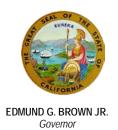


State of California—Health and Human Services Agency

Department of Health Care Services



September 16, 2015

TO: ALL COUNTY WELFARE DIRECTORS Letter No.: 15-29

ALL COUNTY ADMINISTRATIVE OFFICERS

ALL COUNTY MEDI-CAL PROGRAM SPECIALISTS/LIAISONS

ALL COUNTY HEALTH EXECUTIVES

ALL COUNTY MENTAL HEALTH DIRECTORS

ALL PROBATION CHIEFS

SUBJECT: Former Foster Youth Who Applied for Health Coverage Through California

Healthcare Eligibility, Enrollment and Retention System and Aid Code 4M

The purpose of this All County Welfare Directors Letter (ACWDL) is to provide instructions and guidance to counties for processing youth who indicate on their California Healthcare Eligibility, Enrollment and Retention System (CalHEERS) application that they are Former Foster Youth (FFY) and who have not been enrolled into Medi-Cal under aid code 4M.

These youth have been grouped in the following three categories:

1. FFY in Other Aid Code:

Youth who applied for health coverage through CalHEERS or Statewide Automated Welfare Systems (SAWS) and have been determined eligible for Medi-Cal, but have been placed in an aid code other than 4M.

2. FFY with No Aid Code and with APTC Eligibility:

Youth who applied for health coverage through CalHEERS and have been determined eligible for Advanced Premium Tax Credit (APTC) through Covered California (Covered CA), but did not select or pay premium for a Qualified Health Plan (QHP) and are not currently enrolled in coverage.

3. FFY Enrolled in a QHP:

Youth who applied for health coverage through CalHEERS and have been determined eligible for APTCs and paid premiums to a QHP and are currently enrolled in coverage through Covered CA. For this third group of FFY, a separate ACWDL will be issued with instructions once the Centers for Medicare and Medicaid Services (CMS) issues final guidance.

Youth who applied for health coverage through CalHEERS, identified themselves as FFY, and meet eligibility criteria, are entitled to receive continuous Medi-Cal coverage in aid code 4M up to age 26.

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Please see ACWDL 14-41 for more information about FFY enrollment, including the FFY verification process and additional program requirements. Some of the FFY who applied through CalHEERS were determined ineligible for Medi-Cal because the system lacks the FFY programming logic. Currently, CalHEERS is conducting a Modified Adjusted Gross Income determination for all applicants, even though FFY are eligible for Medi-Cal (4M) regardless of their income. As a result, some youth may have been placed in aid codes other than 4M or not placed in any aid code.

In most cases, the appropriate aid code for FFY is 4M. However, in some instances, such as California Work Opportunity and Responsibility to Kids (CalWORKs) or Supplemental Security Income (SSI), 4M cannot be provided without the loss of other benefits, such as cash aid. The cash-linked programs provide automatic Medi-Cal eligibility and other benefits that 4M does not provide. SAWS is not currently programmed to allow the youth to have both aid codes. Until programming changes are made to allow FFY to have a 4M aid code and simultaneously maintain eligibility for CalWORKS or SSI, FFY should not be moved out of the existing CalWORKS or SSI aid code unless a request is made by the FFY. If an FFY enrolled in CalWORKs or SSI, is discontinued from either program and is still under the age of 26, the county must transfer the youth to Med-Cal (in aid code 4M).

For a mixed household, the county eligibility worker (CEW) will add the 4M household member as a companion case or in a different case segment/program window (depending on SAWS functionality). The FFY member of the household will be assigned the 4M aid code. This will allow the 4M household member to remain eligible and in aid code 4M, even if changes are made or a discontinuance action is taken on the other household members' eligibility.

Data Extracts

Data extracts from CalHEERS, containing information about FFY who applied through CalHEERS and were not placed in 4M, will be provided by DHCS to the counties. The data extract files from CalHEERS will be posted to the password protected Department of Health Care Services (DHCS) File Transfer Protocol (FTP) server for the SAWS Consortiums (i.e. California Work Opportunity and Responsibility to Kids Information Network (CalWIN), Consortium-IV Joint Powers Authority (C-IV) and Los Angeles Eligibility, Automated Determination, Evaluation and Reporting System (LEADER)) to retrieve. The SAWS Consortium contacts will provide access to the data for their respective counties.

