



TOBY DOUGLAS
Director

State of California—Health and Human Services Agency
Department of Health Care Services



EDMUND G. BROWN JR.
Governor

April 1, 2014

TO: ALL COUNTY WELFARE DIRECTORS Letter No.: 14-16
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: REFUGEE MEDICAL ASSISTANCE AND THE AFFORDABLE CARE ACT

Overview

The purpose of this letter is to clarify that:

- Ineligibility for Medi-Cal is a condition of eligibility for Refugee Medical Assistance (RMA). Individuals currently covered by RMA must be evaluated under the Affordable Care Act (ACA) eligibility rules to determine if they are eligible for Medi-Cal benefits in 2014.
- RMA beneficiaries who are still within their 8-month time-limited RMA eligibility period will not be removed from RMA aid codes without being evaluated for full scope Medi-Cal under ACA rules.
- Refugee/entrant cash assistant (RCA/ECA) beneficiaries will continue to get cash assistance under the current RCA/ECA cash assistance aid codes until new aid codes are developed.
- RMA beneficiaries will be evaluated under ACA rules using the simplest process available in accordance to guidance provided in All County Welfare Directors Letter (ACWDL) 14-03.
- RMA is available to individuals with net countable income based on RMA rules up to 200 percent of the federal poverty level (FPL) without a share of cost (SOC) (subject to the availability of federal RMA funding for this purpose). All RMA

eligibility requirements, including the 8-month time-limited eligibility requirements, still apply.

- Nothing in this letter is intended to change the RMA eligibility requirements.

Background

RMA is a time-limited federal program designed to aid refugees during their first eight (8) months in the United States. Individuals with refugee status and individuals in groups treated as refugees by law (asylees, trafficking victims, and special immigrants), but who lack categorical linkage to Medi-Cal, have historically received medical benefits through RMA if they met all other medically needy eligibility requirements. Applicants must first apply for Medi-Cal and be found ineligible to be considered for RMA.

RMA Medi-Cal benefits are funded 100 percent by the federal government and are not considered to be Title XIX benefits. States have the option to provide RMA coverage to individuals with incomes up to 200 percent of the FPL. California's RMA procedures include that option.

The Office of Refugee Resettlement provided guidance that, as states implement expanded Medicaid eligibility under ACA, refugees previously ineligible could qualify for Medicaid and would, therefore, no longer be eligible for RMA. The federal guidance on RMA provides that every effort shall be made by states to redetermine eligibility as Medicaid expands and, when appropriate, transition the client from RMA to Medicaid.

RMA beneficiaries currently meet all Medi-Cal requirements with the exception of categorical linkage. As of January 1, 2014, when Medi-Cal expanded to cover eligible single adults between 19-64 years of age, current RMA beneficiaries may be eligible for Medi-Cal under ACA rules. Those RMA beneficiaries ineligible for expanded Medi-Cal based on income will continue to receive the full 8-month time limited Medi-Cal benefits under the RMA program if their countable income is up to 200 percent of the FPL.

Process

Evaluate ongoing eligibility of current RMA population – Counties must identify all active RMA cases and take the necessary steps to evaluate eligibility for ongoing Medi-Cal coverage under ACA rules using the most streamlined process available in accordance with guidance provided in ACWDL 14-03. For RMA beneficiaries whose 8-month time-limited eligibility will end in 2014, counties must send: (1) the "Information Notice for Refugee Medical Assistance Beneficiaries" (enclosure 1); (2) appropriate documents in accordance with ACWDL 14-03 to request the information needed to evaluate eligibility (for example, the streamlined "Request for Tax Household Information supplemental form to

obtain tax household information when needed) and, when the evaluation is completed, the appropriate notice of action (NOA). Enclosure 2 is a NOA to grant Medi-Cal eligibility to current RMA beneficiaries determined eligible for Medi-Cal without a SOC. Please note that RMA benefits must not be terminated prior to the end of the refugee's 8-month RMA eligibility period without a review of ongoing Medi-Cal eligibility if otherwise eligible or if the program ends. Whenever possible, counties should make every effort to review RMA cases for ongoing eligibility before the end of the 8-month time-limited RMA eligibility so there is no break in aid.

