Equifax Service response and Truv VOIE report include both gross earnings and hours worked. Counties must use hours worked and wage information in the response, in either the Equifax Service response or VOIE, during the ex parte review to support verification of employment-based compliance with the WCER. Equifax and

Truv data elements can assist counties in confirming employment and work hours; however, full WCER eligibility criteria will be addressed separately in the forthcoming WCER ACWDL. Additional examples and detailed instructions will be provided in that guidance.

Equifax and MAGI Medi-Cal Reasonable Compatibility

Currently, when verifying income for MAGI Medi-Cal financial eligibility, CalHEERS compares the self-attestations made by applicants or members on the application or renewal forms to all available electronic data sources through the FDSH. Once the self-attested income information is entered in CalHEERS or California Statewide Automated Welfare System (CalSAWS), CalHEERS will first attempt to verify the self-attested income electronically by comparing the self-attested information to all the electronic sources at once. CalHEERS will use Equifax in the same way as other electronic verification sources already available as part of the reasonable compatibility check. The attestation and data source are considered "reasonably compatible" if they are at or below the eligibility threshold ([ACWDL 26-01](#)). If reasonably compatible, then the self-attested information is considered electronically verified. (See [ACWDL 25-21](#) and [ACWDL 21-04](#) for further guidance.)

With the implementation of Equifax, CEWs must follow the guidance below:

- If income is reasonably compatible and an Equifax response is not received, CEWs must proceed with current business processes and determine the financial eligibility determination.
 - For example, if an applicant reports zero income, and the income is found reasonably compatible through Equifax, the applicant or member is not required to provide additional verification, and the CEW must proceed with the financial eligibility determination.
- If income is not reasonably compatible, and the Equifax response reflects an income amount over the threshold, the Equifax response must not be used as a stand-alone verification source. Manual verification must be requested.
 - CEWs may use the Equifax data reflecting an income amount over the threshold to assist with manual verification requests. However, the data received is not considered verification of income since the reasonable compatibility check failed.

Verification Hierarchy

California opts to use multiple data sources (listed above) to verify financial information. With the expansion of the ACA, states had flexibility in how they structured or used the electronic sources. For example, CMS allowed states to either call multiple sources at once or create a hierarchy. DHCS is currently working with CalHEERS to create a hierarchy for calling electronic income data sources. CalHEERS will continue to call all electronic sources as it does today until this hierarchy is established. Future updates will direct CalHEERS to check the Equifax response first, since Equifax has significantly more current income information than IRS or FTB, which rely on annual tax filings. Creating the hierarchy will ensure CalHEERS uses the most current electronic income source to reduce outdated discrepancies, and it will also prevent income from being considered reasonably compatible when older or less current sources conflict with Equifax.

The verification hierarchy will function as follows:

- If the self-attested income is reasonably compatible with the Equifax data, the income will be electronically verified, and no further action will be required from the applicant or member.
- If the self-attested income is not reasonably compatible with Equifax, the remaining electronic sources will not be utilized to determine reasonable compatibility.
- If Equifax does not return a response (the applicant or member cannot be found within Equifax or the record in Equifax shows the individual is not actively employed), CalHEERS will then rely on the remaining electronic sources to attempt electronic verification.
- CalHEERS will perform a reasonable compatibility check with the remaining sources per the hierarchy below. If one source finds the income reasonably compatible, then the income will be electronically verified.
- If the self-attested income could not be found reasonably compatible with the remaining sources:
 - The applicant or member will then be provided with an option to use Truv to verify their income and WCER.
 - If the applicant or member opts to use Truv, the income information received will be sent to the county where it must be used to determine financial and WCER eligibility.

- If the applicant/member opts not to use Truv, the income will remain pending and the county must follow current business processes and request a reasonable explanation or manual verification.

Reasonable explanation functionality in CalHEERS will not change as a result of the hierarchy. The Reasonable Explanation option will only appear when income is not reasonably compatible with Equifax or other available electronic data sources.

DHCS expects this functionality to be completed in early February 2027. Guidance will be released in the future ACWDL. DHCS will also amend the California MAGI-Based Eligibility Verification Plan to include Equifax as an electronic source, and a description of the expected data hierarchy to be utilized in the verification of income for Medi-Cal applicants and members.

