

RESEARCH REPORT

Medicaid Work Requirements in Arkansas

Who Could Be Affected, and What Do We Know about Them?

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May 2018



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Acknowledgments

This report was funded by the Robert Wood Johnson Foundation. We are grateful to them and to all our funders, who make it possible for Urban to advance its mission.

The views expressed are those of the authors and should not be attributed to the Robert Wood Johnson Foundation or the Urban Institute, its trustees, or its funders. Funders do not determine research findings or the insights and recommendations of Urban experts. Further information on the Urban Institute's funding principles is available at urban.org/fundingprinciples.

The authors appreciate the helpful suggestions and assistance of Stephen Zuckerman, Elaine Waxman, Laura Wheaton, Judy Solomon, MaryBeth Musumeci, Sara Rosenbaum, Katherine Hempstead, Giridhar Mallya, and Jason Gates.

Introduction

The Centers for Medicare & Medicaid Services (CMS) released guidance in January 2018 that paved the way for states to make “work or other community engagement” activities a condition of Medicaid eligibility as part of Section 1115 waiver demonstration projects.¹ More recently, the White House released an executive order directing “welfare programs” to “strengthen requirements that promote obtaining and maintaining employment in order to move people to independence.”² As of this report’s publication, 11 states have submitted proposals to CMS to add work requirements to their Medicaid programs, and Arkansas is expected to be the first state to implement them.³ Mandating work or community engagement activities constitutes a significant departure from Medicaid policy over the past 50 years, which allowed only voluntary linkages to job search and training programs (Hahn et al. 2017).

Under the CMS guidance, qualifying activities include employment, job searches, skills training, education, tribal employment programs, volunteering; and caregiving. Groups who would be excluded are children; elderly people (those age 65 or older); pregnant women; and those who are medically frail, who have an acute condition that prevents them from complying with the requirements, or who qualify for Medicaid because of a disability.

This report builds on our previous analysis of the size and composition of the groups who could be affected by Medicaid work and community engagement requirements in Kentucky, the first state to have Medicaid work requirements approved by CMS (Gangopadhyaya and Kenney 2018). Here, we assess patterns in Arkansas, which is planning to implement the “Arkansas Works” program on June 1, 2018.⁴ We use the information available on Arkansas’s work requirements along with data collected through the US Census Bureau’s American Community Survey (ACS) to estimate the number of nonelderly adult Medicaid enrollees in Arkansas who are not receiving Supplemental Security Income (SSI) disability benefits and are not dually enrolled in Medicare.⁵ We divide these enrollees into three groups:

- **Group 1—Enrollees who are likely exempt from work requirements in Arkansas:** These enrollees (1) are nonelderly adults in an age group exempt from the work requirement, (2) are in a household with children under age 18, (3) are a caregiver of a household member who is receiving SSI disability benefits, or (4) are attending school.
- **Group 2—Enrollees who are potentially subject to work requirements in Arkansas and working:** These enrollees do not fall into one of the exemption categories for Group 1 and are

working at the time of the survey. Some of these enrollees may be working more than 80 hours a month at above the Arkansas minimum wage “on an ongoing basis” and therefore may be exempt from reporting their work-related hours.⁶

- **Group 3—Enrollees who are potentially subject to work requirements in Arkansas and not working:** These enrollees do not fall into one of the exemption categories for Group 1 and are not working at the time of the survey.

In our analysis, we exclude enrollees who report receiving SSI disability benefits and those who are dually enrolled in Medicare and Medicaid because these groups will be excluded from work requirements under the waiver. Throughout this report, we use the term “nondisabled” to refer to nonelderly Medicaid enrollees who are not receiving SSI or are not dually enrolled in Medicaid and Medicare. We have proxy information for four criteria that can earn a Medicaid enrollee an exemption from work requirements (i.e., whether a person is in an age group exempt from the work requirement, whether a person is attending school, whether a person lives with a dependent child under age 18, and whether a person is a caregiver of a household member receiving SSI), and we put enrollees with those characteristics in Group 1. We classify all nonelderly adult enrollees who do not satisfy at least one of these exemption criteria as potentially subject to work requirements (i.e., they are in either Group 2 or Group 3). Using employment status, we further distinguish between individuals who are working (Group 2) and those who are not (Group 3).

Our estimates may underestimate the number of enrollees in Group 2 because the ACS does not capture information about community service and other activities that will qualify an enrollee as having met Arkansas's work requirements. We also may underestimate the number of enrollees in Group 1 because Arkansas will exempt other groups of people because of characteristics not captured in the ACS data (e.g., enrollees who are medically frail, are pregnant or have given birth within 60 days, are temporarily incapacitated, are medically certified as physically or mentally unfit for employment, etc.). See appendix A for further detail on our methodology, analysis limitations, and variable definitions.

For each group, we assess reported socioeconomic characteristics and serious health limitations that might limit enrollees' ability to work. Because Arkansas will require some enrollees to report qualifying exemptions or completed work-related activities online, we also examine whether enrollees in each group report having access to the internet in their household. Further, because some parts of Arkansas do not have public transportation, we also examine whether enrollees in each group report having access to a car in the household, which might be needed to travel to work or other qualifying activities, to meet with caseworkers, or to gain access to a public computer. Given the need for

participants to understand, obtain, and document exemptions or to understand, fulfill, and consistently document compliance with work requirements, enrollees in all three groups could be at risk of losing Medicaid coverage following implementation of the new work requirements, but the risk of coverage loss is likely greatest among Group 3 (those who are potentially nonexempt and not working).

In a letter approving Arkansas’s waiver, CMS states that work requirements in Medicaid “promote health and wellness through increased upward mobility, greater independence, and improved quality of life.”⁷ Although employment and income generated from work may be associated with improved health, we find that some nonelderly, nondisabled Medicaid enrollees in Arkansas may face significant barriers to working. Group 2 enrollees are working, but they may risk losing their Medicaid coverage throughout the year because of the high turnover and seasonality of certain low-wage occupations as well as the lack of affordable private health insurance options available to many low-wage workers.

Because the CMS guidance indicates that people who are compliant with or exempt from work requirements in the Supplemental Nutrition Assistance Program (SNAP, formerly known as Food Stamps) will be considered compliant with Medicaid work requirements, we also assess how many enrollees this might affect.⁸

Key Findings

- **We estimate that approximately 269,000 nonelderly nondisabled⁹ adults were enrolled in Arkansas’s Medicaid program in 2016.** Of these, we estimate that about 198,000 (74 percent) would be in Group 1 (exempt from work requirements), about 31,000 (12 percent) would be in Group 2 (potentially nonexempt but already working), and 39,000 (15 percent) would be in Group 3 (potentially nonexempt and not working) when the waiver is fully phased in. In our main analysis, we consider enrollees who are under 30 as potentially nonexempt because they will be subject to work requirements once the waiver is fully phased in; we include a supplemental analysis that considers this age group exempt because they will not be subject to the work requirements in 2018. In 2018, when enrollees under age 30 will be exempt, the share who will likely qualify for one of the exemptions we model (Group 1) rises to 86 percent, and the shares of enrollees in Group 2 and Group 3 fall to 6 percent and 8 percent, respectively.
- **Group 1 consists of Medicaid enrollees likely to be exempt from work requirements.** Medicaid enrollees in this group are likely to qualify for an exemption from work requirements because they are near-elderly, live in a household with a dependent child under age 18, are

caring for a household member receiving SSI disability benefits, or are students. Among this group, 47 percent are working and 28 percent are in deep poverty (that is, they have incomes below 50 percent of the federal poverty level, or FPL).

- **Group 2 consists of Medicaid enrollees potentially subject to work requirements who are already working.** Among Group 2 enrollees in Arkansas, we find that 32 percent did not work at least 48 weeks and 20 hours a week in the past year and thus would not meet the state’s work requirements throughout the entire year. In the weeks that they worked, Group 2 enrollees averaged 35 hours of work a week, far exceeding the 20 hours a week average that Arkansas would require over the course of a year. For those in this group required to report their work hours online, complying with the work requirements each month as well as a lack of internet access could make it difficult for some Group 2 enrollees in Arkansas to fulfill or document that they are fulfilling the requirements—25 percent of Group 2 enrollees have no internet access in the home, and 53 percent lack broadband access.
- **Group 3 consists of Medicaid enrollees potentially subject to work requirements who are not working.** Thirty-one percent of Group 3 enrollees have no access to the internet. Seventy-eight percent of the nonelderly adults in this group have one or more of the following attributes: no access to a vehicle in their household, no access to the internet in their household, less than a high school degree, a serious health limitation, or a household member with a serious health limitation. Although exempting enrollees below age 30 substantially reduces the number of enrollees estimated to be in Group 3, estimates of internet access and potential barriers to working and documenting completed work hours are qualitatively similar in both cases.

Background on Work Requirements in Arkansas’s Medicaid Program

In preparation for implementing work requirements, Arkansas has posted information on its Department of Human Services website to alert enrollees to the upcoming changes in Medicaid and, in particular, who will be affected by the community engagement provisions.¹⁰ An informational flyer indicates:¹¹

“You are getting this notice because you have Arkansas Works Health Insurance. Some people who get Arkansas Works have to participate in work activities to keep their health insurance coverage. Those people will have to report work activities to DHS. During 2018, this does NOT apply to anyone who is:

- 29 or younger
- 50 or older.

For everyone else: DHS decides if you have to report work activities. DHS needs some information from you to decide that. This notice explains how to report work activities and what kinds of activities DHS accepts...”

The document lists several reasons why enrollees may qualify for an exemption from having to report on work activities in Arkansas:

“I... work at least 80 hours per month at Arkansas minimum wage¹²; have a disability (including blindness) or need help with daily living activities; have a child under age 18 in my home; am pregnant or was pregnant within the last 60 days; care for a person who cannot care for him/herself; ... go to school, vocational, or job training full time.”

The state plans to use a combination of administrative data and information reported by enrollees to determine their exemption status. Where applicable, enrollees are directed to www.access.arkansas.gov to report the exemptions they might qualify for and are informed that the state’s Department of Human Services will respond in writing with information on next steps. Notices will be sent to inform nonexempt enrollees that they would be required to meet the work requirements and to indicate a date by which they would have to appeal.¹³ These notices contain information on where free job-search help, referrals to free GED classes, and other assistance is available, and they direct enrollees to Arkansas Department of Workforce Services centers across the state.¹⁴

Table 1 provides information on the structure of work requirements and exemptions in Arkansas as approved by CMS. Arkansas will require that nonexempt enrollees complete 80 hours of work or other qualifying activities a month for 10 months of the year and will further require that beneficiaries report their compliance online unless they qualify for a reporting exemption. Arkansas will not permit enrollees who work more than the required hours in a single month to apply surplus hours to a future month’s work requirements and will disenroll people for the remainder of the calendar year once they have failed to meet the state’s work requirements for three months. Nonexempt enrollees are required to report their hours for a prior month by no later than the fifth day of the following month.

