

May 14, 2026

**PACE Policy Letter 26-01 Supersedes**  
*PACE Policy Letter 17-01*

TO: Program of All Inclusive Care for the Elderly (PACE) Organizations, the Multipurpose Senior Services Program (MSSP) Sites, and MSSP Site Association

SUBJECT: Dual Enrollment of Participants in PACE and MSSP

**PURPOSE**

The purpose of this policy letter (PL) is to provide clarifying guidance regarding dual enrollment of waiver participants in the MSSP and participants in PACE. PACE participants cannot be served by MSSP, any other Fee-For-Service Medi-Cal program, or Medi-Cal managed care and associated CalAIM benefits (i.e., Enhanced Care Management and Community Supports).

While enrolled in PACE, the participant must receive all Medicare and Medicaid benefits solely through the PACE Organization (PO) that the participant is enrolled with<sup>1</sup>. Additionally, dual enrollment is not allowable, as case management services are provided by POs and would constitute a duplication of services and payment.

This PL also outlines the steps required to allow the waiver participant and PACE participants to disenroll from one of the programs.

**PROGRAM BACKGROUND**

PACE Overview

PACE is an all-inclusive program designed to coordinate and provide necessary preventive, primary, acute, long-term care, social and rehabilitative services through one comprehensive program. Once an individual is enrolled with PACE, the PO provides all services that would otherwise be covered in the Medi-Cal State Plan, in addition to any services deemed necessary by the PO's interdisciplinary team (IDT). Individualized services are provided exclusively by PO staff and the PO's contracted providers, except in the case of an emergency. There are no limits on the amount or duration of services as determined medically necessary by the PO's IDT. Services are available 24 hours a day, seven days a week.

<sup>1</sup> 42 CFR 460.90



IDT care management services are provided by the PACE program through the PO's employed staff and contracted providers. PACE provides services to participants residing in various counties throughout California.

Below is a link to the CalPACE website, which provides information on the PACE program and contact information to the various POs within the state:

<http://www.calpace.org/>

### MSSP Overview

MSSP is a program that provides both social and health care case management services to assist Medi-Cal eligible older adult participants who wish to remain in their own homes and communities. The purpose of the program is to use available community services and resources to prevent or delay institutionalization. The long-term care management services must be provided at a cost lower than that of a skilled nursing facility.

Please refer to the Department of Health Care Services (DHCS) and California Department of Aging (CDA) websites below for more information.

DHCS link:

[www.dhcs.ca.gov/services/medi-cal/Pages/MSSPMedi-CalWaiver.aspx](http://www.dhcs.ca.gov/services/medi-cal/Pages/MSSPMedi-CalWaiver.aspx)

CDA link:

[www.aging.ca.gov/Providers\\_and\\_Partners/Multipurpose\\_Senior\\_Services\\_Program/](http://www.aging.ca.gov/Providers_and_Partners/Multipurpose_Senior_Services_Program/)

## **PROGRAM TERMINATION PROCESS**

### MSSP Termination

If an MSSP waiver participant is enrolled in PACE simultaneously, the waiver participant must select which program they want to remain enrolled in, either PACE or MSSP. Should the waiver participant select to remain in PACE, the MSSP site must begin the MSSP Termination process outlined in Section 3.1700 Termination of the MSSP Site Manual.

### PACE Termination

If the waiver participant would like to remain in MSSP, the participant will need to disenroll from PACE. The PO will continue to furnish all necessary services until the effective disenrollment date and will work with the participant to disenroll expeditiously. The PO will ensure the disenrollment date is the same for both Medicare and Medi-Cal in accordance with the following steps:

- Upon receipt of a participant's request for a voluntary disenrollment from PACE, the PO will inform the participant or authorized representative, in writing, of the

disenrollment procedures;

- The PO will have the participant sign a voluntary disenrollment form;
- The PO will keep the disenrollment form on file to document the disenrollment effective date. If unable to obtain the participant's signature, the PO will document the date the participant provided the verbal voluntary disenrollment request in the participants file; and
- The PO will submit the disenrollment request to DHCS following the process outlined in the PACE Enrollment and Disenrollment Process PL 22-02.<sup>2</sup>

DHCS will disenroll the participant in the Medi-Cal Eligibility Data System (MEDS) on the last day of the month in which disenrollment is requested. Enrollment will cease at 11:59 PM on the last day of the month prior to the effective date of disenrollment as approved by DHCS. From that time forward, the PO will be relieved of all obligations to provide or arrange for covered services to the participant.

## **ENROLLMENT PROCESS**

As part of the PACE program enrollment and screening process, the PO must ask each potential PACE participant whether they are receiving MSSP services. If so, the PO must inform the potential PACE participant that if they enroll in PACE, they must terminate MSSP services because PACE provides all care management services.

If the participant is currently enrolled in MSSP and would like to enroll into PACE, the participant will need to notify the MSSP site to begin the disenrollment process from MSSP. In order to be enrolled into PACE, the participant must meet the enrollment criteria of the PACE program.

Once it has been determined that the participant has met the program requirements/criteria for PACE and the participant has begun the disenrollment process from MSSP, the participant will receive a Notice of Action for the termination of the MSSP benefit.

## **NEXT STEPS**

On a monthly basis, DHCS will run a report identifying which participants have concurrent enrollment in MSSP and PACE.

DHCS will provide the list directly to the POs and to the California Department of Aging for dissemination of the information to the appropriate MSSP site(s). Once the participant has been identified, the PO or MSSP will be responsible for relaying the information to the participant. The participant will then need to decide which program they would like to continue their services. After deciding, the termination process

<sup>2</sup> [PACE Enrollment and Disenrollment Process PL 22-02](#)

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will begin as described in the above section (entitled Program Termination Process). If, after 30 days, the participant has not decided which program they want to be enrolled in, PACE or MSSP will have the authority to proceed with the involuntarily disenrollment process for the participant from their respective program. For PACE involuntary disenrollment POs can refer to the PACE Enrollment and Disenrollment PL<sup>3</sup> and 42 CFR 460.164.

If you have any questions regarding the PACE program, please contact the DHCS PACE inbox at [PACE@dhcs.ca.gov](mailto:PACE@dhcs.ca.gov).

If you have any questions regarding MSSP, please contact the CDA MSSP inbox at [MSSPService@aging.ca.gov](mailto:MSSPService@aging.ca.gov).

Sincerely,

**[Original signed by]**

Lauren Solis, Chief  
Office of Medicare Innovation and Integration  
Department of Health Care Services

Enclosures  
Attachment I – PACE Program Information

<sup>3</sup> [PACE PL 22-02 Revised Dec 2022](#)