The data extracts will be required for county processing, enrollment and verification until the files containing FFY with erroneous determinations have been remedied. CalHEERS is implementing the FFY logic in October of 2015, preventing this issue from occurring. Counties are instructed to continue to use the workaround until all erroneous determinations that

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occurred prior to October 2015 have been remedied. After the FFY logic is implemented in CalHEERS in October of 2015, FFY will be referred to the counties for evaluation.

County Instructions

After counties have retrieved posted CalHEERS data extracts via the DHCS server, CEWs are to begin processing the cases using the instructions provided below.

The CEWs must use all available information and resources to attempt to verify FFY status as outlined in ACWDL 14-41 and utilize all records in the Medi-Cal Eligibility Data System (MEDS), SAWS, and/or the Child Welfare System/Case Management System. If after this data review the county is unable to verify FFY status, the CEW must contact the youth to obtain additional information to help verify FFY status. Because the CalHEERS application does not currently ask for information about which state the youth was in foster care, the county will need to ask if the FFY was in foster care in another state and on Medicaid if FFY status in California cannot be verified. If the youth attests FFY status in another state, the CEW must attempt to verify FFY status with the other state. The county must indicate, via code, validated FFY or unvalidated youth and provide this updated data extraction list to DHCS on a monthly basis. If the county's attempts to verify FFY status are unsuccessful and the youth then provides verification of FFY status, the CEW can proceed to enroll the youth into aid code 4M as described below.

Most foster youth in California are on federal Medicaid. In rare instances, a FFY might not have the immigration status that makes the FFY eligible for federal Medicaid. In this circumstance, counties are to request that the FFY submit a Statement of Citizenship, Alienage, and Immigration Status (MC13) form which is downloadable from the DHCS website: http://www.dhcs.ca.gov/formsandpubs/forms/Forms/mc13.pdf. If needed, the counties should assist the FFY with completing the MC13 form. Upon completion of the MC13 form and based on the FFY attestation of citizenship/immigration status, the county shall enroll the FFY into the full-scope Medi-Cal program for FFY and assign the 4M aid code.

If the county is able to verify FFY status, the county must do the following:

- Immediately enroll the individual into aid code 4M in MEDS and SAWS. (For youth with no aid code, enroll into aid code 4M immediately without waiting for verification to be complete. This enrollment is temporary while the verification process is being completed.)
- Inform the youth in writing using the appropriate Notice of Action (NOA) regarding their FFY program eligibility and benefits. Counties should continue to use existing NOAs from SAWS until DHCS creates and distributes new FFY NOAs.

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• Follow the appropriate steps listed in the sections below to discontinue either the inappropriate Medi-Cal aid code or QHP enrollment in CalHEERS as soon as possible.

For detailed process instructions, see FFY and Enrollment into Aid Code 4M process flowcharts with narratives. For all youths, the CEW must follow the instructions to appropriately verify FFY status and enroll the youth into the aid code 4M as applicable.

1. FFY who applied through CalHEERS or SAWS and are receiving Medi-Cal coverage, but are not enrolled in aid code 4M

For FFY enrolled in an aid code other than 4M or SSI or CalWORKs aid code, (i.e., an incorrect aid code), the CEW shall first verify the youth's FFY status before enrolling into 4M. Once the FFY status is verified, the CEW must enroll the FFY into 4M prospectively in SAWS and MEDS, effective the first of the next month, unless a request for retroactive coverage at the time of application is made by the FFY. In that case, enroll the FFY into 4M retroactively, effective three months prior to the first of the month of the original application date. For a FFY assigned an SSI or CalWORKS aid code, flag in the system that the FFY is 4M eligible and FFY status has already been verified.

Some FFY who were enrolled in another aid code after applying through CalHEERS or SAWS may have applied for coverage more than twelve (12) months ago. Some of these applicants may have subsequently been discontinued from Medi-Cal at the annual redetermination date; for example, due to a loss of contact or for failing to return redetermination forms. Had these youth been in the 4M aid code, they would not have been discontinued for not returning the annual redetermination form or due to a loss of contact. The CEW should immediately reinstate Medi-Cal, with eligibility in 4M effective the date of the discontinuance.