Equifax and Truv as an Income Verification Source for Non-MAGI Medi-Cal

While CMS allows states to apply reasonable compatibility standards to Non-MAGI groups, California did not opt to include the ability for CalHEERS to electronically verify or use reasonable compatibility standards of income for Non-MAGI Medi-Cal programs automatically due to technical and system restrictions, as well as the complexity and variation in calculating income eligibility for the various Non-MAGI programs.

Non-MAGI Medi-Cal does not leverage the automated MAGI reasonable compatibility conditions for income in CalHEERS. However, in certain situations, it must be used to confirm a Non-MAGI applicant's or member's self-attested information using a manual reasonable compatibility process when available. For example, a Non-MAGI individual is part of a household with MAGI members. The MAGI member reports a change in circumstance, triggering a new eligibility determination through the BRE. During this process, CalHEERS returns an Equifax Service response for the MAGI and Non-MAGI member. The county must use that Equifax data to support the manual reasonable compatibility process for the Non-MAGI member when applicable.

CEWs must use the Equifax Service response (when available) for the Aged, Blind, and Disabled (ABD) Federal Poverty Level (FPL) program to confirm self-attested income information. To be eligible to the ABD FPL Non-MAGI program, an applicant's or member's countable income cannot exceed a level set by the state that is based on the

FPL. Due to the ABD-FPL program's income eligibility threshold, it aligns more easily than other Non-MAGI program income eligibility calculations to leverage the reasonable compatibility policy concept.

CEWs must proceed with verifying income using Equifax Service response for Non-MAGI ABD-FPL program eligibility determinations when:

- The Equifax Service response matches with the applicant's or member's self-attested employer information **and**
- The self-attested income and the Equifax Service response (after all applicable income deductions have been applied) would not exceed the ABD-FPL program income threshold.

However, if the self-attested income information and/or the Equifax Service response would result in a Share-of-Cost (SOC) to the applicant or member, CEWs must contact the applicant or member to request verification.

At this time, the Equifax Service response must only be used for the ABD-FPL Non-MAGI program. DHCS will explore the future use of Equifax Service response with other Non-MAGI Medi-Cal programs and will issue future guidance when other programs are identified. For more information on the acceptable use of the FDSH e-verifications for Non-MAGI Medi-Cal eligibility determination, please see [ACWDL 20-17E](#).

When Truv VOIE or Income Insights Report information is received through CalHEERS for a Non-MAGI applicant, counties should treat the Truv information the same way they would any other income and property verification. If the CEW identifies income in the Income Insights Report that was not previously reported, the CEW must contact the applicant or member to request the information needed to determine the source of the income and whether it must be used to complete the financial and asset determination.

Use of Available Information

With the inclusion of the Equifax Service as a source of electronic income verification and Truv as a consumer-facing tool, CEWs may see prior Equifax or Truv responses used in previous eligibility determinations. Additional information may include VOIE data, financial information from the Income Insights Report, or information previously obtained through The Work Number for applicants or members who are concurrently

enrolled in other public assistance programs. Per [ACWDL 18-21](#), counties must continue to complete an ex parte review of all available information, from cases or programs that are either open or were closed within the last 90 days, which may include any available commercial income verification reports, including the Equifax Service response, The Work Number and the other sources listed above. The county should evaluate the veracity and age of the information as they would any other available income information.

For Medi-Cal only cases at application, income information from The Work Number or other public assistance programs may only be used when that information already is valid and still exists in the other program's open case file, or case file is closed within 90 days. For CIC or renewal, commercial income verification reports may be used if the case is open or closed within the last 90 days.

Additionally, since most applicants or members provide self-attested income information that does not match how income is reviewed and calculated for Medi-Cal, it will not be unusual for the Equifax Service response to have:

- Discrepancies, or not an exact match, between the self-attested income information and the Equifax Service response, or
- An Equifax Service response sent back even when self-attested income information is not reasonably compatible with the information received from any of the electronic data sources.

