

Page Number	2022 Implementation Guide (current version)	2023 Implementation Guide (newest version)	Type of Change	Reason for Change	Burden Change
Page 1	MMDL: CS27 2105(a)(4)(A) 2107(e)(1)(K) of the SSA and 42 CFR 457.342 and 435.926; 2107(e)(1)(J) and 1902(e)(16) of the SSA	Remove reference to 2105(a)(4)(A) and add 2107(e)(1)(K)	Rev	New statutory option to provide extended postpartum coverage in Medicaid and CHIP, consistent with sections 1902(e)(16) and 2107(e)(1)(J) of the Act respectively.	No
Page 1	2) whether states' elect the option to provide continuous eligibility coverage for children.	Change language from an option to mandatory assurance to provide continuous eligibility for children.	Rev	Revises scenario to make the CE for children mandatory.	No
Page 1	1) Effective between April 1, 2022, and March 31, 2027, continuous eligibility during an individual's 12-month extended postpartum period in Medicaid if they have an approved CS7 and/or CS8.	Remove reference to the beginning date April 1, 2023, for the option as well as the sunset date of March 31, 2027.	Rev	New statutory option to provide extended postpartum coverage in Medicaid and CHIP, consistent with sections 1902(e)(16) and 2107(e)(1)(J) of the Act respectively. Removes the 5-year option in CAA.	No
Page 1	2) Optional continuous eligibility coverage to targeted low-income children.	Change language from Optional to Mandatory Continuous Eligibility for Children.	Rev	Revises title to make the CE for children mandatory.	No
Page 1	For states that elect to cover only unborn children consistent with the CS9 through its separate CHIP, the 12-Month Postpartum Continuous Eligibility section of this template is not applicable. However, states may elect the option to provide continuous eligibility for	Replace reference for unborn children to from-conception-to-end-of-pregnancy population (otherwise known as the "unborn"). Changes language from elect the option to Mandatory Continuous Eligibility for Children section is required.	Rev	Revises title for the unborn children. Revises title to make CE for children mandatory.	No

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	unborn children in addition to other targeted low-income children.				
Page 1	States implementing the extended postpartum period in CHIP are required to provide the same scope of benefits provided to other targeted low-income children or targeted low-income pregnant women under the CHIP state plan.	Move paragraph to page 2.	Rev	Better placement of the language.	No
Pages 2 - 3	CHIP Agency may provide continuous eligibility for a period up to 12 months or until the time the child reaches an age specified by the state	Revise introductory paragraph indicating that CE for children is now mandatory. The CHIP Agency must provide that children who have been determined eligible under the state plan shall remain eligible, regardless of any changes in the family's circumstances, for a 12-month continuous eligibility period.	Rev	Consistent with section 2107(e)(1)(K) of the SSA which was added by the CAA.	No
		Include state assurance that continuous eligibility is provided to its targeted low-income children for duration of 12 months. Includes updates to sub-bullets.	Rev	Consistent with section 2107(e)(1)(K) of the SSA which was added by the CAA.	Yes - mandatory section for any state providing coverage to targeted low-income children in CHIP.
Page 3	Optional Continuous Eligibility Period for Children	Revise introductory paragraph indicating that CE for children	Rev	Consistent with section 2107(e)(1)(K) of the SSA	No

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	<ul style="list-style-type: none"> • Policy Statement • Selection of Continuous Eligibility Option • Age • Continuous Eligibility Period • Exceptions to Continuous Eligibility 	is now mandatory. Includes updates to sub-bullets.		which was added by the CAA.	
Page 4	Pregnant individuals are eligible for the extended postpartum option in CHIP beginning on the effective date of this CS27 template (as early as April 1, 2022) through a 5 year-period ending on March 31, 2027.	Remove paragraph and reference to the beginning date April 1, 2023, for the option as well as the sunset date of March 31, 2027.	Rev	New statutory option to provide extended postpartum coverage in Medicaid and CHIP, consistent with sections 1902(e)(16) and 2107(e)(1)(J) of the Act respectively. Removes the 5-year option in CAA.	No
Page 5	Optional Continuous Eligibility Period for Children	Revise title from Optional to Mandatory Continuous Eligibility for Children. Revise language to reflect mandatory assurance of CE and permissible exceptions to CE.	Rev	Revises title to make the CE for Children Mandatory	No
Page 5	Age selection for optional CE -for children up to age 19 or	Remove	Rev	Consistent with section 2107(e)(1)(K) of the SSA which was added by the CAA.	No
Page 5	CE ends at the end of the (drop down box max of 12) months continuous eligibility period	Remove	Rev	Consistent with section 2107(e)(1)(K) of the SSA which was added by the CAA.	No
Page 6	There is a failure to pay required premiums or	Remove	Rev	Consistent with section 2107(e)(1)(K) of the SSA	No

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	enrollment fees on behalf of a child, as provided for in the state plan.			which was added by the CAA.	
		The state elects to provide coverage to the from-conception-to-end-of-pregnancy (FCEP) population (otherwise known as the “unborn”). Yes/No	Add	Consistent with section 2107(e)(1)(K) of the SSA which was added by the CAA.	Yes - if state elects to provide coverage to the unborn option
		The state assures continuous eligibility for the FCEP population is provided in the same manner as continuous eligibility for other targeted low-income children, except for the duration of the continuous eligibility period.	Add	Consistent with section 2107(e)(1)(K) of the SSA which was added by the CAA.	Yes - if state elects to provide coverage to the unborn option
		The duration of continues eligibility for the FCEP population depends on whether a state enrolls the birthing parent into Medicaid for coverage of labor and delivery or pays for the delivery under CHIP. The state conducts at least one of the following actions upon birth of the child: CHIP pays for labor and delivery and the state screens the child for potential eligibility for Medicaid. Yes/No Emergency Medicaid pays for labor and delivery and the state deems the newborn eligible for Medicaid and ends	Add	Consistent with section 2107(e)(1)(K) of the SSA which was added by the CAA.	Yes - if state elects to provide coverage to the unborn option

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		the continuous eligibility period in CHIP. Yes/No			