



TOBY DOUGLAS  
Director

June 7, 2013

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



EDMUND G. BROWN JR.  
Governor

Medi-Cal Eligibility Division Information Letter: I 13-04

TO: ALL COUNTY WELFARE DIRECTORS  
ALL COUNTY MEDI-CAL PROGRAM SPECIALISTS/LIAISONS

SUBJECT: Affordable Care Act of 2010 – Provision of Policy Guidance to Counties

The purpose of this letter is to provide counties with information regarding the Department of Health Care Services' (DHCS) approach to providing policy guidance to counties over the coming months until implementation of the Affordable Care Act of 2010 (ACA) begins in October 2013. Historically, DHCS has provided counties with detailed policy guidance to implement changes in federal or state law, often addressing how counties must handle many different scenarios that may result from a particular policy change. This policy guidance has generally come in the form of an All County Welfare Directors' Letter (ACWDL), developed by DHCS, with input from consumer advocates and county representatives.

DHCS, in recognition of the compressed timeframes under which the counties and the Statewide Automated Welfare Systems (SAWS) must implement ACA policy changes, has decided the past practice of issuing detailed policy guidance through ACWDLs prior to counties and SAWS beginning to implement systems or business operational changes is not feasible from a timing or workload perspective. Therefore, DHCS will manage the provision of ACA policy guidance through the following communications:

- A policy guidance matrix (Enclosure 1) identifying current or pending documents or reference materials that provide direction and/or guidance the counties/SAWS can use to begin implementing necessary changes. This policy matrix has been converted into an online webpage that DHCS will continuously update as relevant materials are available. The online webpage can be accessed at <http://www.dhcs.ca.gov/services/medi-cal/Pages/CoEEpolicyguide.aspx>
- Continuing the County Eligibility and Enrollment Workgroup meetings (and subgroup meetings) for as long as necessary.
- Monthly ACA status updates provided to the County Welfare Directors' Association (CWDA) Medical Care Committee.
- Availability of DHCS policy staff to meet with counties/SAWS upon request.

June 7, 2013

This new approach will require counties/SAWS to make some decisions to operationalize ACA requirements that would have otherwise been made by DHCS. DHCS encourages counties/SAWS to coordinate decision making to the extent possible to minimize inconsistencies across counties/SAWS and to seek DHCS review and approval of decisions and/or implementation plans. In addition, please note this new approach does not eliminate the need for DHCS to issue ACWDLs and/or regulations pursuant to statutory requirements; however, the timing will likely be in the latter half of 2013, and into 2014, and beyond. To the extent possible, DHCS intends to provide counties/SAWS with sufficient flexibility to meet ACA requirements, both in terms of timing and business rules/processes.

If you have any questions, please contact Tara Naisbitt, Chief, Medi-Cal Eligibility Division, at (916) 552-9450 or [tara.naisbitt@dhcs.ca.gov](mailto:tara.naisbitt@dhcs.ca.gov).

Sincerely,

**Original Signed By**

René Mollow, MSN, RN  
Deputy Director  
Health Care Benefits and Eligibility

Enclosure

## ***Policy Inventory & Deployment Matrix***

Policy Item & Description	Current or Near-Term Source of Guidance
1. <b>Final data elements of the single streamlined application</b>	<ul style="list-style-type: none"> <li>• <a href="#">Data Elements (Version 1.5.1 – CRFI 13-20, February 15, 2013)</a></li> </ul>
2. <b>Case management/handling of mixed households (Medi-Cal/APTC)</b>	<ul style="list-style-type: none"> <li>• <a href="#">Application Processing Scenarios Resulting in Mixed Households (March 13, 2013)</a></li> <li>• <a href="#">Roles of Counties and Covered California (March 12, 2013)</a></li> </ul>
3. <b>Final verification plan and impact to SAWS/county business processes</b>	<ul style="list-style-type: none"> <li>• <a href="#">DRAFT CMS Verification Template (March 26, 2013)</a></li> <li>• <a href="#">Verification Plan Phase 2 (Version 0.5 - CRFI 13-0047, March 28, 2013) (4.8mb)</a></li> <li>• <a href="#">Manual Verification System Design Outline (Version 0.9, May 1, 2013)</a></li> <li>• <a href="#">Proposed State Legislation: SBX1 1 (Non DHCS)</a></li> <li>• <a href="#">Proposed State Legislation: ABX1 1 (Non DHCS)</a></li> <li>• <a href="#">Federal Regulations (42 C.F.R. 435.940 through 435.960) (Non DHCS)</a></li> </ul>
4. <b>Whether medically needy with a SOC is minimum essential coverage</b>	<ul style="list-style-type: none"> <li>• MEDIL forthcoming (projected June 30, 2013). Policy decision has been made: medically needy with SOC is not MEC until the SOC is met.</li> </ul>
5. <b>Business processes associated with continuing the Medi-Cal/CalWORKS linkage</b>	<ul style="list-style-type: none"> <li>• MEDIL forthcoming (projected June 30, 2013)</li> </ul>
6. <b>Transitional Medi-Cal (TMC) 1931B</b>	<ul style="list-style-type: none"> <li>• MEDIL forthcoming (projected June 30, 2013)</li> </ul>
7. <b>Continuous Enrollment for Children (CEC)</b>	<ul style="list-style-type: none"> <li>• <a href="#">Addressed in MEDIL - I 13-03 Affordable Care Act of 2010 – Initial Guidance (May 16, 2013)</a></li> </ul>
8. <b>Impact of open enrollment period to SAWS/counties</b>	<ul style="list-style-type: none"> <li>• <a href="#">DRAFT Recommendation of Handling Applications During Open Enrollment Period (April 16, 2013)</a></li> </ul>

