

Preliminary Overview of State Assessments Regarding Compliance with Medicaid and CHIP Automatic Renewal Requirements at the Individual Level, as of September 21, 2023¹

On August 30, 2023 CMS sent a [letter](#) to all State Medicaid Directors, alerting them to a potential eligibility system issue related to automatic renewals for Medicaid and coverage through the Children’s Health Insurance Program (CHIP). Auto-renewals (also known as “ex parte” renewals) are one of the strongest requirements states must implement to keep eligible people enrolled in Medicaid or CHIP coverage during the renewals process. Federal rules require states to use information already available to them through existing reliable data sources (e.g., state wage data) to determine whether people are still eligible for Medicaid or CHIP and to do so for each individual in a household, regardless of the eligibility of other household members. Auto-renewals make it easier for eligible people to renew Medicaid and CHIP, helping to make sure individuals are not disenrolled due to red tape. In its August 30th letter, CMS urged all states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands to assess their eligibility systems and to determine and report whether they have this systems issue. Other U.S. territories were excluded due to differing eligibility rules and requirements.

The table below presents preliminary state-reported information about the ability of states’ systems to conduct automatic renewals at the individual level, consistent with federal requirements, as of September 21, 2023. Instances where states are continuing to evaluate their programs are reflected as “TBD” in the affected populations column and/or “still assessing” in the estimated number of affected individuals column below. States were asked to submit information on the affected populations and the state’s plan and timeline for reinstatement and implementation of mitigation strategies, if applicable. As of September 21, 2023, 24 states and territories (including Puerto Rico and the U.S. Virgin Islands) attested to correctly conducting automatic renewals at the individual level. Twenty-nine states (including the District of Columbia) indicated they are not conducting automatic renewals at the individual level or are still working to reinstate affected individuals.

Impact of this issue varies widely from state to state, and many states are continuing to assess their programs and the impact of the issue. States that provided estimates reported a wide range in the numbers of individuals impacted or potentially impacted. Estimates refer to the number of individuals in each state impacted by this issue since the end of the continuous enrollment condition (April 1, 2023). See Table 1 for more information on state-reported preliminary data on the estimated number of affected individuals, which is subject to change as states continue their assessments and work to address the issue.

CMS will be reviewing all the information provided by states and offering direct assistance as states work to complete their assessments and achieve compliance. State compliance with other federal renewal requirements is not reflected in this table. For more information about required state actions, please see the [State Medicaid Director letter from August 30, 2023](#).

¹ This document was updated on September 28, 2023, to reflect clarifying information provided by two states.

Table 1: State-Reported Preliminary Assessment as of September 21, 2023

State	States Attesting to Auto-Renewing at the Individual Level, Consistent with Federal Requirements	Affected Population(s) ¹	Estimated Number of Affected Individuals					Still Assessing
			None	< 10,000	10,000 – 49,999	50,000 – 99,999	>100,000	
Alabama	Yes	N/A						
Alaska	No	<ul style="list-style-type: none"> • Children • Household members with different eligibility statuses 		X				
Arizona	Yes	N/A						
Arkansas	Yes	N/A						
California	Yes	N/A						
Colorado	No	<ul style="list-style-type: none"> • Children • Household members with different eligibility statuses 			X			
Connecticut	No	<ul style="list-style-type: none"> • Children • Household members with different eligibility statuses 			X			
Delaware	No	<ul style="list-style-type: none"> • Household members with different eligibility statuses 						X
District of Columbia	No	<ul style="list-style-type: none"> • Children 		X				
Florida	Yes	N/A						

¹ “Children” refers to children in households with at least one adult enrolled in Medicaid. Noting “children” as an affected population does not mean all children in the state are impacted. “Household members with different eligibility statuses” refers to individuals in households in which another household member needs to provide additional documentation (e.g., immigration status documentation) to verify eligibility. Some states may only have specific scenarios in which individuals in this population are impacted. These categories, “Children” and “Household members with different eligibility statuses,” are not mutually exclusive. Additionally, states may have identified affected individuals in other groups or circumstances.

