

DATE: September 9, 2026

TO: ALL COUNTY WELFARE DIRECTORS Letter No.:26-15
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: RESIDENCY AND ELECTRONIC VERIFICATION STATUS UPDATE

Supersedes & Obsoletes: [ACWDL 26-04](#) and [ACWDL 26-04E](#)

The purpose of this All County Welfare Directors Letter (ACWDL) is to provide counties with updated and consolidated guidance on California state residency policy and verification procedures, as well as the corresponding updates to the California Healthcare Eligibility, Enrollment, and Retention System (CalHEERS) and the California Statewide Automated Welfare System (CalSAWS). This letter also aims to clarify county responsibilities, promote alignment between systems, and ensure compliance with state and federal eligibility regulations.

Background

During the implementation of the Affordable Care Act (ACA), Department of Health Care Services (DHCS) issued policy guidance that counties were required to check whether an applicant met the residency requirement but allowed for residency discrepancies to be addressed after Medi-Cal eligibility was granted. With the implementation of Accelerated Enrollment (AE) for children and adults, and improvements to the residency verification sources, DHCS is enhancing the residency verification process in CalHEERS to better align with state and federal policy.

Policy

Residency is a requirement for Medi-Cal eligibility as set forth in Welfare and Institutions Code (W&I) sections 14007 through 14007.15 and Title 22, California Code of Regulations (CCR) sections 50320 through 50338. To be eligible for Medi-Cal in California, an individual must reside in California and meet all other eligibility requirements. Children are residents where their primary parent or guardian is a resident. A child's residency is generally the same as their parent(s) or legal guardian(s)

(W&I Code §17.1). No separate proof of residency is required for the child if the parent or guardian has established California residency.

California residency is established if the individual is:

- Living in California with the intent to remain permanently or for an indefinite period; or
- entered the state with a job commitment or to seek employment, whether or not currently employed.

Residency is assessed based on the totality of circumstances, including the intent to remain in California. Temporary absences from the state, such as for school, work, or medical reasons, do not necessarily impact an applicant/member's residency status if they maintain the intent to return.

Residency requirements apply to all Medi-Cal programs including Modified Adjusted Gross Income (MAGI), Non-MAGI, Medi-Cal Inmate Eligibility Programs (MCIEP), Medi-Cal Access Program (MCAP) and County Children's Health Initiative Program (CCHIP). Residency is a one-time eligibility factor, and once verified, does not need to be re-verified at renewal unless a reported or discovered change reasonably suggests a change in residency status.

Electronic Verification of California Residency

Effective February 23, 2026, CalHEERS and CalSAWS will implement enhancements to the residency verification process to provide counties with a clearer and more consistent process for confirming residency status. As part of these enhancements, residency verification must be satisfied for an applicant prior to having a final Medi-Cal eligibility determination.

Electronic residency verification will be attempted for every adult on the application or renewal. When the primary applicant is successfully verified, that verification may be applied to all other household members who live with the primary applicant, and have no conflicting residency information.

When an applicant cannot be electronically verified for California residency, the applicant may have their residency verified based on another household member's electronic residency verification under the following conditions:

For Adult Applicants:

- The primary applicant has been electronically verified for California residency, AND
- The adult applicant resides in the same household as the primary applicant.

Example: Individual A and Individual B submit their application through the online portal. They are married and living together. California residency is electronically verified for Individual A (primary applicant) but electronic data sources cannot verify residency for the Individual B (no conflicting responses were returned). Individual B's residency will be verified through Individual A's electronic verification, since there is no other conflicting information.

For Child Applicants:

- The primary applicant or the child's parent, guardian, or caretaker relative has been electronically verified for California residency, AND
- The child resides in the same household as that verified individual.

Applicants whose residency verification cannot be electronically verified (either through their own verification or the residency verification of the primary applicant) who meet all other Medi-Cal eligibility factors will be granted Accelerated Enrollment. Counties must request administrative verification of residency to complete the Medi-Cal determination. Additional guidance regarding accelerated enrollment can be found in [ACWDL 25-05](#).

Administrative Verification of California Residency

When electronic verification of residency is not available, counties must allow applicants to provide acceptable administrative verification. To do this, counties must request the necessary information from the applicant(s) by following the two-contact requirement outlined in ([ACWDL 08-07](#) and [22-12](#)). As part of this request, counties must obtain proof of residency from each adult household member who was unable to verify residency through electronic sources. For children, administrative verification of

residency is not required. Residency for children will be confirmed automatically based on the proof of residency provided by the parent(s), similar to electronic verification.

