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Department of Health Care Services



GAVIN NEWSOM  
GOVERNOR

April 23, 2020

Medi-Cal Eligibility Division Information Letter No.: I 20-11

TO: ALL COUNTY WELFARE DIRECTORS  
ALL COUNTY MEDI-CAL PROGRAM SPECIALISTS/LIAISONS  
ALL COUNTY WELFARE ADMINISTRATIVE OFFICERS  
ALL COUNTY MEDS COORDINATORS  
ALL COUNTY HEALTH EXECUTIVES  
ALL COUNTY MENTAL HEALTH DIRECTORS

SUBJECT: FOLLOW-UP GUIDANCE TO MEDIL I 20-07 & I 20-08 ON MEDI-CAL  
INMATE ELIGIBILITY PROGRAMS & MEDI-CAL BENEFICIARIES WHO  
BECOME INCARCERATED

The purpose of this Medi-Cal Eligibility Division Information Letter (MEDIL) is to provide additional information and clarification for counties and the Statewide Automated Welfare System (SAWS) regarding incarcerated Medi-Cal beneficiaries on the Medi-Cal Inmate Eligibility Program (MCIEP) and/or beneficiaries who become incarcerated during the declared State and National Emergency due to the COVID-19 public health crisis.

The instructions found in MEDIL [I 20-07](#) and [I 20-08](#) directs counties to delay the processing of Medi-Cal annual renewals, and defer discontinuances and negative actions based on the declared State and National Emergency due to the COVID-19 public health crisis.

SAWS, in collaboration with the Department of Health Care Services (DHCS), made immediate changes to their systems to ensure the intent of Executive Order N-29-20 and MEDIL I 20-7 were executed timely. This included the following:

- Preventing Medi-Cal cases from discontinuing automatically via pre-scheduled batch jobs for the duration of Executive Order N-29-20; and
- Maintaining normal automated renewal functions including executing the auto ex-parte process for Modified Adjusted Gross Income (MAGI) Medi-Cal cases and sending out the redetermination packets for both MAGI and Non-MAGI Medi-Cal cases, if ex parte did not result in continued eligibility.

SAWS has informed counties and DHCS that the measures taken would prevent the cases from discontinuing automatically through their respective automated processes for the duration of the Executive Order.

### **Suspension of Benefits for Medi-Cal Beneficiaries Who Are or Become Incarcerated**

The Centers for Medicare & Medicaid Services (CMS) issued a Frequently Asked Questions document on April 13, 2020, which clarified that the Families First Coronavirus Response Act (FFCRA) - Public Law No. 116-127 Coronavirus Aid, Relief, and Economic Security (CARES) Act, Public Law No. 116-136 - allows for the suspension of Medi-Cal benefits for incarcerated Medi-Cal beneficiaries during this public health crisis. Therefore, the Counties and SAWS shall continue to follow the existing inmate suspension policy guidance via All County Welfare Directors Letters (ACWDLs) [14-26](#), [14-26E](#), and the Medi-Cal Eligibility Data System (MEDS) changes to the incarceration and suspension process via MEDIL I 20-05.

However, in an effort to ensure that Californians continue to receive coverage during the COVID-19 public health crisis per Executive Order N-29-20, the Counties and SAWS shall delay discontinuances and negative actions for incarcerated individuals as a result of reaching the 1-year Medi-Cal suspension time limit or at renewal.

DHCS will continue to deliver the Incarceration Verification Program (IVP) reports on a monthly basis. For basic information about the IVP reports, please refer to ACWDL [12-39](#), or contact [IVP@dhcs.ca.gov](mailto:IVP@dhcs.ca.gov).

### **Continuous Coverage Expectation for MCIEP Cases**

During this COVID-19 public health crisis, the counties should follow all current MCIEP policy guidance with the exception of the following operational changes via MEDIL I 20-07 and I 20-08, effective March 16, 2020:

- Delay processing of annual renewals and reported changes in circumstance through the duration of the Executive Order, unless the processing of the information would allow individuals to gain access to health care coverage or resolve barriers related to access to care such as, intercounty transfers, adding a household member, or a decrease in income.
- Delay discontinuance and negative actions as a result of annual renewals and reported change in circumstances, including verifications requested as part of the annual renewal and change in circumstance processing, to ensure individuals have access to medical care through the duration of the Executive Order.

### **Continuous Coverage for Individuals Released from Incarceration**

Counties are to continue to take action and process transactions for individuals released from incarceration, by reporting the Release Date, as this is a positive action and addresses a barrier to care that the inmate would otherwise experience. In addition, the termination of the MCIEP aid code, if applicable, would be appropriate to ensure the Medi-Cal (non-MCIEP) eligibility displays accurately in MEDS for released inmates.

### **Next Steps**

For the duration of Executive Order N-29-20, DHCS will continue to work in collaboration with SAWS and counties on the next steps to develop a process for the resumption of regular business operations.

Please continue to reference the ACWDLs and MEDILs regarding public health crisis or disasters:

- MEDIL I 20-06 - Public Health Crisis or Disaster Reminders for Medi-Cal
- ACWDL 19-01 – Exceptions due to Public Health Crisis or Disaster
- MEDIL I 17-16 – Processing Applications from Individuals Affected by Disasters
- ACWDL 15-36 – Guidance to Counties on Treatment of Applications/Redeterminations in Disaster Areas and Treatment of Disaster

If you have any questions, or if we can provide further clarification, please contact the MCIEP team via [MCIEP@dhcs.ca.gov](mailto:MCIEP@dhcs.ca.gov).

Sincerely,

Original Signed By

Sandra Williams, Chief  
Medi-Cal Eligibility Division