Although CMS’s January guidance permits states to require work as a condition of eligibility, states are not permitted to use any Medicaid funding to cover job training or education expenses, job search assistance, or supports that could help enrollees obtain and retain jobs (e.g., child care, transportation).¹⁵ The Arkansas Works Resource Dashboard indicates how enrollees can get free job search help from the state’s Department of Workforce Services and provides links for accessing

services such as career education, volunteer opportunities, SNAP Employment and Training Providers, public computers, and transportation.¹⁶

TABLE 1

Medicaid Work Requirements in Arkansas

Work requirements	<ul style="list-style-type: none"> ▪ Enrollees must engage in at least 80 hours of work or other qualifying activities a month ▪ Enrollees must satisfy work requirements for at least 10 months a year ▪ Enrollees must document completed work-related hours online every month unless they qualify for a reporting exemption ▪ State will assess enrollees’ work-related activities every month
Noncompliance	<ul style="list-style-type: none"> ▪ After third month of noncompliance with work requirements, enrollees are disenrolled for remainder of calendar year (up to nine months). ▪ Individuals can reapply for Medicaid at the start of the next calendar year.
Exempt populations	<ul style="list-style-type: none"> ▪ Children age 18 and under ▪ Adults ages 19 to 29 (2018 only) ▪ Adults age 50 and above ▪ Medically frail people ▪ Full-time students ▪ Pregnant women (and women who have given birth in the past 60 days) ▪ Parents living with dependent children under age 18^a ▪ Caregivers of a person who is incapacitated ▪ People who are incapacitated in the short term, are medically certified as physically or mentally unfit for employment, or have an acute medical condition validated by a medical professional that would prevent them from complying with the work requirements ▪ People participating in a treatment program for alcoholism or drug addiction ▪ People who are exempt from SNAP’s work requirements ▪ People who receive TANF cash assistance ▪ People receiving unemployment benefits
Qualifying work-related activities	<ul style="list-style-type: none"> ▪ Employment ▪ Self-employment ▪ Income or earnings of at least \$736 a month ▪ Enrollment in an educational program, including high school, GED classes, or higher education ▪ On-the-job training ▪ Vocational training ▪ Community service ▪ Independent job search (up to 40 hours a month) ▪ Job search training (up to 40 hours a month) ▪ Classes on health insurance, using the health system, or healthy living (up to 20 hours a year) ▪ Participation in activities or programs available through the Arkansas Department of Workforce Services ▪ Participation in and compliance with SNAP or TANF employment initiative programs

Source: Seema Verma (CMS), [letter to Governor Asa Hutchinson](#), March 5, 2018.

Notes: TANF = Temporary Assistance for Needy Families; SNAP = Supplemental Nutrition Assistance Program.

^a Parents with incomes below 16 percent of the federal poverty level may be enrolled under Section 1931 and would be unaffected by Medicaid work requirements in Arkansas. They will not be required to document their exemption status.

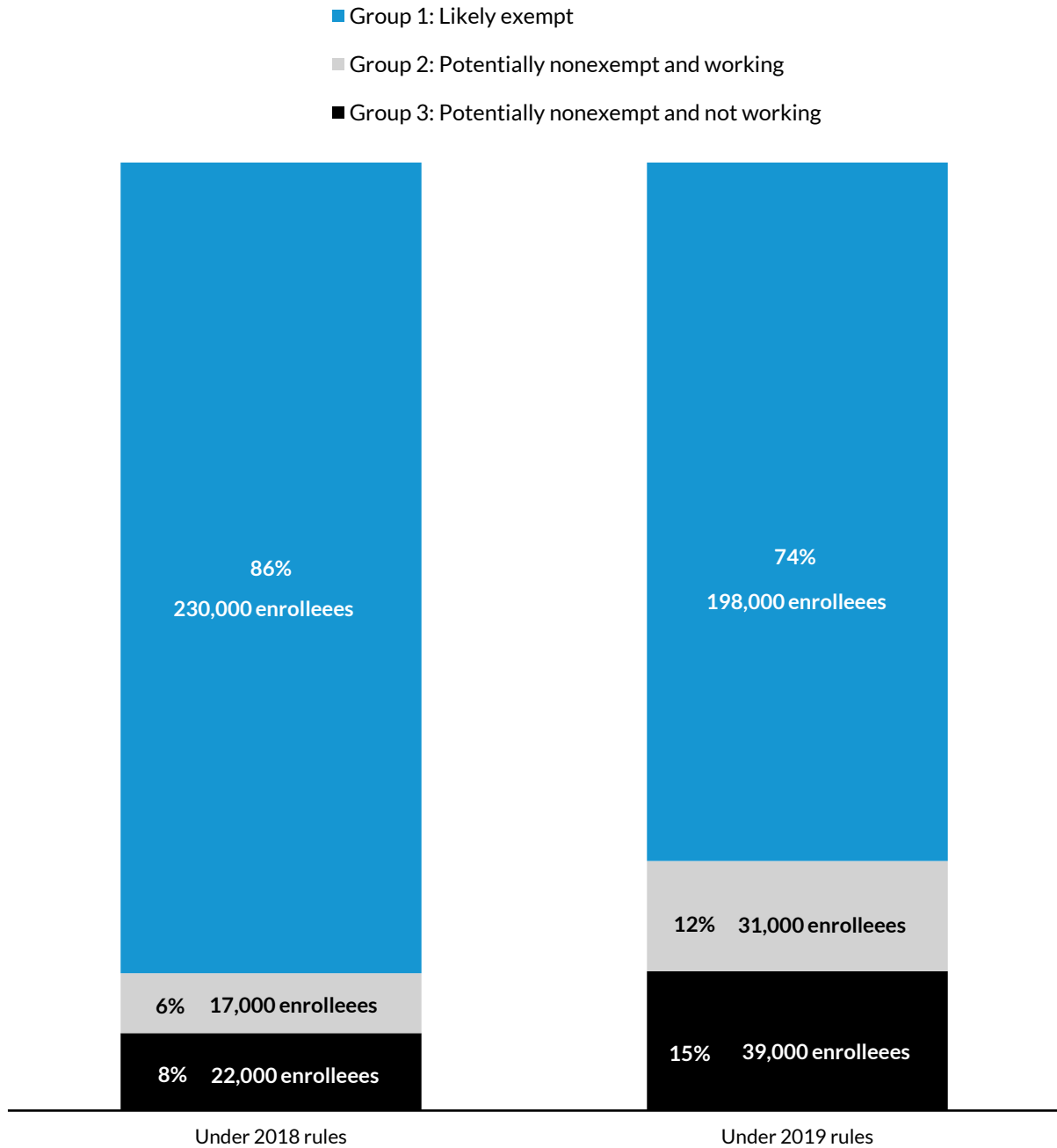
Findings

Figure 1 shows estimates of the composition of nonelderly, nondisabled adult Medicaid enrollees in Arkansas based on work requirements that are being implemented in 2018 (when enrollees ages 19 to 29 are exempt) and in 2019 (when those enrollees will no longer be exempt). Based on the available survey data, we estimate that approximately 269,000 nonelderly nondisabled adults in Arkansas were enrolled in Medicaid at some point in 2016.¹⁷ Under 2018 work requirement rules, we estimate that approximately 230,000 of these enrollees (86 percent) are in Group 1 (likely to be exempt from work requirements). Of the 230,000, we estimate that about 18,000 enrollees (8 percent of the Group 1 total) are likely to be parents enrolled under the Section 1931 eligibility pathway (i.e., they report incomes below 16 percent of FPL) and would thus not need to obtain an exemption or be subject to work requirements.¹⁸ We estimate that the remaining 39,000 nonelderly nondisabled adult enrollees would be potentially subject to work requirement in 2018.¹⁹ We classify about 17,000 enrollees (6 percent) into Group 2 (those who do not meet one of the Group 1 exemptions and were working at the time of the survey); some of these working enrollees will be exempt from reporting work hours. The remaining 8 percent (22,000 enrollees) are classified into Group 3 (those who do not meet one of the Group 1 exemptions and were not working at the time of the survey). Starting in 2019, when enrollees ages 19 to 29 will become subject to Medicaid work requirements, we find that the number of enrollees in Group 1 drops to 198,000 (or about 74 percent of enrollees) and the shares of enrollees in Groups 2 and 3 expand to 12 and 15 percent, respectively.²⁰

In table 2, we assess the composition of nondisabled nonelderly Medicaid enrollees across geographic regions in Arkansas using 2018 and 2019 work requirement rules. To increase statistical power for the regional analysis, we combine data from the 2015 and 2016 ACS. Figure 2 presents a county-level reference map indicating the boundaries of each region. We find little regional variation in enrollee group composition across the state. In 2018, an estimated 86 to 89 percent of enrollees are in Group 1; 4 to 6 percent are in Group 2; and 6 to 8 percent are in Group 3. As the state transitions to 2019 work requirement rules, we find that across regions, 74 to 79 percent of enrollees are in Group 1; 9 to 14 percent are in Group 2; and 12 to 13 percent are in Group 3. Throughout the remainder of this report, we assess enrollee group composition and characteristics under Arkansas's work requirements as fully implemented starting in 2019.

FIGURE 1

Composition of Nonelderly Nondisabled Adult Medicaid Enrollees in Arkansas in 2018 and 2019

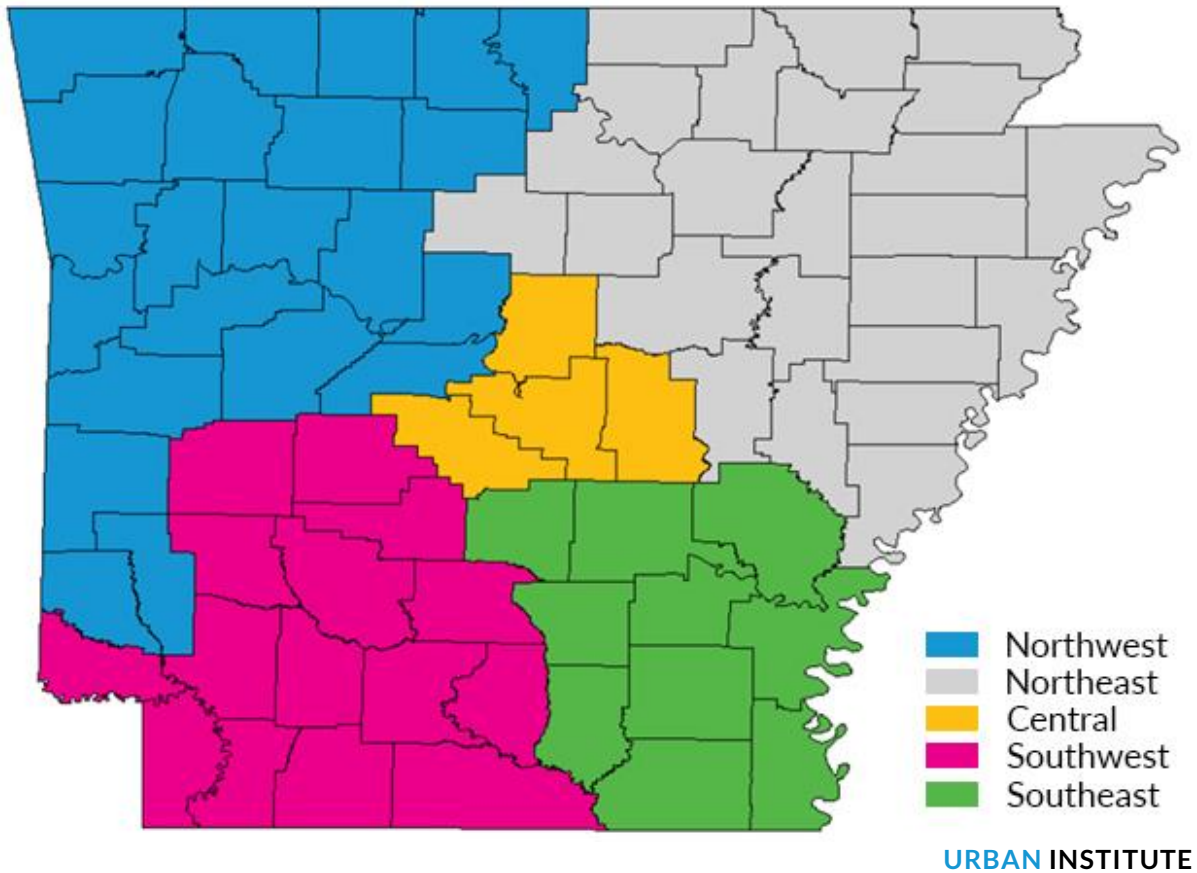


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Source: Urban Institute tabulations of the 2016 American Community Survey.