Welfare & Institutions Code 14007.1(b), state residency can be established if the individual 21 years of age or older is capable of indicating intent, and not residing in an institution, by providing one of the following documents to verify residency. These documents must be in the name of the applicant or member and include:

- 1) A recent California rent or mortgage receipt or utility bill in the individual's name.
- 2) A current California motor vehicle driver's license or California identification card issued by the Department of Motor Vehicles in the individual's name.
- 3) A current California motor vehicle registration in the individual's name.
- 4) A document showing that the individual is employed in this state or is seeking employment in the state.
- 5) A document showing that the individual has registered with a public or private employment service in this state.
- 6) Evidence that the individual has enrolled his or her children in a school in this state.
- 7) Evidence that the individual is receiving public assistance in this state. For purposes of this paragraph, "public assistance" shall not include unemployment insurance benefits.
- 8) Evidence of registration to vote in this state.
- 9) A declaration by the individual under penalty of perjury that he or she intends to reside in this state and does not have a fixed address and cannot provide any of the documents as identified in paragraphs (1) to (8), inclusive.
- 10) A declaration by the individual under penalty of perjury that they have entered the state with a job commitment or is seeking employment in the state and cannot provide any of the documents identified in paragraphs (1) to (8), inclusive.

Once acceptable administrative verification has been provided and confirmed, the county must proceed with the determination process and finalize Medi-Cal eligibility.

Failure to Provide Residency Verification

If an adult applicant fails to provide residency verification after the county has followed the two-contact request process, Medi-Cal eligibility must be denied for all adults who did not provide proof of residency. When residency cannot be verified electronically and the individual does not submit sufficient documentation after being given a reasonable opportunity, the county must issue a Notice of Action (NOA). The NOA must explain:

- The reason for the discontinuance or denial
- The specific missing or insufficient verification
- The opportunity to provide verification and reestablish eligibility
- The required appeal rights

Current NOAs related to residency are available within CalSAWS and CalHEERS. These notices are up to date and reflect the latest policy guidance.

For households that contain children under the age of 19:

If during the administrative verification process, the primary applicant fails to provide residency verifications, the county must maintain the child's eligibility and not discontinue coverage. Residency does not need to be verified at renewal unless the county has received any contradictory evidence or discrepancies indicating the child is residing outside of California.

Evidence to the Contrary

In general, evidence to the contrary is any information available to the county that contradicts an applicant's claim that they are a resident of California (see [ACWDL 95-47](#) and [96-27](#)).

Counties must take action when they become aware of any information that contradicts an applicant's or member's claim of California residency. This includes data from electronic sources, administrative records, or third-party reports. The county must assess whether the evidence meets the threshold of a "preponderance of credible evidence" indicating the individual is not a California resident. In other words, a county's determination of an applicant's residency must reflect whichever conclusion is more likely to be true than not be true, based on all of the available information.

CEWs must monitor residency discrepancies flagged by CalSAWS, CalHEERS, or other sources (e.g. out-of-state address on documents submitted, employment/school in another state, PARIS match indicating residency out of state).

CEWs must document the facts/rationale for any residency concern in the case journal. If any evidence is inconclusive, CEWs must request an investigation to resolve the discrepancy.

Counties must follow the two-contact requirement (per [ACWDL 08-07](#) and [22-12](#)) to request residency verification from the applicant. If verification is not provided or the evidence confirms non-residency, the county must issue a Notice of Action (NOA) with reason for the denial, specific missing or insufficient verification, opportunity to re-establish eligibility, and the appeal rights.

During redetermination, if residency is in question after the ex parte review, the county must follow guidance in [ACWDL 22-33](#) to send a MC 355 and provide the member(s) 30 days to provide the required verification. If the member does not respond within 30 days, and the county has completed the second contact attempt as required under [ACWDL 22-33](#), the county shall proceed with discontinuance if it did not receive a response and issue a timely ten-day Notice of Action (NOA) including the 90-day cure period language.

If the primary applicant's residency is denied, all linked household members whose residency is derived from the primary applicant may also be denied. Children under 21 may retain Eligibility Status Protection (ESP) if other criteria are met, even when residency is pending.

Example #1: An applicant submits a lease agreement with an out-of-state address. CEW documents the discrepancy, and requests California residency verification. The CEW denies the case when no verification is provided.

Example #2: An adult applicant submits a Medi-Cal application through CalHEERS. The applicant self-attests to living in California and intends to remain. However, during the e-verification process, the system flags a discrepancy. Employment records, obtained via a third-party match, show active employment in Nevada, with a Nevada address listed. The CEW documents the conflicting information in the case journal. They initiate the

two-contact process to request clarification and California residency verification. The applicant responds with an insufficient affidavit stating they intend to return to California. The county determines the applicant is not a California resident and denies the case. A NOA is issued explaining the denial due to failure to verify California residency.

