



Department of Human Assistance

Stable Income Waiver for Continuous Coverage Unwinding

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Purpose

The purpose of this alert is to inform staff of a Stable Income temporary waiver to assist in case processing during the Continuous Coverage Unwinding Period.

In order to protect beneficiaries from inappropriate terminations and reduce staff burden during the Continuous Coverage Unwinding Period, the Department of Healthcare Services (DHCS) requested and received temporary approval to complete the income determination for annual renewals without requesting additional income verification for individuals with stable income and no data returned during the Covid-19 Public Health Emergency (PHE) and the Continuous Coverage Unwinding period. This will be referred to as the “Stable Income waiver”.

NOTE: The waiver flexibility does not apply to application processing requirements. The waiver is for beneficiaries only during the unwinding **and through December 31, 2024**. This waiver is similar to the zero-income waiver and 100 Percent FPL Income waiver.

References

[PHE Continuous Coverage Unwinding](#)

[Continuous Coverage Unwinding Frequently Asked Questions](#)

[Zero Income Waiver for Continuous Coverage Unwinding](#)

[Asset Waiver for Continuous Coverage Unwinding](#)

[100 Percent FPL Income Waiver](#)

[Temporary Waivers for Continuous Coverage Unwinding](#)

[Annual Renewal Packet and Reasonable Explanation Flexibilities for Redeterminations Processing During Continuous Coverage Unwinding](#)

Stable Income Waiver Guidance

During the Continuous Coverage Unwinding period, the Stable Income waiver will assist county staff in streamlining case processing for beneficiaries that have reported or continue to report stable sources of income. This flexibility allows staff to temporarily complete the income determination for ex parte annual renewals during the continuous coverage unwinding period without requesting additional income verification when:

- The most recent income determination was based on a previously verified attestation at
 - o the initial application or
 - o the most recent renewal within the last 12 months prior to the start of the PHE (or no earlier than March 2019); and

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- The individual had only the following sources of stable income at the most recent determination:
 - o Title II Social Security income,
 - o Pension income,
 - o Retirement income (i.e. annuities, deferred compensation),
 - o Disability payments (i.e. worker's compensation or private sources),
 - o Alimony or child support payments,
 - o Fixed distributions of dividends or interest, or non-retirement related fixed annuities
- No conflicting income information from other sources; and
- All other non-financial eligibility components are verified.

The waiver allows staff to complete annual redetermination ex parte without generating the annual renewal packet if it is determined that the customer qualifies for the waiver and all other non-financial information is verified before the annual renewal packet goes out. Packet is not required to be generated in this situation.

If packet goes out, the waiver will streamline processing when the renewal packet is returned by the beneficiary without income verification(s). Staff may utilize the waiver if the beneficiary meets the waiver criteria.

For instances where there is conflicting information on file, such as the county can see that a beneficiary has other sources of non-stable income that are countable in their eligibility determination, staff must continue to follow normal business processes and request for a reasonable explanation or income verification to resolve the discrepancy or verify income if not electronically or administratively verified.

In addition, if a household has additional family members who do not meet the requirements for the Stable Income waiver and whose income is countable for the beneficiary then the county must follow the regular verification process.

When applying the waiver, the county staff must add a journal entry indicating the stable income waiver was applied and proceed with the eligibility determination.

Automation in CalSAWS

CalSAWS will identify the Non-MAGI only cases that meet the criteria of the waiver and then run Batch EDBC with the renewal run reason to automatically advance the renewal one year. CalSAWS will insert an automated journal entry to indicate the case was advanced due to the Stable Income waiver. The automation of the Stable Income waiver in CalSAWS started in December 2023 for February 2024 renewals.

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CalSAWS Income Types

The income types that qualify for the Stable Income Waiver are listed in [Enclosure 1](#).

Examples

Example #1: Married Couple Medi-Cal Renewal Self-Attesting to Stable Income as Only Source of Income.

- Spouse A and Spouse B apply for Medi-Cal on January 2021, and self-attest to Title II Social Security Income.
- Income was verified by the county staff along with all other non-financial components.
- Spouse A and B are found eligible to Non-MAGI ABD-FPL Medi-Cal program.
- The continuous coverage unwinding period begins and Spouse A and Spouse B have an annual renewal due December 2023.
- The only source of income on file is a stable source of Title II Social Security Income and no changes have been reported, nor any other conflicting information is found on file.

