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# A Snapshot of State Proposals to Implement Medicaid Work Requirements Nationw

\*Updated Jan. 22, 2019

Earlier this year, the Centers for Medicare & Medicaid Services (CMS) issued a new [policy](#) allowing states to implement work and community engagement requirements for certain I enrollees. States must seek federal approval to require non-elderly, non-pregnant, and non-disabled adults to meet these requirements to qualify for full or partial Medicaid coverage summarizes states' pending and approved Section 1115 waivers, waiver renewals, and waiver amendments to implement work and community engagement requirements.

For a printable version or to view the complete chart, click [here](#).

Waiver Status	Medicaid Expansion Status	Work Requirement Hours	Qualifying Activities	Population Group	Exempted Groups	Penalties for Non-Compliance
			<p><a href="#">AL</a></p> <ul style="list-style-type: none"> <li>-Employment</li> <li>-On-the-job training</li> <li>-Job search and job readiness activities</li> <li>-Attendance in high school, GED certification classes, an institution of higher education, or vocational classes</li> <li>-Volunteer work activities or community service</li> <li>-Technical training</li> </ul> <p>Individuals who fulfill the work requirements but become ineligible due to their income level exceeding Medicaid eligibility levels will be provided with 18 months of transitional Medicaid coverage.</p>			
			<p><a href="#">AZ</a></p> <ul style="list-style-type: none"> <li>-Employment, including self-employment</li> <li>-Participating in employment readiness activities, which can include:                             <ul style="list-style-type: none"> <li>-Education (less than full time)</li> <li>-Job skills training</li> <li>-Life skills training</li> <li>-Health education classes</li> </ul> </li> <li>-Engage in job search activities similar to those required to receive unemployment benefits</li> <li>-Community service</li> </ul>			
			<p><a href="#">AR</a></p> <ul style="list-style-type: none"> <li>-Employment or self-employment, or those whose income is consistent with being employed/self-employed at least 80 hours/month</li> <li>-Enrollment in educational program (high school, higher education, or GED classes)</li> <li>-On-the-job or vocational training</li> <li>-Job search or job search training (up to 40 hours/month)</li> <li>-Community service</li> <li>-Participation in classes on health insurance, using health care, or healthy living (up to 20 hours/year)</li> <li>-Participating in programs through state Department of Workforce Services</li> </ul>			

-Compliance with either SNAP or Transitional Employment Assistance (TEA) employment programs

[IN](#)

- Subsidized or unsubsidized employment
- Participating in state's Gateway to Work program
- Managed care entities employment initiatives
- Job skills training
- Job search activities
- Education related to employment; general education (e.g. GED or community college)
- Accredited ESL education or homeschooling
- Vocational education/training
- Community work experience
- Community service/public service
- Volunteer work
- Caregiving services for a non-dependent relative or other individual with a chronic, disabling health condition
- Compliance with SNAP work requirements

Certain tribal members will be considered as meeting the Gateway to Work requirement due to tribe's Pathways employment program.

Gateway to Work will also encourage enrollees with a substance use disorder to seek treatment by considering participation in treatment program as criteria for exemption.

[KY](#)

- Subsidized or unsubsidized employment
- Self-employment
- Job skills training
- Job search activities
- Enrollment in educational program related to employment (e.g., management training)
- General education (e.g., high school, GED, college or graduate education, ESL classes)
- Vocational education and training
- Community work experience
- Community service/public service
- Caregiving services for a non-dependent relative or other individual with a chronic, disabling health condition
- Participation in substance use disorder treatment

[ME](#)

- Paid employment
- Self-employment for at least 80 hours/month, receiving weekly earnings at least equal to state or federal minimum wage
- Enrollment in educational program at least half-time
- Participating in requirements of a state-approved work program
- Workfare or volunteer community service (24 hours/month)
- Job search/readiness assistance
- Receiving unemployment benefits
- Complying with or exempt from SNAP or TANF work requirements
- Participating in tribal work or community engagement programs

-Combination of qualifying activities for a total of 80 hours/month (except hour requirement is limited to 24 hours/month if individual is m requirement solely through volunteer or community service)

-Other community engagement activities, subject to state approval

MI

-Employment, self-employment, or having income consistent with being employed or self-employed (e.g. makes at least minimum wage average of 80 hours per month)

-Education directly related to employment (i.e. high school equivalency test preparation, postsecondary education)

-Job training or vocational training directly related to employment

-Unpaid workforce engagement directly related to employment (e.g. internship)

-Tribal employment programs

-Participation in substance use disorder (SUD) treatment (court ordered, prescribed by a licensed medical professional, or Medicaid-funded SUD treatment)

-Community service completed with a nonprofit 501(c)(3) or 501(c)(4) organization (can only be used as a qualifying activity for up to 3 r in a 12-month period)

-Job search directly related to job training

-Individuals in compliance with or who are exempt from SNAP or TANF work requirements will be deemed compliant with the Medicaid requirements

MS

-Working in paid employment

-Self-employment

-Participation with Office of Employment Security

-Volunteering with approved agencies

-Participation in alcohol or drug abuse treatment program

-Compliance with SNAP and TANF work requirements

Individuals who fulfill the workforce training or community engagement requirement but become ineligible due to their income level exceeding Medicaid eligibility levels will be provided with 12 month transitional medical assistance coverage. Once this coverage is exhausted, an additional 12 months of coverage will be offered if these individuals continue to meet the workforce training or community engagement requirement.

