Summary of State Mitigation Strategies for Complying with Medicaid Renewal Requirements
Described in the Consolidated Appropriations Act, 2023

The Consolidated Appropriations Act, 2023 (CAA) establishes new conditions to claim the temporary FMAP increase under section 6008(a) of the Families First Coronavirus Response Act (FFCRA) after March 31, 2023, including the condition at section 6008(f)(2)(A) of the FFCRA, which provides that states conduct Medicaid and Children's Health Insurance Program (CHIP) redeterminations consistent with federal requirements. These requirements are described at 42 CFR § 435.916.[1] Regardless of whether a state is claiming the temporary FMAP increase, after March 31, 2023, all states must comply with federal renewal requirements or implement strategies approved under section 1902(e)(14)(A) of the Social Security Act (the Act) or other CMS-authorized processes and procedures to be considered compliant with federal redetermination requirements and to avoid corrective action and enforcement under section 1902(tt)(2) of the Act. CMS worked with all states and territories prior to the end of the continuous enrollment condition to assess compliance with Medicaid renewal requirements and implement mitigations, as appropriate, to address areas of non-compliance. Generally, states were expected to adopt multiple strategies to address areas of non-compliance and, if necessary, to hold procedural terminations until all other approved mitigations were implemented. CMS expects that all states will work toward full statutory and regulatory compliance with all renewal and redetermination requirements. As part of CMS' approval of a state's mitigation strategy to qualify for receipt of the temporary increased FMAP, states agreed to achieve full compliance with federal renewal requirements without mitigation strategies no later than two years after the end of a state's unwinding period.

The tables below summarize the CMS-approved mitigation strategies that states adopted to address areas of non-compliance with Medicaid renewal requirements and information on each state's area(s) of non-compliance and adopted mitigations. The information below reflects CMS approvals as of March 31,2023, prior to the end of the FFCRA continuous enrollment condition. As unwinding has progressed, some states have addressed the area(s) of non-compliance noted and retired use of some or all mitigations. The tables below only reflect state-adopted mitigation strategies required by CMS to meet the renewal requirements referenced in section 6008 of the FFCRA and section 1902(tt) of the Act. Nearly all states have also implemented strategies to streamline renewals and support retention of eligible individuals, including during their unwinding periods. These strategies are not included in Tables 1 or 2. For additional information on some of these strategies, please see CMS' summary of 1902(e)(14)(A) waiver approvals.

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[1] Federal renewal requirements are described in more detail in CMCS' Informational Bulletin, *Medicaid and Children's Health Insurance Program Renewal Requirements*, released on December 4, 2020 available at https://www.medicaid.gov/federal-policy-guidance/downloads/cib120420.pdf. For more information about the CAA and requirements for states to receive the increased temporary FMAP, see *Medicaid Continuous Enrollment Condition Changes, Conditions for Receiving the FFCRA Temporary FMAP Increase, Reporting Requirements, and Enforcement Provisions in the Consolidated Appropriations Act, 2023* [State Health Official Letters #23-002]. Available at https://www.medicaid.gov/federal-policy-guidance/downloads/sho23002.pdf.

Table 1: Summary of Primary Mitigations

This table provides a summary of the primary approved mitigations Medicaid agencies have adopted to address identified areas of non-compliance with federal Medicaid renewal requirements. The table does not provide a comprehensive list of individual strategies states have implemented to facilitate renewals, minimize inappropriate coverage loss, and ensure compliance with federal requirements. States may also have adopted varied approaches to implementation of the strategies described below.

Mitigations and Other Strategies	Description
1. **Holding procedural terminations**	• Hold terminations that would otherwise occur due to beneficiary non-response to the renewal form, until approved mitigations are implemented. States will redetermine eligibility for affected renewals once those mitigations are fully implemented. • This strategy may apply to some or all Medicaid beneficiaries, depending on the populations affected by the area of non-compliance with renewal requirements
2. *Ex parte* **attempt prior to termination**	• In states that lack automated *ex parte*/administrative renewal functionality, states check data sources and complete an *ex parte* determination prior to termination for people who do not return a renewal form.
3. **Streamlining income determinations**	• Includes strategies to simplify verification of income, including use of section 1902(e)(14)(A) waiver strategies to renew eligibility based on findings from SNAP or TANF. Also includes other authorities to streamline income determinations for people with stable sources of income (e.g., pension income) or no income
4. **Streamlining asset determinations**	• Includes strategies to simplify the verification of resources/assets at renewal, including modifying documentation requirements, temporarily waiving asset requirements for some populations, and/or renewing eligibility based on available information for certain assets unlikely to change
5. **Streamlining renewal forms and requirements**	• Includes strategies to minimize requests for unnecessary information on renewal forms, including providing simplified forms, adding instructions to specify which information is required, and/or pre-populating as much information as possible (e.g., demographic information) for MAGI populations and pre-populating renewal forms for non-MAGI populations • May also include adding instructions to help identify individuals as potentially eligible on another eligibility basis