In accordance with [42 CFR § 435.952\(b\)](#), self-attested information provided by the applicant or beneficiary and found reasonably compatible with the Equifax Service response must be used to determine or renew Medi-Cal eligibility. Reasonable compatibility is intended to confirm, not replace, the self-attested income information. Therefore, when the Equifax Service response and the self-attested income do not match **and** income is reasonably compatible, CEWs shall enter or continue to use the self-attested income information in SAWS. This policy aligns with existing reasonable compatibility functionality from other verification sources, such as the IRS.

When requesting manual verification to complete the eligibility determination, CEWs should incorporate the information received in the Equifax response such as the

individual's employer or organization name to best assist the applicant or member in locating the information needed by the county, or to provide clarity for the request.

Truv VOIE or Income Insights Report information received must be treated the same as manual documentation provided by the member. When Truv information is received, the CEW must update the appropriate CalSAWS data collection screens using the Truv information, rather than the self-attested income, consistent with current business processes used when a member provides physical pay stubs.

For further guidance related to contact requirements, please see [ACWDL 08-07](#), [ACWDL 18-25](#), and [ACWDL 22-12](#). For reminders on acceptable Medi-Cal verification request forms, further guidance can be found in [MEDIL 20-13](#), while the most updated guidance released by CMS regarding the use of affidavits can be found in [ACWDL 21-12](#). Furthermore, CEWs shall continue to follow current guidance in [MEDIL 21-36](#) regarding historical income record entry where an applicant has self-attested to receiving income during the current calendar year, including but is not limited to Unemployment Insurance Benefits (UIB).

Equifax Service Responses and Truv Examples

The following examples pertain only to the use of Equifax, the Equifax Response, and Truv as sources of verification. Additional guidance, including examples related to the six-month renewal process and WCER requirements, will be provided in forthcoming ACWDLs.

Example #1: The Equifax Service response was received, income is E-verified and WCER is met

- Applicant A applies for Medi-Cal through the BenefitsCal portal on January 1, 2027, and self-attests to part time employment with Safeway earning \$800 per month.
- Applicant A is 30 years old and subject to the WCER for the New Adult Group (ages 19-64).
- The CEW enters self-attested data in SAWS and information is sent to CalHEERS.
- The Equifax Service response is provided by CalHEERS via eHIT to SAWS.

- The Equifax Service confirms that the WCER is met and verifies active employment with Safeway.
- The Equifax Response verifies that Applicant A began with Safeway in May 2026.
- Income is e-verified using Equifax income information.

Outcome: Applicant A's self-attested income is reasonably compatible, and WCER are also met because the applicant's income is equivalent to at least 80 hours at federal minimum wage. Since the income was e-verified, the applicant's WCER compliance for the look back month (December) is also met. The CEW must proceed with completing the application without requesting manual verification of income and WCER information.

In this scenario, the CEW completes the eligibility determination and Applicant A is eligible for Medi-Cal beginning January 1, 2027.

Example #2: Full-time college student applies for Medi-Cal. The Equifax Service response was received. WCER is met.

- Applicant B applies for Medi-Cal through the BenefitsCal portal on January 1, 2027, and self-attests to part-time employment with Amazon, earning \$200 every two weeks.
- Applicant B submits verification that they are a full-time student at their local university.
- Applicant B is 24 years old and meets the student WCER qualifying activity.
- The CEW enters self-attested data in SAWS and information is sent to CalHEERS.
- CalHEERS makes an Equifax call with demographic details (SSN, FN, LN, DOB, and address) in the request to verify income.
- The Equifax Service response is provided by CalHEERS via eHIT to SAWS.
- The Equifax Service confirms active employment with Amazon.
- Income is e-verified using Equifax income information, shown in the DER.

Outcome: Applicant B's self-attested income is reasonably compatible based on the Equifax response using demographic data. Applicant B meets WCER because of meeting a qualifying activity by being a full-time student. Therefore, the CEW must proceed with completing the application without requesting manual verification of income and WCER information.

In this scenario, the CEW completes the eligibility determination and Applicant B is eligible for Medi-Cal beginning January 1, 2027.

Example #3: Equifax Service response is received, SSN not present, and not e-verified. Applicant is found in the Equifax Service using the mailing address provided.

