



ALL COUNTY WELFARE DIRECTORS LETTER 24-04

Questions and Answers

Consolidated Policy for the Medi-Cal Inmate Eligibility Program (MCIEP), Medi-Cal Benefit Suspension Processes, and Pre-Release Medi-Cal Application Processes for Incarcerated Individuals Questions and Answers:

After the release of All County Welfare Directors Letter (ACWDL) No: 24-04, any relevant clarification or technical assistance that DHCS provides to County Social Services Departments (SSDs), County Correctional Facilities (CCFs), or California Department of Corrections and Rehabilitation (CDCR) related to the policy will be captured in this questions and answers page. Any areas identified as new policy, or guidance will be released in a stand-alone policy letter.

For more information, please reference [ACWDL 24-04](#).

Questions and Answers

The tables below contain questions and answers, organized by topic.

Medi-Cal Inmate Eligibility Program (MCIEP)

Date Added	Question	Answer
4/1/2025	Does MCIEP need a separate application when the individual has existing active or suspended Medi-Cal? For example, if a Medi-Cal member become incarcerated and receives inpatient services off the grounds of the county correctional facility, does the county need to collect another application to grant MCIEP?	<p>If a member has Medi-Cal established (suspended or not) at the time MCIEP eligibility is requested, a <i>separate</i> application for MCIEP is not required for eligibility review for County MCIEP. If the member meets the requirements for MCIEP, the county can leverage current case information to determine eligibility for MCIEP. The county should document the request, steps taken, and outcome in the member's case. If the county does not have access to enough information within the existing case to make an eligibility determination for MCIEP, they can request additional information from the designated entity.</p> <p>New Information: When the member is active in a different county and the <i>county</i> of incarceration does not have access to the primary case record or enough information to make an eligibility determination for MCIEP, they can request additional information from the designated entity. The primary case record should not be Intercounty Transferred (ICT) to the county of incarceration unless the member has indicated that they intend to permanently reside in the new county upon release.</p>

Medi-Cal Inmate Eligibility Program (MCIEP)

Date Added	Question	Answer
4/23/2025	<p>Prior to the publishing of ACWDL 24-04, counties would obtain a Medi-Cal application for MCIEP for Medi-Cal recipients and new applicants and evaluate for retro coverage from the date of the application. Now that MCIEP applications are not required for Medi-Cal recipients, how do counties determine the effective MCIEP date? There are times when the CCF request MCIEP and the month of request is more than 3 months prior to the date of request. ACWDL 24-04 page 14 and 16 only addresses applications.</p>	<p>The MCIEP effective date for Medi-Cal recipients should only be determined for the month in which the MCIEP request for the inpatient stay was reported and any of the 3 months prior to the date that MCIEP was requested, regardless of the date of service/inpatient stay. The MCIEP eligibility covers the entire month unless the member was incarcerated mid-month, if otherwise eligible.</p> <p>Examples:</p> <ul style="list-style-type: none"> • If the report occurred in February 2025, and the member was incarcerated the full month of February with the Date of Service (DOS)/inpatient stay beginning on 2/6/2025, the MCIEP effective date is 2/1/2025. • If the report occurred in March 2025, and the member's first full day of incarceration was 3/21/2025, with the DOS/inpatient stay beginning on 3/22/2025 the MCIEP effective date is 3/21/2025. <p>Any retroactive MCIEP requests that fall outside the standard 3-month retroactive eligibility period must be denied for the requested month, unless there were additional qualifying inpatient stays within the 3 months preceding the date of the MCIEP request for the reported stay. In such cases, the county may approve retroactive coverage consistent with the standard 3-month MCIEP retroactive eligibility policy, provided the individual is otherwise eligible.</p> <p>The county remains responsible for arranging for and paying for the medical care of the county incarcerated individual, if the services rendered do not fall under the MCIEP allowable services, the county is not participating in MCIEP, or they are ineligible for MCIEP.</p>

Medi-Cal Inmate Eligibility Program: Courtesy Application Process

Date Added	Question	Answer
04/1/2025	<p>In ACWDL 24-04, under the Courtesy Application Process for MCIEP on page 21, Example 1, there appears to be a missing designation after County Welfare Department "(CWD)". Could you please clarify what specific county designation (e.g., "CWD A" or "CWD B") is required in this example?</p>	<p>Example 1: County A receives an application from County B for a Medi-Cal member who is incarcerated in County B, but the Medi-Cal Eligibility Data System (MEDS) shows their Medi-Cal benefits in County A.</p> <ul style="list-style-type: none"> ○ County A should return the application to County B for the MCIEP eligibility determination and maintenance of the case because they are incarcerated in County B. Note: County A shall follow the suspension process of the Medi-Cal benefits in their county, if applicable.

