

Table 6: Renewals, Changes in Circumstances, and Returned Mail, January 2021 ¹				
State	Renewals		Changes in Circumstances	
	Processing ex parte renewals and extending renewal dates ²	Renewal form sent if unable to process ex parte renewal ³	New 12-month renewal period if moved to new eligibility category ⁴	Proactively update addresses or plans to prior to the end of the PHE ⁵
Total	41	28	19	19
Alabama			Y	Y
Alaska	Y	Y		
Arizona	Y	Y		
Arkansas	Y	Y		
California	Y	Y	Y	
Colorado	Y	Not reported	Y	
Connecticut	Y	Y	Y	
Delaware	Y			
District of Columbia				
Florida	Y	Y	Y	Y
Georgia	Y	Y		
Hawaii	Y	Y		Y
Idaho	Y	Y		
Illinois	Y	Y	Y	Y
Indiana	Y			
Iowa	Y			
Kansas	Y		Y	
Kentucky				
Louisiana	Y			Y
Maine	Y	Y		
Maryland	Y	Y	Y	Y
Massachusetts	Y		Y	Y
Michigan				
Minnesota	Y			Y
Mississippi	Y			
Missouri				Y
Montana	Y	Y	Y	Y
Nebraska	Y	Y		
Nevada				
New Hampshire	Y	Y		Y
New Jersey	Y	Y	Y	
New Mexico	Y	Y		Y
New York			Y	Y
North Carolina	Y	Y	Y	
North Dakota	Y	Y		Y
Ohio	Y	Y		
Oklahoma	Y	Y		
Oregon	Y	Not reported		
Pennsylvania	Y	Y		
Rhode Island			Y	Y
South Carolina			Y	Y
South Dakota	Y	Y	Y	
Tennessee	Y			Y
Texas	Y	Y	Y	Y
Utah	Y	Y	Y	Y
Vermont	Y			
Virginia	Y	Y		
Washington	Y	Y		
West Virginia	Y	Y		
Wisconsin	Y		Y	
Wyoming				

SOURCE: Based on a national survey conducted by KFF with the Georgetown University Center for Children and Families, 2021. Table presents rules in effect as of January 1, 2021.

Table 6 Notes

1. Normal state operations were disrupted in 2020 as a result of the COVID-19 pandemic. The Families First Coronavirus Response Act requires states to maintain continuous eligibility during the public health emergency. As a result, some states suspended or altered their renewal processes.
2. Under the Affordable Care Act (ACA), states must seek to re-determine eligibility at renewal using electronic data matches with reliable sources of data prior to requiring enrollees to complete a renewal form. This process is technically called ex parte but is often referred to as automated or passive renewals. This column indicates if the state was continuing to conduct ex parte renewals as of January 2021.
3. Under the ACA, when a state is unable to process an automated renewal, it is expected to send the enrollee a renewal notice or form pre-populated with data on file. This column indicates if a state was continuing to send pre-populated renewal forms as of January 2021.
4. This column indicates if the state is currently moving beneficiaries to a new eligibility pathway when changes in circumstances are processed. In early November 2020, CMS released an [Interim Final Rule](#) establishing new regulations requiring states to move beneficiaries with changes in circumstances to a new eligibility pathway if it is in the same or a higher benefit tier. The guidance establishes three benefit tiers: tier 1 meets minimum essential coverage (MEC); tier 2 benefits are not MEC but are robust enough to include access to coverage of both testing services and treatment for COVID-19; tier 3 benefits are not MEC and do not cover COVID-19 testing and treatment.
5. This column indicates whether the state routinely takes steps to update address information for enrollees prior to receiving returned mail or plans to do so prior to the end of the public health emergency.