Outcome: After review of the case, the Human Services Specialist is able to apply the stable income waiver and the property asset waiver found in [Asset Waiver](#) program document, and staff is able to complete the renewal without any further verification needed.

Example #2: Married Couple Medi-Cal Renewal Self-Attesting to Mix of Stable Income and Employment Income.

- Spouse C and Spouse D apply for Medi-Cal in November 2020.
- Spouse C self-attests to Title II Social Security Income, and Spouse D reports part-time employment at a local business receiving an average of \$200 per week.
- Income was verified by the Human Service Specialist along with all other non-financial components.
- Spouse C and D are found eligible to Non-MAGI ABD-FPL Medi-Cal program.
- The continuous coverage unwinding period begins and Spouse C and Spouse D have an annual renewal due in October 2023.
- The sources of income on file are a stable source of Title II Social Security Income, along with employment income (non-stable income) that was not able to be electronically verified.

Outcome: After review of the case, since there is non-stable income being counted for both individuals, the county must follow usual business practices to verify the employment income through reasonable explanation (if applicable) or requesting

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manual verification. The property asset waiver found in [Asset Waiver](#) program document is able to be applied and property verification is not requested.

Ex Parte and Renewal Packet Requirement Flexibility

The Annual Renewal Packet requirement unwinding flexibility/waiver allows county staff to complete the annual redetermination via ex parte (if successful), even after a renewal packet is sent to a Medi-Cal beneficiary. This means that if a renewal packet has already been sent out, it is not required for the beneficiary to submit the packet if they meet the Stable Income Waiver requirements or the information is available is ex parte.

Please see [Annual Renewal Packet Flexibilities](#) program document for more information and examples.

Documenting the Stable Income Waiver in Journal

When utilizing the Stable income waiver, staff must document the waiver and appropriate use in a Journal entry. Staff shall document who qualified for the waiver, the outcome of the case and individual redetermination, notate income reported prior to redetermination and/or reported on the redetermination forms, previous income verification information, if the customer met the criteria and that the Stable Income waiver was applied to this case.

Reminder to also document the Asset waiver as listed in [Asset Waiver for Continuous Coverage Unwinding](#) if applicable.

Note: As with other ex parte waivers for renewal, ex parte can be used only for positive or neutral outcome. If ex parte results to negative outcome, staff shall follow regular redetermination and income verification process.

Contacts

Supervisors with questions should be directed to the DHA-Medi-Cal@saccounty.gov mailbox.

Enclosure 1 CalSAWS Stable Income Types

| Income Type Description | Income Category Description |
|----------------------------------------------------------------|----------------------------------|
| Spousal Support - Through LCSA | Child/Spousal Support |
| Child & Spousal Support - Through LCSA | Child/Spousal Support |
| Child Support - Through LCSA | Child/Spousal Support |
| Spousal Support - Direct | Child/Spousal Support |
| Child Support - Excess | Child/Spousal Support |
| Child Support - Direct | Child/Spousal Support |
| Child/Spousal Support DA-Prior Disregard | Child/Spousal Support |
| Child/Spousal Support DA-Current Retained | Child/Spousal Support |
| Spousal Support - Disregard | Child/Spousal Support |
| Child Support - Disregard | Child/Spousal Support |
| Private - Permanent | Disability |
| Employee - Permanent | Disability |
| Worker's Comp - Permanent | Disability |
| Railroad - Disability | Railroad |
| Railroad - Retirement | Railroad |
| Ordinary/qualified dividends, 1099-DIV | Interest, Dividends, Investments |
| Interest income (taxable and non-taxable), 1099-INT | Interest, Dividends, Investments |
| Promissory Note Holder | Interest, Dividends, Investments |
| Mortgage/Deed Holder | Interest, Dividends, Investments |
| Interest, Dividends, Investments - From Non-Countable Property | Interest, Dividends, Investments |
| Sale of Notes, Contracts, Trust Deeds | Interest, Dividends, Investments |
| Interest, Dividends, Investments | Interest, Dividends, Investments |
| Reverse Annuity Mortgage | Loans, Gifts, Contributions |
| Federal Per Capita or Interest | Native American |
| Foreign Pension | Retirements, Pensions, Annuities |
| Govt. Employee | Retirements, Pensions, Annuities |
| Private | Retirements, Pensions, Annuities |
| Deferred Comp | Retirements, Pensions, Annuities |

