

Care for the Common Good

Medicaid Work & Community Engagement Requirements

Keep Medicaid Accessible for All Who Are Eligible



Trinity Health is one of the largest not-for-profit, Catholic health care systems in the nation, serving diverse communities across 25 states. We advocate for public policies that promote the common good including sustaining our faith-based mission, improving community health, and growing our workforce while addressing the continuously shifting national health care system landscape.

Our Catholic values of reverence and a commitment to those experiencing poverty guide our belief that high-quality, affordable health care should be accessible to all. Medicaid provides a lifeline for 72 million Americans. The Common Good is achieved when all who are Medicaid eligible can successfully navigate enrollment and access to care.

New work and community engagement requirements for Medicaid expansion states are projected to result in coverage loss for more than 5 million low-income adults without dependents. Many eligible enrollees could lose coverage due to state-imposed administrative burdens like complex rules, insufficient outreach and complex reporting systems.¹ Past experience shows that work requirements are expensive to implement and fail to provide enrollees simple supports. Enrollees have had difficulty with verifying unpredictable hourly income, accessing online portals, or dealing with employers refusing to complete forms. Successful implementation is crucial to protect coverage for eligible enrollees. We can do better.

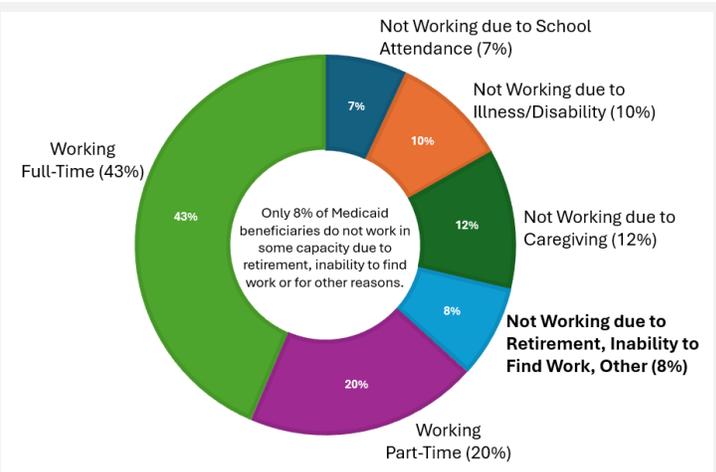
Policy Recommendations

Trinity Health urges policymakers to consider the following guardrails for Medicaid work and community engagement requirement policies:

Implement a Simple Reporting Process

- Streamline the process through user-friendly platforms, mobile access and fewer reporting intervals (e.g., annual vs. monthly), with information available in the state's top non-English languages.
- When possible, automatically determine enrollee compliance or exemption through an *ex parte* review process by using existing data from other programs such as food benefits, community college enrollment, health insurance claims or income verification tools.
- Develop reporting options beyond web-based platforms.
- Establish flexible look-back periods to account for seasonal work.
- Allow for hardship exemptions for individuals experiencing situations like hospitalization, or living in areas with a federally declared disaster, or high unemployment.
- Establish a flexible and broad definition for exemptions for *medical frailty* and *caregiver*.
- Provide longer-term exemptions for appropriate medical conditions.

Most Medicaid Beneficiaries Who Can Work...Do



Source: KFF analysis of the March 2024 Current Population Survey ASEC

¹ Center on Budget and Policy Priorities. (November 2020). States' Experiences Confirm Harmful Effects of Medicaid Work Requirements.

Addressing Medicaid Work Requirements

Support Enrollees in Meeting Requirements

- Provide enrollee education to help understand the new requirements.
- Fund providers and community-based organizations to offer in-person assistance with reporting requirements.
- Invest in job training, placement programs, and wraparound services to help enrollees meet requirements sustainably.
- Allow enrollees to regain coverage quickly after resolving noncompliance and offer grace periods for those transitioning between jobs.

Monitor the Impact on Health

- Require data reporting to track and publicly report coverage loss, employment outcomes, and health impacts. Adjust policies accordingly.
- Examine the impact of work and community engagement requirements as an administrative burden on Medicaid agencies and physicians, especially primary care providers and their ability to be responsive to the needs of enrollees.

Mission

We, Trinity Health, serve together in the spirit of the Gospel as a compassionate and transforming healing presence within our communities.

Core Values

Reverence • Commitment to Those Experiencing Poverty •
Safety • Justice • Stewardship • Integrity