



April 2, 2026

DPHHS Response to Legislative Committee Information Request

Requesting Committee: Children, Families, Health, and Human Services Interim Committee

Committee Meeting Date: March 9, 2026

Requested Information:

1. Additional information about the data and interfaces used to verify ex parte renewals.

The table below shows current interfaces used for both redeterminations and applications. In addition, the Department is working with the Centers for Medicare & Medicaid Services (CMS) to be able to provide client-driven income information, student data, veteran disability data, and employer income information in the coming months.

Data	Interface	Age of Data
Wage records	Department of Labor and Industry	Information could be 4 months old
	Quarterly wage information	
	Department of Labor and Industry Unemployment Insurance	Information could be 4 months old
State tax records	Department of Revenue	Information updated monthly
Death records	Social Security Administration	Information updated daily
	Montana Death Registry System	Information updated daily
Residency records	Social Security Administration	Information updated daily
	State Online Query - Internet (SOLQ-I)	



Data	Interface	Age of Data
	Lexis Nexis Identity Verification	Information updated daily
Incarceration records	Department of Corrections Manual file	Information updated monthly (note: DPHHS and DOC have a separate process for entering and exiting inmates)
Social Security Administration records	Beneficiary Earnings and Data Exchange (BENDEX)	Information updated daily
	Income information	
	State Online Query - Internet (SOLQ-I)	Information updated daily
	SSN records	
	State Verification and Exchange System (SVES)	Information updated daily
	40 quarters' wage information for LAPR	
HHS new hire records	National Directory of New Hires	Information could be 4 months old
HHS child support records	DPHHS Child Support Services Division	Information updated daily
	SEARCHS interface	
FBI fleeing felon records	Lexis Nexis Identity Verification	Information updated daily
OOS EBT transactions	National Accuracy Clearinghouse (NAC)	Information updated daily
	PARIS report	File received monthly
Verification of Exchange referrals to Medicaid	Federal Data Services Hub	Information updated daily

2. The committee requests the following information on redetermination and implementation of community engagement requirements:

- a. H.R. 1 includes a notice period to ensure enrollees are aware of new community engagement requirements. States must notify individuals at least three months before implementation. At the committee meeting on March 9, the Department noted that CMS will accept notice received at any time in a month, including the last day of the month, as a month of**



notice. Please provide a copy of the communication or other guidance document from CMS that supports this interpretation of H.R. 1.

The Department is not aware of a formal CMS guidance document confirming this interpretation. The Department's timeline is based on the statutory language in H.R. 1, Subchapter D, Section 71119(a)(xx)(8)(A), which states:

"In general.—In accordance with standards specified by the Secretary, beginning not later than the date that precedes December 31, 2026 (or, if the State elects under paragraph (1) to specify an earlier date, such earlier date) by the number of months specified by the State under paragraph (1)(A) plus 3 months, and periodically thereafter, the State shall notify applicable individuals enrolled under a State plan (or waiver) under this title of the requirement to demonstrate community engagement under this subsection."

The Department plans to implement community engagement requirements on July 1, 2026. Montana follows a 60-day redetermination process. The first redeterminations subject to community engagement will be those due in August 2026 and initiated in July 2026. Montana will begin with a one-month lookback period for these cases. Because the statute requires notice at least four months in advance of redetermination, notices sent in March 2026 satisfy that requirement by providing more than four months of notice: April, May, June, and July.

The Department will transition to a three-month lookback period beginning with cases initiated in September 2026 and due in October 2026. These cases require at least six months of notice. Notices issued in March 2026 satisfy that requirement by providing more than six months of notice: April, May, June, July, August, and September.

b. The committee requests copies of the notices sent to Medicaid enrollees by mail, email, text, phone script, or any other means.

Notices sent to enrollees are available on the Department's informational website: medicaidchanges.mt.gov.

c. How are states authorized to "pull forward" redeterminations? Is that authority provided through CMS guidance? The committee requests the guidance document or other communication that permits states to begin this process early.



CMS issued a State Medicaid Director letter outlining state options for pulling forward cases. Montana will begin this process in January 2027 using Option 1 described in the letter: [State Medicaid Director Letter SMD #26-001](#).