

Identifying Individuals Impacted by H.R.1

This decision tree was developed by Bowling Business Strategies, in partnership with the National Council for Mental Wellbeing, as part of the H.R.1 Redetermination Community of Practice. It is intended to help organizations identify which individuals are most likely impacted by H.R.1's Medicaid community engagement requirements and provide guidance on actions the organization should take to support continuity of coverage. This tool should only be used for individuals ages 19-64 covered by Medicaid Expansion. Definitions for all categories are provided as an appendix to this document. Information is current as of July 2026.

Alternatively, [view the decision tree](#) in an interactive, online format.

Determine whether the individual is excluded. There are several categories of “Specified Excluded Individual” which are not subject to community engagement requirements. Excluded individuals may be identified automatically by the State using data from the month of evaluation; however, provider organizations may need to advocate to ensure qualifying individuals are excluded by helping to gather or provide the necessary verification. This is especially important if an individual receives a prepopulated renewal form seeking additional information to verify excluded status. Provider organizations should explore all potential exclusions or exceptions to allow for back-up plans in case of insufficient documentation. In most cases, excluded individuals are still likely to be subject to 6-month redeterminations.

1. Does the individual have a disability or physical or behavioral health condition that significantly impairs their ability to work (i.e., [medically frail](#))?

- a. **Yes — medically frail:** The individual is *not* subject to community engagement requirements while they meet this exclusion. States must reverify at least every 12 months if based on data and at the next renewal if based on self-attestation. Provider organizations should help individuals collect and submit documentation, monitor status between redeterminations, and support community engagement if the condition no longer impairs the individual's ability to work and they do not qualify for other excluded status or exceptions. **Continue to Question 2.**
- b. **No:** **Continue to Question 2.**

2. Is the individual participating in a public or non-profit drug [addiction or alcohol treatment](#) and rehabilitation program?

- a. **Yes — SUD treatment:** The individual is *not* subject to community engagement requirements while they meet this exclusion. States must reverify at least every 12 months if based on data and at the next renewal if based on self-attestation. *Note that federal guidance does not specify the intensity of treatment required to meet this exclusion; this is determined at the state level.* Private for-profit treatment programs do not meet this requirement although an individual with SUD may qualify under the medically frail category. Provider organizations should help individuals collect and submit documentation, monitor status between redeterminations, and support community engagement if the condition no longer impairs the individual's ability to work and they do not qualify for other excluded status or exceptions. **Continue to Question 3.**
 - b. **No:** **Continue to Question 3.**
3. Is the individual a parent, guardian, or caretaker relative of a dependent child under 14 or of a disabled individual?
- a. **Yes – caregiver:** The individual is *not* subject to community engagement requirements while they meet this exclusion. States must reverify at least every 12 months if based on data and at the next renewal if based on self-attestation. Provider organizations should help individuals collect and submit documentation, monitor status between redeterminations, and support community engagement if the individual's caregiver status changes and they do not qualify for other excluded status or exceptions. It is particularly important to monitor the age of the individual's dependent(s). **Continue to Question 4.**
 - b. **No:** **Continue to Question 4.**
4. Is the individual a disabled veteran?
- a. **Yes – disabled veteran:** The individual is *not* subject to community engagement requirements while they meet this exclusion. States must reverify at least every 12 months if based on data and at the next renewal if based on self-attestation. Provider organizations should help individuals collect and submit documentation, monitor status between redeterminations, and support community engagement if the individual's

disability status changes and they do not qualify for other excluded status or exceptions. [Continue to Question 5.](#)

- b. **No:** [Continue to Question 5.](#)

5. Does the individual's [household receive SNAP](#) for which they are subject to work requirements?

- a. **Yes – SNAP:** The individual is *not* subject to community engagement requirements while they meet this exclusion. States must reverify at least every 12 months if based on data and at the next renewal if based on self-attestation. Provider organizations should help individuals collect and submit documentation, monitor status between redeterminations, and support community engagement if the individual's SNAP status changes and they do not qualify for other excluded status or exceptions. [Continue to Question 6.](#)
- b. **No:** [Continue to Question 6.](#)