Mitigations and Other Strategies	Description
6. **Enhancing the availability & accessibility of other renewal submission modalities**	• Includes strategies to facilitate renewals via specific submission modalities, for states without functionality to accept renewals via a required modality (e.g., online) • May include strategies to extend call center hours, provide flexibility for recordings of telephonic signatures and/or permitting individuals/organizations to be authorized representatives to assist with submission, accept and promote submission via fax or online upload of renewal documentation
7. **Enhancing outreach and in-person assistance**	• May include multiple approaches to support enrollees' completion of renewals, including sending reminders via multiple modalities (e.g., text, email, phone), highlighting the availability of in-person community resources and outstationed eligibility workers, or partnering with managed care organizations, providers, or other resources to provide in-person assistance with the renewal process
8. **Additional policy changes to support retention**	• Changes to simplify the renewal or reenrollment of eligible individuals, such as extending or implementing a reconsideration period for certain populations, accepting reasonable explanations to explain data inconsistencies, extending the time beneficiaries have to return documentation, etc.
9. **Operational changes to support retention**	• Changes to internal state agency staffing approaches and processes, including training staff to review required information for redetermining eligibility, implementing manual workarounds, reviewing and/or exchanging data between systems, etc.
10. **Supporting transitions to Marketplace coverage**	• Includes strategies to facilitate transitions to the Federally Facilitate Marketplace (FFM) or State Based Marketplace (SBM) such as enhanced outreach to notify individuals of potential coverage options, providing instructions for applying and enrolling in a plan, and/or connecting individuals to Navigators or assisters to receive additional assistance

Table 2: Areas of Non-Compliance with Renewal Requirements and CMS-Approved Mitigations, by State

For each state listed below, column 2 (Area(s) of Non-Compliance) identifies areas in which the state was not fully compliant with federal renewal requirements as of March 31, 2023. "Primary Mitigations and Other Strategies" reflect the strategies described in Table 1 that states implemented to address the area(s) of non-compliance with federal renewal requirements. Mitigation strategies were tailored based on the area of non-compliance, and the number and type of strategies adopted varied based on the scope of non-compliance and the affected population (e.g., MAGI or non-MAGI populations and/or a subset of Medicaid enrollees). States may implement the same mitigation to address multiple areas of non-compliance. However, for CMS approval, most areas of non-compliance required adoption of multiple strategies. "None Identified" or "N/A," are noted, no areas of non-compliance were identified as of the start of the state's unwinding period.

State	Area(s) of Non-Compliance with Renewal Requirements	Primary Mitigations and Other Strategies
Alabama	• Conducting *ex parte* renewals for some non-MAGI populations • Transferring electronic accounts to the Marketplace for relevant non-MAGI populations	• Strategy 2: *Ex parte* prior to termination • Strategy 10: Supporting transitions to Marketplace coverage
Alaska	• Conducting *ex parte* renewals for the non-MAGI population • Renewal form requests more information than needed to determine eligibility (e.g., MAGI form is not fully pre-populated) • Ability to submit renewal forms through all required modalities • Determining eligibility on all bases • Transferring electronic accounts to the Marketplace for relevant non-MAGI populations	• Strategy 3: Streamlining income determinations • Strategy 4: Streamlining asset determinations • Strategy 5: Streamlining renewal forms and requirements • Strategy 6: Enhancing availability and accessibility of other renewal submission modalities • Strategy 7: Enhancing outreach and in-person assistance • Strategy 8: Additional policy changes to support retention • Strategy 9: Operational changes to support retention • Strategy 10: Supporting transitions to Marketplace coverage
Arizona	• Ability to submit renewal forms through all required modalities for non-MAGI populations	• Strategy 6: Enhancing availability and accessibility of other renewal submission modalities • Strategy 7: Enhancing outreach and in-person assistance • Strategy 8: Additional policy changes to support retention
Arkansas	• Conducting *ex parte* renewals for the non-MAGI population	• Strategy 3: Streamlining income determinations • Strategy 4: Streamlining asset determinations • Strategy 5: Streamlining renewal forms and requirements • Strategy 7: Enhancing outreach and in-person assistance • Strategy 8: Additional policy changes to support retention

