



## PUBLIC SECTOR SERVICES

# Navigating Work Requirements with AI-Driven Eligibility and Enrollment Solutions Under H.R. 1

The One Big Beautiful Bill Act (H.R. 1 or OBBBA) was signed into law on July 4, 2025,<sup>1</sup> introducing significant changes to Medicaid policies and operations.

More specifically, H.R. 1 introduces mandatory work requirements for certain able-bodied adults aged 19 to 64.<sup>2</sup> Beneficiaries must complete and document 80 hours per month of work, community service, or educational programs, while certain groups such as pregnant individuals and those recently released from incarceration or hospitalization are exempt. The Congressional Budget Office (CBO) projects that annually, 18.5 million people could be impacted by work requirements, leading to a potential reduction in Medicaid enrollment of 5.2 million adults by 2034.<sup>3</sup>

Overall, new Medicaid work requirements stand to dramatically increase the technical and administrative burdens on state eligibility systems along with other changes in H.R. 1 such as 6-month Medicaid eligibility redeterminations, elimination of Supplemental Nutrition Assistance Program (SNAP) work requirement waivers, and a reduction in SNAP administrative funding.

These combined impacts will be particularly challenging for states with integrated eligibility systems. The added administrative burden only increases when considering the current reality of limited state resources and the staffing and technology capacity to meet these requirements within the mandated timelines.

**Without a clear strategy, states may face challenges that could be costly and time-consuming, and they may be at risk of not complying with federal standards or appropriately serving stakeholders.**

Before implementing a large-scale, complex, and costly solution, states should consider a rapid and thorough analysis of their current Medicaid enrollment and eligibility infrastructure, along with other systems involved in efficiently and transparently managing work requirements and potentially other parts of eligibility determination.



<sup>1</sup> U.S. Congress. H.R.1 - 119th Congress (2025-2026): One Big Beautiful Bill Act. Congress.gov. Accessed August 27, 2025. <https://www.congress.gov/crs-product/R48569>.

<sup>2</sup> Congressional Research Service. R48569: Analysis of H.R.1 - One Big Beautiful Bill Act. Library of Congress. Accessed August 27, 2025. <https://www.congress.gov/crs-product/R48569>.

<sup>3</sup> Congressional Budget Office. Cost Estimate for H.R.1 - One Big Beautiful Bill Act. April 2023. Accessed August 27, 2025. <https://www.cbo.gov/system/files/2023-04/59109-Pallone.pdf>.



As states face the challenge of increased eligibility workload and decreased administrative funding, AI offers new tools and strategies.

These include access to and analyses of relevant data across state government, and other enhancements to the eligibility process that are critical to the path forward. For AI to truly be a part of this solution, significant work is needed around access to information across the state, governance, and overall enhancement of the eligibility process.

**A&M has proven success in supporting states with rapid and strategic assessments that quickly and logically facilitate project planning to achieve federal compliance and meet state policy and programmatic goals.**

Our methodology effectively assesses existing infrastructure capabilities while strategically planning for additional infrastructure needs and the future governance model. This approach is vital to achieve compliance with work requirements and other OBBBA provisions that align with state laws, regulations, and priorities.

More specifically, the A&M P.A.T.H (Plan, Adapt, Transform, Harmonize) Framework offers a comprehensive and flexible approach for states to consider when implementing AI solutions within complex systems such as Medicaid. This framework outlines the entire process, from the initial planning stages to long term sustainability. It includes essential components such as cost-benefit analyses, seamless integration with existing systems, and iterative testing to ensure successful implementation. A&M's PATH Framework can further assist states with technical support, governance, and structured methods to effectively implement AI-driven solutions, driving sustainable modernization and measurable improvements in Medicaid programs. While our PATH framework is customizable to the environment and needs for each state, the planning and implementation of such initiatives under significant time constraints creates common risks and pitfalls.

**A&M is equipped to quickly mobilize and support states as they undertake this important and complex journey and maximize the use of technology within their current Medicaid ecosystems.**

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