



Common Cents

New Hampshire Fiscal Policy Institute Blog

Work Requirement Implementation Begins Amid Troubling Signs from Other States

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Implementation of the work and community engagement requirements for Medicaid expansion enrollees [officially began March 1](#), with June as the first month requiring non-exempt enrollees to have 100 hours of [qualifying activities](#). The flexibility within New Hampshire's current rules permits enrollees to use a subsequent month to fulfill their required hours, and certain individuals are [exempt](#) from the requirements; however, individuals could lose health care coverage for not fulfilling the work and community engagement reporting requirements as early as August.

The prospect of potentially thousands of New Hampshire's [nearly 52,000](#) Medicaid expansion enrollees losing coverage due to lack of compliance stems from experiences in Arkansas, which is the only state to have thus far implemented Medicaid work requirements. Arkansas has different reporting requirements, which initially required use of an online portal for reporting compliance, and also requires disenrolled individuals to wait until a subsequent calendar year to reapply for health care coverage. However, Arkansas requires 80 hours per month of qualifying activities, does not require those with children under 18 years old to work, has been phasing in the requirements for different groups within the Medicaid expansion population, and currently has automatic cross-verification with other programs, such as the Supplemental Nutrition Assistance Program, that exempts individuals from needing to report for Medicaid.

Data collected by the Arkansas Department of Human Services [show](#) that a total of [18,164 individuals lost coverage](#) due to failure to meet the work and community engagement reporting requirements in 2018. No individuals have lost coverage thus far in 2019, as noncompliance restrictions end with the calendar year, but only 1,452 of those who lost coverage in 2018 have reapplied and been reenrolled in Medicaid in 2019, while 8,895 enrollees were out of compliance for the year, as of February 7, 2019.

Evidence [suggesting](#) enrollees in Arkansas were uninformed about the requirements or faced difficulty navigating the reporting mechanisms, paired with the disenrollments, prompted the [Medicaid and CHIP Payment and Access Commission](#), a non-partisan federal agency that informs Congress, to [recommend](#) pausing coverage losses due to implementation of the work and community engagement requirements. However, the concern is not unique to Arkansas. An analysis by the law and consulting firm Manatt found that Michigan’s work and community engagement reporting requirements may lead to [between 9 percent and 27 percent of Medicaid expansion enrollees](#) in the state losing coverage once implementation begins. The Center on Budget and Policy Priorities [highlighted the risk for unintended consequences](#) and disenrollment associated with any work reporting requirement, including research suggesting failure to report work or exemptions may be the primary factor leading to coverage losses, and that the inconsistency of low-wage work hours from month to month may lead to widespread noncompliance even among those working.

Members of the New Hampshire Legislature are currently considering several bills that would make changes to the work and community engagement reporting requirements, and [other states are revisiting](#) work reporting requirement policies as well. For more information about New Hampshire’s current requirements and Medicaid expansion program, see NHFPI’s May 10, 2018 post “[Senate Approves Medicaid Expansion Bill as Amended by the House](#)” and March 30, 2018 Issue Brief [Medicaid Expansion in New Hampshire and the State Senate’s Proposed Changes](#).