State	Area(s) of Non-Compliance with Renewal Requirements	Primary Mitigations and Other Strategies
California	• None identified	N/A
Colorado	• None identified	N/A
Connecticut	• Ability to submit renewal forms through all required modalities is available for the non-MAGI population • Determining eligibility on all bases	• Strategy 5: Streamlining renewal forms and requirements • Strategy 6: Enhancing availability and accessibility of other renewal submission modalities • Strategy 8: Additional policy changes to support retention
Delaware	• Conducting *ex parte* renewals for the non-MAGI population	• Strategy 1: Holding procedural terminations • Strategy 2: *Ex parte* prior to termination • Strategy 7: Enhancing outreach and in-person assistance • Strategy 8: Additional policy changes to support retention
District of Columbia	• Conducting *ex parte* renewals for the non-MAGI population • Renewal form requests more information than needed to determine eligibility (e.g., MAGI form is not fully pre-populated or individuals must submit a new application at renewal)	• Strategy 3: Streamlining income determinations • Strategy 4: Streamlining asset determinations • Strategy 5: Streamlining renewal forms and requirements • Strategy 8: Additional policy changes to support retention • Strategy 7: Enhancing outreach and in-person assistance
Florida	• None identified	N/A
Georgia	• Conducting *ex parte* renewals for the non-MAGI population • Ability to submit renewal forms through all required modalities	• Strategy 4: Streamlining asset determinations • Strategy 7: Enhancing outreach and in-person assistance • Strategy 6: Enhancing availability and accessibility of other renewal submission modalities • Strategy 8: Additional policy changes to support retention • Strategy 9: Operational changes to support retention
Hawaii	• Ability to submit renewal forms through all required modalities	• Strategy 6: Enhancing availability and accessibility of other renewal submission modalities • Strategy 7: Enhancing outreach and in-person assistance
Idaho	• Conducting *ex parte* renewals for the non-MAGI population • Ability to submit renewal forms through all required modalities	• Strategy 1: Holding procedural terminations • Strategy 2: *Ex parte* prior to termination • Strategy 6: Enhancing availability and accessibility of other renewal submission modalities • Strategy 5: Streamlining renewal forms and requirements • Strategy 7: Enhancing outreach and in-person assistance

State	Area(s) of Non-Compliance with Renewal Requirements	Primary Mitigations and Other Strategies
Illinois	• None identified	N/A
Indiana	• None identified	N/A
Iowa	• Conducting *ex parte* renewals for the non-MAGI population	• Strategy 1: Holding procedural terminations • Strategy 2: *Ex parte* prior to termination • Strategy 7: Enhancing outreach and in-person assistance • Strategy 8: Additional policy changes to support retention
Kansas	• None identified	N/A
Kentucky	• None identified	N/A
Louisiana	• None identified	N/A
Maine	• Conducting *ex parte* renewals for MAGI or non-MAGI populations • Renewal form requests more information than needed to determine eligibility (e.g., MAGI form is not fully prepopulated, or individuals must submit a new application at renewal)	• Strategy 1: Holding procedural terminations • Strategy 2: *Ex parte* prior to termination • Strategy 3: Streamlining income determinations • Strategy 4: Streamlining asset determinations • Strategy 9: Operational changes to support retention • Strategy 8: Additional policy changes to support retention • Strategy 7: Enhancing outreach and in-person assistance
Maryland	• None identified	N/A
Massachusetts	• None identified	N/A
Michigan	• Conducting *ex parte* renewals for the non-MAGI population • Ability to submit renewal forms through all required modalities	• Strategy 2: *Ex parte* prior to termination • Strategy 4: Streamlining asset determinations • Strategy 6: Enhancing availability and accessibility of other renewal submission modalities • Strategy 8: Additional policy changes to support retention • Strategy 7: Enhancing outreach and in-person assistance
Minnesota	• Conducting *ex parte* renewals for the non-MAGI population • Renewal form is pre-populated for the MAGI population and/or does not request more information than needed to determine eligibility • Ability to submit renewal forms through all required modalities • Determining eligibility on all bases	• Strategy 1: Holding procedural terminations • Strategy 2: *Ex parte* prior to termination • Strategy 3: Streamlining income determinations • Strategy 4: Streamlining asset determinations • Strategy 5: Streamlining renewal forms and requirements • Strategy 6: Enhancing availability and accessibility of other renewal submission modalities • Strategy 7: Enhancing outreach and in-person assistance