- Applicant C is 22 years old and does not have an SSN.
- Applicant C is undocumented.
- Applicant C is unhoused and applies for Medi-Cal at their local county office on February 10, 2027.
- Applicant C reports earned income of \$1100 per month from Los Rios School District.
- Applicant C does not have an e-verified SSN on file and provides their mailing address only.
- The CEW enters self-attested data in SAWS and information is sent to CalHEERS.
- CalHEERS makes an Equifax call with demographic details available (FN, LN, DOB, and mailing address).
- The Equifax Service confirms the income and active employment with Los Rios School District.
- Income is e-verified using Equifax income information, shown in the DER.

Outcome: Since the applicant does not have an SSN, the Equifax Service used demographic details with the applicant's mailing address. Applicant C's self-attested income and the total countable income in the FDSH is under the MAGI FPL limit, and the Equifax service response confirmed income as reasonably compatible. Once all other eligibility requirements are met, the CEW must proceed with completing the application without requiring manual verification for any pending verifications. Additionally, the Equifax Service response confirmed Applicant C meets WCER.

In this scenario the CEW completes the eligibility determination and Applicant C is eligible for Medi-Cal beginning February 1, 2027.

Example #4: Equifax Service response and self-attested income information for a Non-MAGI financial evaluation is below ABD-FPL program limits.

- Spouse A (67 years old) and Spouse B (60 years old) apply for Medi-Cal at their local county office on March 10, 2027.
- Spouse B is subject to the WCER for the New Adult Group (ages 19-64).
- Spouse A reports monthly unearned income of \$900 per month from SSA's Retirement, Survivors, and Disability Insurance (RSDI), as well as earned income from a part time job at McDonald's for \$325 per month.
- Spouse B reports zero income.
- RSDI for Spouse A is verified in IEVS.
- Spouse A was found in the Equifax database, and the Equifax Service response is sent via eHIT to SAWS.
- The Equifax Service response confirms active employment with McDonald's but reflects current earned income of \$500 per month.
- The income for Spouse B was e-verified.

Outcome: After all applicable Non-MAGI income deductions have been applied to the unearned and earned income for Spouse A and despite the discrepancies, the CEW finds that the Equifax Service response and the self-attested income for Spouse A do not exceed the income limits for the ABD-FPL program. Spouse A's earned income can be verified using the Equifax information. Spouse A is excluded from WCER. As a reminder, CEWs must not enter what was returned in the Equifax Service and would continue to use the self-attested income information for Spouse B.

In this scenario, the CEW completes the eligibility determination, and Spouse A and Spouse B are eligible for Medi-Cal beginning March 1, 2027.

Example #5: Equifax Service response and self-attested income information for a Non-MAGI financial evaluation is above ABD-FPL program limits.

- Spouse A (68) applies for Medi-Cal through CalHEERS in August 2027.
- Spouse A is not subject to WCER. Spouse B is not requesting Medi-Cal.
- Spouse A self-attests to \$1100 in RSDI and earned income from Target of \$845 per month.
- Spouse B self-attests to \$2250 per month from Walgreens.

- Spouse A was found in the Equifax database, and the Equifax Service response is sent via eHIT to SAWS. The Equifax Service response confirms active employment with Target but reflects current earned income of \$1220 per month.
- Spouse B's income and employment information was not found in Equifax; however, it was found to be reasonably compatible with other sources.
- Neither Spouse A nor Spouse B consented to using Truv.
- After all applicable Non-MAGI income deductions have been applied to the unearned and earned income, the Equifax Service response exceeds the ABD-FPL program limits and would potentially result in a SOC for Spouse A.

Outcome: The CEW must request manual verification of income to resolve the discrepancy and ensure the SOC is accurate for Spouse A. Spouse A is excluded from WCER.

Example #6 (Continuation of Example 5) Spouse B Contacts the County to Report a Change-in-Circumstance to the county and Requests to Add Spouse.

- In February 2028 (six months after Spouse A's initial application, Spouse B reports that their income at Walgreens has been reduced.
- Spouse B is requesting to be evaluated for Medi-Cal.
- The income reported would potentially place Spouse B within the New Adult Group.
- The CEW updates the Walgreens income and sends the updated information to CalHEERS to try and electronically verify the income.
- Spouse B was not found in the Equifax Service and income is not reasonably compatible with any other electronic source.

