

Medicaid Expansion Eligibility Verification - CER Exemptions

Specified Exclusions

Beginning on January 1, 2027, Medicaid Expansion enrollees will be required to comply with Community Engagement Requirements (CER), also known as “work requirements.” Pennsylvania has developed specified exclusions for individuals enrolled in Medicaid Expansion that will not have to demonstrate compliance with the CERs. Eligibility notices sent from the Pennsylvania Department of Human Services (DHS) will include information for individuals who meet criteria for an exclusion. DHS will also provide notice if an individual loses an exclusion.

To verify whether or not an individual is eligible for an exemption, Pennsylvania will use data from existing, reliable sources. Some exemptions will also require documentation from the enrollee. In 2027, enrollees will have the option to “self-attest,” or state for themselves that they qualify for an exemption. Beginning in 2028, federal law will prohibit states from accepting self-attestation, so exemptions will need to be formally documented in order to maintain coverage. The chart below describes the specified exclusions in Pennsylvania, along with any documentation that may be required.

Category	Definition	Verification Needed Before 1/1/28	Client Verification Needed After 1/1/28
Former Foster Care	Former Foster Care Youth (FFCY) eligibility is mandatory Medicaid coverage for individuals under 26 who aged out of foster care in a qualifying state (or any state under State Option) and were enrolled in Medicaid at that time.	Existing data to be utilized. No reverification specific to CERs will be needed.	Existing data to be utilized. No reverification specific to CERs will be needed.
American Indian	Members of a federally recognized tribe as defined by 25 USC 1603(13), 1603(28), or 1679(a), or those who have been determined eligible American Indian under 42 CFR 136.12.	Existing data will be utilized along with verification policy. No reverification specific to CERs will be needed.	Existing data will be utilized along with verification policy. No reverification specific to CERs will be needed.
Caretaker Relative	A Caretaker Relative is any adult that lives with the dependent child or dependent individual and assumes primary responsibility for the child or individual’s care. There may be more than one Caretaker Relative in the same household.	The State will use reliable information that is available. PA will accept self-attestation of Caretaker Relative status unless questionable.	The State will use reliable information that is available. PA will accept self-attestation of Caretaker Relative status unless questionable.
Family Caregiver	A Family Caregiver is an adult family member, or another adult with a significant relationship, who provides care and assistance. This can include individuals who live in the same household, are a relative, or another individual who provides at least 80 hours of care per month.	The State will use reliable information that is available. Documentation from the enrollee is optional.	The State will use reliable information that is available. Documentation from the enrollee will be required.

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Veterans with 100% Disability	Applies to veterans with a VA disability rating of 100% ("total") or veterans receiving Total Disability based on Individual Unemployability (TDIU). Applicable regardless of whether the status is temporary or permanent, but temporary status will need verified at least every 12 months.	The State will use reliable information that is available. Documentation from the enrollee is optional.	Reverification will be required for individuals with temporary status but not for individuals with permanent status. Documentation will be required from the enrollee.
SNAP Recipient	If an individual is in a household that receives SNAP benefits and is subject to SNAP CERs, they meet the definition of a specified excluded individual.	The State will use information available in the system.	The State will use information available in the system.
TANF Recipient	If an individual is in a household that receives TANF benefits and is subject to TANF CERs, they meet the definition of a specified excluded individual.	The State will use information available in the system.	The State will use information available in the system.
D&A Treatment Programs	Anyone participating in a qualifying drug addiction or alcohol treatment program and rehabilitation as defined by section 3(h) of the Food and Nutrition Act of 2008 is a specified excluded individual. Active participation is defined by the State, but it must be current at the time of the review period.	The State will use reliable information available in their system. Documentation will be optional.	The State will use reliable information available in their system. Documentation from the enrollee will be required.
Inmates	Any individual in custody and held involuntarily through the operation of law enforcement authorities inside a public institution, such as prison, jail, or detention facility.	The State will use reliable information available in their system. Documentation will be optional.	The State will use reliable information available in their system. Documentation from the enrollee will be required.
Pregnant and Postpartum	The State must accept an attestation of pregnancy unless the State has information that is questionable or not reasonably compatible with such attestation. Postpartum information is available in the State's system.	The State will use reliable information available in their system. Documentation will be optional.	The State will use reliable information available in their system. Documentation will be optional.