Residency Examples

Example #1: Parent A and 10-year-old child apply for Medi-Cal. Residency was electronically verified for Parent A. The child's residency is considered verified based on Parent A and they will be granted Medi-Cal eligibility (assuming all other eligibility factors are met).

Example #2: Parent B and 10-year-old child apply for Medi-Cal. Parent B's residency could not be electronically verified. Both household members were granted AE for MAGI Medi-Cal. Since residency was unable to be verified, the county requested proof of residence from Parent B. Parent B provides adequate verification. Verifications are updated and both household members are eligible for Medi-Cal (assuming all other eligibility factors are met).

Example #3: Parent C and 12-year-old child apply for Medi-Cal. Parent C's residency could not be electronically verified. Both household members were granted AE for MAGI Medi-Cal. Since residency was unable to be verified, the county requested proof of residence from Parent C. The requested verification was never provided. The county denies Parent C for Medi-Cal. The child remains in Continuous Eligibility for Children (CEC) and continues Medi-Cal.

Example #4: Parent D, Parent E and their 10-year-old child apply for Medi-Cal. Residency verification for Parent D, and the 10-year-old child were electronically verified. Parent E's residency was unable to be electronically verified. Since Parent D was successfully verified, Parent E's and the child's residency is considered verified based on Parent D and they will be granted Medi-Cal eligibility (assuming all other eligibility factors are met).

Example #5: Parent F, Parent G and their 10-year-old child apply for Medi-Cal. Parent F and G's residency could not be electronically verified. All household members were

granted AE for MAGI Medi-Cal. Since residency was unable to be verified, the county requested proof of residence from Parent F and G. One week later, Parent F provides sufficient proof for their residency. Parent G fails to provide verification. The county approves Medi-Cal for Parent F and child and denies Medi-Cal for Parent G.

Example #6: Parent H, Parent I and their 14-year-old child apply for Medi-Cal. Parent H and I's residency could not be electronically verified. All household members were granted AE for MAGI Medi-Cal. Since residency was unable to be verified, the county requested proof of residence from Parent H and I. One week later, Parent I provides sufficient proof for their residency. Parent H fails to provide verification. The county approves Medi-Cal for Parent I and child and denies Medi-Cal for Parent H.

Residency Reminders

All Medi-Cal applicants must meet California residency requirements. However, counties must follow specific guidance for certain populations. This section provides a reminder of the established procedures for verifying California residency, as outlined below.

- **Residency for Students** – Students who leave California to attend school in another state may still be considered California residents if they intend to return after completing their education. Students must meet California residency requirements regardless of where they attend school. For students attending school out-of-state but residing in California, or attending school in California with intent to return to another state, counties must continue to follow the procedures outlined in [ACWDL 15-23](#). Counties should evaluate intent to return based on statements from the student and other supporting information.
- **B-1/B-2 Visas and State Residency** – Persons holding B-1/B-2 visas are allowed to enter the United States to visit temporarily for either business or pleasure. Policy regarding B-1/B-2 visa holders remains unchanged. Counties must continue to apply existing policy guidance without exception ([ACWDL 96-27](#) and [97-06](#)). If, at any time, a B-1/B-2 Visa holder indicates they have established or are taking the steps to establish California residency and do not intend to return

to their prior country of residence, counties must follow the verification process for California residency as outlined in this ACWDL.

- **The PARIS-interstate match** – DHCS is required by federal law (Title XIX of the Social Security Act, §1903(r)(3)) to participate in PARIS interstate matches. The goal is to:
 - a. Verify California residency for Medi-Cal beneficiaries
 - b. Prevent duplicate enrollment in Medi-Cal and other states' Medicaid programs
 - c. Reduce fraud and improper payments

Residency verification procedures under the PARIS interstate match remain unchanged. Counties must continue to follow the policy guidance published in [ACWDL 09-41](#) and [10-05](#).

- **MEDS Alerts** – MEDS alert codes such as 9070 and 9073, are system-generated flags that notify counties of residency-related issues in the Medi-Cal Eligibility Data System (MEDS). Counties are reminded to address these MEDS Alerts when received to resolve residency discrepancies. Counties should refer to the MEDS Alert Reference Guide for clarification of alert codes and [ACWDL 23-14E](#) for direction on resolving these alerts.
- If you have any questions, please submit your inquiry using the Request for Policy Interpretation Form and send it, along with any supporting documentation, to MCED-Policy@dhcs.ca.gov.

Sincerely,

Sarah Crow, Chief
Medi-Cal Eligibility Division
Department of Health Care Services