Notes: Sample consists of adults ages 19 to 64 who have Medicaid coverage, reside in Arkansas, and do not receive Supplemental Security Income disability benefits or are not dually enrolled in Medicaid and Medicare (since these groups will be excluded from work requirements under the waivers). For 2018 rules, we model enrollees as “likely exempt” if they would qualify for an exemption based on age (below 30 and above 49), school attendance, or status as caregivers of children or disabled family members receiving Supplemental Security Income. For 2019 rules, enrollees ages 19 to 29 are no longer exempt. Using self-reported income data, we estimate that about 18,000 enrollees in Group 1 are parents who are likely enrolled under the Section 1931 eligibility pathway and would not be subject to work requirements in Arkansas. Because we do not observe the basis of Medicaid eligibility in the American Community Survey, this group is retained in the sample.

FIGURE 2
Reference County Map for Arkansas Regional Analysis



Source: Urban Institute tabulations of the 2015 and 2016 American Community Survey.

Notes: Regions are constructed by combining Public-Use Microdata Areas from the American Community Survey. See table B.5 for a list of counties in each region.

In the past, Arkansas has used a health screening questionnaire to determine whether Medicaid enrollees will be designated as medically frail.²¹ The questionnaire asked enrollees to rate their own health and mental health and to identify hospital and emergency room use, outpatient clinic use, chronic disease prevalence, and functional limitations. Although it is unclear whether Arkansas will continue to use this screener to identify enrollees who are medically frail and therefore exempt from Medicaid work requirements, the 2018 Arkansas Medicaid application includes questions that assess new enrollees' disability status; whether they live in a medical facility or nursing home; and whether they have a physical, mental, or emotional health condition that limits their activities (bathing, dressing, daily chores, etc.). Responses to these questions may be used to determine whether enrollees are medically frail.²² In table 3, we assess how our enrollee group composition estimates change when we reclassify enrollees who report one of six serious health limitations enumerated in the survey (using that information as a proxy measure for medical frailty) into Group 1. Although our main analysis classifies

enrollees who have household members receiving SSI benefits as in Group 1 (because being a caregiver of disabled household members is an exemption criterion), we also assess the impact of broadening our caregiver exemption criteria to also include in Group 1 enrollees who live with someone who has a serious health limitation (table 3).

TABLE 2
Composition of Enrollee Groups in Arkansas by Region, 2015–2016 American Community Survey
Percent

	Under 2018 Rules			Under 2019 Rules		
	Group 1 Likely exempt	Group 2 Potentially nonexempt and working	Group 3 Potentially nonexempt and not working	Group 1 Likely exempt	Group 2 Potentially nonexempt and working	Group 3 Potentially nonexempt and not working
Arkansas total	88	5	7	76	11	12
Northwest	88	5	7	78	10	12
Northeast	86	6	8	76	11	13
Central	87	6	7	74	14	12
Southwest	89	4	7	79	9	12
Southeast	88	5	6	77	11	12

Source: Urban Institute tabulations of the 2015 and 2016 American Community Survey.

Notes: See figure 2 for a map of Arkansas regions. Regions are constructed by combining Public-Use Microdata Areas from the American Community Survey. See table B.5 for a list of counties in each region.

Sample consists of adults ages 19 to 64 who have Medicaid coverage, reside in Arkansas, and do not receive Supplemental Security Income disability benefits and are not dually enrolled in Medicaid and Medicare (since these groups will be excluded from work requirements under the waiver). For 2018 rules, we model enrollees as “likely exempt” if they would qualify for an exemption based on age (below 30 and above 49), school attendance, or status as caregivers of children or disabled family members receiving Supplemental Security Income. For 2019 rules, enrollees ages 19 to 29 are no longer exempt. Using self-reported income data, we estimate that about 18,000 enrollees in Group 1 are parents who are likely enrolled under the Section 1931 eligibility pathway and would be not be subject to work requirements in Arkansas. Because we do not observe the basis of Medicaid eligibility in the American Community Survey, this group is retained in the sample.

The first two rows assess the composition of enrollees when the waiver is initially implemented in 2018. When considering enrollees who may qualify as medically frail (because they reported a serious health limitation) or who are caregivers for a medically frail household member (because they reported living with someone with a serious health limitation), an additional 18,000 enrollees are classified into Group 1, bringing the total group share to 92 percent. The bottom two rows assess the composition of enrollees once the waiver is fully implemented in 2019. Using proxy measures for medical frailty and caregiving for a medically frail household member, we reclassify an additional 30,000 enrollees into Group 1, raising the group share from 74 percent to 85 percent of all nonelderly nondisabled enrollees.

TABLE 3

Composition of Nonelderly Nondisabled Adult Medicaid Enrollees in Arkansas

Work requirement exemption criteria	Group 1 Likely exempt	Group 2 Potentially nonexempt and working	Group 3 Potentially nonexempt and not working
Age 50 and above; age 29 and below ^a ; attending school; living in household with child under age 18; or a caregiver of family member receiving SSI	230,000 enrollees (86%)	17,000 enrollees (6%)	22,000 enrollees (8%)
Age 50 and above; age 29 and below ^a ; attending school; living in household with child under age 18; caregiver of family member receiving SSI; or reporting a serious health limitation or living with someone with a serious health limitation	248,000 enrollees (92%)	10,000 enrollees (4%)	11,000 enrollees (4%)
Age 50 and above; attending school; living in household with child under age 18; or caregiver of family member receiving SSI ^{b, c}	198,000 enrollees (74%)	31,000 enrollees (12%)	39,000 enrollees (15%)
Age 50 and above; attending school; living in household with child under age 18; caregiver of family member receiving SSI; or reporting a serious health limitation or living with someone with a serious health limitation^b	228,000 enrollees (85%)	21,000 enrollees (8%)	20,000 enrollees (7%)

Source: Urban Institute tabulations of the 2016 American Community Survey.

Notes: Sample consists of adults ages 19 to 64 who have Medicaid coverage and reside in Arkansas; and do not receive Supplemental Security Income disability benefits or are not dually enrolled in Medicaid and Medicare (since these groups will be excluded from work requirements under the waivers). Using self-reported income data, we estimate that about 18,000 enrollees in Group 1 are parents who are likely enrolled under the Section 1931 eligibility pathway and would not be subject to work requirements in Arkansas. Because we do not observe the basis of Medicaid eligibility in the American Community Survey, this group is retained in the sample.

^aCriteria based on work requirement implementation rules for 2018.

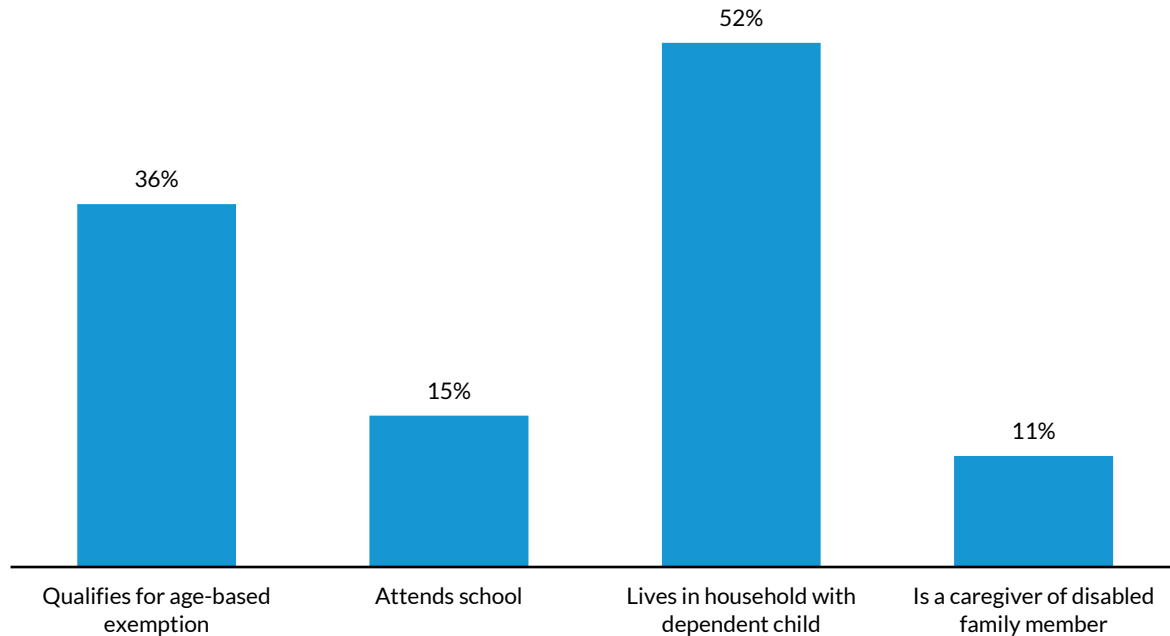
^bCriteria based on work requirement implementation rules for 2019.

^cCriteria used for main analysis in report.

As shown in figure 3, living in a household with a child under age 18 is the most common reason enrollees are exempt from work requirements in our sample, with 52 percent meeting that exemption category; 36 percent would qualify for an exemption based on being age 50 or older; 15 percent because they are students; and 11 percent because they are caregivers of disabled family members.

FIGURE 3

Reasons That Nonelderly Nondisabled Adult Medicaid Enrollees in Arkansas May Be Exempt from Work Requirements, 2016



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Source: Urban Institute tabulations of the 2016 American Community Survey.

Notes: Waiver exemptions are modeled under 2019 rules. Sample consists of adults ages 19 to 64 who have Medicaid coverage, reside in Arkansas, do not receive Supplemental Security Income or are not dually enrolled in Medicare (these groups will be excluded from work requirements under the waivers), and qualify for an exemption from Medicaid work requirements that we can model. Enrollees are classified as “likely exempt” if they are above age 50, attend school, live in a household with a child under age 18, or are a caregiver to a disabled family member receiving Supplemental Security Income. Percentages do not sum to 100 because the criteria are not mutually exclusive. Using self-reported income data, we estimate that about 18,000 enrollees in Group 1 are parents who are likely enrolled under the Section 1931 eligibility pathway and would not be subject to work requirements in Arkansas. Because we do not observe the basis of Medicaid eligibility in the American Community Survey, this group is retained in the sample.

Table 4 shows the sociodemographic, labor market, health, and information and transportation access characteristics of Medicaid enrollees in each of our three groups. Appendix table B.2 shows these same characteristics by enrollee group under Arkansas’s 2018 work requirement rules (when enrollees ages 19 to 29 will be exempt from Medicaid work requirements). Appendix table B.3 classifies all low-income adults with incomes below 138 percent of FPL (the income eligibility limit for Medicaid coverage for this group in Arkansas) into one of our three enrollee groups and similarly presents these characteristics by each group.