See Attachment 1, "FFY and Enrollment into Aid Code 4M – FFY in Incorrect Aid Code" process flowchart and narrative for more detailed instructions.

2. FFY with No Aid Code and with APTC Eligibility

For these FFY, the CEW must immediately enroll the FFY into the 4M aid code and provide them with the NOA, as indicated above. After enrolling the individual into aid code 4M and verifying FFY status, the CEW is to maintain the youth in aid code 4M until the youth attains the age of 26 or until the youth moves out of state or is deceased. In the event that the youth is incarcerated, the CEW must follow the instructions in ACWDLs 14-26 and 14-26E to appropriately suspend Medi-Cal benefits. In the event that the youth's FFY status is unable to be verified after 30 days of research, the youth should remain in coverage while continued verification efforts occur and determination for other health coverage is researched, as

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described in ACWDL 14-41. The county must indicate the youths who were 4M validated on the data extraction list and post this list back to the DHCS secure FTP server, via their SAWS Consortium contact, on a monthly basis. DHCS will provide the information to Covered CA, so that they can terminate APTC/Cost Sharing Reductions eligibility from CalHEERS and MEDS.

See Attachment 2, "FFY and Enrollment into Aid Code 4M – FFY with No Aid Code and with APTC Eligibility" process flowchart and narrative for more detailed instructions.

3. FFY Enrolled in a QHP

Note: As mentioned previously, a separate ACWDL will be issued with specific instructions ("FFY in QHP with/without APTC and Premium") on how to remedy FFY cases who enrolled in a Covered CA QHP, with or without APTC, and with a premium, after final guidance has been delivered by CMS.

For other information and for other FFY categories not mentioned in this guidance, please refer to the processing instructions, referred to ACWDL Numbers: 00-41, 00-61, 01-41 and 14-41 and Medi-Cal Eligibility Division Information Letter Numbers: 13-07 and 14-05. Unless superseded by later ACWDLs, the eligibility information in this and other ACWDLs must continue to be followed when processing FFY eligibility.

If you have any questions or need further information, please contact the Access Unit in the Access Programs and Policy Branch at (916) 552-9200 or by email at FFY@dhcs.ca.gov.

Alice Mak, Acting Chief Medi-Cal Eligibility Division

Attachments

This document provides instructions and guidance to counties on the handling of the Former Foster Youth (FFY) who indicated on their application that they are FFY and who have not been enrolled into aid code 4M.

Any youth living in California, previously in foster care, and under age 26, should be identified and immediately enrolled into aid code 4M. The process flow narrative (see County Instructions below) provides steps for FFY that applied for health coverage through California Healthcare Eligibility, Enrollment, and Retention System (CalHEERS) Application Portal or Statewide Automated Welfare Systems (SAWS) and were determined eligible for Advanced Premium Tax Credit (APTC) but did not sign up for a Covered California Qualified Health Plan (QHP).

Aid Code 4M FFY Coverage

Youths who applied for health coverage through CalHEERS, and identified themselves as FFY, are entitled to receive continuous Medi-Cal coverage in aid code 4M up to age 26. Please see All County Welfare Directors Letter (ACWDL) 14-41 for more information about FFY enrollment, including the FFY verification process and additional program requirements.

Some of the FFY who applied through CalHEERS were determined ineligible for Medi-Cal because the CalHEERS system lacks the FFY programming logic. As a result, some youth may have no coverage or assigned to another aid code. Currently, CalHEERS is conducting a Modified Adjusted Gross Income determination for all applicants, and as a result, some youth may have no Medi-Cal coverage due to their reported income on the application. However, FFY are eligible for Medi-Cal (4M) regardless of their income. FFY with no Medi-Cal or APTC coverage should be temporarily approved for Medi-Cal (in aid code 4M) during the verification process of their FFY status.

For FFY who are in a mixed household, the county eligibility worker (CEW) will add the FFY household member to a companion case or in a different case segment/program window (depending on SAWS functionality). The FFY member of the household will be assigned the 4M aid code. This will allow the FFY household member to remain eligible even if changes are made or a discontinuance action is taken on the other household members' eligibility.

