



Health Care Practice Tip – April 2022 Medi-Cal’s Health4All Older Adults Expansion

More people can qualify for Medi-Cal starting May 1, 2022. Immigrants age 50 and older who used to get only restricted-scope (“emergency”) Medi-Cal can now get full-scope (“regular”) Medi-Cal. Immigration status does not matter, so many undocumented immigrants are now eligible.¹

- **Do you already have restricted-scope Medi-Cal?** People age 50 and older with restricted-scope Medi-Cal in April 2022 will automatically get full-scope Medi-Cal on May 1, 2022. No new application is required.²
- **Do you need to apply for Medi-Cal?** Only people who did not have any Medi-Cal already will need to submit a new application. If people meet all Medi-Cal eligibility rules, counties must approve full-scope Medi-Cal starting May 1, 2022 or later. For people turning 50, eligibility starts the first day of their birthday month.³ Apply today!

Here are our top 8 issues and tips for navigating this Medi-Cal expansion:

(1) There are no immigration status requirements!

This expansion of full-scope Medi-Cal is available for people who cannot satisfy Medi-Cal’s old immigration requirement, known as “satisfactory immigration status.”⁴ Now, to get full-scope Medi-Cal, applicants and beneficiaries do not need to share their immigration status or submit proofs about their status.

Counties may only request immigration proofs (including [Form MC 13](#)) when somebody says they have “satisfactory immigration status.”⁵ If somebody does not submit immigration proofs, counties must still approve full-scope eligibility.⁶ Counties cannot request immigration proofs when the applicant or beneficiary sent proof at any time earlier with their application or renewal,⁷ and when somebody did not share their immigration status.⁸

Consider these two examples that show there is no immigration status requirement:

- **Úrsula** applied for Medi-Cal in February 2018 and did not share her immigration status. She was approved for restricted-scope Medi-Cal. Since she turned 50 in February 2022, Úrsula automatically gets full-scope Medi-Cal starting May 1, 2022. At any point in the future, she is not required to submit any proof of immigration status, including a Form MC 13. If the county

erroneously asks for immigration proof, Úrsula should tell her county that she does not need to provide it. The county must rescind the request and continue Úrsula's full-scope Medi-Cal.

- **Quan** is 50 years old and applied for Medi-Cal in June 2022. They checked the "Yes" box for "satisfactory immigration status."⁹ The county sent Form MC 13 and requested immigration proof. Later Quan realized that they made a mistake because they did not have "satisfactory immigration status." Quan did not respond to the county's request but met all application requirements. The county must approve Quan for full-scope Medi-Cal without requiring their response to Form MC 13.
- **TIP:** For everybody age 50 and older, proof of immigration status is not required. If a county asks for immigration proofs, check to see if the applicant or beneficiary shared their immigration status before. If they already sent proof of their status with the application or earlier renewal, they do not need to submit it again. If they never shared their immigration status or did not turn in immigration proofs, the county must still approve full-scope Medi-Cal.¹⁰

(2) Full-scope Medi-Cal should not impact immigration status!

Most immigrants are not subject to public charge. In the rare situations when public charge applies, Medi-Cal does not matter except when somebody is institutionalized for a long time.¹¹ Recently the federal government clarified that "Institutionalization for short periods of rehabilitation is not considered in a public charge determination."¹² Even if a person with full-scope Medi-Cal gets long-term institutionalization, it may not automatically harm their immigration status. For more information, visit keepyourbenefitsca.org.

For immigrants with sponsors, Medi-Cal does not recover costs from sponsors or count sponsor income when deciding eligibility.¹³

(3) Many people should now be eligible for full-scope Medi-Cal!

More than 244,000 people with restricted-scope Medi-Cal should get full-scope Medi-Cal overnight on May 1, 2022. And more people can apply for Medi-Cal at any time. Beneficiaries will have any of several aid codes for full-scope Medi-Cal. For a complete list, check out [Attachment A to ACWDL 21-13](#). There are no new aid codes for this expansion.

Watch out for erroneous application denials based on residency or failure to prove cash income:

- **Residency** –The rule is simple: people are "residents" when they are living in California with the intent "to reside" in California.¹⁴ If applicants cannot submit proof of their residency (rent receipt, utility bill, paystub, child school enrollment, etc.), counties must accept an applicant's sworn statement.¹⁵

- **Cash income** – When somebody is paid in cash, counties must accept sworn statements as proof.¹⁶ Applicants can submit their statement in writing or by phone.¹⁷ For example: “I work at ABC Daycare. I am paid \$1250 every month in cash.”