TABLE 4

Selected Characteristics of Nonelderly Nondisabled Medicaid Enrollees in Arkansas by Work Requirements Waiver Exemption and Work Status

Enrollee characteristic	Group 1 Likely exempt	Group 2 Potentially nonexempt and working	Group 3 Potentially nonexempt and not working
Age (years)			
Average	40.75	33.88*	33.05*
19-29	28%	45%*	44%*
30-39	24%	17%*	22%
40-49	12%	38%*	34%*
50-64	36%	0%*	0%*†
Race and ethnicity			
White, non-Hispanic	69%	68%	68%
Black, non-Hispanic	22%	23%	27%*
Hispanic	5%	4%	3%
Other race, non-Hispanic	4%	5%	3%
Gender			
Male	35%	41%*	52%*†
Female	65%	59%*	48%*†
Marriage and family			
Married	43%	19%*	16%*
Divorced, separated, or widowed	28%	30%	30%
Never married	29%	51%*	54%*
Childless ^a	42%	89%*	94%*†
Parents of children age 17 and under	52%	0%*	0%*†
Parents of children age 6 and under	30%	0%*	0%*†
Income and education			
Income <50% FPL	28%	12%*	32%†
Income ≥50% and <100% FPL	26%	21%	21%
Income ≥100% FPL	47%	68%*	47%†
SNAP receipt	39%	31%*	40%†
Attending school	15%	0%*	0%*†
Less than high school education	17%	9%*	23%*†
High school degree	46%	51%	57%*
Greater than high school education	37%	39%	20%*†
Labor market			
Employed at time of survey	47%	100%*	0%*†
Worked in prior year	58%	100%*	26%*†
Worked at least 48 weeks in prior year ^b	59%	71%*	6%*†
Worked at least 48 weeks and 20 hours a week in prior year ^b	55%	68%*	6%*†
Usual hours worked per week in prior year (if working in prior year) ^b	33.58	35.47*	29.96*†
Unemployed	6%	0%*	24%*†
Not in labor force	47%	0%*	76%*†
Looking for work	15%	55%*	27%*†
At least one member of household is employed	72%	100%*	62%*†
Health limitations			
Serious difficulty concentrating, remembering, or making decisions	9%	5%*	18%*†
Serious difficulty walking or climbing stairs	11%	5%*	11%†
Serious difficulty doing errands	7%	1%*	13%*†

Enrollee characteristic	Group 1 Likely exempt	Group 2 Potentially nonexempt and working	Group 3 Potentially nonexempt and not working
Serious difficulty bathing or dressing	4%	0%*	6%*†
Blind or serious vision difficulty	4%	3%	5%
Deaf or serious hearing difficulty	3%	2%	5%
Reports one or more serious health limitation	20%	12%*	29%*†
Reports two or more serious health limitations	10%	3%*	17%*†
Household member (including self) reports one or more serious health limitation	43%	33%*	50%*†
Internet and vehicle access			
Household has no internet access (neither through cellphone nor an internet service provider)	21%	25%	31%*
Household has no broadband (cable/DSL/fiber-optic) internet access	51%	53%	61%*
Household has no access to vehicle	6%	5%	8%
Estimated number of enrollees	198,000	31,000	39,000

Source: Urban Institute tabulations of the 2016 American Community Survey.

Notes: Waiver exemptions are modeled under 2019 rules. Sample consists of adults ages 19 to 64 who have Medicaid coverage, reside in Arkansas, and do not receive Supplemental Security Income or are not dually enrolled in Medicare (these groups will be excluded from work requirements under the waivers). We model enrollees as “likely exempt” if they are age 50 or above, attend school, live in a household with a child under age 18, or are a caregiver of a disabled family member receiving Supplemental Security Income. Percentages for each group represent the share of the state’s nonelderly, nondisabled enrollee total. See appendix A for more detail on variable definitions. Population numbers have been rounded to the nearest thousand. Using self-reported income data, we estimate that about 18,000 enrollees in Group 1 are parents who are likely enrolled under the Section 1931 eligibility pathway and would be not be subject to work requirements in Arkansas. Because we do not observe the basis of Medicaid eligibility in the American Community Survey, this group is retained in the sample.

^a Childless adults are not living with dependent children age 18 or under, but they may be noncustodial parents of children age 18 or under or parents of children age 19 or older.

^b Estimates of work intensity are conditional on having worked in the previous year.

* Estimate differs significantly ($p < 0.05$) from Group 1 estimate.

† Estimate differs significantly ($p < 0.05$) from Group 2 estimate.

Characteristics of Group 1 (Likely Exempt) Enrollees

Fifty-two percent of Group 1 enrollees are under age 40, and their average age is 41. Sixty-nine percent of those in Group 1 are non-Hispanic white, 22 percent are non-Hispanic black, and just 5 percent are Hispanic. Sixty-five percent of enrollees in Group 1 across the three states are women, possibly reflecting the fact that women are more likely than men to be in single-headed households with children²³ (and thus designated likely exempt). Fifty-two percent of Group 1 enrollees are parents with children age 17 and under in their household.

Fifty-four percent of Group 1 enrollees are in poverty, and 28 percent are in deep poverty (with incomes less than 50 percent of FPL). Thirty-nine percent report receipt of SNAP benefits.²⁴ About 15

percent are currently attending school (one of the Arkansas waiver's exemption criteria). More than half (63 percent) have a high school degree or less education.

Despite their low incomes, about 47 percent of Group 1 enrollees were employed at the time of the survey. Seventy-two percent of enrollees in this group are either employed or live with an employed household member. About one in five (20 percent) report having at least one serious health limitation, and 43 percent report that they or another household member have a serious health limitation.

Twenty-one percent of Group 1 enrollees have no internet access (which includes no internet access through a cell phone company), and 51 percent are without broadband (high-speed) internet access in their household.

Medicaid enrollees who are eligible for Medicaid under the Section 1931 eligibility pathway will not be subject to work requirements and will not need to document their exemptions online. In Arkansas, this consists of parents with incomes below 16 percent of FPL. When excluding parents of children under age 18 and with incomes below 16 percent of FPL, we estimate approximately 18,000 enrollees may be enrolled under Section 1931 eligibility. Removing this group from our sample has little effect on the characteristics of Group 1 enrollees. The percentage of Group 1 enrollees in poverty slightly falls (from 54 percent to 49 percent), but estimates of the share of Group 1 enrollees with no internet access (21 percent in both samples), no broadband internet access (51 percent compared with 50 percent), and no high school degree (17 percent in both samples) are virtually identical.

Characteristics of Group 2 (Potentially Nonexempt and Working) Enrollees

With an average age of 34, Group 2 enrollees are significantly younger than Group 1 enrollees; they also have higher incomes and are more educated than those in Group 1. Although Group 2 enrollees are less likely to be in poverty than those in Group 1, about one-third (33 percent) of Group 2 enrollees are still in poverty, and 12 percent are in deep poverty. Ninety percent of Group 2 enrollees have at least a high school degree.

Group 2 enrollees were (by definition) working at the time of the survey. However, we find that about 32 percent of enrollees did not work at least 48 weeks and 20 hours a week in the past year and thus would not meet Arkansas's work requirements throughout the entire year. In the weeks that Group 2 enrollees did work, however, they worked more than 35 hours a week, far exceeding the hours needed to satisfy the state's work requirements.

Group 2 enrollees in Arkansas have lower rates of serious health limitations than Group 1 enrollees. Only 5 percent of this group report serious difficulty concentrating, remembering, or making decisions, and only 5 percent have difficulty walking or climbing stairs. Twelve percent of Group 2 enrollees report one or more serious health limitations. Of note, 25 and 53 percent of Group 2 enrollees in the state have no household internet access and no household broadband internet access, respectively, which could make it difficult for them to document their work hours online each month.

In appendix table B.2, we assess the sociodemographic, labor market, health, and information and transportation access characteristics of enrollees under the 2018 work requirement rules, which will exempt enrollees ages 19 to 29 from Medicaid work requirements. Correspondingly, the share of nonelderly nondisabled enrollees in Group 2 enrollees falls to 6 percent, and the average age of the group rises to 42. Estimates of work intensity and internet access are not markedly different from our main analysis. Thirty-two percent of Group 2 enrollees in 2018 do not work more than 48 weeks a year and 20 hours a week and therefore could face Medicaid coverage lock-outs in the first year of implementation. Similar to our primary analysis, 26 percent of Group 2 enrollees in 2018 don't have internet access in their households.

In appendix table B.3, we assess these characteristics for a broader low-income adult population in Arkansas. We restrict our sample to nonelderly nondisabled adults with incomes below 138 percent of FPL and classify respondents into one of our three enrollee groups. We find that among low-income working adults who would likely be income-eligible for Medicaid and potentially subject to work requirements, 40 percent would not meet Arkansas's Medicaid work requirements year-round. If those adults were to seek Medicaid coverage, they would need to work more consistently throughout the year to maintain it. Twenty percent of Arkansas's low-income working population who would be categorized into this enrollee group report no internet access in their households.

Characteristics of Group 3 (Potentially Nonexempt and Not Working) Enrollees

Fifty-three percent of the Arkansas Medicaid enrollees in Group 3 have incomes below 100 percent of FPL, and 32 percent are in deep poverty, putting them closer to the income profile of Group 1 than of Group 2. Group 3 enrollees are relatively less educated than the two other groups. Twenty-three percent have less than a high school education, and just 20 percent have educational attainment beyond high school. About 62 percent of these enrollees live with at least one employed household member.

Although no enrollees in Group 3 receive SSI disability benefits or are dually enrolled in Medicare and Medicaid, they report high rates of serious health limitations relative to the other two groups. About 18 percent report serious difficulty concentrating, remembering, or making decisions, and 13 percent report serious difficulty doing errands. Twenty-nine percent report that they have at least one serious health limitation (more than twice the rate of Group 2 enrollees), and 50 percent report that at least one person in their household has a serious health limitation.

Group 3 also has relatively worse internet and transportation access in the household than the two other groups, possibly making it more difficult for them to obtain employment, participate in other work-related activities, meet with caseworkers, otherwise receive assistance to obtain exemptions or comply with the new requirements, or provide documentation concerning exemptions and compliance. About 31 percent of Group 3 enrollees have no home internet access, and 61 percent report no broadband access. Eight percent of Group 3 enrollees report having no access to a vehicle in their household.

Appendix table B.2 presents the characteristics of enrollees under the 2018 rules and classifies enrollees under age 30 as likely exempt. As a result of exempting enrollees under age 30, the share of Group 3 enrollees in 2018 falls to 8 percent. Still, this group indicates similar rates of serious health limitations (28 percent have one) and low rates of internet access in their household (37 percent have no access). Sixteen percent do not have a high school degree.