County Instructions

For youth who applied for health coverage through CalHEERS and have been determined eligible for APTC, but did not select or pay premium for a QHP and are not currently enrolled in Medi-Cal or APTC coverage, the following steps will be used to address this population.

1. Medi-Cal Eligibility Division (MCED) receives the CalHEERS data extract.

2. MCED checks the CalHEERS data extract against the Medi-Cal Eligibility Data System (MEDS).

<u>Note</u>: Due to timing of CalHEERS data extracts to Department of Health Care Services (DHCS) and timing of MEDS transactions, some overlap of data may occur; i.e., some FFY will already have 4M status.

- 3. MCED reviews data before posting.
- 4. MCED posts the data extract on the DHCS secure File Transfer Protocol (FTP) server. The SAWS Consortium (i.e. California Work Opportunity and Responsibility to Kids Information Network (CalWIN), Consortium-IV Joint Powers Authority (C-IV) and Los Angeles Eligibility, Automated Determination, Evaluation and Reporting System (LEADER)) contacts will provide access to the data for their respective counties.
- Using the retrieved data extract, the CEW immediately establishes a SAWS case and enrolls the youth into aid code 4M, effective the original application date. This aid code 4M enrollment is temporary, pending completion of the verification process.

<u>Note</u>: If the youth has unpaid medical bills for any of the three (3) months prior to the application month, the youth should be evaluated for retroactive coverage at the same time the county verifies the youth's FFY status on the original application.

Verify the youth's status as a FFY. Verification should be completed within 30 days.

<u>Note</u>: Verification of the youth's status should be completed within 30 days, and the results should be coded (Y, N, I or NC) on the data extract listing (see step 5). Subsequent process steps may be completed beyond the 30-day threshold.

The county must use all available information and resources to attempt to verify FFY status as outlined in ACWDL 14-41 and utilize all records in MEDS, SAWS, and/or the Child Welfare System/Case Management System (CWS/CMS). If after this data review, the county is unable to verify FFY status, the county must contact the youth to obtain additional information to help verify FFY status. Because the CalHEERS application does not currently ask for information about which state the youth was in foster care, the county will need to ask if the FFY was in foster care in another state if FFY status in California cannot be verified. If the youth attests FFY status in another state, the county must attempt to verify FFY status and Medicaid enrollment with the other state. If the county's attempts to verify FFY status are unsuccessful, and the youth then provides verification of FFY status, the county can keep the youth enrolled in aid code 4M as described below.

7. If FFY status is verified via MEDS, SAWS, or CWS/CMS case records or through contact with another state or the youth provides verification, go to step 8. If not, go to step 14.

- 8. Inform the FFY in writing using the appropriate Notice of Action (NOA) regarding FFY program eligibility with the effective date. Counties should continue to use existing NOAs from SAWS until DHCS creates and distributes new FFY NOAs.
- The FFY remains in Medi-Cal until 26 years old unless the FFY moves out of California, dies, or requests the county to discontinue their coverage. If an FFY is incarcerated, follow the steps in ACWDL 14-26 to suspend their Medi-Cal eligibility.
- 10. The county indicates enrolled FFY who are verified (Y), unverified (N) youths, in-process (I) youths, and youths with no change (NC) on the data extract report. The report is returned to SAWS for posting back on the DHCS secure FTP server each month within 30 days of the date posted by DHCS.

Note: Y = 4M verification completed

N = Verification of not being eligible for 4M

I = *In-process* of verifying 4M eligibility

NC = No change (due to Supplemental Security Income/CalWORKS

- 11.MCED accesses and reposts the data extract to the secure FTP server, under directories SAWS\C-IV\DHCS TO C-IV, SAWS\CalWIN (CW)\DHCS TO CW and SAWS\LEADER (LDR)\DHCS TO LDR, after all previously verified 4M FFY have been deleted from the data extract.
- 12. DHCS notifies Covered California to remove APTC eligibility from CalHEERS.
- 13. CalHEERS sends MEDS update transaction. End of process.