➤ **TIP:** Everybody getting full-scope Medi-Cal under this expansion should receive an official mailed notice. If they did not, they might need to update their contact information! You can [contact county welfare offices](#) to report updates (mailing address, phone numbers, and email). This will help people keep their Medi-Cal and access care.

(4) Full-scope Medi-Cal covers all Medi-Cal services!

Immigrants who get full-scope Medi-Cal under this expansion are eligible for all benefits that Medi-Cal covers – including doctor visits, dental, vision, foot care, prescription drugs, mental health, substance use disorder services, transportation, and more!¹⁸ It also includes In-Home Supportive Services (IHSS) and other Home and Community Based Services (HCBS).¹⁹

➤ **TIP:** There is no immigration status requirement to receive IHSS. But IHSS providers must be legally authorized to work in the United States.²⁰ This means people can qualify for full-scope Medi-Cal and IHSS, but their family members might not meet the IHSS provider requirements. Contact [your county’s Public Authority](#) to find IHSS providers.

(5) Most people will enroll in Medi-Cal managed care plans!

Most people with full-scope Medi-Cal will get their covered services through a managed care plan. How people enroll in managed care plans depends on the county where they live.

People living in counties with a County Organized Health System (COHS) will be enrolled in their county’s plan starting May 1, 2022. Those counties are: Del Norte, Humboldt, Lake, Lassen, Marin, Mendocino, Merced, Modoc, Monterey, Napa, Orange, San Luis Obispo, San Mateo, Santa Barbara, Santa Cruz, Shasta, Siskiyou, Solano, Sonoma, Trinity, Ventura, and Yolo.

People living in all other counties will get to choose their managed care plan. If they do not choose a plan, the state will automatically enroll them into a plan starting July 1, 2022. Here are the important deadlines:

If you pick a plan by:	Then your enrollment starts:
April 24, 2022	May 1, 2022
May 22, 2022	June 1, 2022
June 22, 2022	July 1, 2022

People can pick a plan by returning the form they received in the mail, contacting Health Care Options at 1-844-580-7272, or visiting the [Health Care Options website](#). On the

online enrollment form, the Social Security Number field is not required – so people can leave it blank.

- **TIP:** For people not living in COHS counties, they will likely have at least a month of fee-for-service or regular Medi-Cal eligibility (before they enroll into a plan). While they have fee-for-service Medi-Cal, people can access care at any Medi-Cal provider. For help locating a provider, contact the Medi-Cal Helpline at (800) 541-5555.²¹

(6) Medi-Cal's asset & resource limits are increasing July 1, 2022!

People age 65 and older who have assets above the current limits (\$2,000 for one person and \$3,000 for a couple) might see their Medi-Cal applications denied before July 1, 2022. If this happens, they should reapply in June to get evaluated under the [higher limits that start on July 1, 2022](#).

- **TIP:** People denied or discontinued from Medi-Cal in April and May 2022 will get a mailer starting in July 2022 that tells them they can reapply under the higher limits. But people should not wait for the mailer! They can apply as early as June 2022 and get evaluated under the higher limits for full-scope coverage starting July 1, 2022.

(7) The Health4All movement continues!

California's [Health4All movement](#) is the reason for this Medi-Cal expansion. Since 2013, Health4All has advocated for Medi-Cal to include all Californians regardless of immigration status. Thanks to the movement, in 2016 Medi-Cal stopped excluding children. In 2019, it stopped excluding young adults up to age 26.

Health4All continues to advocate for Medi-Cal to end the final exclusion for people ages 26 through 49. In January 2022, the governor proposed full-scope Medi-Cal for people ages 26 through 49 no sooner than January 1, 2024. Advocates are pushing for implementation on January 1, 2023. Stay tuned for more soon!

(8) There are many helpful resources on this Medi-Cal expansion!