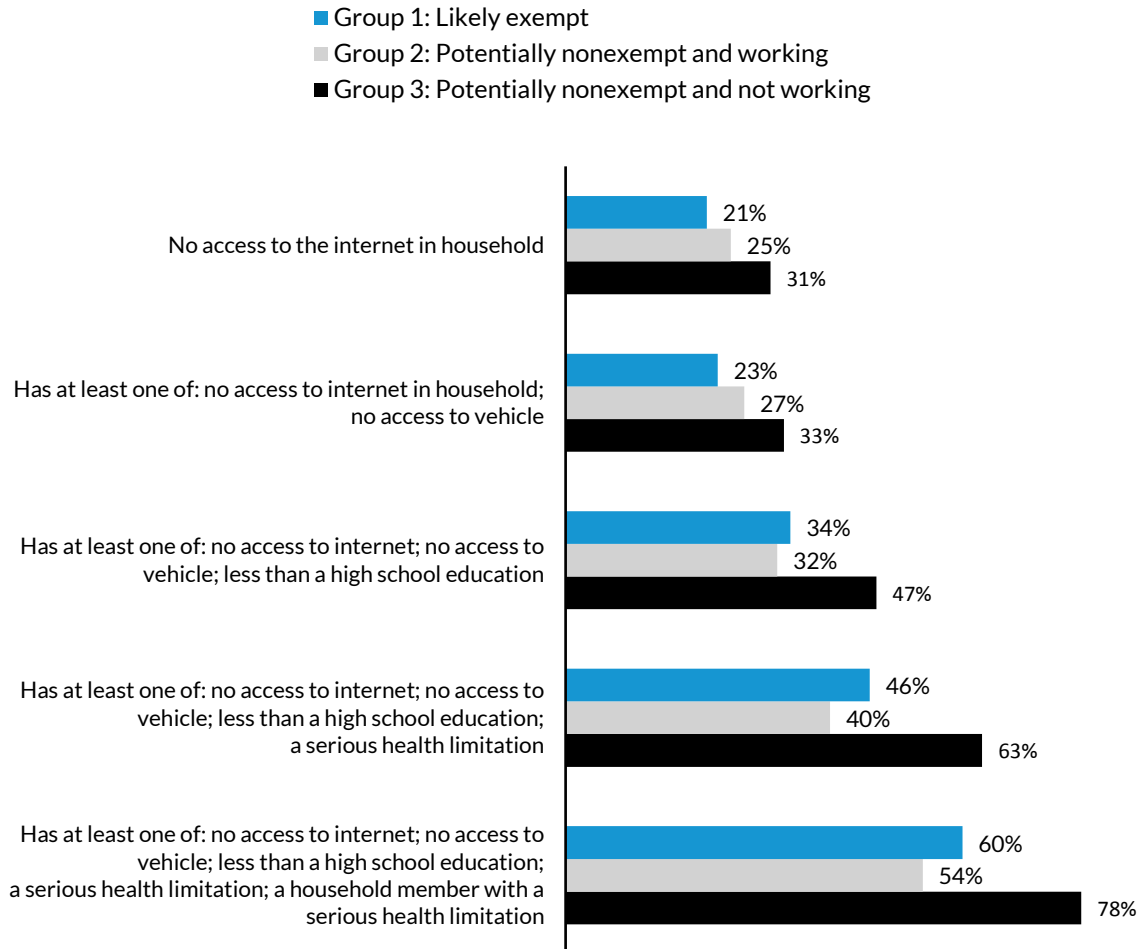
We assess the characteristics of the broader low-income adult population in Arkansas in table B.3. Among low-income nonelderly nondisabled adults who would be potentially subject to Medicaid work requirements and are not working, 27 percent have a serious health limitation, 31 percent have no internet access, and 20 percent have less than a high school education. These results suggest that some newly eligible adults in Arkansas may face challenges navigating the work requirement processes online, acquiring Medicaid, and keeping their coverage.

Potential Barriers to Work and Documenting Compliance

Figure 3 shows summary measures for all three enrollee groups that combine information on vehicle and internet access, completion of high school, and presence of serious health limitations to identify some of the barriers these enrollees may face to successfully complying with Arkansas's new work requirements. We include having less than a high school education as a potential barrier because of the high correlation between dropping out of high school and risk factors such as poverty, lower annual

earnings and, among women, a higher likelihood of being a single mother between the ages of 16 and 24 (Sum, Khatiwada, and McLaughlin 2009).

FIGURE 4
Potential Barriers Facing Nonelderly Nondisabled Adult Medicaid Enrollees in Arkansas



URBAN INSTITUTE

Source: Urban Institute tabulations of the 2016 American Community Survey.

Notes: Waiver exemptions are modeled under 2019 rules. Sample consists of adults ages 19 to 64 who have Medicaid coverage, reside in Arkansas, and do not receive Supplemental Security Income or are not dually enrolled in Medicare (these groups will be excluded from work requirements under the waivers). We model enrollees as “likely exempt” if they are age 50 or above, attend school, live in a household with a child under age 18, or are a caregiver of a disabled family member receiving Supplemental Security Income. Percentages for each group represent the share of state’s nonelderly, nondisabled enrollee total. See appendix A for more detail on variable definitions. Population numbers have been rounded to the nearest thousand. Using self-reported income data, we estimate that about 18,000 enrollees in Group 1 are parents who are likely enrolled under the Section 1931 eligibility pathway and would not be subject to work requirements in Arkansas. Because we do not observe the basis of Medicaid eligibility in the American Community Survey, this group is retained in the sample.

Across all three groups, 23 to 33 percent of enrollees report having either no access to a vehicle or no internet access in the household, and 32 to 47 percent report having no access to a vehicle, no internet, or no high school degree. Overall, 78 percent of Group 3 enrollees (those who are potentially subject to the work requirements and not currently working) have at least one of the following characteristics: no access to a vehicle, no internet access, less than a high school education, a serious health limitation, or a household member with a serious health limitation; this suggests that more than three out of four people in Group 3 may experience challenges meeting the new work requirements. Group 1 enrollees (those who are likely exempt from the work requirements) and Group 2 enrollees (those who are potentially subject to them and currently working) are not markedly different from one another in the information and transportation barriers they face. Group 3 enrollees, however, are worse off across all five measures.

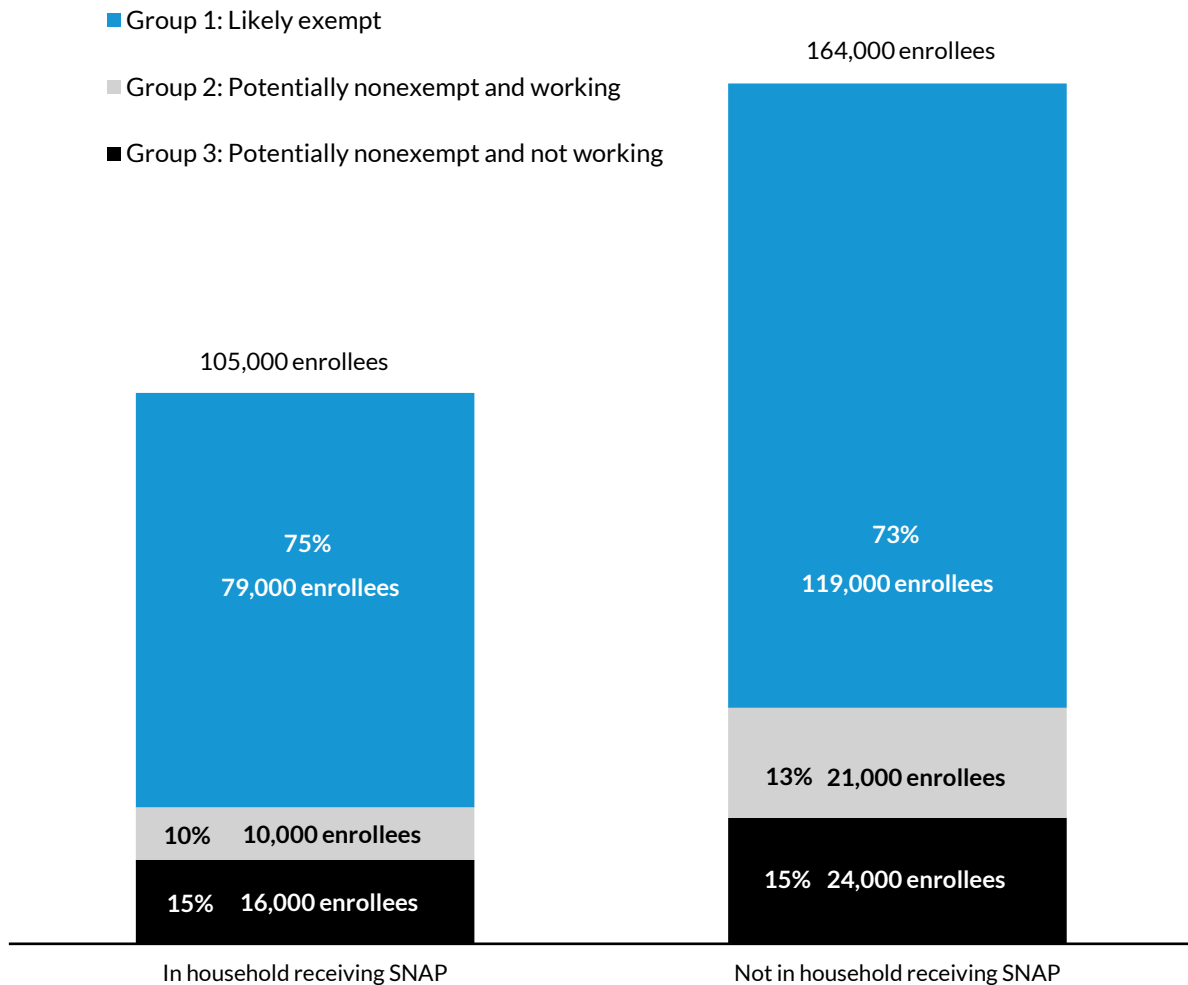
Composition of Medicaid Enrollees by SNAP Receipt

As discussed, our main analysis includes all nonelderly nondisabled Medicaid enrollees in Arkansas. However, the approved Medicaid work requirements waiver includes language that exempts Medicaid enrollees who are exempt from SNAP work requirements and deems as compliant those who are fulfilling work requirements through SNAP. As a result, when Medicaid work requirements are implemented, enrollees who are also receiving SNAP will be affected differently than enrollees who are not receiving SNAP: those who are exempt from or compliant with SNAP work requirements will be exempt or compliant with the Medicaid requirement (though they could also be subject to different documentation requirements). Given that SNAP caseloads are likely to have declined following the reinstatement of work requirements and time limits for able-bodied adults without dependents in Arkansas's SNAP program in the second quarter of 2016,²⁵ we expect that fewer nondisabled nonelderly Medicaid recipients than we observed in 2016 will be concurrently enrolled in SNAP when Medicaid work requirements are implemented in 2018.²⁶

Figure 5 describes the composition of nondisabled nonelderly Medicaid enrollees in Arkansas by household SNAP receipt in the prior year. Of the estimated 269,000 nonelderly nondisabled adult Medicaid enrollees in Arkansas, approximately 39 percent of enrollees (105,000 enrollees) were in households that reported receipt of SNAP benefits in the prior year, and 61 percent (164,000 enrollees) were not. Distributions of our three enrollee groups are not very different between those who do and do not reside in households receiving SNAP in the prior year.

FIGURE 5

Composition of Nondisabled Nonelderly Adult Medicaid Enrollees in Arkansas, by Household SNAP Receipt in the Prior Year



URBAN INSTITUTE

Source: Urban Institute tabulations of the 2016 American Community Survey.

Notes: Waiver exemptions are modeled under 2019 rules. Sample consists of adults ages 19 to 64 who have Medicaid coverage, reside in Arkansas, and do not receive Supplemental Security Income or are not dually enrolled in Medicare (these groups will be excluded from work requirements under the waivers). We model enrollees as “likely exempt” if they are age 50 or above, attend school, live in a household with a child under age 18, or are a caregiver of a disabled family member receiving Supplemental Security Income. Group population estimates are rounded to the nearest thousand. SNAP receipt is measured at the household level and refers to any SNAP assistance received in the past 12 months. See appendix A for more detail on variable definitions. Using self-reported income data, we estimate that about 14,000 enrollees with household SNAP receipt and 4,000 enrollees without household SNAP receipt are parents who are likely enrolled under the Section 1931 eligibility pathway and would be not be subject to work requirements in Arkansas. Because we do not observe the basis of Medicaid eligibility in the American Community Survey, this group is retained in both samples.

Discussion

This report describes the demographic, income, education, labor market, and serious health limitations of nonelderly, nondisabled adult Medicaid enrollees in Arkansas who could be affected by work requirements in Arkansas either because they need to obtain an exemption or because they need to fulfill the requirements. According to our estimates, when the work requirements are implemented in 2018 (during which time enrollees ages 19 to 29 will be exempt), an estimated 86 percent of nondisabled nonelderly adult Medicaid enrollees will be exempt. This estimate falls to 74 percent in 2019, when the work requirements are fully phased in and adults ages 19 to 29 are no longer exempt. Our estimates for Group 1 enrollees are subject to measurement error. Because we identify all student enrollees as full-time students (and thus exempt from work requirements), we likely overstate the share who are exempt because of this category. Further, we do not observe whether enrollees or their family members are considered medically frail (i.e., whether they are assigned to traditional Medicaid in Arkansas), likely leading to an underestimate of the share of enrollees exempt because of their poor health or because they are a caregiver for a family member in poor health. When we use reported serious health limitations as a proxy for medically frail enrollees and their family members, we find that an estimated 85 percent of nonelderly nondisabled adult enrollees are likely exempt from Medicaid work requirements in Arkansas in 2019. Parents with incomes below 16 percent of FPL may be eligible for Medicaid under Section 1931 and would therefore be unaffected by Medicaid work requirements in Arkansas (i.e., they would not be required to document their exemption status). We find that about 18,000 parents fit this criteria, about 8 percent of all Group 1 enrollees under the 2018 work requirement rules.