## ***Policy Inventory & Deployment Matrix***

<b>Policy Item &amp; Description</b>	<b>Current or Near-Term Source of Guidance</b>
<b>9. Notice of Action content and triggers</b>	<ul style="list-style-type: none"> <li>• <a href="#">DRAFT MAGI NOA Template (April 16, 2013)</a></li> <li>• <a href="#">DRAFT MAGI NOA Snippet Table (April 12, 2013)</a></li> </ul>
<b>10. Senate Bill 87/Ex parte requirements</b>	<ul style="list-style-type: none"> <li>• <a href="#">DRAFT CMS Verification Template (March 26, 2013)</a></li> <li>• <a href="#">Verification Plan Phase 2 (Version 0.5 - CRFI 13-0047, March 28, 2013) (4.8mb)</a></li> <li>• <a href="#">Manual Verification System Design Outline (Version 0.9, May 1, 2013)</a></li> </ul>
<b>11. Outreach to potential Exchange/MC eligible, CalFresh, CCS, etc.</b>	<ul style="list-style-type: none"> <li>• <a href="#">Outreach and Education Grant Program Presentation (February 6, 2013) (Non DHCS)</a></li> </ul>
<b>12. AIM babies from 250% to 300% FPL</b>	<ul style="list-style-type: none"> <li>• No guidance currently available – still under discussion with the Administration</li> </ul>
<b>13. Processing of mass updates</b>	<ul style="list-style-type: none"> <li>• <a href="#">Decision made at the Program Policy Committee in March 2013</a></li> </ul>
<b>14. Renewal processing for MAGI and non-MAGI eligibility</b>	<ul style="list-style-type: none"> <li>• <a href="#">DRAFT CMS Verification Template (March 26, 2013)</a></li> <li>• <a href="#">Verification Plan Phase 2 (Version 0.5 - CRFI 13-0047, March 28, 2013) (4.8mb)</a></li> <li>• <a href="#">Manual Verification System Design Outline (Version 0.9, May 1, 2013)</a></li> <li>• <a href="#">Federal Regulations (42 CFR 435.916)</a></li> </ul>
<b>15. Periodic verification processing for MAGI and non-MAGI eligibility</b>	<ul style="list-style-type: none"> <li>• <a href="#">DRAFT CMS Verification Template (March 26, 2013)</a></li> <li>• <a href="#">Verification Plan Phase 2 (Version 0.5 - CRFI 13-0047, March 28, 2013) (4.8mb)</a></li> <li>• <a href="#">Manual Verification System Design Outline (Version 0.9, May 1, 2013)</a></li> <li>• <a href="#">Federal Regulations (42 CFR 435.916) (Non DHCS)</a></li> <li>• <a href="#">Federal Regulations (42 CFR 435.952) (Non DHCS)</a></li> </ul>
<b>16. Handling of Appeals</b>	<ul style="list-style-type: none"> <li>• <a href="#">Ongoing meetings with Manatt (April 9, 2013) (5.9mb)</a></li> </ul>

## ***Policy Inventory & Deployment Matrix***

<b>Policy Item &amp; Description</b>	<b>Current or Near-Term Source of Guidance</b>
<b>17. Policy for where potential applicants are directed to mail applications (county vs. CalHEERS service center)</b>	<ul style="list-style-type: none"><li>• Mailed to Pitney-Bowes for entry into CalHEERS. Address provided on the application and return envelope. Counties can also enter application data into CalHEERS. No wrong door.</li></ul>
<b>18. Final ACA aid codes</b>	<ul style="list-style-type: none"><li>• <a href="#">New ACA Aid Codes (CIT 0018-13, March 28, 2013)</a></li></ul>