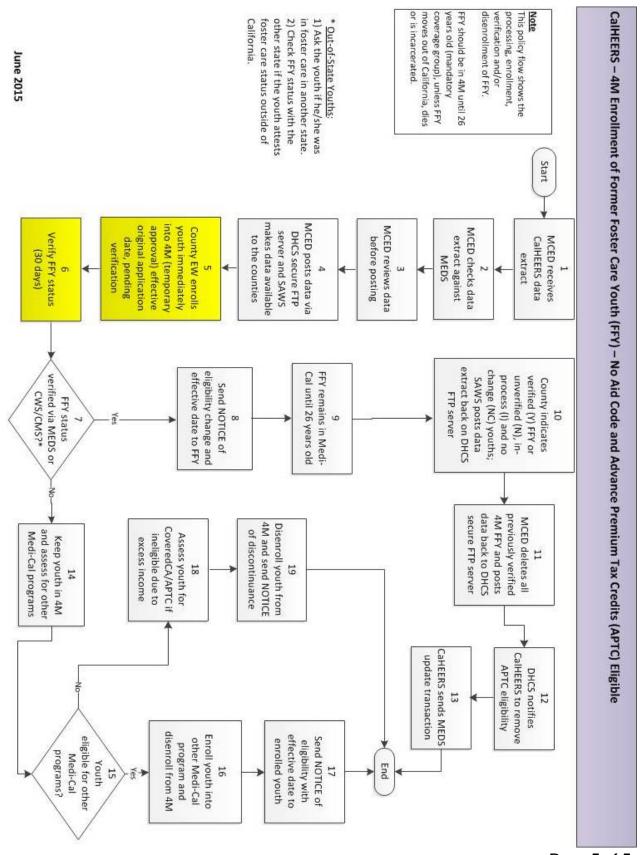
Other Medi-Cal programs

- 14. The CEW keeps the youth in 4M while assessing the youth for other Medi-Cal programs (ACWDL 14-41).
- 15. Check the youth's eligibility for other Medi-Cal programs. If the youth is eligible for other Medi-Cal programs, go to step 16. If not, go to step 18.
- 16. Enroll the eligible youth into another Medi-Cal program and disenroll the youth from aid code 4M.
- 17. Inform the youth in writing using the appropriate NOA regarding the change in program eligibility with the effective date. End of process.

Covered California/APTC

18. Assess the youth for Covered California/APTC if the youth is determined to be ineligible for another Medi-Cal program due to excess income. If eligible, the county should process the case, and the youth should be enrolled in Covered California QHP, with APTC, per ACWDL 14-31. Disenroll youth from aid code 4M and send written notice of Medi-Cal discontinuance. End of process.

For other information and for other FFY groups not mentioned in this document, refer to the processing instructions in ACWDL No.: 00-41, 00-61, 01-41, and 14-41 and MCED Information Letter No.: 13-07 and 14-05. The eligibility information in this and other ACWDLs must be followed when processing FFY eligibility.



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This document provides instructions and guidance to counties on the handling of the Former Foster Youth (FFY) who indicated on their application that they are FFY, who are enrolled in Medi-Cal but who have not been enrolled into aid code 4M.

Any youth living in California, previously in foster care at age 18 or older that aged out of the program, and under age 26, should be identified and immediately enrolled into aid code 4M. The process flow narrative (see County Instructions below) provides steps for those FFY that applied for health coverage through California Healthcare Eligibility, Enrollment, and Retention System (CalHEERS) or Statewide Automated Welfare System (SAWS) Application Portal and were determined eligible for Medi-Cal, but have been placed in an aid code other than 4M.

FFY 4M Coverage

Youths who applied for health coverage through CalHEERS, and identified themselves as FFY, are entitled to receive continuous Medi-Cal coverage in aid code 4M up to age 26 after being placed in 4M and subsequently verified by the county. Please see All County Welfare Directors Letter (ACWDL) 14-41 for more information about FFY enrollment, including the FFY verification process and additional program requirements.

Currently, CalHEERS is conducting a Modified Adjusted Gross Income determination for all applicants; however, FFY are eligible for Medi-Cal (4M) regardless of their income. Some of the FFY who applied through CalHEERS were not determined eligible for Medi-Cal for FFY because the system lacks the programming logic. As a result, some youth may have been placed in aid codes other than 4M.