To maintain Medicaid coverage, Group 1 enrollees will need to understand that they are exempt and successfully obtain their qualifying exemption. Evidence from the imposition of work requirements in TANF and SNAP suggests that this process can often be confusing and cumbersome for some beneficiaries (Hahn 2018). Even absent work requirements, some would-be SNAP and TANF recipients have lost access to benefits because they have not completed paperwork in time or because of clerical office errors (Isaacs, Katz, and Amin 2016). Our analysis indicates that Group 1 enrollees experience high rates of poverty and high rates of serious health limitations and that some have limited internet access. These characteristics may mean that some of these enrollees, many of whom appear to be exempt from the work requirements, could struggle to obtain and maintain exemptions.

The enrollees we expect are most likely to lose coverage following the implementation of the waiver (Group 3) constitute an estimated 15 percent of all nondisabled, nonelderly adult enrollees in Arkansas when the state's work requirements are fully phased in. This share falls to 7 percent when we

use reported serious health limitations as a proxy for medically frail enrollees and their family members. In either case, Group 3 enrollees have lower incomes, have less household internet and vehicular access, and have lower educational attainment levels than the other enrollee groups. Given that some enrollees will be required to submit online documentation of their hours worked each month, complying with work requirements may pose challenges for those enrollees in Group 3 who manage to obtain work or participate in other designated activities but who lack home internet access. We find that 31 percent of Group 3 enrollees report having no home internet access.²⁷ In Arkansas, about 47 percent of Group 3 enrollees indicate they have no access to a vehicle, no access to the internet, less than a high school education (which could limit their job prospects), or some combination of those challenges. Twenty-nine percent in this group report having a serious health limitation, which may limit their job prospects; some in this group may qualify as medically frail and not be subject to the work requirements, but others may not qualify for this exemption.

Importantly, although the ACS captures several serious health limitations, it does not capture some other dimensions of enrollees' health (e.g., chronic illnesses that can limit employability, oral health issues, mental health issues, and other conditions). Some enrollees will likely be eligible for an exemption from work requirements because of their poor health status or medical frailty. Although this analysis only assesses the potential impact of Medicaid work requirements on nondisabled nonelderly Medicaid enrollees, low-income adults who are newly eligible for Medicaid would likely be affected as well and may also experience difficulties navigating exemptions processes.

Despite working, enrollees in Group 2 also risk losing coverage under the waiver. Arkansas requires at least 80 hours of work or related activities a month and requires that enrollees meet this requirement for 10 months in the year. Certain enrollees may have trouble meeting these requirements given that they may not be able to work for a consistent number of hours throughout the year. The lack of consistent work hours among this population may reflect high rates of turnover in low-wage jobs or a high prevalence of seasonal work. Although nonexempt enrollees can apply for a "good-cause" exemption if they are unable to meet the state's work requirements because of a disability, the birth or death of a family member living with them, severe inclement weather, or a family emergency, working enrollees who have problems finding consistent work throughout the year could fall in and out of compliance with the state's work requirements and thus experience interruptions in Medicaid coverage and access to health care. Losing coverage would also expose enrollees to financial risks associated with any unexpected health care needs. Further, among those required to report their work hours monthly, some Group 2 enrollees may also face difficulties reporting their completed work hours

in Arkansas, where they will need to report their fulfilled hours online and where 25 percent of these enrollees report having no internet access in the household.

Our analysis finds that Group 3 enrollees have characteristics that could make it difficult for some of them to comply with the state's new work requirements, especially if the state does not make new investments in job training, job search assistance, employment supports, and related services (which cannot be financed by Medicaid). Some enrollees in Groups 1 and 2 also have characteristics that may make it difficult for them to navigate the administrative processes established to enforce work requirements, thus putting them at risk of losing or failing to obtain Medicaid coverage even if they qualify for an exemption or are fulfilling the requisite number of work-related hours, possibly leading to coverage losses among people that the waiver is not intended to affect.

Appendix A. Details on Data, Methods, and Limitations

We use data from the US Census Bureau's 2016 ACS, which has a sufficient sample size and the requisite statistical power to conduct state-level analyses. We restrict our analysis sample to nonelderly adults reporting Medicaid coverage who reside in Arkansas. In our main analysis, we exclude enrollees who report receiving SSI disability benefits and those who are dually enrolled in Medicare and Medicaid because these groups will be excluded from work requirements under the waiver. The sociodemographic, labor market, health, internet access, and transportation access characteristics of nonelderly Medicaid enrollees receiving SSI or dually enrolled in Medicare are contained in table B.1.

We have proxy information for four of the criteria that can earn a Medicaid enrollee an exemption from work requirements (age, whether a person is attending school, whether a person is living in the same household as a dependent child under age 18, and whether a person is a caregiver of a household member receiving SSI). For our analysis, we classify all nonelderly adult enrollees who do not satisfy at least one of these exemption criteria as potentially subject to work requirements (i.e., being in either Group 2 or Group 3). We further distinguish between people who are working (and thus likely to meet the state's work requirement; Group 2) and those who are not working (and thus unlikely to meet the state's work requirement; Group 3). We may underestimate the number of enrollees expected to comply with the state's work requirements because the ACS does not capture information about community service and other activities that will allow enrollees to comply with work requirements in Arkansas.

Our approach has several limitations. First, we cannot model all the exemptions that will be permitted. For example, we do not observe all of the health limitations that will define individuals as "medically frail" and thus exempt from work requirements. Similarly, some enrollees who work more than 80 hours a month and earn more than the Arkansas minimum wage will be exempt from reporting their work hours. In the ACS, hours worked refer to the previous year, and hourly wage rates are not reported.

Second, Arkansas's Medicaid expansion occurred under a demonstration waiver that enrolled most Medicaid eligible adults into private plans on the individual Marketplace exchange with cost-sharing benefits and subsidized premiums (Guyer et al. 2015). As a result, there may be confusion among enrollees about whether they are covered by a private plan or whether they are covered under

Medicaid. We use coverage edits developed by Lynch and colleagues (2011) that combine information on family income, family size, and state Medicaid rules to determine enrollee coverage type. Still, identifying Medicaid enrollees in the ACS in Arkansas is challenging, and our analysis may exclude respondents who are in fact covered by Arkansas Medicaid and include respondents who are not. We find that using ACS coverage variables available from the US Census Bureau likely undercounts the total number of Medicaid enrollees in Arkansas,²⁸ but estimates of enrollee group composition and their sociodemographic characteristics, income, labor market, health limitations, and information and transportation access are qualitatively similar whether we use the coverage variables from the ACS or the edited variables.

Third, in Arkansas, only full-time students are exempt from the work requirements, but we only observe school attendance rather than full- or part-time status. We classify all school-attending adults as full-time students, likely leading to an overestimate for this exemption category. Fourth, pregnant women are exempt from the work requirements, but we cannot identify this group in the ACS.²⁹ Fifth, with changes in the economy and other policy changes, the size and characteristics of the group of nondisabled nonelderly Medicaid enrollees may be different in 2018, when Arkansas begins implementing the work requirements, than in these 2016 data. The most recent ACS survey year available is 2016. Our estimates reflect the characteristics and potential barriers Medicaid enrollees faced at that time rather than in 2018 and 2019. Our model will not capture changes in the composition, demographic and socioeconomic characteristics, and potential barriers facing Arkansas Medicaid enrollees if they are substantially different in the period of implementation than in 2016.

A sixth limitation of our analysis is that enrollees who meet (or are exempt from) work requirements under Arkansas's SNAP or TANF program will also be considered to have met (or be exempt from) the proposed Medicaid work requirements. Our main analysis sample includes all nonelderly nondisabled Medicaid enrollees irrespective of their SNAP receipt. In the ACS, SNAP receipt is measured at the household level, so we cannot determine whether specific people were in fact receiving SNAP benefits (and, consequently, whether they were exempt from or compliant with SNAP work requirements). Further, the ACS asks about household SNAP receipt in the past 12 months. This complicates our analysis because our Medicaid sample is defined as of the time of the survey, meaning we may not be observing concurrent SNAP and Medicaid receipt. Moreover, SNAP work requirements have changed rapidly since the 2015–16 period as states have started reinstating SNAP work requirements and time limits following the recovery from the Great Recession. Since that time, SNAP work requirements for able-bodied adults without dependents have been reinstated statewide in

Arkansas.³⁰ Thus, the actual share of Medicaid enrollees also receiving SNAP is likely to be lower than we observe in the 2016 sample.

Seventh, we classify all nonelderly dual Medicare and Medicaid enrollees as excluded from the waiver, but the coverage reports likely contain measurement errors, so we may be excluding some Medicaid enrollees who are not dually enrolled in Medicare and Medicaid and who would actually be affected by the waiver. For respondents reported to be receiving Social Security or retirement income but not reported to be receiving SSI or dually enrolled in Medicaid or Medicaid, we treat them as potentially affected by the waiver, but they may actually be excluded. Eighth, our analysis reflects our understanding of how Arkansas's waiver will be implemented as of May 2018, which may be subject to change once the state begins implementation.

Ninth, parents who are enrolled in Medicaid through Section 1931 eligibility will be unaffected by the Medicaid work requirements in Arkansas (i.e., they will not be required to obtain and document an exemption). In Arkansas, parents with incomes below 16 percent of FPL are eligible under Section 1931. However, we cannot observe the basis of Medicaid eligibility in the ACS, and self-reported income is subject to measurement error. Therefore, we do not exclude this group in our analysis. We note that there are approximately 18,000 nonelderly nondisabled enrollees who are parents with reported incomes below 16 percent of FPL and may therefore be enrolled in Medicaid under the Section 1931 provision.

Finally, some individuals subject to work requirements will need to report the number of hours of work or other qualifying activities they engage in each month. The ACS asks respondents how many hours they usually worked a week over the prior year, but it does not ask them how many hours they are working a week at the time of the survey. Estimates of the number of weeks worked a year and hours worked a week are based on employment in the past year. In addition to these issues, receipt of SSI, caregiver status, and employment may be measured with error if respondents do not accurately recall circumstances during the period of the survey or if they fail to understand survey questions. Because of these limitations, some Medicaid enrollees are likely misclassified across our groups. Our estimates are intended to identify key differences between enrollees who are likely exempt from or potentially subject to states' work requirements and between enrollees who are likely to be noncompliant or compliant with the work requirements.

Assessing Medicaid Coverage in the 2016 ACS

Estimates are derived from the 2016 ACS, an annual survey fielded by the US Census Bureau. This analysis is limited to noninstitutionalized civilians. We use an augmented version of the ACS prepared by the University of Minnesota Population Center, known as the Integrated Public Use Microdata Sample, which uses the public use sample of the ACS and contains edits for family relationships and other variables (Ruggles et al. 2017).

Health insurance coverage is measured as status at the time of the survey. The data are collected continuously over a 12-month period, and the coverage estimates represent an average day in the calendar year. We apply a set of logical coverage edits if other information collected in the ACS implies that coverage for a sample case is misclassified. For instance, a low-income adult who does not have access to employer-sponsored insurance, is enrolled in another means-tested program, and reports private nongroup coverage but likely could not afford such coverage is reclassified as having Medicaid (Lynch et al. 2011).

