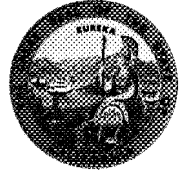




TOBY DOUGLAS  
DIRECTOR

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



EDMUND G. BROWN JR.  
GOVERNOR

Original Date Stamped October 22 2013

Ms. Jennifer Ryan  
Deputy Director for Policy  
Children and Adults Health Programs Group  
Center for Medicaid and CHIP Services  
Centers for Medicare and Medicaid Services  
7500 Security Boulevard, Mail Stop S2-26-12  
Baltimore, MD 21244-1850

Dear Ms. Ryan,

The California Department of Health Care Services (DHCS) is submitting the following request in response to the Centers for Medicare and Medicaid Services (CMS), State Medicaid Director's Letter, ACA #26 Guidance, dated, May 17, 2013. This guidance is designed for state Medicaid programs to employ flexibilities for enrollment and renewal processes for 2014. DHCS plans to undertake these efforts with the understanding that the applicable federal funding for the covered populations noted below in item numbers 2, 3, and 4 will be at the enhanced rate established for newly eligible adults under Medicaid, e.g., 100 percent federal funding, which decreases over time to 90 percent in perpetuity.

The requested flexibilities will be used through December 31, 2015, unless otherwise stated. For the express eligibility enrollment options, DHCS would seek to establish a new aid code for the program. Aid codes are used to identify program eligibility, the numbers enrolled through the identified program, and for claiming the applicable federal funding levels.

Specifically DHCS is requesting a waiver of section 1902 (e)(14)(A) to accomplish the following activities:

1. *Ability to delay the use of applying the Modified Adjusted Gross Income (MAGI) methodologies for individuals, who require a Medicaid redetermination during the first quarter of calendar year (CY) 2014 (January 1, 2014 through March 31, 2014) and the ability to not act on changes of circumstances during this same time period.* This delay with redeterminations and not acting on changes in circumstances would occur no sooner than the first day of the second quarter of CY 2014, beginning April 2014, and would be phased in. For example, January

renewals will be processed in April; February renewals will be processed in May; and so forth. DHCS will be assessing enrollment efforts and any unintended consequences which may necessitate seeking further federal approval for additional time delays of processing renewals/changes in circumstances.

2. ***Ability to enroll individuals into Medi-Cal, relying on their eligibility for California's Supplemental Nutrition Assistance Program, known as CalFRESH in California.***

This strategy will be targeted toward approximately 600,000 individuals, who currently do not have health care coverage or dependent children enrolled in Medi-Cal. California will be transitioning over 600,000 individuals from the Low Income Health Program into Medi-Cal on January 1, 2014. Given this volume of individuals coming into Medi-Cal, all at once, in addition to newly eligible individuals enrolling on their own, California would like to take this step to ease the administrative burden on the county eligibility workers. DHCS is requesting CMS approval of using this streamlined enrollment process through December 31, 2015. Enrollment efforts will include:

- a. Using application information from CalFresh as the means to target the potentially eligible individuals. This information will include income, family size, citizenship/identity, and residency.
- b. Use of a simplified form/postcard for outreach and informing purposes for potential eligibility into Medi-Cal using CalFresh application information. Will also provide information on and steps to take for Medi-Cal enrollment and health plan selection and enrollment.
- c. Ability to apply by phone, mail, fax, or in-person and to similarly collect required signatures (electronic, soft copy, phone), using the simplified form/postcard as mentioned above.
- d. Working with county eligibility workers to implement a seamless enrollment process, leveraging information received from the simplified enrollment form/postcard and the information contained in the Statewide Automated Welfare System (SAWS; also known as the local county eligibility system) that is available from the person's CalFresh case to establish the case for Medi-Cal purposes.
- e. Use of the CalFresh enrollment date as a means to streamline the renewal dates for both programs, to the extent the person elects to be enrolled in Medi-Cal or the date in which the simplified form/postcard is returned to the county for processing, whichever is more advantageous to the person from an administrative standpoint.
- f. An outreach campaign would be coordinated with the California Department of Social Services and our county partners to effectuate this express lane enrollment process.
- g. Establishing unique aid codes to track individuals.

3. ***Ability to target and enroll populations, who are enrolled in state only programs such as the Genetically Handicapped Persons, Every Woman Counts, or the Prostate Cancer Program, as well as locally developed programs such as county based medically indigent care programs.*** DHCS would use similar processes and information as described in "2a-2g" above to leverage such information from the applicable programs to help establish potential eligibility for Medi-Cal through this express lane eligibility process. DHCS would seek to create unique aid codes to track individuals enrolled through this streamlined enrollment process.
4. ***Enrolling eligible, but un-enrolled parents, into Medi-Cal coverage based on the income eligibility for their enrolled children that does not exceed 138 percent of the federal poverty level.*** DHCS would use similar processes and information described in "2a-2g" above to leverage such information from the current case established for the child to help establish potential Medi-Cal eligibility for their parents. DHCS would seek to create unique aid codes to track individuals enrolled through this streamlined enrollment process.

DHCS looks forward to your review and approval of the requested flexibilities. If you have any questions or concerns please contact Ms. Tara Naisbitt, Chief, Med-Cal Eligibility Division, at [tara.naisbitt@dhcs.ca.gov](mailto:tara.naisbitt@dhcs.ca.gov) or by phone at 916-552-9450.

Sincerely,

Original Signed by Toby Douglas

Toby Douglas  
Director