California Department of Corrections and Rehabilitation (CDCR): Medi-Cal Applications Received from CDCR Reentry Participants

Date Added	Question	Answer
4/1/2025	Has CDCR renamed Custody to Community Transitional Reentry Program (CCTRP)?	Yes. CDCR renamed CCTRP to Female Community Reentry Program (FCRP).

Pre-Release Applications: Household Composition

Date Added	Question	Answer
04/1/2025	<p>If an incarcerated person is interested in applying for Medi-Cal while still residing in a state prison, but may or may not have access to their spouse/other household member's information and may or may not have confirmation of returning to the home, how should the designated entity assist with filling out the application to prevent delays and barriers with them being enrolled in Medi-Cal?</p>	<p>Modified Adjusted Gross Income (MAGI) Medi-Cal household composition methodology follows the federal tax filing rules as a framework to determine household compositions for all MAGI Medi-Cal based programs. Per ACWDL 20-10, in situations where there is uncertainty about the tax dependent filing status of an individual such as when an applicant or member is unsure if they are claimed as a tax dependent by a tax filer or if a tax filer cannot reasonably establish another individual is a tax dependent of the tax filer for the year in which MAGI Medi-Cal is requested, the CEW shall use Non-Filer Rules to determine the MAGI household composition as outlined in 42 C.F.R. Section 435.603(f)(5).</p> <p>Additionally, in situations where the applicant or beneficiary reasonably predicts a change in their tax filing status, CEWs shall use the reasonably predictable future changes to establish the household composition. Centers for Medicare and Medicaid Services (CMS) has provided clarification that the flexibilities outlined in 42 C.F.R. Section 435.603(h)(3) include future tax filing status changes as they are the basis for the income counting rules. County Eligibility Workers (CEWs) shall follow existing self-attestation rules for gathering tax filing information outlined in ACWDL 20-10.</p>

Pre-Release Applications: Identity Proofing

Date Added	Question	Answer
04/1/2025	<p>Without identity proofing, counties are precluded from calling the business rules engine (BRE) to attempt e-verification. Since the designated entity signs the statement of facts for MCIEP, how do we meet the mandate of attempting e-verification and conducting ex parte when nothing is signed by the client and no identity document is submitted?</p>	<p>As detailed in MEDIL 15-10, Identity Proofing and Identity Verification are both required in order to properly adjudicate Medi-Cal applications.</p> <p>There are three options for Identity Proofing, as detailed in MEDIL 15-10: option 1 (Signature), option 2 (Visual Verification) and option 3 (Remote Identity Proofing through CalHEERS). However, options 2 and 3 are unavailable for MCIEP members.</p> <p>For MCIEP, the designated entity and/or appointed authorized representatives (AR) have authority to sign Medi-Cal forms including the single streamlined application on behalf of MCIEP applicants, therefore, counties are advised to use option #1 (Signature) to establish proof of identity for the incarcerated individual, enrolled in Medi-Cal as part of the MCIEP.</p> <p>Note: The guidance in MEDIL 15-10 does not specify that the signature must be the applicant and cannot be that of their Designated Entity or AR. Therefore, counties should accept the Designated Entity or AR's signature for the inmate applicant in order to run Eligibility Determination and Benefit Calculation (EDBC)/ BRE.</p> <p>Option 1 states the following:</p> <p>1. Signature – The applicant can complete and send or deliver a paper application to the county or the Covered California Service Center for processing. The applicant's signature on an application qualifies as proof</p>

Pre-Release Applications: Identity Proofing

Date Added	Question	Answer
		of identity when a Service Center Representative (SCR), other CalHEERS user, or county eligibility staff processes the application.

Individuals Not Considered as Incarcerated

Date Added	Question	Answer
9/19/2025	Are youth in a juvenile detention center prior to disposition (judgement) for care, protection, or in the child's best interest considered inmates of a public institution under Medi-Cal rules?	<p>As notes in Title 22 CCR §50273(c)(5), and All County Welfare Directors Letter (ACWDL) 12-22, youth in juvenile detention with a court-ordered placement (such as Short-Term Residential Therapeutic Program or foster care) if there is a specific plan for that person that makes the stay at the detention center temporary. This would include those juveniles awaiting placement but still physically present in juvenile hall are <u>not</u> considered inmates of a public institution for Medi-Cal eligibility purposes. Therefore, this population is <u>not</u> subject to benefit suspension as typically applied for Medi-Cal members during incarceration, as outlined in ACWDL 24-04, which superseded or replaced ACWDL 12-22.</p> <p>Mental health services provided to these youth while in juvenile detention for the purpose outlined above can be billed to Medi-Cal. DHCS encourages the County Social Service Department to collaborate with other county partners as needed to achieve this.</p>