

DATE: June 26, 2025

Medi-Cal Eligibility Division Information

Letter No.: I 25-16

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY ADMINISTRATIVE OFFICERS
ALL COUNTY MEDI-CAL PROGRAM SPECIALISTS/LIAISONS

SUBJECT: Tribal Temporary Assistance for Needy Families and Medi-Cal Eligibility
(REFERENCE: ALL COUNTY WELFARE DIRECTOR LETTER 16-02)

The purpose of this Medi-Cal Eligibility Division Information Letter (MEDIL) is to provide counties with reminders of the Medi-Cal processing requirements for individuals eligible for Tribal Temporary Assistance for Needy Families (Tribal TANF), and how to assess Tribal TANF and other income for the evaluation of Modified Adjusted Gross Income (MAGI) Medi-Cal, Non-MAGI Medi-Cal, and Covered California (CCA).

Background

The Affordable Care Act (ACA) requires states receive federal approval to facilitate enrollment processes that enable other social service programs to determine Medi-Cal eligibility without a separate Medi-Cal application. Currently, there is no authority to provide automatic Medi-Cal eligibility to Tribal TANF participants as each Tribal TANF program establishes its own income rules and income counting methodologies. As Tribal TANF and Medi-Cal eligibility are determined by different entities, the Department of Health Care Services (DHCS) recognizes the challenges in access to Medi-Cal. Therefore, it is crucial that counties work in partnership with Tribal Organizations to ensure continued support to eligible families.

Medi-Cal Application for Tribal TANF Recipients

If the county receives a referral or application from an individual that is already enrolled in Tribal TANF, the county eligibility worker (CEW) shall process the Medi-Cal application using normal business processes, including collecting necessary information and progressing through the Medi-Cal hierarchy, to ensure an appropriate eligibility determination is made.

As a best practice, counties should consider establishing a process to receive applications and/or verifications directly from the Tribal TANF program to ease the burden on the individual, preventing the applicant/member from having to submit the requested information multiple times.

Best Practices: Streamlining the Medi-Cal Application Process for Tribal TANF Participants

Establishing a strong partnership with Tribes and Tribal Organizations provides a more streamlined process for individuals eligible for Tribal TANF benefits who are applying for Medi-Cal. During a joint Tribal TANF and Medi-Cal Eligibility Workgroup discussion, both Tribal Organizations and counties provided insight on best practices developed to reduce barriers experienced by those applying for Tribal TANF and Medi-Cal benefits.

The following are practices counties should consider implementing, as they may help foster a more robust operating relationship with Tribes and Tribal organizations:

- Establish a dedicated worker for Tribal TANF participants and Tribal TANF representatives for CalFresh/Medi-Cal applications, recertifications, and questions about cases;
- Conduct active outreach and engagement with Tribal TANF agencies. These local Tribal Organizations should then be included in regular meetings that discuss the processing of applications for Tribal TANF participants;
- Establish a direct line of communication between the county and Tribal TANF case managers, ensuring a warm handoff between organizations;
- Develop workshops which demonstrate how existing county programs can complement Tribal TANF benefits;
- To ensure accurate income calculation, the county and Tribes should work together to develop written procedures detailing qualifying Tribal income sources that can be referenced when reviewing income information provided by an applicant.

The workgroup highlighted the importance of thorough collaboration between county agencies and their Tribal partners. As a result, DHCS will work closely with the California Department of Social Services (CDSS) and Covered California (CCA) to evaluate additional best practices for eligible Tribal TANF participants.

Data Sharing Agreement

Recognizing the important role Tribal TANF programs play in supporting their communities, DHCS encourages voluntary collaboration between Tribal TANF organizations and counties to explore data sharing agreements that may benefit mutual members. These agreements, based on mutual consent, can help ensure that the contact information and other relevant data are accurate and up to date, supporting access to Medi-Cal coverage and related services.

Such partnerships may help streamline processes related to Medi-Cal eligibility and annual renewals by improving coordination and ensuring that members receive timely information and support. Sharing agreed-upon data can strengthen communication and

collaboration between Tribal TANF organizations and counties, with the shared goal of helping individuals maintain or gain access to needed benefits and services.

If a Tribal TANF organization is interested in exploring a data sharing agreement, DHCS recommends initiating discussions with the relevant county(ies).

Treatment of Tribal TANF and Other Income

Tribal TANF is exempt income for both MAGI and Non-MAGI eligibility determinations.

Individuals eligible to receive Tribal TANF may receive other tribal income that is also exempt from Medi-Cal. It is important to understand the different types of income an individual may have and to ensure income for Tribal TANF is entered into the "Other Program Assistance" page in the California Statewide Automated Welfare System (CalSAWS) for correct income calculations. If the county is unsure about the type of income, they must engage with the individual directly or seek technical assistance from the Tribal TANF program for confirmation.

Income received by those who are eligible for Tribal TANF or who are American Indian/Alaska Native (AI/AN), which is exempt from the income calculation for MAGI and Non-MAGI Medi-Cal, are as follows:

- Income that falls within the IRS General Welfare Doctrine;
- Distributions from Alaska Native Claims Settlement Act (ANCSA) Corporations and Settlement Trusts;
- Distributions from trust/reservation property;
- Income from property and rights related to hunting, fishing, and natural resources;
- Income from the sale and use of cultural/subsistence property;
- Student financial assistance provided by the Bureau of Indian Affairs and/or a Tribe;
- Any other income that is non-taxable according to federal law or IRS guidance (exempt from MAGI Medi-Cal only);
- Payments made to individuals under Public Law 90-507 are considered property rather than income;
- Per capita payments made to individuals under Section 6 of Public Law 87-775 and Public Law 92-254;
- Per capita payments distributed pursuant to a judgment of the Indian Claims Commission or the Court of Indian Claims in favor of any Tribe;
- Payments to specific tribes and groups.

Counties should reference the Income and Deductions Chart linked in [ACWDL 21-04](#) for a list of income types that are exempt from the income calculation for MAGI and Covered California programs for applicants/members who are receiving Tribal TANF or who are AI/AN. For additional information on AI/AN Income Exemptions, counties can refer to [ACWDL 16-02](#).

Other Reminders

Individuals losing MAGI Medi-Cal must be screened for other Medi-Cal eligibility, including Consumer Protection Programs such as Transitional Medi-Cal. Updated guidance on Transitional Medi-Cal will be released in the coming months.

When individuals are not eligible to Medi-Cal without a Share of Cost, they should have their eligibility determined for Covered California programs automatically. Covered California offers additional assistance, such as cost saving reductions for individuals from federally recognized Tribes, which reduces the out-of-pocket expenses for individuals eligible for Advance Premium Tax Credit (APTC). However, to have this information screened correctly, it is critical that the Tribe's information is entered correctly in the Individual Demographics page in CalSAWS, as incorrect data entry can lead to a delay in, and potential denial of, services to which an individual is entitled.

If you have any questions, or if we can provide further information, please contact the Medi-Cal Eligibility Division (MCED) Policy inbox at MCED-Policy@dhcs.ca.gov.

Sincerely,

Sarah Crow, Chief
Medi-Cal Eligibility Division