



JENNIFER KENT
Director

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



EDMUND G. BROWN JR.
Governor

January 25, 2017

TO: ALL COUNTY WELFARE DIRECTORS Letter No: 17-04
ALL COUNTY ADMINISTRATIVE OFFICERS
ALL COUNTY MEDI-CAL PROGRAM SPECIALISTS/LIAISONS
ALL COUNTY PUBLIC HEALTH DIRECTORS
ALL COUNTY MENTAL HEALTH DIRECTORS
ALL CONSORTIA/SAWS PROJECT MANAGERS

SUBJECT: Duplicate Application Reduction Efforts and Duplicate Case Closure Process

Purpose

The purpose of this letter is to inform counties about the efforts undertaken to reduce the volume of duplicate applications created through the California Healthcare Eligibility, Enrollment and Retention System (CalHEERS) and to provide guidance to counties on the process for closing duplicate cases in CalHEERS.

1. Duplicate Application Reduction Efforts

Multiple efforts have been undertaken to reduce the number of duplicate applications created through CalHEERS. The Duplicate Application Workgroup, which consisted of staff from the Department of Health Care Services (DHCS), Covered California, California Welfare Directors Association, CalHEERS and the Statewide Automated Welfare System (SAWS), along with County Eligibility Workers (CEWs) and Covered California Service Center Representatives (SCRs), was convened in 2015 to develop potential solutions to reduce duplicate applications. As a result of the workgroup and ongoing conversations with their partners, DHCS and Covered California developed three Change Requests (CRs): CR 30174 *Implement CalHEERS MEDS Check for Medi-Cal Eligibility*, CR 52313 *Short-Term Duplicate Applications* and CR 52314 *Long-Term Duplicate Applications*.

- A. CR 30174 Implement CalHEERS Medi-Cal Eligibility Data System (MEDS) Check for Existing Medi-Cal Eligibility

The purpose of the MEDS Check CR, implemented in May 2016, is to determine whether an applicant already has Medi-Cal eligibility, including eligibility for the Medi-Cal Access Program, in MEDS at application through the CalHEERS channel to prevent duplicate applications. Duplicate applications for applicants who already have Medi-Cal eligibility are denied on the basis of already being aided. The Eligibility Results message provided by CalHEERS states: "We checked our files when you applied and you are already receiving Medi-Cal. If you think this is a mistake, please contact your County Social Services office for help."

Additionally, the denial notice of action (NOA) generated by CalHEERS informs the applicant that: "We checked our files, and you already have health coverage. If you think this is incorrect, please contact your county social services office for help."

Counties and SCRs have the ability to bypass the MEDS check to ensure that individuals are evaluated for Modified Adjusted Gross Income (MAGI) eligibility even if they currently have Non-MAGI eligibility. Please see Medi-Cal Eligibility Division Information letter (MEDIL) I 15-29 for more information about reviewing non-MAGI cases for potential MAGI or Advanced Premium Tax Credit (APTC)/Cost-Sharing Reduction (CSR) eligibility.

B. CR 52313 Short-Term Duplicate Applications

The purpose of the short-term duplicate application CR, implemented in May 2016, is to reduce the number of duplicate applications created within the CalHEERS portal by preventing individuals from creating duplicate CalHEERS accounts, enhancing administrative (admin) search capability, disabling the "Withdraw Application" link when an application has already been submitted, and enhancing the Log In/Create Account page.

Prevention of Duplicate Account Creation

Account validation functionality has been added that prevents an individual with an existing CalHEERS account from creating a new account. CalHEERS does this by matching, through the "Create an Account" page, either a combination of name and social security number (SSN), or a combination of name and date of birth along with one of following: phone number, email address or home address. Once an individual is identified as already having a CalHEERS account, they will be unable to create a new one and will receive the following pop-up message:

"It appears that you may already have an account. Did you forget your username or password?"

If yes, please click [here](#).

If you aren't sure if you already have an account, please contact the Covered California Service Center at 1-800-300-1506. A Service Center representative can help set up your account or reset your password."