These youth may have existing coverage but, in most cases, the appropriate aid code is 4M. In some instances, such as California Work Opportunity and Responsibility to Kids (CalWORKs) or Supplemental Security Income (SSI), 4M cannot be provided without the loss of other benefits, such as cash aid. SAWS is not currently programmed to allow the youth to have both aid codes, and the cash-linked programs provide automatic Medi-Cal eligibility and enrollment. Until programming changes are made to allow FFY to have a 4M aid code and simultaneously maintain eligibility for CalWORKS or SSI, FFY should not be moved out of the existing CalWORKS or SSI aid code unless a request is made by the FFY. If an FFY, enrolled in CalWORKs or SSI, is discontinued from either program and is still under the age of 26, the county must transfer the youth to Medi-Cal (in aid code 4M).

For a FFY in a mixed household, the county eligibility worker (CEW) will add the 4M household member as a companion case or in a different case segment/program window (depending on SAWS functionality). The FFY member of the household will be assigned the 4M aid code. This will allow the FFY household member to remain eligible even if changes are made or a discontinuance action is taken on the other household members' eligibility.

County Instructions

For youth who applied for health coverage through CalHEERS or SAWS and are receiving Medi-Cal coverage, but are not enrolled in aid code 4M, the following steps will be used to address this population.

- 1. Medi-Cal Eligibility Division (MCED) receives the CalHEERS data extract.
- 2. MCED checks the CalHEERS data extract against the Medi-Cal Eligibility Data System (MEDS).

<u>Note</u>: Due to timing of CalHEERS data extracts to Department of Health Care Services (DHCS) and timing of MEDS transactions, some overlap of data may occur; i.e., some FFY will already have 4M status.

- 3. MCED reviews data before posting.
- 4. MCED posts the data extract on the DHCS secure File Transfer Protocol (FTP) server. The SAWS Consortium (i.e., California Work Opportunity and Responsibility to Kids Information Network (CalWIN), Consortium-IV Joint Powers Authority (C-IV) and Los Angeles Eligibility, Automated Determination, Evaluation and Reporting System (LEADER)) contacts will provide access to the data for their respective counties.
- Using the retrieved data extract, the CEW will verify the youth's status as a FFY.
 Verification should be completed within 30 days of the county receiving the extract.

Note: Verification of the youth's status should be completed within 30 days, and the results should be coded (Y, N, I or NC) on the data extract listing (see step 12). Subsequent process steps may be completed beyond the 30-day threshold.

The county must use all available information and resources to attempt to verify FFY status as indicated in ACWDL 14-41 and utilize all records in MEDS, SAWS, and/or the Child Welfare System/Case Management System (CWS/CMS). If after this data review, the county is unable to verify FFY status, the county must contact the youth to obtain additional information to help verify FFY status. Because the CalHEERS application does not currently ask for information about which state the youth was in foster care, the county will need to ask if the FFY was in foster care in another state if FFY status in California cannot be verified. If the youth attests FFY status in another state, the county must attempt to verify FFY status with the other state. If the county's attempts to verify FFY status are unsuccessful and the youth then provides verification of FFY status, the county can proceed to enroll the youth into aid code 4M as described below.

- 6. If FFY status is verified via MEDS, SAWS, or CWS/CMS case records or through contact with another state or the youth provides verification, go to step 8. If not, go to step 7.
- 7. Keep the youth in the current aid code.

- 8. Check the youth's status for CalWORKS or SSI. If currently enrolled in CalWORKs or SSI, go to step 7. If the youth is not currently enrolled in CalWORKS or SSI, go to step 9.
- 9. Disenroll the FFY from the current aid code via the SAWS system and enroll the FFY in 4M with no gap in coverage.
- 10. a. FFY receiving Medi-Cal under another aid code Enroll the FFY into aid code 4M prospectively in MEDS and SAWS, effective the first of the month, unless a request for retroactive coverage at the time of application was made by the FFY. In that case, enroll the FFY into aid code 4M retroactively, effective three months prior to the first of the month of the original application date.

