

# Preparing for Medicaid Work Requirements

## The Problem

As the January 2027 deadline approaches for implementation of Medicaid's new work and community engagement requirements, physicians may experience an increase in requests for documentation supporting exemption status. These requests will generally require documentation that a patient:

- a) Is medically frail; or
- b) Has a serious or complex medical condition.

At present, there are no clear or universally accepted definitions of these terms, but CMS is expected to issue guidance by June 2026. In the meantime, these requests may create substantial administrative burden or disrupt clinical workflows which can harm patient care.

## The Solution

A combination of documentation, workflow, and policy modifications can significantly reduce the administrative burden from exemption requests. These include:

### 1. Developing standardized EHR templates for exemption documentation.

Templates may include:

- Relevant ICD-10 diagnoses
- Assessment of functional limitations (e.g., impact on ADLs, work capacity)
- Expected duration (temporary vs. chronic)
- Supporting objective data (labs, imaging, specialist evaluations)
- Clear clinical rationale

*Tip: State Medicaid agencies may publish sample forms or required documentation elements that can be incorporated directly into EHR templates.*

### 2. Establishing clear staff triage protocols.

Staff should be trained to:

- Confirm that a qualifying diagnosis exists in the medical record
- Verify a recent clinical evaluation (e.g., within the past six months)
- Escalate only appropriate requests to the physician

*Tip: Structured intake processes can prevent informal or incomplete requests from reaching the level of the physician.*

### 3. Adopting transparent administrative policies.

Practices may consider:

- Requiring an appointment (in-person or telehealth) for exemption certification
- Setting defined turnaround times for form completion
- Charging reasonable administrative fees where permitted under state law

*Tip: Proactive planning now can help protect clinical time, preserve workflow efficiency, and ensure documentation remains accurate and aligned with forthcoming federal guidance.*