TO: All County Welfare Directors  
All County Administrative Officers  
All County Medi-Cal Program Specialists/Liaisons

Letter No.: 96-24

REPORTING AND IDENTIFYING OF OTHER HEALTH COVERAGE

This is to clarify the county welfare departments' (CWD) responsibilities in identifying and reporting private health coverage in a Medi-Cal Managed Care/County Organized Health System (COHS) environment.

County Responsibility and Reasons

Counties must continue to report Other Health Coverage (OHC) to the Department of Health Services (DHS), even if there is a COHS or Medi-Cal Managed Care Plan in the county. This allows DHS to:

- Cost avoid and retrobill the private insurance company for health services rendered to the beneficiary before Managed Care/COHS enrollment.
- Immediately begin cost avoiding Medi-Cal services should a beneficiary disenroll from a Managed Care/COHS plan because of intra-county transfer, change of aid type, or exceeding the plan's allowed maximum benefits.
- Provide OHC information to the Managed Care/COHS plans and their providers through the Medi-Cal Eligibility Data System and the automated eligibility verification process, thus allowing the plans to coordinate benefits with the OHC.
- Provide OHC data to out-of-county providers.

Legal Citation

Title 22, California Code of Regulations, Section 50765 stipulates that the CWDs shall determine if OHC is available to a beneficiary at the determination and redetermination of Medi-Cal eligibility. The regulation also stipulates that the CWDs provide information regarding the beneficiaries' OHC to the DHS in the manner, form, and frequency requested. There is no provision to waive these requirements for managed care enrollees.
All County Welfare Directors  
All County Administrative Officers  
All County Medi-Cal Program Specialists/Liaisons 
Page 2 

Even in those circumstances where a beneficiary is enrolled, or likely to be enrolled, in a Medi-Cal Managed Care or COHS plan, the counties must identify and report private health insurance coverage to DHS. The county is to report this information directly to the DHS by means of the Health Insurance Questionnaire form (DHS 6155). Counties may also provide health coverage information to a COHS, but this does not supersede the county's responsibilities to report COHS to DHS. 

We hope that this has clarified a CWD's responsibilities of identifying and reporting private health coverage. If you require further clarification, please contact Lisa Luchini of the Health Insurance Identification Unit at (916) 323-5618.

Sincerely, 

ORIGINAL SIGNED BY 

FRANK S. MARTUCCI, CHIEF 
Medi-Cal Eligibility Branch