To the extent that retroactive enrollment into the aid code 4M is not possible due to the date being out of range in MEDS, the county must consider this an administrative error and provide the beneficiary with a Letter of Authorization form, MC 180, as appropriate if the youth has any unpaid medical bills and requests assistance from the county.

- <u>b. FFY discontinued due to another aid code</u> Some FFY who were enrolled in an another aid code after applying through CalHEERS or SAWS may have applied for coverage more than 12 months ago. Some of these applicants may have subsequently been discontinued from Medi-Cal at the annual redetermination; for example, due to a loss of contact or for failing to return redetermination forms. Had these youth been in the correct 4M aid code, they would not have received incorrect annual redetermination forms and would not have been discontinued from Medi-Cal due to a loss of contact. The county should immediately reinstate Medi-Cal, with eligibility in aid code 4M effective the date of the discontinuance. This process should be completed within 30 days.
- 11. Inform the youth in writing using the appropriate Notice of Action (NOA) regarding their FFY program eligibility with the effective date. Counties should continue to use existing NOAs from SAWS until DHCS creates and distributes new FFY NOAs.
- 12. The county indicates enrolled FFY who are verified (Y), unverified (N) youths, in-process (I) youths, and youths with no change (NC) on the data extract report. The report is returned to SAWS for posting back on the DHCS secure FTP server each month within 30 days of the date posted by DHCS.

Note: Y = 4M verification completed.

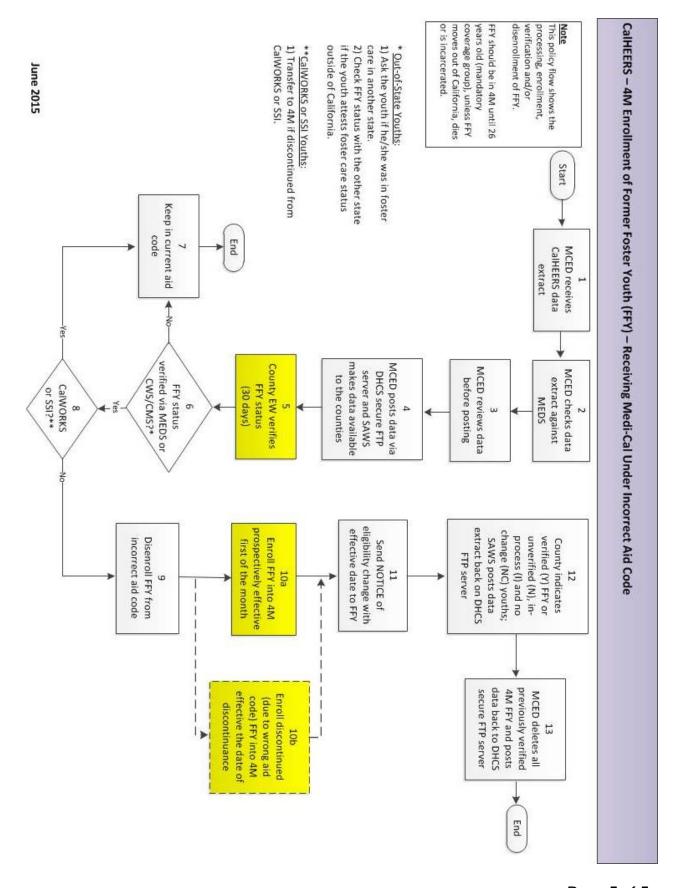
N = Verification of not being eligible for 4M.

I = In-process of verifying 4M eligibility.

NC = 4M verification complete, but No Change in aid code due to SSI/CalWORKS eligibility.

13. MCED accesses and reposts the data extract to the secure FTP server, under directories SAWS\C-IV\DHCS TO C-IV, SAWS\CalWIN (CW)\DHCS TO CW and SAWS\LEADER (LDR)\DHCS TO LEADER, after all previously verified 4M FFY have been deleted from the data extract. End of process.

For other information and for other FFY groups not mentioned in this document, refer to the processing instructions, referred to ACWDL No.: 00-41, 00-61, 01-41, and 14-41 and MCED Information Letter No.: 13-07 and 14-05. The eligibility information in this and other ACWDLs must be followed when processing FFY eligibility.



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