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|------------------------------------------------------------------|--------------------------------------------|
| Retirement - Military | Retirements, Pensions, Annuities |
| Social Security Survivors | Social Security |
| Social Security Disability | Social Security |
| Social Security Retirement | Social Security |
| Austrian Social Insurance Payments | Government Settlements, Payments, Programs |
| Austrian Other Payments | Government Settlements, Payments, Programs |
| Taxable refunds, credits, or offsets of state/local income taxes | Government Settlements, Payments, Programs |
| Adoption Assistance Subsidy | Government Settlements, Payments, Programs |
| Victims of Crimes | Government Settlements, Payments, Programs |
| Victims of Nazi Persecution | Government Settlements, Payments, Programs |
| Senior Citizen Volunteers | Government Settlements, Payments, Programs |
| Ricky Ray Hemophilia | Government Settlements, Payments, Programs |
| Japanese/Filipino Restitution | Government Settlements, Payments, Programs |
| Radiation Exposure | Government Settlements, Payments, Programs |
| Low Income Energy Assistance | Government Settlements, Payments, Programs |
| Agent Orange | Government Settlements, Payments, Programs |
| HUD Payments | Government Settlements, Payments, Programs |
| Executive Volunteer Programs | Government Settlements, Payments, Programs |
| Nutrition Assistance Program | Government Settlements, Payments, Programs |
| Family Subsistence Allowance | Government Settlements, Payments, Programs |
| SDI | Disability |
| Private - Temporary | Disability |
| Employee - Temporary | Disability |
| Worker's Comp - Temporary | Disability |
| Railroad - Survivors | Railroad |
| Cal Grant C | Educational, Student |
| Cal Grant B Access | Educational, Student |
| Cal Grant B - TANF | Educational, Student |
| Cal Grant B | Educational, Student |
| Cal Grant A - TANF | Educational, Student |
| Cal Grant A | Educational, Student |

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|------------------------------------------------------|------------------------------------------|
| Awards/Scholarships | Educational, Student |
| Grants, Loans - Needs Based | Educational, Student |
| Grants, Loans - Non Needs Based | Educational, Student |
| Title IV, Other Federal | Educational, Student |
| Utilities - Earned | Income In-Kind - Earned |
| Housing - Earned | Income In-Kind - Earned |
| Clothing - Earned | Income In-Kind - Earned |
| Food - Earned | Income In-Kind - Earned |
| VEAP | Veterans |
| GI Bill - Educational | Veterans |
| GI Bill - Non-Educational | Veterans |
| Disability - Partial | Veterans |
| Disabled Survivor Benefits | Veterans |
| Work Therapy | Veterans |
| Student Services Program | Veterans |
| Survivor Benefits | Veterans |
| Disability - Total | Veterans |
| Life or Burial Insurance | Insurance, Legal Settlement, Third Party |
| Survivors Benefit | Insurance, Legal Settlement, Third Party |
| Senior Citizens Rent Assistance | Miscellaneous |
| Income from American Indian or Alaska Native Sources | Native American |
| Leases/Trusts of Individual Land | Native American |
| Leases/Trusts of Tribal Land | Native American |
| Alaskan Native Claims Act | Native American |
| Deemed Sponsor Income | Unemployment |
| Manpower Training Allowance | Work Study, Training |
| AmeriCorps*VISTA Joined before on aid | Work Study, Training |
| College Work Study | Work Study, Training |
| AmeriCorps*State | Work Study, Training |
| AmeriCorps*National | Work Study, Training |
| AmeriCorps*Civilian Community Corps | Work Study, Training |

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|--------------------------------------------|---------------------------|
| Voc Rehab - Training Allowance | Work Study, Training |
| Job Corps | Work Study, Training |
| JTPA/WIA - Earned | Work Study, Training |
| JTPA/WIA - Incentive or Training Allowance | Work Study, Training |
| Youth Corps | Work Study, Training |
| AmeriCorps*VISTA Joined while on aid | Work Study, Training |
| Displaced Workers | Work Study, Training |
| Utilities - Unearned | Income In-Kind - Unearned |
| Housing - Unearned | Income In-Kind - Unearned |
| Clothing - Unearned | Income In-Kind - Unearned |
| Food - Unearned | Income In-Kind - Unearned |
| Military Income | Military Dependent |