NH

-Subsidized or unsubsidized employment

-Education directly related to employment, in the case of an individual who has not received a high school diploma or equivalent

-Secondary school/course of study leading to a certificate of general equivalence

-Enrollment at an accredited community college, college or university that is counted on a credit hour basis

-Vocational training (not to exceed 12 months)

-On-the-job training

-Job skills training related to employment

-Job search/readiness activities, such as job training workshops and time spent with employment counselors

-Participation in substance use disorder treatment

-Community service and public service

-Caregiving services for a non-dependent relative or other individual with a disabling health, mental health, or developmental condition

-Compliance with SNAP or TANF work requirements

OH

-Work or participation in a community engagement activity (or a combination of the two)

Community engagement activities include:

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-Community engagement activities include:

- SNAP education and training activities
- Job search/job readiness programs (for no more than 30 days)
- Work Experience Program

[OK](#)

- Employment
- Workforce Innovation and Opportunity Act (WIOA) Program
- Employment & Training (E&T) Program; job search or job search training activities when offered as part of other E&T program components are acceptable as long as those activities comprise less than half the total required time spent in the components
- Education related to employment
- General Education Development/Diploma (GED)
- Vocational education/training
- Participation in Oklahoma Works
- Volunteer work (e.g. classroom volunteer, faith-based or community service programs)
- Meeting any combination of work, participating in work training or volunteering the specified number of hours per week, averaged monthly

[SD](#)

- Employment
- Meeting monthly milestones through activities such as:
- English as a second language courses
  - Health insurance literacy courses
  - Financial literacy courses
  - Disease management courses and other healthy living courses
  - Treatment for chronic or behavioral health conditions
  - High school equivalency education
  - Post-secondary education and training
  - Volunteer work
  - Caregiving for an elderly or disabled individual
  - Resume writing and soft skills training
  - Job searching
- Individuals will be connected with a case manager to assist with connecting individuals to support services and to develop an employment training plan
- Individuals will be eligible for Transitional Medical Benefits (TMB) for 12 months if their income exceeds the Medicaid income eligibility limit and for up to an additional 12 months of premium assistance if they have income above the Low Income Families program limit but below 100% FPL. One well-adult visit and one preventive dental visit is required during the period an individual is eligible for TMB to qualify for premium assistance.

[TN](#)

- Paid employment
- Self-employment (individual must be able to demonstrate income consistent with working at least 20 hours/week, averaged monthly)
- General education (e.g. high school or high school equivalency, college, ESL courses, etc.)
- Vocational education and training
- Participation in job search or job skills training activities sponsored by the state's Department of Labor & Workforce Development
- Accredited homeschooling

-Community service (volunteering) in approved settings

-Individuals complying with SNAP or TANF work requirements will be deemed compliant

[UT](#) (8/17)

-Online job search/training, completed through the Department of Workforce Services; participation activities will align closely with those SNAP program

[UT](#) (6/18)

-Compliance with SNAP work requirements

[VA](#)

-Subsidized or unsubsidized employment

-Self-employment

-Job skills/job readiness training or job search activities

-Participation in a state workforce program

-Participation in a tribal workforce program

-Participation in state's Agriculture and Foreign Labor or other migrant workforce program

-Education related to employment, general education such as a GED preparation program, participation in chronic disease management classes or nutrition education classes, participation in financial literacy, health literacy, or insurance literacy education classes, or participation in ESL classes

-Vocational education, training, and apprenticeships

-Community work experience programs, community service or public service (excluding political activities) that can reasonably improve readiness

-Caregiving services for a non-dependent relative or other person with a chronic, disabling health condition

-Any additional activities deemed as supporting the health of enrollees and promote program objectives

[WI](#)

-Working in exchange for money or for goods or services

-Unpaid work (e.g. volunteer work or community service)

-Self-employment

-Participating in allowable work, job training, or job search program (e.g. FoodShare Employment and Training and other state-approved workforce programs)

#### **Other State Activity**

Kansas submitted a [waiver proposal](#) to CMS in December 2017 that included Medicaid work requirements for certain individuals; in December 2018, CMS [approved](#) the waiver, but asked CMS to defer consideration of the work requirements.

North Carolina submitted a [waiver proposal](#) to CMS in November 2017 that included Medicaid work requirements, but the work requirements were contingent on [proposed legislative](#) Medicaid through a program called Carolina Cares that did not move forward.

South Carolina's governor directed the state Medicaid agency to develop a work requirements waiver, and in December 2018 the state opened a comment period on the [draft waive](#)

In addition to Utah's waiver to implement Medicaid work requirements and request to expand Medicaid up to only 100 percent of the federal poverty level (waiver details noted in [the issue of Medicaid expansion](#) was on the November 2018 [ballot](#) and was passed by voters, to be implemented 4/1/19.



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