State	Area(s) of Non-Compliance with Renewal Requirements	Primary Mitigations and Other Strategies
		• Strategy 8: Additional policy changes to support retention • Strategy 9: Operational changes to support retention
Mississippi	• Ability to submit renewal forms through all required modalities	• Strategy 1: Holding procedural terminations • Strategy 6: Enhancing availability and accessibility of other renewal submission modalities • Strategy 8: Additional policy changes to support retention
Missouri	• Ability to submit renewal forms through all required modalities	• Strategy 6: Enhancing availability and accessibility of other renewal submission modalities
Montana	• None identified	N/A
Nebraska	• Conducting *ex parte* renewals for some MAGI and non-MAGI populations	• Strategy 2: *Ex parte* prior to termination • Strategy 3: Streamlining income determinations • Strategy 8: Additional policy changes to support retention • Strategy 7: Enhancing outreach and in-person assistance
Nevada	• Conducting *ex parte* renewals for the non-MAGI population • Ability to submit renewal forms through all required modalities • Transferring electronic accounts to the Marketplace for all relevant populations in timely manner	• Strategy 2: *Ex parte* prior to termination • Strategy 3: Streamlining income determinations • Strategy 4: Streamlining asset determinations • Strategy 6: Enhancing availability and accessibility of other renewal submission modalities • Strategy 8: Additional policy changes to support retention • Strategy 7: Enhancing outreach and in-person assistance • Strategy 10: Supporting transitions to Marketplace coverage
New Hampshire	• None identified	N/A
New Jersey	• Conducting *ex parte* renewals for some of the MAGI population • Renewal form requests more information than needed to determine eligibility (e.g., MAGI form is not fully pre-populated or individuals must submit a new application at renewal) • Ability to submit renewal forms through all required modalities for non-MAGI and some MAGI populations	• Strategy 3: Streamlining income determinations • Strategy 5: Streamlining renewal forms and requirements • Strategy 6: Enhancing availability and accessibility of other renewal submission modalities • Strategy 8: Additional policy changes to support retention • Strategy 9: Operational changes to support retention • Strategy 10: Supporting transitions to Marketplace coverage • Strategy 7: Enhancing outreach and in-person assistance

State	Area(s) of Non-Compliance with Renewal Requirements	Primary Mitigations and Other Strategies
	• Transferring electronic accounts to the Marketplace for relevant non-MAGI populations	
New Mexico	• None identified	N/A
New York	• Conducting *ex parte* renewals for the non-MAGI population • Ability to submit renewal forms through all required modalities for the non-MAGI population	• Strategy 1: Holding procedural terminations • Strategy 3: Streamlining income determinations • Strategy 4: Streamlining asset determinations • Strategy 6: Enhancing availability and accessibility of other renewal submission modalities • Strategy 7: Enhancing outreach and in-person assistance • Strategy 8: Additional policy changes to support retention
North Carolina	• Ability to submit renewal forms through all required modalities for the non-MAGI population	• Strategy 7: Enhancing outreach and in-person assistance • Strategy 6: Enhancing availability and accessibility of other renewal submission modalities • Strategy 8: Additional policy changes to support retention
North Dakota	• None identified	N/A
Ohio	• Conducting *ex parte* renewals for the non-MAGI population	• Strategy 2: *Ex parte* prior to termination • Strategy 9: Operational changes to support retention
Oklahoma	• Conducting *ex parte* renewals for the non-MAGI population • Ability to submit renewal forms through all required modalities • Transferring electronic accounts to the Marketplace for relevant non-MAGI populations	• Strategy 3: Streamlining income determinations • Strategy 4: Streamlining asset determinations • Strategy 6: Enhancing availability and accessibility of other renewal submission modalities • Strategy 7: Enhancing outreach and in-person assistance • Strategy 8: Additional policy changes to support retention • Strategy 10: Supporting transitions to Marketplace coverage •
Oregon	• Conducting timely renewals for individuals enrolled in the Medicaid family planning group	• Strategy 7: Enhancing outreach and in-person assistance
Pennsylvania	• Conducting *ex parte* for the non-MAGI and some MAGI populations	• Strategy 2: *Ex parte* prior to termination • Strategy 3: Streamlining income determinations • Strategy 8: Additional policy changes to support retention • Strategy 7: Enhancing outreach and in-person assistance
Rhode Island	• None identified	N/A

