

# Proposal: Good Faith Exemption Request

## Goal:

Provide CMS with a recommended template to collect information from States that documents:

- efforts to comply and
- unavoidable delays

in order to gain additional time to implement.

## Assumptions:

- Request an additional 12 months delay in enforcement – proposed enforcement date: July 1, 2022
- Recommend that any State request be submitted by **July 30, 2021**
- Request will be sent by State Medicaid Director
- Responses to States will be sent within 30 days of receipt; if the request is not approved, States will have the ability to revise and re-submit.

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| Project Phase                           | Description of Activities  | By July 1, 2021 States be able to document the following in order to meet a good faith exemption   |
|---|--|--|
| Discovery;<br>environmental<br>scanning | Assess State readiness for implementation  | Complete. This milestone can be met through documented participation in S-TAG Interoperability Workgroup sponsored demonstrations; meetings with stakeholders and potential partners such as HIEs and MCOs; review potential to leverage the eligibility systems; review existing policies and procedures related to data sharing with Medicaid-eligible individuals; review CMS required or recommended implementation guides |
| Project Planning                        | Determine implementation approach, including the services/solutions to procure; the opportunity to collaborate with other States | Complete. Meeting this milestone can be met through documented efforts to secure resources to assist in planning, including the identification of key internal leads, the establishment of a governance structure and the development of a planning APD  |
| Procurement                             | RFP(s) developed, shared with CMS and issued   | In process   |
| Go-live                                 |  | Request should indicate expected implementation date no later than July 1, 2022.   |