6. Is the individual [compliant with TANF](#) work requirements?

- a. **Yes – TANF compliant:** The individual is *not* subject to community engagement requirements while they meet this exclusion. States must reverify at least every 12 months if based on data and at the next renewal if based on self-attestation. Provider organizations should help individuals collect and submit documentation, monitor status between redeterminations, and support community engagement if the individual's TANF compliance status changes and they do not qualify for other excluded status or exceptions. [Continue to Question 7.](#)
- b. **No:** [Continue to Question 7.](#)

7. Is the individual an [American Indian or Alaska Native](#)?

- a. **Yes – AI or AN:** The individual is *not* subject to community engagement requirements. This is a permanent exclusion category once verified by the state. Provider organizations should help individuals collect and submit documentation. [Continue to Question 8.](#)
- b. **No:** [Continue to Question 8.](#)

8. Is the individual a [former foster youth](#) under age 26?

- a. **Yes – former foster:** The individual is *not* subject to community engagement requirements while they meet this exclusion. States must reverify at least every 12 months if based on data and at the next renewal if based on self-attestation. Provider organizations should help individuals collect and submit documentation, monitor status between redeterminations, and support community engagement as the individual approaches age 26 if they do not qualify for other excluded status or exceptions. *Continue to Question 9.*
- b. **No:** *Continue to Question 9.*

9. Is the individual an inmate in a public institution?

- a. **Yes – inmate:** The individual is *not* subject to community engagement requirements while they meet this exclusion. States must reverify at least every 12 months if based on data and at the next renewal if based on self-attestation. Provider organizations should help individuals collect and submit documentation, monitor status between redeterminations, and support community engagement if the individual's status changes and they do not qualify for other excluded status or exceptions. *Continue to Question 10.*
- b. **No:** *Continue to Question 10.*

10. Is the individual pregnant or postpartum?

- a. **Yes – PPP:** The individual is *not* subject to community engagement requirements while they meet this exclusion. Provider organizations should help individuals collect and submit documentation, monitor status between redeterminations, and support community engagement if the individual's status changes and they do not qualify for other excluded status or exceptions. Many individuals in this category may transition to the caregiver exclusion after the postpartum period. *Continue to Question 11.*
- b. **No:** *Continue to Question 11.*

Determine whether the individual meets the community engagement requirements.

11. Has the individual spent at least 80 hours per month working, providing documented community service, and/or participating in an education program?

- a. **Yes — 80 hours met:** The individual is likely to meet community engagement requirements. Provider organizations should help individuals collect and submit documentation. In case of any difficulty verifying having met

community engagement requirements, this individual may still be eligible for an exception. *Continue to Question 12 to explore exceptions.*

- b. **No — 80 hours not met:** The individual is not likely to meet community engagement requirements and is at risk for loss of eligibility. *Continue to Question 12 to assess whether the individual meets criteria for an exception during this redetermination period.*

Determine whether the individual meets criteria for an exception. Individuals will be evaluated for an exception in the lookback month(s), which vary from 1-3 months, depending on the state.

12. Was the individual released from incarceration in the last 90 days?

- a. **Yes — mandatory exception:** The individual is *not* subject to community engagement requirements for this redetermination period. *This will be reassessed during the next redetermination period.* This exception should be initiated automatically by the State. Provider organizations should help collect documentation. If the individual is not expected to meet this exception next period, support them in meeting community engagement requirements or pursuing eligibility under an exclusion. *Continue to Question 13.*
- b. **No:** *Continue to Question 13.*

13. Does your state accept “Short-Term Hardship Exceptions”?

- a. **Yes – short-term hardship:** *Continue to Question 14.*
- b. **No:** The individual is not likely to meet community engagement requirements, deeming them ineligible for Medicaid this redetermination cycle. Provider organizations should support the individual in meeting requirements. Once the individual has met community engagement requirements for 1-3 months, depending on the requirements in your state, the individual has met community engagement requirements and can reapply for Medicaid.

