

DATE: October 19, 2025

TO: ALL COUNTY WELFARE DIRECTORS Letter No.: 25-19
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: TREATMENT OF THE MEDICARE ADVANTAGE FLEX CARD
FOR NON-MODIFIED ADJUSTED GROSS INCOME (NON-MAGI).

The purpose of this All County Welfare Directors Letter (ACWDL) is to provide guidance to counties regarding the treatment of the Medicare Advantage Flex Card when determining Medi-Cal eligibility for Non-MAGI programs.

Background

The Medicare Advantage (MA) Flex Card is a supplemental benefit offered by participating MA plans. These cards are not issued by the Centers for Medicare & Medicaid Services (CMS), the federal Medicare program, or by the Department of Health Care Services (DHCS). Instead, they are provided directly by participating MA plans as an additional benefit to Medicare beneficiaries who are enrolled in those specific plans. Not all MA plans offer the flex card.

The MA Flex Card is a prepaid debit card, funded by the MA plan, and may be used to pay for eligible health-related expenses, which may include but are not limited to the following:

- Dental, vision, and hearing services
- Prescriptions and over the counter medications
- Copayments and Deductibles
- Medical equipment
- Healthy food and wellness-related purposes (depending on the MA plan)

Treatment for Non-MAGI Eligibility Determinations

The MA Flex Card is considered a supplemental benefit under a participating MA plan and is not treated as income or property for the purposes of Non-MAGI Medi-Cal eligibility determinations.

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For additional information, the following resources are available, [CMS letter to Representative Doggett](#), [Medicare FAQ](#) and [Medicare Advocacy](#).

If you have any questions regarding the information provided in this letter, please contact the Non-MAGI unit at NonMAGIInbox@dhcs.ca.gov. County questions regarding policy guidance should be sent to MCED-Policy@dhcs.ca.gov.

Sincerely,

Sarah Crow
Division Chief
Medi-Cal Eligibility Division