State	Area(s) of Non-Compliance with Renewal Requirements	Primary Mitigations and Other Strategies
South Carolina	• Conducting *ex parte* for some MAGI and non-MAGI populations • Renewal form requests more information than needed to determine eligibility (e.g., MAGI form is not fully pre-populated or individuals must submit a new application at renewal) • Ability to submit renewal forms through all required modalities	• Strategy 2: *Ex parte* prior to termination • Strategy 3: Streamlining income determinations • Strategy 4: Streamlining asset determinations • Strategy 6: Enhancing availability and accessibility of other renewal submission modalities • Strategy 9: Operational changes to support retention • Strategy 8: Additional policy changes to support retention • Strategy 7: Enhancing outreach and in-person assistance
South Dakota	• Conducting *ex parte* for the non-MAGI population • Renewal form requests more information than needed to determine eligibility (e.g., MAGI form is not fully pre-populated or individuals must submit a new application at renewal) • Transferring electronic accounts to the Marketplace for relevant non-MAGI populations	• Strategy 2: *Ex parte* prior to termination • Strategy 3: Streamlining income determinations • Strategy 5: Streamlining renewal forms and requirements • Strategy 6: Enhancing availability and accessibility of other renewal submission modalities • Strategy 9: Operational changes to support retention • Strategy 8: Additional policy changes to support retention • Strategy 10: Supporting transitions to Marketplace coverage • Strategy 7: Enhancing outreach and in-person assistance
Tennessee	• None identified	N/A
Texas	• Renewal form requests more information than needed to determine eligibility (e.g., MAGI form is not fully pre-populated or individuals must submit a new application at renewal) • Determining eligibility on all bases	• Strategy 5: Streamlining renewal forms and requirements • Strategy 8: Additional policy changes to support retention • Strategy 9: Operational changes to support retention
Utah	• Conducting *ex parte* renewals for some MAGI and non-MAGI populations	• Strategy 2: *Ex parte* prior to termination
Vermont	• Ability to submit renewal forms through all required modalities for the non-MAGI population	• Strategy 6: Enhancing availability and accessibility of other renewal submission modalities • Strategy 8: Additional policy changes to support retention • Strategy 7: Enhancing outreach and in-person assistance
Virginia	• Conducting *ex parte* renewals for the non-MAGI population	• Strategy 2: *Ex parte* prior to termination • Strategy 3: Streamlining income determinations • Strategy 8: Additional policy changes to support retention

State	Area(s) of Non-Compliance with Renewal Requirements	Primary Mitigations and Other Strategies
		• Strategy 7: Enhancing outreach and in-person assistance
Washington	• Conducting *ex parte* renewals for the non-MAGI population • Ability to submit renewal forms through all required modalities for the non-MAGI population	• Strategy 2: *Ex parte* prior to termination • Strategy 4: Streamlining asset determinations • Strategy 6: Enhancing availability and accessibility of other renewal submission modalities • Strategy 7: Enhancing outreach and in-person assistance • Strategy 8: Additional policy changes to support retention
West Virginia	• Conducting *ex parte* renewals for the non-MAGI population • Ability to submit renewal forms through all required modalities	• Strategy 1: Holding procedural terminations • Strategy 3: Streamlining income determinations • Strategy 5: Streamlining renewal forms and requirements • Strategy 6: Enhancing availability and accessibility of other renewal submission modalities • Strategy 9: Operational changes to support retention • Strategy 8: Additional policy changes to support retention • Strategy 7: Enhancing outreach and in-person assistance
Wisconsin	• Conducting *ex parte* renewals for some populations	• Strategy 3: Streamlining income determinations • Strategy 5: Streamlining renewal forms and requirements • Strategy 7: Enhancing outreach and in-person assistance • Strategy 8: Additional policy changes to support retention • Strategy 9: Operational changes to support retention
Wyoming	• Conducting *ex parte* renewals for MAGI or non-MAGI populations	• Strategy 1: Holding procedural terminations • Strategy 2: *Ex parte* prior to termination • Strategy 3: Streamlining income determinations • Strategy 4: Streamlining asset determinations • Strategy 5: Streamlining renewal forms and requirements • Strategy 7: Enhancing outreach and in-person assistance • Strategy 8: Additional policy changes to support retention