14. Did the individual receive inpatient or similar care during the lookback period?

- a. **Yes — inpatient:** The individual may meet criteria for an exception to community engagement requirements *for this redetermination period.* This will be reassessed during the next redetermination period. Provider

organizations should help collect documentation and *help initiate the request for the exception*. Given the short-term nature of the exception, provider organizations should assess whether they are likely to be considered excluded during the next redetermination cycle. If not, support the individual in meeting requirements.

- b. **No:** Continue to Question 15.

15. Did the individual travel outside of their community for part or all of a month to receive medical services for themselves or their dependent or otherwise require a leave for reasons related to the dependent's condition or travel?

- a. **Yes — medical travel:** The individual is *not* subject to community engagement requirements *for this redetermination period*. This will be reassessed during the next redetermination period. Provider organizations should help collect documentation and *help initiate the request for the exception*. Given the short-term nature of the exception, provider organizations should assess whether they are likely to be considered excluded during the next redetermination cycle. If not, support the individual in meeting requirements.

- b. **No:** Continue to Question 16.

16. Does the individual live in a county in which there exists a declared emergency or high unemployment rate?

- a. **Yes — declared emergency/high unemployment:** The individual is *not* subject to community engagement requirements *for this redetermination period*. This exception should be initiated automatically by the State. This will be reassessed during the next redetermination period. Given the short-term nature of the exception, provider organizations should assess whether they are likely to be considered excluded during the next redetermination cycle. If not, support the individual in meeting requirements.
- b. **No:** The individual is not likely to meet community engagement requirements, deeming them ineligible for Medicaid this redetermination cycle. Provider organizations should support the individual in meeting requirements. Once the individual has met community engagement requirements for 1-3 months, depending on the requirements in your state, the individual has met community engagement requirements and can reapply for Medicaid.

Definitions for Specified Excluded Individuals

Category	Definition in Interim Final Rule with Comment Period (IFC)
Former foster care youth	Enrolled in Medicaid while in foster care and then exited foster care or “aged out” without an adoption or other permanency and are <i>under age 26</i> . Return to Question 8 .
American Indians or Alaska Natives	Individuals from federally recognized tribes and any individuals eligible for services at an IHS facility, Tribally-operated facility, or Urban Indian Organization. <i>States will not be required to re-verify this exception once established</i> . Return to Question 7 .
Caregivers of a dependent child 13 and under, or a disabled individual	Parent, guardian, caretaker relatives, or family caregivers. CMS adopts the Americans with Disabilities Act definition of disability to determine who qualifies as a disabled individual. An individual need not be eligible for Medicaid or other federal programs on the basis of a disability to be a disabled individual under this definition. This definition applies to any age, including older adults who require assistance of varying scope in performing activities of daily living. Return to Question 3 .
Veterans with a total disability rating	Total disability based on individual unemployability, as well as veterans with a combined rating of 100%. Return to Question 4 .
Meet the TANF work requirements	States should confirm if an individual meets TANF work requirements according to state criteria as requirements will vary. Return to Question 6 .
SNAP household member subject to work requirements	Individuals in households receiving SNAP and subject to SNAP work requirements (not exempt from). CMS interprets statutory language in H.R.1 saying “not exempt from” SNAP work requirements to mean “subject to” SNAP work requirements. States are not required to confirm compliance with SNAP work requirements. Return to Question 5 .

