



# The Enrollment Coalition

On November 14, 2024, the Centers for Medicare & Medicaid Services (CMS) released an [informational bulletin](#) (CIB) updating its guidance for the continued use of certain streamlined eligibility and enrollment strategies following the COVID-19 Public Health Emergency and the expiration of the continuous enrollment condition. In this informational bulletin, CMS outlines which unwinding-related section 1902(e)(14)(A) waiver strategies 1) states will be **required to implement** by the Medicaid Eligibility & Enrollment [final rule](#) implemented in April 2024, 2) states have the **option to continue long-term under Medicaid or CHIP state plan authority**, and 3) which **strategies will sunset after June 30, 2025**. The following tables provide information on the status of existing strategies, as well as which states have implemented these strategies.

Strategy	Description	Status	States Implementing (as of Nov 2024)
Applying for Other Benefits Strategy	Suspend the requirement to apply for other benefits under 42 C.F.R. § 435.608.	Strategy required by the April 2024 Eligibility and Enrollment Final Rule.	15 states—AK, AZ, CA, HI, IN, KS, KY, ME, MT, NE, NC, SC, TN, VT, WY
National Change of Address (NCOA) and/or U.S. Postal Service (USPS) Contact Update Strategy	Update the beneficiary’s case record with the updated in-state contact information received from the NCOA database or USPS returned mail without first sending a notice to the beneficiary address on file with the state.	Strategy required by the April 2024 Eligibility and Enrollment Final Rule.	37 states—AK, AZ, AR, CA, CO, CT, DE, DC, GA, HI, ID, IL, IN, IA, KS, LA, ME, MA, MN, MS, MO, NV, NJ, NM, NC, ND, OH, RI, SC, TN, TX, UT, VT, VA, WA, WI, WY
Managed Care Organization (MCO) Beneficiary Contact Update Strategy	Update the beneficiary’s case record with the updated in-state contact information received from an MCO without first sending a notice to the beneficiary address on file with the state.	Strategy required by the April 2024 Eligibility and Enrollment final rule.	32 states—AZ, AR, CA, GA, HI, IL, IN, IA, KS, KY, LA, MA, MI, MN, MS, MO, NE, NV, NJ, NM, NY, ND, OH, OR, PA, SC, TN, TX, UT, VA, WA
Supplemental Nutrition Assistance Program (SNAP)/Temporary Assistance for Needy Families (TANF) Strategy	Enroll and/or renew Medicaid eligibility for Modified Adjusted Gross Income (MAGI) or non-MAGI-based individuals based on gross income findings from SNAP or TANF.	Optional strategy under state plan to use SNAP gross income	24 states—AL, AK, AR, CO, CT, DE, DC, GA, HI, IN, KY, LA, MD, MI, MS, MO, NJ, NM, NC, ND, OH, OK, TN, VT
\$0 Income Strategy	Renew Medicaid eligibility for individuals with no income and no data returned on an ex parte basis.	Optional strategy under state plan.	37 states—AL, AK, AZ, CA, CO, CT, DE, DC, GA, HI, IL, IN, KS, KY, LA, ME, MD, MA, MI, MN, MS, MT, NV, NH, NJ, NM, NY,

			NC, OH, OR, PA, SC, TN, UT, VT, VA
100 Percent Income Strategy	Renew Medicaid eligibility for individuals with income at or below 100 percent of the federal poverty level (FPL) and no data returned on an ex parte basis.	Optional strategy under state plan.	20 states—AZ, CA, CO, DC, HI, KY, ME, MD, MN, MT, NV, NH, NH, NM, NY, NC, ND, SC, TN, VT
Streamlining Asset Determinations Strategy	Renew Medicaid eligibility without regard to the resource test for non-MAGI beneficiaries who are subject to a resource test.	Optional strategy under state plan.	15 states—CA, DE, HI, KY, ME, MD, MA, MI, MN, NV, NY, RI, SC, VT, WY
Asset Verification System (AVS) Strategy	Renew Medicaid for individuals for whom information from the AVS is not returned or is not returned within a reasonable timeframe.	Optional strategy under state plan.	24 states—AL, AK, AZ, CA, GA, HI, ID, IL, IN, KS, KY, LA, MD, MS, MO, NV, NH, NM, NC, OR, TN, UT, VT, WA
Stable Income and Asset Strategy	Renew Medicaid eligibility for individuals with only Title II or other stable sources of income (e.g., pension income) or stable assets (e.g., burial funds) without checking required data sources.	Optional strategy under state plan.	10 states—CA, HI, ME, MN, NV, NJ, NY, ND, VT, WI
Managed Care Organization (MCO) Renewal Support Strategy	Permit MCOs to provide assistance to beneficiaries to complete and submit Medicaid renewal forms.	Optional strategy under state plan.	22 states—AZ, DC, IN, KS, KY, MD, MA, MI, MS, NV, NM, ND, OH, PR, RI, SC, TN, UT, VA, WV
Enrollment Broker and/or Program of All-Inclusive Care for the Elderly (PACE) Contact Update Strategy	Update the beneficiary’s case record with the updated in-state contact information received from enrollment brokers and/or PACE organizations without first sending a notice to the beneficiary address on file with the state.	Optional strategy under April 2024 Eligibility and Enrollment final rule.	9 states—CA, DC, IN, LA, MI, ND, NM, OR, VA
State Agency and/or Other Qualified Entities Using Presumptive Eligibility (PE) Strategy	Designate state agency, pharmacies, community-based organizations (CBOs), and/or other providers as qualified entities to make determinations of PE on a MAGI basis for individuals not enrolled in Medicaid or CHIP. Designate the state	Optional strategy under state plan.	0 states

	<p>agency as a qualified entity to make PE determinations on a MAGI basis and allow the option to make PE determinations based on information provided on a renewal form or a full Medicaid application, and extend the PE period until the state determines eligibility based on the renewal form or a full Medicaid application.</p>		
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<b>Strategies Discontinued after June 30, 2025</b>	
Telephonic Signature Recording Strategy	Waive the recording of the telephone signature at application and/or renewal from the applicant or beneficiary.
Authorized Representative Designation Strategy	Permit the designation of an authorized representative for the purposes of signing an application or renewal form via the telephone without a signed designation from the applicant or beneficiary.
12-Month Extension for Children and/or Non-MAGI Beneficiaries Strategy	Renew Medicaid eligibility for children and/or non-MAGI beneficiaries for 12 months based on the individual's most recent Medicaid determination (either at initial application or most recent renewal) without conducting a renewal or making a new eligibility determination.
Medicaid Premium Resumption Delay Strategy	Delay the resumption of Medicaid premiums otherwise approved under the state plan for a beneficiary until the individual's redetermination is completed.
Former Foster Care Children (FFCC) Strategy	Extend eligibility in the FFCC group to youth formerly in foster care from any state, without regard to when the individual turned age 18.
Fair Hearings Timeframe Extension Strategy	Extend the timeframe permitted for the state to take final administrative action on fair hearing requests, greater than the 90-day time limit, provided that state provides benefits pending the outcome of the fair hearing to all appellants.
Reinstate Eligibility Back to Termination Date During Reconsideration Period Strategy	Reinstate eligibility effective on the individual's prior termination date for individuals who were disenrolled based on a procedural reason and are subsequently redetermined eligible for Medicaid during a 90-day reconsideration period.
Managed Care Plan Auto-Reenrollment Strategy	Extend automatic reenrollment into an MCO to up to 120 days after a loss of Medicaid coverage.
Medical Support Cooperation Strategy	Suspend the requirement to cooperate with the agency in establishing the identity of a child's parents and in obtaining medical support