Our main ACS analysis excludes Medicaid enrollees who report receipt of SSI and enrollees who report being dually enrolled in Medicare and Medicaid these groups of enrollees will be unaffected by the Medicaid work requirements in Arkansas. We describe the characteristics of these enrollees in appendix table B.1.

Classification of Nonelderly Adult Medicaid Enrollees

Using 2016 ACS information from Arkansas, this analysis classifies Medicaid enrollees by waiver exemption status and, among those who are thought to be nonexempt, working status. To estimate exemption status under 2019 rules, we identify the following groups:

- Enrollees age 50 and above
- Students
- Enrollees living in household with a child under age 18
- Caregivers of family members with SSI

Enrollees who do not fit one of the classification criteria listed above are classified as potentially nonexempt (falling into Group 2 or Group 3). We further subdivide people based on their working status, which we determine by whether they reported having worked for pay in the prior week. Under

the waiver, people who are not exempt from the work requirements are required to participate in 80 hours of community engagement activities a month. In the ACS, we do not observe the number of hours individuals are currently working (if any). Questions about work intensity are only asked about the previous calendar year. Thus, we simply classify whether nonexempt Medicaid enrollees are working (Group 2) or not working (Group 3) at the time of the survey.

Descriptions of Other Measures

Income measures are developed to approximate modified adjusted gross income using the procedure outlined in the methodological appendix in Kenney et al. (2016).³¹

“Employed” is an indicator for whether a person reports employment at the time of the survey. ACS measures on the number of weeks and hours worked (employed 48 weeks a year and 20 hours a week, as well as usual hours worked per week) are conditional on having worked in the previous calendar year. Individuals who are not working at the time of the survey may report positive working hours in the past. In the ACS, people who are not working or who are temporarily absent from work are asked whether they have actively been looking for work in the past four weeks. “Unemployed” is an indicator for whether a person is not employed and is looking for work. People who are not employed at the time of the survey nor actively looking for work are counted as not being in the labor force.

The six health limitations measured in the ACS are whether a person is deaf or has serious difficulty hearing; whether a person is blind or has serious difficulty seeing even when wearing glasses; or, because of a physical, mental, or emotional condition, the person has a serious difficulty concentrating, remembering or making decisions; serious difficulty walking or climbing stairs; serious difficulty doing errands; or serious difficulty bathing or dressing.

Internet access questions are assessed at the household level and consider cell phone services as a form of internet access. Broadband internet refers to cable, DSL, or fiber-optic internet connections and is assessed at the household level.

SNAP receipt is measured at the household level and refers to any SNAP assistance received in the previous 12 months.

Appendix B. Additional Tables

TABLE B.1

Selected Characteristics of Nonelderly Medicaid enrollees in Arkansas receiving SSI Disability Benefits or Dually Enrolled in Medicare and Medicaid

Enrollee characteristic	Enrollees receiving SSI or dually enrolled in Medicare and Medicaid
Age	
Average (years)	46.80
19-29	12%
30-39	17%
40-49	20%
50-64	51%
Race and ethnicity	
White, non-Hispanic	66%
Black, non-Hispanic	27%
Hispanic	4%
Other race, non-Hispanic	3%
Gender	
Male	45%
Female	55%
Marriage and family	
Married	25%
Divorced, separated, or widowed	39%
Never married	36%
Childless ^a	70%
Parents of children under age 18	19%
Parents of children under age 6	8%
Income and education	
Income <50% of FPL	43%
Income ≥50 and <100% of FPL	23%
Income ≥100% of FPL	33%
SNAP receipt	47%
Attending school	4%
Less than a high school education	26%
High school degree	52%
Greater than a high school education	22%
Labor market	
Employed at time of survey	9%
Worked in prior year	12%
Worked at least 48 weeks in prior year ^b	49%
Worked at least 48 weeks and 20 hours a week in prior year ^b	43%
Usual hours worked per week in prior year (if working in prior year) ^b	29.66
Unemployed	3%
Not in labor force	88%
Looking for work	3%
At least one member of household is employed	40%
Health limitations	
Serious difficulty concentrating, remembering, or making decisions	37%
Serious difficulty walking or climbing stairs	43%

Enrollee characteristic	Enrollees receiving SSI or dually enrolled in Medicare and Medicaid
Serious difficulty doing errands	31%
Serious difficulty bathing or dressing	17%
Blind or serious vision difficulty	11%
Deaf or serious hearing difficulty	9%
Reports one or more serious health limitations	68%
Reports two or more serious health limitations	40%
Household member (including self) reports one or more serious health limitations	76%
Internet and vehicle access	
Household has no internet access	37%
Household has no broadband (cable/DSL/fiber-optic) internet access	61%
Household has no access to vehicle	17%
Estimated number of enrollees	98,000

Source: Urban Institute tabulations of the 2016 American Community Survey.

Notes: FPL = the federal poverty level; SNAP = the Supplemental Nutrition Assistance Program; SSI = Supplemental Security Income. Sample consists of adults ages 19 to 64 who have Medicaid coverage and are receiving SSI assistance or are dually enrolled in Medicaid and Medicare, and reside in Arkansas. Population numbers have been rounded to the nearest thousand.

^a Childless adults are not living with dependent children age 18 or under, but they may be noncustodial parents of children age 18 or under or parents of children age 19 and older.

^b Estimates of work intensity are conditional on having worked in the prior year.

TABLE B.2

Selected Characteristics of Nonelderly Nondisabled Medicaid Enrollees in Arkansas by Waiver Exemption and Work Status, under 2018 Work Requirement Rules

Enrollee characteristic	Group 1 Likely exempt from waiver	Group 2 Potentially nonexempt and working	Group 3 Potentially nonexempt and not working
Age (years)			
Average	38.44	41.56*	40.58*
19-29	38%	0%*	0%*†
30-39	21%	31%*	40%*
40-49	10%	69%*	60%*
50-64	31%	0%*	0%*†
Race and ethnicity			
White, non-Hispanic	68%	66%	73%
Black, non-Hispanic	23%	26%	24%
Hispanic	5%	3%	0%*†
Other race, non-Hispanic	4%	5%	3%
Gender			
Male	36%	47%*	53%*
Female	64%	53%*	47%*
Marriage and family			
Married	38%	23%*	23%*
Divorced, separated, or widowed	26%	47%*	41%*
Never married	35%	30%	36%
Childless ^a	50%	80%*	90%*†
Parents of children age 18 and under	45%	0%*	0%*†

Enrollee characteristic	Group 1 Likely exempt from waiver	Group 2 Potentially nonexempt and working	Group 3 Potentially nonexempt and not working
Parents of children age 6 and under	26%	0%*	0%*†
Income and education			
Income <50% of FPL	26%	16%*	36%*†
Income ≥50% and <100% of FPL	26%	16%*	20%
Income ≥100% of FPL	48%	68%*	45%†
SNAP receipt	38%	35%	39%
Attending school	13%	0%*	0%*†
Less than a high school education	17%	14%	16%
High school degree	47%	49%	63%*†
Greater than a high school education	36%	37%	21%*†
Labor market			
Employed at time of survey	47%	100%*	0%*†
Worked in prior year	58%	100%*	25%*†
Worked at least 48 weeks in prior year ^b	58%	74%*	3%*†
Worked at least 48 weeks and 20 hours a week in prior year ^b	55%	68%*	3%*†
Usual hours worked per week in prior year (if working in prior year) ^b	33.48	35.84*	32.95*†
Unemployed	8%	0%*	19%*†
Not in labor force	46%	0%*	81%*†
Looking for work	18%	56%*	20%†
At least one member of household is employed	74%	100%*	54%*†
Health limitations			
Serious difficulty concentrating, remembering, or making decisions	9%	5%	17%*†
Serious difficulty walking or climbing stairs	10%	8%	15%*†
Serious difficulty doing errands	7%	1%*	10%†
Serious difficulty bathing or dressing	4%	1%*	5%†
Blind or serious vision difficulty	4%	6%	5%
Deaf or serious hearing difficulty	3%	3%	4%
Reports one or more serious health limitation	20%	16%	28%*†
Reports two or more serious health limitations	10%	4%*	17%*†
Household member (including self) reports one or more serious health limitation	42%	44%	49%
Internet and vehicle access			
Household has no internet access	22%	26%	37%*†
Household has no broadband (cable/DSL/fiber-optic) internet access	50%	61%*	67%*
Household has no access to vehicle	6%	5%	6%
Estimated number of enrollees	230,000	17,000	22,000

Source: Urban Institute tabulations of the 2016 American Community Survey.

Notes: FPL = the federal poverty level; SNAP = the Supplemental Nutrition Assistance Program. Sample consists of adults ages 19 to 64 who have Medicaid coverage; reside in Arkansas; and do not receive Supplemental Security Income or are not dually enrolled in Medicare (these groups will be excluded from work requirements under the waivers). We model enrollees as “likely exempt” if they are age 50 or above, age 29 or below, attend school, live in a household with a child under age 18, or are a caregiver of a disabled family members receiving Supplemental Security Income. Percentages refer to fraction of each group that compose the state’s enrollee total. See appendix A for more detail on definition of these variables. Population numbers have been rounded to the nearest thousand. Using self-reported income data, we estimate that about 18,000 enrollees in Group 1 are parents who are likely enrolled under the Section 1931 eligibility pathway and would be not be subject to work requirements in

Arkansas. Because we do not observe the basis of Medicaid eligibility in the American Community Survey, this group is retained in the sample.

^a Childless adults are not living with dependent children under age 18, but they may be noncustodial parents of children under age 18 or parents of children age 18 or older.

^b Estimates of work intensity are conditional on having worked in the previous year.

* Estimate differs significantly ($p < 0.05$) from Group 1 estimate.

† Estimate differs significantly ($p < 0.05$) from Group 2 estimate.

TABLE B.3

Selected Characteristics of Adults with incomes below 138 percent of the Federal Poverty Level in Arkansas by Potential Waiver Exemption and Work Status

Enrollee characteristic	Group 1 Likely exempt from waiver	Group 2 Potentially nonexempt and working	Group 3 Potentially nonexempt and not working
Age (years)			
Average	37.64	30.02*	31.88*†
19–29	38%	59%*	50%*†
30–39	22%	17%*	20%
40–49	11%	24%*	30%*†
50–64	29%	0%*	0%*†
Race and ethnicity			
White, non-Hispanic	67%	71%	65%
Black, non-Hispanic	22%	21%	26%
Hispanic	6%	4%*	5%
Other race, non-Hispanic	5%	4%	4%
Gender			
Male	42%	57%*	58%*
Female	58%	43%*	42%*
Marriage and family			
Married	33%	9%*	13%*
Divorced, separated, or widowed	29%	20%*	27%†
Never married	38%	71%*	61%*†
Childless ^a	45%	95%*	96%*
Parents of children age 17 and under	50%	0%*	0%*†
Parents of children age 6 and under	30%	0%*	0%*†
Income and education			
Income <50% of FPL	38%	16%*	50%*†
Income ≥50% and <100% of FPL	31%	35%	29%
Income ≥100% of FPL	30%	49%*	21%*†
SNAP receipt	34%	18%*	40%*†
Attending school	24%	0%*	0%*†
Less than a high school education	15%	8%*	20%*†
High school degree	45%	57%*	61%*
Greater than a high school education	40%	36%*	19%*†
Labor market			
Employed at time of survey	52%	100%*	0%*†
Worked in prior year	64%	100%*	31%*†
Worked at least 48 weeks in prior year ^b	58%	63%*	5%*†
Worked at least 48 weeks and 20 hours a week in prior year ^b	54%	60%*	5%*†
Usual hours worked per week in prior year (if working in prior year) ^b	33.59	34.55*	33.65*†

Enrollee characteristic	Group 1 Likely exempt from waiver	Group 2 Potentially nonexempt and working	Group 3 Potentially nonexempt and not working
Unemployed	7%	0%*	26%*†
Not in labor force	41%	0%*	74%*†
Looking for work	19%	35%*	28%*
At least one member of household is employed	71%	100%*	53%*†
Health limitations			
Serious difficulty concentrating, remembering, or making decisions	7%	2%*	15%*†
Serious difficulty walking or climbing stairs	8%	3%*	10%†
Serious difficulty doing errands	5%	1%*	11%*†
Serious difficulty bathing or dressing	2%	0%*	4%*†
Blind or serious vision difficulty	3%	3%	4%
Deaf or serious hearing difficulty	2%	2%	4%*†
Reports one or more serious health limitation	15%	8%*	27%*†
Reports two or more serious health limitations	7%	1%*	14%*†
Household member (including self) reports one or more serious health limitation	35%	28%*	43%*†
Internet and vehicle access			
Household has no internet access	23%	20%	31%*†
Household has no broadband (cable/DSL/fiber-optic) internet access	54%	53%	65%*†
Household has no access to vehicle	7%	5%	9%*†
Estimated number of adults	304,000	63,000	48,000

Source: Urban Institute tabulations of the 2016 American Community Survey.