If the county is contacted by an individual as a result of this messaging, the county shall assist the individual per normal business practices. This may include providing current case or eligibility status for MAGI or Non-MAGI Medi-Cal, updating case information and reevaluating eligibility, and/or assisting the individual with accessing their existing case in CalHEERS. If the individual does not already have a CalHEERS log in account, counties can assist the individual in accessing their existing case in CalHEERS by logging in to CalHEERS, accessing the individual's open CalHEERS case, and obtaining a delegation code for the individual. The delegation code is used by the individual to create a new account that ties to the existing case in CalHEERS. If the individual knows they already have an account, counties can transfer the individual to an SCR for assistance in accessing their account.

Enhancing Admin Search Capability

In addition to preventing duplicate accounts, the CR also enhanced the admin search capability by allowing phonetic name searches, returning search results for similar names based on spelling, and allowing a date of birth range of up to two years. This enhanced search capability increases the counties' and SCRs' ability to locate an existing application/case prior to creating a new application. In order to ensure that an existing application/case in CalHEERS belongs to the same individual who has tried to reapply, counties must match specific identifiers that are available to them. For individuals with an SSN, this means matching, at a minimum, the name, Date of Birth (DOB) and SSN. For individuals without an SSN, this means matching, at a minimum, the name and DOB, along with a telephone number, email address or home address. If there is any question about whether the application/case found in CalHEERS is a match for the new application received, counties must follow up with the applicant using the Second Contact process outlined in All County Welfare Directors Letter (ACWDL) 08-07 to gather the needed identifying information.

Disabling the "Withdraw Application" Link

Prior to implementation of this CR, individuals who had already submitted an application were able to click a "Withdraw Application" link located on the Individual Landing Page in CalHEERS that allowed an application to be "closed" regardless of the status of the application and without any communication to the counties. This led to the CalHEERS, SAWS and MEDS systems being out of sync while increasing duplicate applications when the individual would decide to reapply. As part of CR 52313, the "Withdraw Application" link was modified to ensure it is only available to individuals who have started an application but have not yet submitted it.

Enhance Log In/Create Account Page

During the course of discussions related to CR 52313, an enhanced Log In/Create Account page was also developed to combine the log in information and the create an account information while making the log in information more predominant. This serves to reduce the number of individuals who attempt to create a new account instead of logging in to their existing account. The Log In/Create Account page change was ultimately released through technical CR 36484 in May 2016.

C. CR 52314 Long-Term Duplicate Applications

The original purpose of the long-term duplicate applications CR was to allow for the closure of duplicate CalHEERS cases and to allow the counties to delink and/or relink SAWS cases and CalHEERS cases. As a result of additional technical discussions that are needed, CR 52314 was modified to focus solely on the ability to close duplicate CalHEERS cases. Discussions regarding the ability to delink and/or relink SAWS cases from CalHEERS cases will continue through a separate CR. The functionality to allow the closure of duplicate CalHEERS cases was implemented with release 16.9.

Closure of Duplicate Cases in CalHEERS

With the implementation of CR 52314 Long-Term Duplicate Applications, counties and SCRs will be able to manually close duplicate CalHEERS cases through the CalHEERS portal. In accordance with Welfare & Institutions Code (WIC), Sections 14015.5 and 14015.7, counties will retain case management responsibilities, including duplicate case closure actions, for Medi-Cal-only cases and for mixed household cases that have both Medi-Cal and APTC/ CSR individuals. SCRs will retain case management responsibilities, including duplicate case closure actions, for APTC/CSR only cases.

In order to close a duplicate case, CEWs or SCRs will:

- log into CalHEERS and access the duplicate case to be closed;
- navigate to the new Case Status page, which is accessible to admin users only;
- read the information presented about the consequences of closing a duplicate case; and
- check a box, after following the process detailed in the “Required County Process Prior to Duplicate Case Closure” section below, to confirm that, “I have ensured that this case is a duplicate and can be closed without affecting the consumer’s existing eligibility or enrollment in another case.”