Outcome: Since income could not be found reasonably compatible, the CEW would need to obtain a reasonable explanation and/or manual verification from Spouse B. Spouse B will also be subject to the WCER. The CEW reviews to see if they qualify before requesting information about work and community engagement requirements, following the steps outlined in ACWDL 25-30.

Example #7: The Equifax Service response received shows active employment with an undisclosed employer at application.

- Applicant A applies at their local county office and submits the application along with pay stubs from their current self-attested employment with Apple Inc.
- Applicant A is 27 years old and subject to the WCER for the New Adult Group (ages 19-64).
- Applicant A self-attests to \$850 per month in earned income with Apple Inc.
- Income for Applicant A is not e-verified.
- Applicant A was found in Equifax's database, and an Equifax Service response was sent to SAWS in the DER via eHIT.
- Equifax Service response confirms active employment with two employers; Apple Inc. and CVS.

Outcome: The CEW must request manual verification of income to address the discrepancy caused by the additional employment (CVS) not reported on the application, including income information for Apple Inc. The income and employment data found in the Equifax response, from Apple Inc., verifies the applicant's WCER compliance including for the look-back month.

Example #8: Applicant reports zero income and Equifax Service response is not received.

- Applicant A (24) applies for Medi-Cal at their local county office and reports zero income.
- Applicant A is 24 years old and subject to the WCER for the New Adult Group (ages 19-64).
- The CEW enters all data into SAWS and sends the information to CalHEERS.
- Applicant A is not known in the Equifax database, and the Equifax Service response is not received.
- Income is not e-verified.

Outcome: The self-attested income information was not found reasonably compatible with Equifax. Since the applicant reports zero income, Truv is not an option for them to use. The zero income remains pending and the county must obtain a reasonable explanation or manual documentation to resolve the discrepancy.

Example #9: Pregnant Applicant reports zero income and Equifax Service response is received.

- Applicant A applies for Medi-Cal via mail on July 3, 2027, and reports they are pregnant and currently have zero income, therefore, they are not subject to WCER.
- The CEW receives the application and enters all data into SAWS and sends the information to CalHEERS.
- Applicant A is known in the Equifax database, and the Equifax Service response is received showing that Applicant A has income from Costco, and the Equifax Service response is sent to CalSAWS.
- Income is not e-verified in CalHEERS through Equifax.

Outcome: The CEW must reach out to the applicant for further information on their Costco employment since there is a discrepancy between their self-attestation and what was received in the Equifax Service report. As a reminder, the county may use the information from the Equifax Report as leverage in their request to the applicant. Since Applicant A is pregnant, they are exempt from WCER.

Example #10: Medi-Cal member requests Retro Medi-Cal coverage for the month prior to the month of application two months later.

- Member A (32) applies for Medi-Cal on April 2, 2027, and is subject to the WCER.
- Member A self-attests to income over \$580 per month at the Grocery Outlet.
- Member A's income and WCER were verified using an Equifax Service response.
- Member A contacts the county on June 11, 2027, to request Retroactive Medi-Cal.
- Member A continues to be subject to WCER.
- Member A just received unpaid medical bills for the month of March 2027.
- The CEW completes the MC 210A telephonically with Member A.
- Member A reports that there was no income change in the month of March.
- The CEW must use the information found in the previous Equifax Service response that verifies that Member A has at least 80 hours of work and over \$580 income in the month of March.

Outcome: Since the Equifax Service response received at application contained employment information for Member A's employment with Grocery Outlet back to when Member A began in December 2026, the CEW used the information found in the previous Equifax Service response to verify that Member A has 80 hours of work and over \$580 income in the month of March for the retroactive period requested, and the lookback period of February 2027.

In this scenario, the CEW completes the eligibility determination, and Member A is eligible for retro-active Medi-Cal in the month of March 2027, and ongoing Medi-Cal beginning April 2027.

Example #11 Member A (43), subject to the WCER, completes their renewal in CalHEERS during their 90-day cure period.

