

# Scheduled State Timelines for Completing Unwinding-Related Renewals\*

Preliminary Analysis as of May 2024

\*Analysis excludes certain populations whose renewals were extended due to state implementation of certain unwinding-related waivers, strategies, and flexibilities.

# Background: State Timelines for Unwinding-Related Renewals

- In March 2020, the Families First Coronavirus Response Act (FFCRA) established the continuous enrollment condition, which gave states extra federal Medicaid funding on the condition that they maintained enrollment for most individuals (among other conditions).<sup>1</sup>
- The Consolidated Appropriations Act (CAA), 2023 ended the Medicaid continuous enrollment condition on March 31, 2023, enabling states to begin full Medicaid renewals and disenrollment of individuals determined to no longer be eligible. States originally had 12 months to initiate all unwinding-related renewals and up to 14 months to complete them.<sup>2,3</sup>
- Nearly all states and DC (50 of 51) were originally anticipating to complete a first renewal for all individuals who were enrolled in Medicaid or CHIP as of the beginning of the state's unwinding period (unwinding-related renewals) by June 2024. These initial estimates were based on:
  - When states initiated unwinding renewals (February, March, or April 2023)<sup>4</sup> and
  - The length of the state's renewal process (e.g., 60 or 90 days between initiation and completion of renewals for a cohort, or group of individuals due for renewal at the same time).
- These original estimates did not account for state mitigation measures, potential compliance issues, or state adoption of CMS-approved strategies to protect eligible beneficiaries which affect the timing of renewals for some or all beneficiaries in a state.

1. Pub. L. No. 116-127

2. SHO# 23-002. Medicaid Continuous Enrollment Condition Changes, Conditions for Receiving the FFCRA Temporary FMAP Increase, Reporting Requirements, and Enforcement Provisions in the Consolidated Appropriations Act, 2023. Available at <https://www.medicaid.gov/sites/default/files/2023-08/sho23002.pdf>

3. Pub. L. No. 117-328, division FF, title V, subtitle D, sec 5131

4. States had the option to initiate unwinding renewals beginning in February, March, or April 2023 but terminations could not be effective before April 1, 2023.

# Preliminary State Timelines for Completing Unwinding-Related Renewals

- Since states began unwinding-related renewals, CMS has approved state implementation of additional flexibilities, mitigation strategies, and other approaches that have affected states' original unwinding timelines. For example:
  - As of May 2024, 15 states have received CMS concurrence to delay procedural disenrollments for one or more months to conduct additional beneficiary outreach<sup>1</sup>
  - Multiple states were required to pause some or all terminations as part of a mitigation strategy to prevent inappropriate disenrollments and/or address areas of non-compliance with federal renewal requirements
- Some states extended timelines to initiate and complete unwinding-related renewals for full monthly renewal cohorts, while other states have extended renewal timelines for certain populations (e.g., children, individuals receiving long-term services and supports, and individuals affected by areas of noncompliance with federal renewal requirements).
- CMS is providing this interim, preliminary overview of states' scheduled timelines for completion of unwinding-related renewals as an update to prior estimates. A more detailed analysis will be released in the coming months.

1. <https://www.medicare.gov/resources-for-states/coronavirus-disease-2019-covid-19/unwinding-and-returning-regular-operations-after-covid-19/state-option-to-delay-procedural-disenrollments/index.html>

# Preliminary State Timelines for Completing Unwinding-Related Renewals – continued

- This document reflects preliminary estimates of states' scheduled timelines to complete a first renewal for individuals who were enrolled in Medicaid or CHIP as of the beginning of the state's unwinding period (when the state initiated its first full unwinding renewals).
- The document does not reflect:
  - Timeline extensions for certain populations for whom a state extended the renewal timeline through waivers under section 1902(e)(14)(A) of the Social Security Act, mitigation plans, concurrence requests, or other authorities.
  - States' processing of pending unwinding-related renewals (e.g., renewals for individuals who returned documentation to the state that still needs to be processed), which may occur in the months after the estimated completion dates.
  - When a state will complete all unwinding-related renewals, the end of unwinding, or an end of unwinding-related flexibilities. Many states will require additional time to complete processing of all unwinding-related renewals.
- **All data in the table are preliminary and subject to change.** States may need to redistribute remaining unwinding-related renewals based on their volume of pending renewals. Additional state guidance related to renewal processing and an updated table with state timelines for completion of all unwinding-related renewals is forthcoming.

## Preliminary Analysis: Estimated Completion Month for Unwinding-Related Renewals (excluding certain populations)<sup>1, 2</sup>

Timeframe	# of states	States
Mar-24	5	ID, MT, NH, OK, SD
Apr-24	12	AR, AZ, CT, FL, IA, IN, NE, OH, PA, UT, WV, WY
May-24	15	CO, DE, GA, KS, MA, MD, ME, ND, NM, NV, RI, TN, VA, VT, WA
Jun-24	8	AL, CA, LA, MN, MO, MS, OR, TX
Jul-24	5	IL, KY, MI, NJ, WI
Aug-24	2	HI, SC
Sept-24	0	-
Oct-24	0	-
Nov-24	1	NC
Dec-24	0	-
2025	2	AK, DC
Under Development <sup>3</sup>	1	NY

**State timelines are preliminary and subject to change, even for states that do not have timelines listed as “under development.”**

1. Anticipated effective month\* for the final monthly cohort of unwinding-related renewals, excluding certain populations whose renewals were extended due to state implementation of 1902(e)(14) waivers, mitigation plans, concurrence requests, or other authorities.
2. State timelines for completing all unwinding-related renewals may be later than dates included in this table.
3. CMS is actively engaging with the state to determine a final timeline.

\*Effective month in which renewals are scheduled to be completed, including terminations as applicable. For most states, this reflects the month after when the renewal was due. For example, for a cohort with renewals due in March 2024 and terminations effective as of April 1, 2024, April 2024 is the estimated completion month.