



Internal Strategies to Prepare for Medicaid Work Reporting Requirements

July 2026

Below are ten recommendations that HCH programs can implement internally to prepare clients, staff, and leadership for the upcoming changes to Medicaid:

1. Prioritize Medicaid enrollment and connect clients to needed services to ensure medical codes are in the system to substantiate any exemptions that may be claimed later (ensure codes submitted align with the state's exemption codes).
2. Ensure current client contact information is on file with the state Medicaid agency, including any reliable address, telephone number, and email address.
3. Keep redetermination dates accurate and visible to the enrollment teams in the verification systems, information exchanges, or other shared data systems.
4. Talk with clients and staff about impending changes.
 - Use our new [compliance checklist](#) for case managers, community health workers, and other staff to estimate how many clients on each case load may qualify for exemptions.
 - Use Council resources, official state materials, and/or develop your own.
 - For clients likely subject to the work requirement (called community engagement requirements in the law), proactively discuss how they will document their hours if the state cannot verify automatically.
5. Prioritize SSI/SSDI disability enrollment using [a SOAR approach](#) so more patients are automatically exempt from the requirement.
6. If your state has a temporary disability program, use the qualifications to document medical frailty or other exemption criteria.
7. Estimate coverage losses and (re)establish pro-bono specialty care relationships.
8. Estimate revenue shortfalls beginning in January 2027 as reimbursable visits wane.
9. Plan new Medicaid enrollment and compliance verification workflows with internal operations teams.
10. Train staff on how to complete documentation required to prove exemptions and the process for submission. Make sure staff are familiar with your state's list of diagnoses, diseases, disorders, and other health conditions that will be used to qualify individuals for medical frailty.

This document is an excerpt from: [Updated Medicaid Work Reporting Requirements: Summary & Action Steps](#)