

DATE: December 6, 2023

Medi-Cal Eligibility Division Information

Letter No.: I 23-58

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

SUBJECT: Continuous Coverage Unwinding Reminders: 90-Day Cure and Retroactive Discontinuances

### **Purpose**

The purpose of this Medi-Cal Eligibility Division Information Letter (MEDIL) is to provide counties with two reminders on policy during the Continuous Coverage Unwinding surrounding the 90-Day Cure Period and discontinuances resulting from renewal actions.

### **Reminders for Counties During the Continuous Coverage Unwinding**

As described in [MEDIL I 23-02](#), the continuous coverage requirement ended March 31, 2023, with the continuous coverage unwinding period beginning April 1, 2023. Counties began conducting annual renewals after a three-year hiatus period during the COVID-19 Public Health Emergency and subsequent continuous coverage requirement.

As counties resume processing of renewals and return to normal business operations, the Department of Health Care Services (DHCS) may issue reminders to counties on existing policy, guidance, or other processes as counties resume renewal processes.

#### ***90-Day Cure Reminder – No New Application Required***

[ACWDL 19-13](#) provides guidance on the 90-Day Cure Period, specifically the requirement for an individual who was discontinued to failure to provide required information must provide that needed information in order to restore Medi-Cal eligibility. During the unwinding period, DHCS has received approval for numerous waivers and flexibilities that allow counties to leverage other sources and ex parte review to complete the renewal process, or restore coverage during the 90-Day Cure Period.

Counties are reminded that if an individual provides requested information or reaches out during the 90-day Cure Period to attempt to restore their coverage, a new application is not required. Counties must not request the member submit a new application, and instead review the case file and determine if any unwinding waivers or

flexibilities is applicable, and if not, what the required information is in order to resolve the missing information.

*No Retroactive Discontinuances from Medi-Cal Reminder*

Medi-Cal members that are determined no longer eligible are required by law to receive at least 10-days notice before the adverse action is taken, per [ACWDL 15-19](#). Counties are reminded that while processing renewals, despite the renewal date, any negative actions in terminating eligibility must following the 10-day noticing guidelines and only prospectively discontinue eligibility. For example, when processing an active member's September renewal on November 29, the 10-day noticing would require termination to begin January 1.

If you have any questions or require additional information, please contact Kathryn Floto via email at [Kathryn.Floto@dhcs.ca.gov](mailto:Kathryn.Floto@dhcs.ca.gov).

Sincerely,

**ORIGINAL SIGNED BY**

Theresa Hasbrouck  
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Medi-Cal Eligibility Division