Once a duplicate case has been closed, the consumer will no longer be able to access or modify the case information in the CalHEERS case that is closed. If the consumer attempts to log in to the account that is tied to a closed duplicate case, he/she will receive the following message:

“Attention:

This case has been closed and you can no longer use it because our system shows you have another open case.

If you don’t know about your other case, need help logging in or applying again, or think we made a mistake, call:

1. Covered California at 1-800-300-1506, or
2. Your local county social services office. You can find your local county office by clicking [here](#).

By calling one of the numbers above, you can get information about your eligibility or learn how to access your existing case.”

The Case Status page will also allow CEWs and SCRs to reopen a case, should the case have been closed erroneously. However, CEWs must ensure that the required process described in Section 2, “Required County Process Prior to Duplicate Case Closure,” is followed prior to taking action to close a case in CalHEERS, as reopening a case will not automatically reestablish eligibility or enrollment. Reopening a closed case will restore the consumer’s ability to log in to the account tied to that case and will return the case to apply mode. The case information would need to be run through the Business Rules Engine (BRE) in order to establish current or ongoing eligibility.

2. Required County Process Prior to Duplicate Case Closure

The following section describes the process that must be followed prior to using the functionality available through CR 52314 to close a duplicate CalHEERS case. CEWs will typically recognize a duplicate case during file clearance on a new application, when an unsolicited Determination Eligibility Response (DER) is received from CalHEERS.

File Clearance

In order to determine that an unsolicited DER is for a CalHEERS case that is a duplicate to an existing SAWS case, CEWs must follow their current file clearance process to match the household members’ specific identifiers that are available to the county. CEWs shall:

- review the SAWS system and MEDS to determine if an individual included in an unsolicited DER is already known to the county; and
- for individuals with an SSN, the CEWs shall match, at a minimum, the name (first, middle initial if available, last), DOB and SSN; or
- for individuals without an SSN, the county shall match, at a minimum, the name and DOB, along with a telephone number, email address or home address.

The CEWs may use other available information, such as gender or mother's name, when verifying that an individual is already known to the county. Additionally, if the household is for more than one person, it is expected that the CalHEERS case and the SAWS case will have some of the same individuals that are matched using the criteria listed above. The cases do not have to have all of the exact same household members in order to be considered duplicate.

If there is any question about whether the new CalHEERS case received via unsolicited DER is a match for the existing SAWS case, CEWs shall:

- follow up with the responsible household members from their existing SAWS case and/or the responsible household members from the new CalHEERS case to request additional information that is needed to determine if it is a match; and
- follow the Second Contact process outlined in ACWDL 08-07 to gather the needed identifying information.

Based on the information gathered from the responsible household members, counties may determine that recent household changes require the two separate cases or that recent household changes require updates to the existing SAWS case, along with closure of the new duplicate case.

Case Consolidation

Once the CEW determines that a CalHEERS case is duplicate to an existing SAWS case, the CEW must take certain actions prior to closing the duplicate case in CalHEERS. In order to ensure consistent eligibility and enrollment processes, CEWs should attempt to complete the actions described below as soon as discovering a duplicate CalHEERS case.

Prior to taking any actions, the CEW should access the duplicate case in CalHEERS and enter case notes to reflect that the case has been flagged as a duplicate by the county. Additionally, the CEW must:

- Update the case notes in the existing SAWS case that will remain open to explain that a duplicate CalHEERS case was identified and closed. This will

allow other county workers or SCRs to recognize that the case is a duplicate which may soon be closed and to coordinate with the CEW working on the duplicate case before taking any actions.

- Review the duplicate case to determine if there is any new information that has been provided or new individuals that have applied for an insurance affordability program.
- Update their existing SAWS case by including all new information that was found in the duplicate CalHEERS case, in accordance with WIC Section 14005.37(a), if new information or individuals are found.
- Run eligibility through the BRE to ensure Medi-Cal eligibility is accurate and up-to-date.
- Send a NOA as required per normal business processes, if any eligibility changes occur within the existing SAWS case that has been updated and remains open. This includes any transitions from Medi-Cal to APTC/CSR or vice versa.

