

DATE: January 21, 2026

Medi-Cal Eligibility Division Information

Letter No.: I 26-02

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY ADMINISTRATIVE OFFICERS
ALL COUNTY MEDI-CAL PROGRAM SPECIALISTS/LIAISONS

SUBJECT: Good Faith Effort and Good Cause Determinations for the Adult Expansion Freeze
(REFERENCE: All County Welfare Directors Letter [25-13, 07-12, 09-27, 17-01](#); Medi-Cal Eligibility Division Information Letter I [25-22, 25-27 \(Enclosure\), 14-21, 14-41](#))

This Medi-Cal Eligibility Division Information Letter (MEDIL) provides guidance to county eligibility workers on good faith effort and good cause determination when requesting immigration status documentation from applicants aged 19 and older, newly applying on or after January 1, 2026, and subject to the Adult Expansion Freeze. This guidance ensures new and returning applicants are given the opportunity to obtain acceptable verification to enroll in full scope coverage following the implementation of the Adult Expansion Freeze.

Background

The federal Deficit Reduction Act of 2005 (DRA) required Medi-Cal applicants to provide evidence of United States (U.S.) citizenship or U.S. national status and identity as a condition of Medi-Cal eligibility for individuals who declare they are U.S. citizens or nationals.

Applicants who are not U.S. citizens or nationals but attest to an immigration status must be able to prove their immigration status as a condition of Medi-Cal eligibility. With the implementation of the Affordable Care Act (ACA), applicants who attest to an immigration status have their status electronically verified. If it cannot be verified electronically, the applicant is asked to provide proof of their immigration status. Otherwise eligible applicants shall be granted conditional full scope benefits without

delay, during a 90-day Reasonable Opportunity Period (ROP) to provide acceptable proof.

With the implementation of the adult expansions that began in 2020, applicants who were otherwise eligible were granted full scope Medi-Cal regardless of their immigration status.

Effective January 1, 2026, the Adult Expansion Freeze stops new enrollment into state funded full scope Medi-Cal for individuals 19 and older without an immigration status, without a verified immigration status, or with certain non-immigrant visas – who are not pregnant, one-year postpartum, or foster youth/former foster youth under 26.

Individuals who are 19 and older, newly applying on or after January 1, 2026, who fail to provide acceptable proof of their immigration status and have not demonstrated a good faith effort by the end of the ROP, will be reduced from full scope to restricted scope coverage.

Individuals, 19 and older, who applied before January 1, 2026, and are otherwise eligible for Medi-Cal will remain eligible for full scope Medi-Cal, regardless of their immigration status, even if the ROP extends past January 1, 2026. County eligibility workers should review the member's immigration status at the next annual renewal. If the member does not provide verification at renewal, county eligibility workers shall not take negative action to reduce the member's scope of coverage from full scope to restricted scope.

For a list of acceptable documents and who is exempt, please refer to ACWDL [07-12](#) and MEDIL I [14-41](#).

Reasonable Opportunity Period

Applicants attesting to an immigration status are required to submit acceptable proof as a requirement of eligibility for Medi-Cal. County eligibility workers should attempt to electronically verify the immigration status. If all other eligibility criteria are met, the applicant will be conditionally eligible for full scope Medi-Cal and entitled to a 90-day ROP to provide proof. A reasonable opportunity to provide documentation is defined as the time needed for the applicant to obtain valid documentation of their immigration

status based on the individual circumstances, their ability to obtain that documentation, and the applicant's good faith efforts.

With the implementation of the Adult Expansion Freeze (ACWDL [25-13](#)), otherwise eligible individuals aged 19 and older newly applying on or after January 1, 2026, whose immigration status cannot be electronically verified will be granted conditional eligibility for full scope Medi-Cal during the ROP. If they are unable to provide acceptable proof of their immigration status by the end of the ROP, eligibility will be reduced from full scope to restricted scope coverage. If the applicant provides verification within a year of the application date and remains otherwise eligible, they will be re-enrolled in full scope Medi-Cal back to the date restricted scope coverage began.

Applications received before January 1, 2026, may have the ROP extend into early 2026. If these applicants fail to provide verification of their immigration status, county eligibility workers should not take any negative action. Under the Adult Expansions, these applicants are eligible for full scope Medi-Cal regardless of their immigration status, if otherwise eligible.

Good Faith Effort

An applicant is making a good faith effort if they demonstrate effort to obtain and present immigration documents. Applicants may provide verbal or written statements of their efforts to obtain verification of their immigration status. Counties must document these efforts in the case journal, including the basis for the determination whether an applicant is or is not making a good faith effort. Whenever possible, such documentation should include dates to indicate how much time the applicant will need to obtain the required documents.

Counties must accept and document any reasonable information provided by an applicant that shows they are trying to obtain the necessary documentation. Counties must also consider circumstances in which a person is incapable of taking the steps necessary to obtain the required documents (for example, due to incompetency or disability) and must provide reasonable assistance to these individuals in obtaining proof of their immigration status.

Verification of Immigration Status Not Received

Applicants who fail to provide verification of their immigration status and are not making a good faith effort will be reduced from full scope to restricted scope coverage after the ROP with proper 10-day notice. If the applicant furnishes proof within one year of their application date and remains otherwise eligible, they will be re-enrolled in full scope Medi-Cal back to the date restricted scope coverage began.

An applicant who provides acceptable proof of their immigration status after restricted scope coverage began, and had good cause for not providing the required documents, counties shall immediately grant full scope Medi-Cal

- Back to the original application date (including up to three months retroactive coverage from the date of application if eligible), or
- Back to the month that restricted scope coverage began (in cases where benefits are reduced from full scope to restricted scope for failing to provide acceptable documents).

For additional information on Good Faith Effort and Good Cause, please refer to ACWDL [07-12](#) and [09-27](#).

Reapplications

Members eligible to retain full scope Medi-Cal after January 1, 2026, who experience discontinuance for any reason are eligible for a three-month grace period to re-establish eligibility. If the member chooses to reapply during the three-month grace period and is otherwise eligible, they will be re-enrolled in full scope Medi-Cal.

If the member exceeds the three-month grace period before a new application is received, the member will be treated as a new applicant. The CEW will continue to follow current application processing procedures. As a new applicant subject to the adult expansion freeze, if they are unable to verify their immigration status or have a verified status ineligible for full scope, they will be enrolled in restricted scope coverage.

If you have any questions, or if we can provide further information, please send them to MCED-Policy@dhcs.ca.gov.

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Sincerely,

Sarah Crow
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Medi-Cal Eligibility Division