Participant in a Drug or Alcohol Rehabilitation Program	Any individual participating in a drug addiction or alcoholic treatment and rehabilitation program. Programs include any such program conducted by a private <i>non-profit</i> organization or institution or a <i>publicly operated</i> community mental health center to provide treatment that can lead to rehabilitation. States may establish a minimum time commitment requirement. Return to Question 2 .
Inmates of a Public Institution	An individual that is in custody and held involuntarily by law enforcement. Individuals in correctional institutions such as state and federal prisons, local jails, detention facilities, or other penal settings. Return to Question 9 .
Pregnant or Postpartum	A pregnant woman or a woman who is receiving Medicaid under either the mandatory postpartum period or the 12-month postpartum extension. Return to Question 10 .
Medically Frail	CMS notes that this exception should not be determined by a diagnosis alone, but rather by the impact of the condition on an individual's ability to comply with community engagement requirements. See following table for detail. Return to Question 1 .

Definitions of Medical Frailty Categories

Category	Definition in IFC
Blind or Disabled	Blind: Central visual acuity of 20/200 or less in the better eye with use of a correcting lens. Disabled: Unable to engage in any substantial gainful activity by reason of any medically determinable physical or mental impairment which can be expected to result in death, or which has lasted or can be expected to last for a continuous period of not less than 12 months.

Substance Use Disorder	SUD <i>significantly impairs an individual's ability to comply with the community engagement requirements</i> . Excludes individuals in recovery for 5 or more years. CMS believes the exception applies whether someone is in active treatment or not. CMS declines to further define SUD in regulation but directs states to DSM-5 and ICD-10 as useful resources.
Disabling Mental Disorder	CMS declines to fully define a disabling mental disorder and directs states to consider <i>whether the disorder significantly impairs an individual's ability to comply with the community engagement requirements</i> . CMS further notes states may find ISMICC, DSM-5, and ICD-10 to be useful resources. CMS notes states may also consider including specific conditions as disabling mental conditions.
Physical, intellectual, or developmental disability	Disability must impair the individual from performing at least one or more activity of daily life (ADL). CMS again notes it may be reasonable for states to consider including specific conditions.
Serious or complex medical condition	A medical condition that is life threatening, seriously disabling without necessarily being life threatening, causing significant pain or discomfort that can cause serious interruptions to life activities, requiring a major time or effort commitment from caregivers for a substantial period of time, requiring frequent monitoring, associated with severe consequences or negative consequences for someone else, affecting multiple organ systems, requiring management to tight physiological parameters, requiring coordination of multiple specialties, requiring treatment that carries a risk of serious complications, or requiring adjustment in non-medical environments. CMS notes there may be variance in acuity even within the same condition and throughout the course of illness. As such, CMS directs states to evaluate and verify an individual's condition according to the impact on their ability to comply with community engagement requirements.

Mandatory Exceptions

Under the age of 19

Entitled to or enrolled
for benefits under
Medicare Part A

Enrolled in
Medicare Part B

In a mandatory
categorically needy
eligibility group

Was an inmate in a public
institution at any point
during a 3-month period
preceding community
engagement applicability

Return to [Question 12](#).

Optional Short-Term Hardship Exceptions

Short-term hardship exceptions that states may choose to allow

Receives inpatient hospital, nursing facility, intermediate care facility for individuals with intellectual disabilities, inpatient psychiatric hospital services, or other services of similar acuity

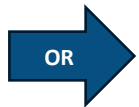
Resides in a county in which an emergency or disaster has been declared

Resides in a county in which unemployment is at or above 8% or 1.5 times the national unemployment rate (the lesser of)

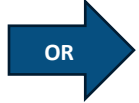
Must travel outside of their area for medical services not available in their community to treat a serious or complex medical condition

Return to [Questions 14-16](#).

Community Engagement Requirements



- Can demonstrate a monthly income of at least \$580



- Can demonstrate 80 hours per month enrolled in an educational program at least half-time
- Can demonstrate 80 hours per month of **any combination** of the following activities:
 - Work: paid, in-kind, or unpaid
 - Community service: unpaid work completed as part of a structured program under a public or non-profit organization
 - Participation in a work program: State or federally recognized employment and training programs

Return to [Question 11](#).