State	States Attesting to Auto-Renewing at the Individual Level, Consistent with Federal Requirements	Affected Population(s) ¹	Estimated Number of Affected Individuals					
			None	< 10,000	10,000 – 49,999	50,000 – 99,999	>100,000	Still Assessing
Georgia	No	<ul style="list-style-type: none"> Household members with different eligibility statuses 						X
Hawaii	No	<ul style="list-style-type: none"> Household members with different eligibility statuses 			X			
Idaho	No	TBD		X				
Illinois	No	<ul style="list-style-type: none"> Children Household members with different eligibility statuses 		X				
Indiana	Yes	N/A						
Iowa	No	TBD			X			
Kansas	No	<ul style="list-style-type: none"> Children Household members with different eligibility statuses 			X			
Kentucky	Yes	N/A						
Louisiana	Yes	N/A						
Maine ²	No	<ul style="list-style-type: none"> Children Household members with different eligibility statuses 	X					
Maryland	No	<ul style="list-style-type: none"> Children 		X				
Massachusetts	No	<ul style="list-style-type: none"> Household members with different eligibility statuses 		X				

² Maine paused all procedural disenrollments as part of a prior mitigation plan

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			None	< 10,000	10,000 – 49,999	50,000 – 99,999	>100,000	Still Assessing
Michigan	Yes	N/A						
Minnesota	No	TBD						X
Mississippi	Yes	N/A						
Missouri	Yes	N/A						
Montana	Yes	N/A						
Nebraska	No	<ul style="list-style-type: none"> • Children • Household members with different eligibility statuses 						X
Nevada	No	<ul style="list-style-type: none"> • Children • Household members with different eligibility statuses 					X	
New Hampshire	Yes	N/A						
New Jersey	No	<ul style="list-style-type: none"> • Children • Household members with different eligibility statuses 		X				
New Mexico	No	<ul style="list-style-type: none"> • Household members with different eligibility statuses 		X				
New York	No	<ul style="list-style-type: none"> • Children • Household members with different eligibility statuses 				X		
North Carolina	Yes	N/A						

State	States Attesting to Auto-Renewing at the Individual Level, Consistent with Federal Requirements	Affected Population(s) ¹	Estimated Number of Affected Individuals					
			None	< 10,000	10,000 – 49,999	50,000 – 99,999	>100,000	Still Assessing
North Dakota	No	<ul style="list-style-type: none"> Children Household members with different eligibility statuses 		X				
Ohio	No	<ul style="list-style-type: none"> Children Household members with different eligibility statuses 			X			
Oklahoma	Yes	N/A						
Oregon	No	<ul style="list-style-type: none"> Household members with different eligibility statuses 						X
Pennsylvania ³	No	<ul style="list-style-type: none"> Children Household members with different eligibility statuses 					X	
Puerto Rico	Yes	N/A						
Rhode Island	Yes	N/A						
South Carolina	Yes	N/A						
South Dakota	Yes	N/A						
Tennessee	Yes	N/A						
Texas	Yes	N/A						
U.S. Virgin Islands	Yes	N/A						
Utah	Yes	N/A						

³Pennsylvania reported the number of individuals impacted at the household (instead of individual) level.

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			None	< 10,000	10,000 – 49,999	50,000 – 99,999	>100,000	
Vermont	No	<ul style="list-style-type: none"> • Children • Household members with different eligibility statuses 		X				
Virginia	No	<ul style="list-style-type: none"> • Children • Household members with different eligibility statuses 			X			
Washington	Yes	N/A						
West Virginia	No	<ul style="list-style-type: none"> • Children 		X				
Wisconsin	No	<ul style="list-style-type: none"> • Household members with different eligibility statuses 		X				
Wyoming	No	<ul style="list-style-type: none"> • Children • Household members with different eligibility statuses 			X			