

Medicaid Community Engagement Requirements: Impact on Vulnerable Populations

Beginning no later than January 1, 2027, certain Medicaid expansion adults will generally be required to complete 80 hours per month of qualifying activities, including employment, education, work programs, or community service, unless they qualify for an exclusion or exception.

The impact on vulnerable populations will depend significantly on how states identify exemptions, communicate requirements, verify compliance, and assist individuals with the process.

Populations Most Likely to Face Barriers

People Experiencing Homelessness

Homelessness alone does not qualify someone for an exclusion. People without stable housing may face greater difficulty receiving notices, maintaining contact information, accessing the internet, providing documentation, or verifying employment and other qualifying activities. Many may qualify for another exclusion because of disability, serious medical conditions, mental health conditions, or substance use disorders, but those circumstances must be identified and documented.

People With Transportation Barriers

Lack of transportation is not a categorical exclusion. In rural areas, individuals without reliable transportation may have difficulty accessing employment, education, community service, workforce programs, medical providers, or eligibility assistance needed to meet or document requirements.

People With Disabilities or Significant Health Conditions

Certain disabilities, serious medical conditions, disabling mental health conditions, and substance use disorders may qualify an individual for an exclusion. Individuals who do not qualify for an exclusion may still be entitled to reasonable modifications under federal disability protections. Ensuring eligible individuals are correctly identified will be an important part of implementation.

Families With Childcare Barriers

Parents, guardians, caretaker relatives, and qualifying family caregivers of dependent children age 13 or younger may qualify for an exclusion from the community engagement requirement. Families may still face administrative barriers if caregiver status is not automatically identified or verified. Parents of older children who do not qualify for another exclusion may be subject to the requirement, and limited or unaffordable childcare could affect their ability to consistently participate in qualifying activities. Families experiencing homelessness may face additional challenges related to unstable childcare arrangements and transportation.

Who May Be Excluded or Excepted?

Not everyone covered by Medicaid's adult group will be required to complete community engagement activities. Depending on individual circumstances, exclusions or exceptions may apply to:

- Parents and caregivers of dependent children age 13 or younger
- Individuals with qualifying disabilities or serious or complex medical conditions
- Individuals with disabling mental health conditions or substance use disorders
- Pregnant and certain postpartum individuals
- Individuals meeting qualifying requirements through other recognized programs or circumstances
- Individuals experiencing certain short term hardships

Eligibility depends on the specific exclusion or exception and how the state verifies it. For service providers, an important first step will be determining whether an individual may qualify for an exclusion or exception before focusing on documenting the 80 hour requirement.

Administrative & Procedural Impact

Some individuals may experience coverage interruptions because of procedural issues rather than failure to participate in qualifying activities. Potential barriers include missed or delayed Medicaid notices, difficulty completing verification, limited phone or internet access, lack of documentation, and changes in address or contact information.

These barriers may disproportionately affect people experiencing homelessness, housing instability, disability, or other barriers to accessing and maintaining benefits.

Recommendations for Homeless Service Providers

Homeless service providers can help reduce administrative and access barriers by:

- **Screening for exclusions and exceptions first**, including disability, medical or behavioral health conditions, caregiver status, and other qualifying circumstances.
- **Helping maintain current contact information**, with Medicaid and providing a reliable mailing address when appropriate and permitted.
- **Assisting with notices and documentation**, including understanding deadlines, submitting verification, and retaining records.
- **Providing access to phones, internet, computers, printing, and scanning**, for Medicaid related requirements.
- **Addressing transportation and childcare barriers**, by connecting households with available transportation, childcare, employment, education, workforce, and community resources.
- **Building referral pathways**, with Medicaid, MCOs, health centers, behavioral health providers, legal assistance, and benefits navigators.
- **Training frontline staff**, on requirements, exclusions, documentation processes, and referral options.

Considerations for West Virginia

As implementation develops, key questions for homeless service providers and community partners include:

- How will WV Medicaid automatically identify individuals who qualify for exclusions or exceptions?
- How will people without stable addresses, phones, internet, transportation, or childcare receive notices and navigate requirements?
- What documentation will be accepted to establish exclusions and exceptions?
- What role can shelters, outreach teams, health providers, and community organizations play in implementation?
- What processes will prevent or quickly resolve coverage interruptions caused by documentation or procedural issues?

Key Takeaway

For vulnerable populations, the practical impact will involve more than meeting the 80 hour requirement. Identifying exclusions and exceptions and ensuring people can document them will be equally important. Access to communication, transportation, childcare, documentation, disability accommodations, and eligibility assistance will affect whether individuals can maintain Medicaid coverage.

Contact Information

West Virginia Bureau for Medical Services

For information and assistance with upcoming Medicaid changes, including community engagement requirements, exclusions and exceptions, reporting requirements, and maintaining Medicaid coverage, visit <https://wvmedicaidhelp.org>.

Sources: [Centers for Medicare & Medicaid Services: Medicaid Program: Community Engagement Requirement for Certain Individuals, Federal Register, June 3, 2026](#); [West Virginia Bureau for Medical Services: New Medicaid Rules Are Coming](#); and [WV Medicaid Help](#).

These resources provide additional information on upcoming Medicaid changes, including community engagement requirements, qualifying activities, exclusions and exceptions, implementation timelines, eligibility and coverage considerations, and resources for individuals who may need assistance navigating Medicaid requirements.