Groups across California have created several helpful resources:

- Health Consumer Alliance flyers: [English](#), [Spanish](#), [Arabic](#), [Vietnamese](#), [Traditional Chinese](#), [Simplified Chinese](#), [Korean](#), [Tagalog](#), and [more](#)
- BAILA Network flyers: [Armenian](#), [Chinese](#), [English](#), [Spanish](#)
- Health4All Older Adults FAQs from advocates: [English](#) & [Spanish](#).
- [Latino Coalition for a Healthy California toolkit](#)
- [Medi-Cal Expansion: Health4All Older Adults \(advocate webinar recording\)](#)
- [BAILA Network's Older Adult Medi-Cal Expansion Webinar \(recording\)](#)
- DHCS website in [English](#) & [Spanish](#)

For more information, please contact:

- Alicia Emanuel (National Health Law Program): emanuel@healthlaw.org

- Tiffany Huyenh-Cho (Justice in Aging): thuyenhcho@justiceinaging.org
- David Kane (Western Center): dkane@wclp.org

¹ This expansion mandates full-scope Medi-Cal for people who do not have “satisfactory immigration status” and even requires counties to approve full-scope Medi-Cal when people cannot prove their immigration status. See Welf. & Inst. Code § 14007.8(a)(2)(A).

² Welf. & Inst. Code § 14007.8(a)(3)(A).

³ See “Age Policy” in [ACWDL 21-13](#) at p. 2.

⁴ See Welf. & Inst. Code § 14007.8(a)(2)(A).

⁵ “For example, individuals age 50 or older under this expansion who do not claim [satisfactory immigration status] are not required to provide immigration status verification.” See [ACWDL 21-13](#) at p. 3.

⁶ “In the event that verification of SIS [satisfactory immigration status] cannot be obtained when it is required or if documentation establishing...SIS is not provided at the time of application or renewal, after the Older Adult Expansion implementation, otherwise eligible individuals 50 years of age or older will no longer be reduced to restricted scope benefits.” See [ACWDL 21-13](#) at p. 3.

⁷ Welf. & Inst. Code § 14011.2(e)(2)(B).

⁸ “Counties must not request verification from immigrants who claim an immigration status for which verification is not required under current policy.” See [ACWDL 21-13](#) at p. 3.

⁹ “Do you have satisfactory immigration status?” appears on page 4 of the [Application for Health Insurance](#) (Single Streamlined Application). The question is not required for all people. Applicants complete it by checking “Yes” only when they have satisfactory immigration status.

¹⁰ Remember Medi-Cal’s “reasonable opportunity period,” which requires Medi-Cal approval and eligibility while an applicant works to submit immigration proofs. See Welf. & Inst. Code § 14011.2(e)(5). DHCS has not updated all existing guidance to reflect this Medi-Cal expansion, but [ACWDL 17-01](#) includes more information.

¹¹ “The only noncash benefit we consider is institutionalization for long-term care at government expense.” See https://healthconsumer.org/members/wp-content/uploads/2021/11/USCIS_Public_Charge_Interagency_Letter_11.16.21.pdf.

¹² See <https://healthconsumer.org/members/wp-content/uploads/2021/07/CMS-cib072221.pdf>.

¹³ For more information on “Sponsored Immigrants & Benefits in California,” visit https://www.nilc.org/wp-content/uploads/2021/07/sponsoredimmsbens_ca_2021.pdf.

¹⁴ See Welf. & Inst. Code § 14007.15(a)(1). People can also qualify if they are in California and looking for work. *Id.* at § 14007.15(a)(2).

¹⁵ See Welf. & Inst. Code § 14007.1(b)(9); 22 CCR § 50320.1(b).

¹⁶ See 22 CCR § 50167(c).

¹⁷ Before July 2021, counties required sworn statements to be submitted in writing. Now they must also accept them by phone. See [ACWDL 21-12](#).

¹⁸ Like all Medi-Cal beneficiaries, people with full-scope coverage under this expansion “shall be eligible for the full scope of Medi-Cal benefits.” Welf. & Inst. Code § 14007.8(a)(2)(A). For a list of some of Medi-Cal’s benefits, check out page 12 of [myMedi-Cal](#).

¹⁹ Medi-Cal has confirmed that IHSS, the HCBA waiver, CBAS, and other benefits are included. See Question 15 at page 7 of [Medi-Cal's Frequently Asked Questions](#).

²⁰ See [Manual of Policies & Procedures § 30-777](#) (PDF page 84).

²¹ You can also search for all enrolled Medi-Cal providers via the Open Data Portal at these two links: <https://data.chhs.ca.gov/dataset/enrolled-medi-cal-fee-for-service-provider> and <https://chhsagency.maps.arcgis.com/apps/webappviewer/index.html?id=336829e7649a45d0b94d080601a9a4a0>.