Please note an individual must be ineligible for Medi-Cal before he/she can be evaluated for the RMA program. This means that the individual must be found ineligible for Modified Adjusted Gross Income (MAGI) Medi-Cal and Non-MAGI Medi-Cal (without a SOC) prior to being evaluated for the RMA program.

Refugees' eligible for Medi-Cal with a SOC – If a refugee is eligible for Medi-Cal with a SOC or Advanced Premium Tax Credit (APTC), the individual's case must be evaluated to determine if he or she is eligible for RMA coverage without a SOC up to 200 percent of the FPL. A refugee who is eligible for Medi-Cal with a SOC and has net countable income based on RMA rules up to 200 percent of the FPL, should remain in their RMA aid code until the end of their 8-month time limit, if otherwise eligible. To ensure we provide the most advantageous coverage in the RMA program, the Department of Health Care Services is providing continuous eligibility to those participants that have not exceeded their 8 months of eligibility. Eight (8) month time-limited RMA eligibility rules still apply to these RMA beneficiaries. If the county determines that a refugee is eligible for Medi-Cal with a SOC or APTC but meets the 200 percent RMA FPL limit and is within the 8-month RMA time-limit, the county should take the steps necessary to contact the individual to determine if they want RMA without a SOC for the remainder of their eight month RMA eligibility period or Advance Premium Tax Credits coverage. If the refugee wants RMA coverage for the rest of their time-limited eligibility period, continue RMA eligibility and evaluate for ongoing eligibility in accordance with current RMA policy when RMA eligibility ends.

Deadline for eligibility review – In order to ensure that RMA eligibility ends in a timely manner for refugees who are eligible for no SOC Medi-Cal in 2014, counties must complete their review of ongoing Medi-Cal eligibility for all active RMA cases no later than April 30, 2014.

RCA/ECA – The current RCA aid codes (08 or 01 respectively) provide for both cash and Medi-Cal benefits. RCA/ECA beneficiaries must remain in their RCA/ECA aid code for their full 8 month eligibility period (if otherwise eligible) until new Medi-Cal aid codes are implemented for this population. Information about any new aid codes will be provided in a subsequent ACWDL. As part of this process, the Medi-Cal Eligibility Division will

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implement new aid codes, as necessary, so that a refugee can receive Medi-Cal and RCA/ECA, when that is appropriate, and Medi-Cal, when that is appropriate.

If you have any questions regarding this letter, please contact Amar Singh at (916) 552-9459 by phone or by email at amar.singh@dhcs.ca.gov.

Original Signed By

Tara Naisbitt, Chief
Medi-Cal Eligibility Division

Enclosures

INFORMATION NOTICE FOR REFUGEE

MEDICAL ASSISTANCE BENEFICIARIES

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┌	┐	Notice Date:	_____
		Case Number:	_____
		Worker Name:	_____
		Worker ID Number:	_____
└	┘	Worker Telephone Number:	_____
		Office Hours:	_____
		Office Address:	_____

IMPORTANT INFORMATION ABOUT CHANGES TO YOUR MEDI-CAL BENEFITS

Due to changes in federal law, your eligibility for Medi-Cal may change. Instead of being eligible for only an 8-month Medi-Cal program, you might be eligible for Medi-Cal that does not end after 8-months. Please fill out the form(s) included with this notice and provide the information they are requested. You must fill out all forms you receive and return them to the address on this notice. If you return the enclosed form, you will receive another notice to tell you whether you are eligible for Medi-Cal that lasts longer than 8-months after we complete our review. You will not lose your 8-month Refugee Medical Assistance benefits while we review your eligibility for other Medi-Cal coverage. If you have questions about this process, please ask your County Eligibility Worker.

DO NOT THROW AWAY YOUR CURRENT PLASTIC BENEFITS IDENTIFICATION CARD (BIC). You can use it again if you are eligible for Medi-Cal that is not time limited.