For mixed Medi-Cal and APTC/CSR cases, the CEW must also:

- Review the duplicate case to determine if any APTC/CSR eligible members have enrolled in a health plan that is not reflected in the existing case.
- Coordinate with consumers and SCRs to transfer the choice of a health plan to the existing case, in accordance with Government Code, Section 100503, if the consumer's plan selection is not reflected in the existing case and to notify consumers of the need to pay their first premium if they have not done so.
- Use the established process to contact the Covered California county liaison to explain the need to transfer the plan to the existing case. The Covered California county liaisons will assist as needed to ensure there is no break or overlap in plan enrollment and effectuation.
- Attempt a minimum of two contacts to provide the consumer with information about the need to transfer the plan to the existing case and the need to pay their first premium to remain covered if necessary. The two contacts should be made on different calendar days to increase the odds of reaching the applicant and should be in the consumer's preferred method, if operationally feasible.

Protected Eligibility

CEWs may identify a duplicate case where an individual has protected eligibility for programs operated by DHCS, such as through a pregnancy program that lasts through 60-days postpartum, deemed eligibility for an infant to age one year, continued eligibility for first year infants for the Medi-Cal Access Program, or continued eligibility for the County Children's Health Initiative Program (in San Mateo, San Francisco and Santa Clara counties), where that protected eligibility is not recognized on the existing SAWS case. Once information is updated in the existing case and eligibility is rerun

through the BRE, it's expected that CalHEERS will update the existing case with the protected eligibility as the SAWS case will include all of the up-to-date information that the new duplicate case had.

If the existing case is not automatically updated by CalHEERS with the protected eligibility as a result of the new information (for example, the woman has already given birth but is still within her 60-day postpartum period), the CEW shall:

- Ensure that the protected individual has equivalent eligibility in the existing case, even if that means submitting an online transaction to MEDS to obtain the correct Medi-Cal eligibility. Counties are reminded that SAWS eligibility and MEDS eligibility should match to avoid any impacts that would result from the MEDS recon process that is described in MEDIL 15-34.
- Note in the SAWS case record the timeline of the protected eligibility and shall ensure that the individual remains eligible through the end of their protected period.
- At the end of the protected period, follow existing change of circumstances processes to obtain a current eligibility determination, send NOAs reflecting the updated eligibility, and reset the annual renewal date as appropriate, in accordance with ACWDL 14-22, Resetting Annual Redetermination Dates.
- Should the CEW recognize that a duplicate CalHEERS case includes an individual in soft pause, the CEW should follow the current process outlined in ACWDL 14-18, including ex parte and evaluation for potential non-MAGI linkage, on the case that will remain open to ensure the individual is moved into the appropriate program.

Once the process above has been followed and eligibility and enrollment are up-to-date and current on the existing case, CEWs may take the necessary actions in SAWS, such as cancelling the DER for the duplicate case, and then access the Case Status page in CalHEERS to close the duplicate case. When the only action taken by a CEW is to close a duplicate case in CalHEERS, the closure shall not result in sending any NOAs to the individual(s) or any transaction to MEDS as eligibility shall not change as a result of the duplicate case closure. An individual who has a duplicate CalHEERS case that has been closed may request assistance in accessing their open CalHEERS case, if they do not already have a user account tied to it. CEWs can assist the individual by logging into CalHEERS, accessing the open CalHEERS case, and obtaining a delegation code for the individual. The individual can use the delegation code to create an account that ties to their open CalHEERS case.

All County Welfare Directors Letter No.: 17-04
Page 9
January 25, 2017

If you have any questions or require additional information, please contact Alison Brown at (916) 319-9565 or by email at Alison.Brown@dhcs.ca.gov.

Original Signed By

Sandra Williams, Chief
Medi-Cal Eligibility Division