Notes: FPL = the federal poverty level; SNAP = the Supplemental Nutrition Assistance Program. Waiver exemptions are modeled under 2019 rules. Sample consists of adults ages 19 to 64 who have Medicaid coverage; reside in Arkansas; do not receive Supplemental Security Income or are not dually enrolled in Medicare (these groups will be excluded from work requirements under the waivers); and report income below 138 percent of the federal poverty level. We model enrollees as “likely exempt” if they are age 50 or above, age 29 or below, attend school, live in a household with a child under age 18, or are a caregiver of a disabled family members receiving Supplemental Security Income. Percentages refer to fraction of each group that compose the state’s enrollee total. See appendix A for more detail on definition of these variables. Population numbers have been rounded to the nearest thousand. Using self-reported income data, we estimate that about 18,000 enrollees in Group 1 are parents who are likely enrolled under the Section 1931 eligibility pathway and would be not be subject to work requirements in Arkansas. Because we do not observe the basis of Medicaid eligibility in the American Community Survey, this group is retained in the sample.

^a Childless adults are not living with dependent children under age 18, but they may be noncustodial parents of children under age 18 or parents of children age 18 or older.

^b Estimates of work intensity are conditional on having worked in the previous year.

* Estimate differs significantly ($p < 0.05$) from Group 1 estimate.

† Estimate differs significantly ($p < 0.05$) from Group 2 estimate.

TABLE B.5

Arkansas Counties in Regional Analysis

Arkansas region	Counties in region
Northwest	Baxter, Benton, Boone, Carroll, Conway, Crawford, Howard, Johnson, Logan, Madison, Marion, Newton, Perry, Polk, Pope, Scott, Searcy, Sebastian, Sevier, Washington, Yell
Northeast	Cleburne, Clay, Craighead, Crittenden, Cross, Fulton, Greene, Independence, Izard, Jackson, Lawrence, Lee, Mississippi, Monroe, Phillips, Poinsett, Prairie, Randolph, Sharp, St. Francis, Stone, Van Buren, White, Woodruff
Central	Faulkner, Lonoke, Pulaski, Saline
Southwest	Clark, Calhoun, Columbia, Dallas, Garland, Hempstead, Hot Spring, Lafayette, Little River, Miller, Montgomery, Nevada, Ouachita, Pike, Union
Southeast	Arkansas, Grant, Jefferson, Ashley, Bradley, Chicot, Cleveland, Desha, Drew, Lincoln

Source: Authors' divisions using 2016 American Community Survey data.

Notes

¹ Brian Neale, “RE: Opportunities to Promote Work and Community Engagement among Medicaid Beneficiaries,” Jan. 11, 2018.

² “Reducing Poverty in America by Promoting Opportunity and Economic Mobility,” Exec. Order No. 13828, 83 Fed. Reg. 15941 (April 13, 2018).

³ See Seema Verma (CMS), Letter to Governor Asa Hutchinson, March 5, 2018. For information on the status of Medicaid work requirements waivers across states, see Kaiser Family Foundation (2018). For further background on Arkansas’s Medicaid work requirements and exemption criteria, see Craig Wilson and Joseph Thompson, “Medicaid Expansion in Arkansas Continues Evolution, Adds Work Requirement,” *Health Affairs Blog*, March 16, 2018.

⁴ Beginning June 1, 2018, Medicaid work requirements will apply to new enrollees ages 30 to 49 who do not qualify for an exemption. Between June and September 2018, enrollees ages 30 to 49 who were enrolled before June 1 and who do not qualify for an exemption will be phased into Medicaid work requirements.

⁵ Medicaid coverage is estimated using a methodology developed by Victoria Lynch of the Urban Institute; see Kenney et al. (2012) for more details. Estimates using the unedited ACS insurance values from the US Census Bureau provide qualitatively very similar results and are available upon request from the authors.

⁶ Enrollees who are “employed or self-employed at least 80 hours per month on an ongoing basis” are exempt from reporting completed work hours. See “F-200 Work and Community Engagement Requirement for the Adult Expansion Group,” Arkansas Department of Human Services, Medical Services Policy Manual, last updated May 1, 2018.

⁷ See Seema Verma (CMS), [letter to Governor Asa Hutchinson](#), March 5, 2018.

⁸ ACS data in 2016 will overstate the likely number of SNAP recipients in 2018 for Arkansas. Arkansas reestablished SNAP work requirements in the second quarter of 2016. As a result, we should expect to first observe SNAP receipt to decrease as a result of the reinstatement of SNAP work requirements.

The approved waiver in Arkansas will also consider those who are exempt from or compliant with the state TANF program to be either exempt from or compliant with Medicaid work requirements. We do not separately assess characteristics of enrollees with and without TANF because it is poorly measured in the ACS. However, previous studies indicate that most TANF recipients receive SNAP benefits (Office of Family Assistance 2016). The ACS collects information about income received from public assistance or welfare payments, which includes information on income from TANF as well as on income from general assistance or general relief programs that are not related to TANF. It does not indicate the type of public assistance received.

⁹ Throughout this report, we use the term “nondisabled” to refer to nonelderly Medicaid enrollees who are not receiving SSI or are not dually enrolled in Medicaid and Medicare.

¹⁰ For examples of Arkansas outreach materials communicating work requirements, see “AR Works Information,” Arkansas Works, accessed May 21, 2018, <https://ardhs.sharepointsite.net/ARWorks/default.aspx>.

¹¹ See “What You Need to Know about the Work Requirement,” Arkansas Works, accessed May 21, 2018, https://ardhs.sharepointsite.net/ARWorks/Notice_Samples/1.%20Flyer%20%E2%80%93%20AR%20Works%20Work%20Requirement%20Info.pdf.

¹² We do not model employment as an exemption qualification but rather as a work-related activity required to maintain compliance. The state has indicated that some employed enrollees may qualify for an exemption from having to report on work activities.

- ¹³ See “4. Example – Subject to Work Requirement – Work Activities,” Arkansas Works, accessed May 21, 2018, https://ardhs.sharepointsite.net/ARWorks/Notice_Samples/4.%20Example%20%E2%80%93%20Subject%20to%20Work%20Requirement%20%E2%80%93%20Work%20Activities.pdf.
- ¹⁴ See “What You Need to Know about the Work Requirement,” Arkansas Works, accessed May 21, 2018, https://ardhs.sharepointsite.net/ARWorks/Notice_Samples/1.%20Flyer%20%E2%80%93%20AR%20Works%20Work%20Requirement%20Info.pdf.
- ¹⁵ Brian Neale, “RE: Opportunities to Promote Work and Community Engagement among Medicaid Beneficiaries.”
- ¹⁶ See “Arkansas Works Resource Dashboard,” Arkansas Works, accessed May 21, 2018, https://ardhs.sharepointsite.net/ARWorks/resource_dashboard/index.html
- ¹⁷ Enrollee estimates may not sum to this total because of rounding.
- ¹⁸ See “Table 5. Medicaid Income Eligibility Limits for Adults as a Percent of the Federal Poverty Level, January 2017,” Kaiser Family Foundation, accessed May 21, 2018 <http://files.kff.org/attachment/Report-Medicaid-and-CHIP-Eligibility-as-of-Jan-2017-Table-5>.
- ¹⁹ Our estimate of the number of enrollees potentially nonexempt from work requirements appears to align well with the state’s own projections. According to one report, Arkansas has projected that in 2018, about 39,000 enrollees ages 30 to 49 will be subject to the work requirement. See Benjamin Hardy, “DHS Rolls Out Work Requirement Portal for Arkansas Works Beneficiaries,” *Arkansas Blog, Arkansas Times*, April 2, 2018.
- ²⁰ Our estimate of total Medicaid enrollees in Arkansas using coverage edits (853,000) benchmarks well with state enrollment totals from June 2016 (857,359).
- ²¹ See Appendix 4 of National Council for Behavioral Health (2015).
- ²² See “Arkansas Department of Human Services Application for Health Coverage,” Arkansas.gov, last updated July 2017, accessed May 21, 2018, <http://humanservices.arkansas.gov/images/uploads/dco/DCO-0152.pdf>.
- ²³ Among all nondisabled Medicaid enrollees who are unmarried and live with a dependent child under age 18 in Arkansas, 86 percent are women.
- ²⁴ Prior research has found that SNAP receipt is underreported in the ACS (for example, Scherpf, Newman, and Prell 2015).
- ²⁵ See “ABAWD Waivers,” Food and Nutrition Service, last published April 11, 2018, <https://www.fns.usda.gov/snap/abawd-waivers>.
- ²⁶ Observing whether individuals are exempt from or compliant with SNAP work requirements introduces limitations as does estimating whether enrollees are likely exempt or nonexempt from Medicaid work requirements. Further, our 2016 ACS data may not be as informative of the current distribution and characteristics of SNAP recipients as it is for Medicaid recipients. Arkansas reintroduced SNAP work requirements for able-bodied adults without dependents in the first quarter of 2016 (see “ABAWD Waivers,” Food and Nutrition Service, last published April 11, 2018, <https://www.fns.usda.gov/snap/abawd-waivers>) and likely operationalized work requirements later in the year.
- ²⁷ Among all states in 2015, households in Arkansas reported the second-lowest rate of computer and internet use and the second-lowest rate of broadband access. See “Table 702.60: Number and Percentage of Households with Computer and Internet Access, by State, 2015,” National Center for Education Statistics, Digest of Education Statistics, accessed May 8, 2018; and Ryan and Lewis 2017).

²⁸ See note 20.

²⁹ Using information reported in the 2016 ACS data, we estimate that approximately 13,000 nonelderly, nondisabled women ages 19 to 50 with Medicaid gave birth in the past year in Arkansas, representing about 7 percent of our total affected Medicaid enrollee group.

³⁰ See “ABAWD Waivers,” Food and Nutrition Service, last published April 11, 2018, <https://www.fns.usda.gov/snap/abawd-waivers>.

³¹ Self-reported income is subject to measurement error in household surveys (Meyer and Mittag 2015). As a result, descriptions of share of enrollees in poverty and deep poverty are potentially mismeasured. However, to the extent that the degree of measurement error in self-reported income is shared across all enrollees, our estimates are reliable for drawing income comparisons *across* enrollee groups.

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