

Justification for a Non-Substantive Change
Medicaid Program; Eligibility Changes under the
Affordable Care Act of 2010 and the Social Security Act
CMS-10410, OMB 0938-1147

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What We Are Doing

CMS is deploying Emmy, a CMS-developed, open-source digital tool that helps people demonstrate whether they satisfy community engagement (C-E) requirements as part of the eligibility renewal and application process. Emmy guides beneficiaries through documenting and submitting the information needed to verify C-E compliance — specifically the workflows already contemplated under currently approved CMS-10410 for existing beneficiaries (8,800,000 respondents) and new applicants (3,750,000 respondents).

Emmy's initial go-live is with Louisiana in December 2026, and additional states may follow in 2027.

How It Works

For beneficiaries, the experience is a seamless step within their existing state eligibility workflow:

1. A beneficiary begins their eligibility renewal or application through their state's existing self-service portal.
2. At the appropriate point in that workflow, the state portal routes the beneficiary to Emmy via a tokenized link.
3. The beneficiary completes their community engagement documentation and submission through Emmy.
4. The beneficiary is returned to their state portal workflow.

No separate account creation, login, or credentials are required at any point. Use of Emmy is optional; a beneficiary may instead document and submit community engagement information directly through the state's existing process. The information beneficiaries provide through Emmy is the same information they would otherwise be required to submit to the state — Emmy simply makes that process faster and easier.

For states, adoption is straightforward:

1. The state executes the required data sharing and security agreements with CMS, including an Interconnection Security Agreement (ISA), and completes CMS API onboarding.
2. The state makes minor technical adjustments to generate a tokenized link to Emmy at the appropriate point in their existing eligibility workflow. In Louisiana's case, this capability already exists.

3. Emmy is live for beneficiaries in that state's workflow.

Why This Is a Non-Substantive Change

Emmy is an optional web-based tool that beneficiaries can use to satisfy community engagement reporting obligations that are currently approved by OMB under this collection's control number. For those who choose to use Emmy, we believe the tool would reduce the amount of time it would take to meet the reporting requirements. This is the intent of the tool. No new populations are affected, no new data elements are collected, and no new requirements are imposed on beneficiaries or states beyond what is already captured in the IFC and our currently approved collection of information request.

Burden Impact

Emmy does not increase burden on states, caseworkers, or beneficiaries. Rather, Emmy is expected to reduce beneficiary burden below our active 2-hour per-response estimate by streamlining the documentation and submission process. It is also expected to reduce State caseworker burden by automating verification steps that would otherwise require manual follow-up as Federal verification data sources become available through Emmy, freeing caseworkers to focus on more complex eligibility determinations.

This includes the process for confirming consent where a community engagement verification source requires it (for example, education enrollment data). Where the state has already obtained the necessary consent from the individual as part of its existing eligibility processes, Emmy relies on that existing consent and no new collection occurs. Where the state has not already obtained consent from the individual, Emmy collects it directly from that individual. This is a brief consent step, not a separate collection of information, and is already accounted for within the existing per-response time estimates in our currently approved Supporting Statement.

CMS is not revising the currently approved burden estimates at this time; those estimates remain in place as a conservative ceiling.

Although we are not making any changes to our currently approved Supporting Statement we are proposing to add the following screen shots of the EMMY tool:

1. Community Engagement Overview
2. Reporting Employment
3. Reporting Education
4. Reporting Volunteer Time