



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



GAVIN NEWSOM
GOVERNOR

September 29, 2020

TO: ALL COUNTY WELFARE DIRECTORS Letter No.: 20 -17
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: USE OF THE FEDERAL DATA SERVICES HUB E-VERIFICATIONS FOR
NON-MODIFIED ADJUSTED GROSS INCOME (NON-MAGI) MEDI-CAL
ELIGIBILITY DETERMINATIONS
(Reference: All County Welfare Directors Letter Nos.14-35,18-16 and 18-25)

Purpose

The purpose of this All County Welfare Directors Letter (ACWDL) letter is to inform counties on the use of information electronically verified (e-verified) by the Federal Data Services Hub (FDSH) and state agencies within the California Healthcare Eligibility, Enrollment, and Retention System (CalHEERS) to verify information for Non-Modified Adjusted Gross Income (Non-MAGI) Medi-Cal for applicants and beneficiaries. The following guidance only applies to applicants and beneficiaries who County Eligibility Workers (CEWs) must run through the CalHEERS Business Rules Engine (BRE) as outlined in [ACWDL 18-16](#).

Background

Upon the enactment of the Affordable Care Act (ACA) of 2010, CalHEERS was created to improve the application experience for individuals applying for insurance affordability programs (IAPs). IAPs include:

- Medi-Cal (all programs, including MAGI and Non-MAGI),
- Pregnancy and infant programs such as the Medi-Cal Access Program (MCAP), Medi-Cal Access Infant Program (MCAIP), or the County-Children's Health Initiative Programs (C-CHIP),
- Covered California Qualified Health Plan (QHP) with Advanced Premium Tax Credit (APTC), or
- Covered California QHP with Cost Sharing Reductions (CSRs).

CalHEERS streamlined Medi-Cal eligibility determinations because counties can now expedite the eligibility process by verifying certain self-attested information through the FDSH and state agencies. This process reduces requests to applicants and beneficiaries for paper verifications of mandatory information needed for each Medi-Cal program.

When an eligibility determination is requested, the application information for all members of the household is sent through the CalHEERS BRE in an attempt to electronically verify certain information in the application through the FDSH and state agencies. Regardless of which IAP(s) an applicant is determined eligible for, information submitted for all other household members is also evaluated and potentially e-verified, including household members who may be eligible, and request a determination for Non-MAGI Medi-Cal.

E-verification in CalHEERS utilizes information provided by the applicant or beneficiary, including but not limited to: income, citizenship, immigration status, and Social Security Number (SSN). This information is compared with information stored by federal and state agencies, such as the Social Security Administration (SSA) and the SSA Composite Service, which is an electronic exchange between two or more federal agencies, Employment Development Department (EDD), Internal Revenue Service (IRS), Franchise Tax Board (FTB), and the Department of Homeland Security (DHS). CalHEERS reviews and compares the provided information for accuracy with the federal and state sources to confirm eligibility for both MAGI Medi-Cal and Covered California.

Non-MAGI Medi-Cal and E-verifications in CalHEERS

The business rules for MAGI Medi-Cal and Covered California program eligibility are stored in CalHEERS, while the business rules for Non-MAGI Medi-Cal are stored in SAWS. Although Non-MAGI Medi-Cal determinations are required to be completed in the SAWS system, relevant e-verified information may be used for more streamlined processing in order to reduce requests for documentation from the applicant/beneficiary. This is common in situations where one or more Non-MAGI members of the household are in a mixed household with MAGI members whose individual eligibility is run through the BRE. Or, when a MAGI individual has transitioned to Non-MAGI eligibility but still has relevant e-verified information on file, such as SSN or citizenship information (see below "E-Verifications for Use in Non-MAGI Eligibility Determinations" for a more comprehensive list). In these instances, if e-verified information is received for the Non-MAGI individual's verifications, then these shall be utilized for Non-MAGI eligibility determinations without further request for verification.

In these instances, the Non-MAGI applicant's e-verified information is transferred from CalHEERS to SAWS and is available, and should then be used to complete the Non-MAGI eligibility determination.

The use of e-verified information for Non-MAGI Medi-Cal eligibility determinations shall be used at:

- Application,
- Annual Renewal, or
- Change of Circumstance

As detailed in ACWDLs [14-11](#), [14-18](#), and [20-10](#), for any Medi-Cal application or redetermination, counties must follow the ex parte process through gathering all available information relevant to the determination prior to contacting the applicant or beneficiary for additional verification. This includes information available electronically from other state or federal agencies or other programs, such as CalFresh. [ACWDL 01-36](#) also provides guidance on utilizing verifications received from other public assistance programs.

Once the information is received and run through the BRE, e-verified information must be used in the Medi-Cal eligibility determination as per Title [42 CFR §435.949](#). Detailed information on acceptable e-verifications are listed below for Non-MAGI determinations in the "E-verifications for Use in Non-MAGI Eligibility Determinations" section.

Per business processes, if there is not enough data collected with the use of e-verified information to make an eligibility determination, the county shall request the appropriate forms and/or verifications needed to complete the application, change in circumstance, or renewal. Additionally, CEW's shall not request unnecessary or duplicative information and only request verifications required to make an eligibility determination ([WIC §15926\(h\) \(1\)](#) and [§14005.37\(g\) \(1\)](#)). [ACWDLs 14-35](#), [18-16](#), [18-25](#) and [MEPM Article 4M](#) provide further instruction on verifications and potential forms to request.

Note: As a reminder, at publication of this notice, property verification cannot be electronically verified through the FDSH. Additionally, further guidance on utilizing income e-verifications for Non-MAGI Medi-Cal will be forthcoming in a future ACWDL.

E-Verifications for Use in Non-MAGI Eligibility Determinations

The following are verifications that, when e-verified, shall be used in Non-MAGI Medi-Cal eligibility determinations:

- Citizenship and Identity Verification

- Immigration Status
 - **Note:** For further guidance on the use of CalHEERS and citizenship/immigration, refer to ACWDLs [18-09](#) and [17-01](#).
- SSN Verification
- Medicare Verification
 - **Note:** [ACWDL 17-08](#) provides further guidance on Medicare verification in CalHEERS.
- Incarceration Verification
- Deceased Verification
- Disability Verification
 - **Note:** [ACWDL 19-09](#) provides further guidance on Medicare verification

In the future, DHCS will release policy guidance regarding the use of e-verified income for Non-MAGI determinations and timeframes for using e-verified information. If you have any questions or if we can provide further information, please contact Janis Kimball at (916) 345-8060 or by email at janis.kimball@dhcs.ca.gov.

Original Signed By

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