- Member A's renewal was due June 30, 2027, after income did not e-verify. Member A did not complete the renewal packet, and their Medi-Cal was discontinued for July 1, 2027.
- Member A was provided with a 90-day cure period and had until September 28, 2027, to cure the Medi-Cal case.
- Member A completes the renewal in CalHEERS on August 3rd, 2027.
- Member A reports that their previous employer has ended and they now work for IKEA.
- Income for member A is e-verified through Equifax.
- Member A is known in the Equifax database, and the Equifax Service response is received showing that Applicant A has income from IKEA, and the Equifax Service response is sent to CalSAWS.

Outcome: The Equifax Service response shows Member A met WCER since their last eligibility determination as they earned more than \$580 and worked over 80 hours in the month of June in their current renewal period. Now that income verification has been received, the county will proceed with processing the renewal and determining eligibility.

In this scenario, the CEW follows the regular rescind process and reinstates Member A's Medi-Cal coverage back to the effective date of the discontinuance.

Example #12 Applicant applies for Medi-Cal through the CalHEERS portal. The applicant consents to the use of Truv.

- Applicant A applies for Medi-Cal on August 13, 2027.
- Applicant A is 24 years old and subject to the WCER for the New Adult Group (ages 19-64).
- Applicant A works for Hamburger Hut.
- Applicant A begins the application flow through CalHEERS and the income and WCER is not found reasonably compatible with Equifax.
- Applicant A is provided the option to connect to Truv.
- Applicant A consents to use the third party Truv to obtain income and hour information from the Hamburger Hut's payroll platform.
- Applicant A is successful in logging in to their payroll platform through Truv.
- The VOIE information is sent to the county through the DER.

Outcome: The CEW receives the application and the VOIE information. The CEW reviews the information received and uses the financial and work hour information included in the VOIE for the financial and WCER eligibility determination.

In this scenario, the CEW completes the eligibility determination and Applicant A is eligible for Medi-Cal beginning August 1, 2027.

Example #13 Applicant applies for Medi-Cal through the CalHEERS portal. The applicant does not consent to the use of Truv.

- Applicant A applies for Medi-Cal on August 13, 2027.
- Applicant A is 21 years old and subject to the WCER for the New Adult Group (ages 19-64).
- Applicant A works for Bath and Body Works.
- Applicant A begins the application flow through CalHEERS, and the applicant could not be found in the Equifax database.
- The self-attested income is then run against the remaining electronic sources in an attempt to determine reasonable compatibility.
- Income was not found reasonably compatible.

- Applicant A is provided with the option to connect to Truv.
- Applicant A does not consent to using the third party Truv to obtain income and hour information from Bath and Body Works payroll platform.

Outcome: The income will remain pending and the county must follow current business processes in either obtaining a reasonable explanation or manual verification of income and WCER for Applicant A.

Example #14 Medi-Cal member A completes a CIC in the CalHEERS portal to report a pregnancy, decrease in income, and an updated address. Member A uses Truv to verify their self-employment income.

- In May 2027, 24 year old Medi-Cal member A logs into CalHEERS to report a change.
- Member A is self-employed with their own home cleaning business.
- Member A reports the following changes:
 - Pregnant and due January 2028
 - A new address (still within current county), and,
 - Due to the relocation, there was a decrease in income as Member A lost two clients.
- Income for Member A is not found to be reasonably compatible with Equifax or the remaining electronic sources.
- Member A is provided with the option to connect to Truv.
- Member A consents to using the third-party Truv to obtain income information using their financial institution.
- Member A is successful in logging in to their financial institution through Truv.
- The Income Insights report information is sent to the county through the DER.

Outcome: The CEW receives the CIC and the Income Insights report information. The CEW reviews the information received and uses the financial information to determine ongoing eligibility. Since Member A reported a pregnancy, WCER does not need to be evaluated.

In this scenario, the CEW completes the eligibility determination, and Member A remains eligible for Medi-Cal.

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If you have any questions, or if we can provide further information, please send a policy clarification request to MCEDPolicy@dhcs.ca.gov.

Sincerely,

Sarah Crow, Chief
Medi-Cal Eligibility Division