



**State of Louisiana**  
Louisiana Department of Health  
Bureau of Health Services Financing

February 6, 2026

Courtney Miller, Director  
CMS/Center for Medicaid and CHIP Services  
Medicaid & CHIP Operations Group  
601 East 12th Street, Room 355  
Kansas City, Missouri 64106

**RE: LA SPA TN 25-0005-A Services to Incarcerated Youth**

Dear Ms. Miller:

Please refer to our proposed Medicaid State Plan amendment (SPA) submitted under transmittal number (TN) 25-0005-A with a proposed effective date of January 1, 2025. The purpose of this SPA is to implement required coverage for incarcerated youth in Medicaid as described in section 5121 of the Consolidated Appropriations Act, 2023 (CAA, 2023). Within the 30 days prior to release (or within one week of release, or as soon as practicable after release), the State will provide eligible children with any screenings, diagnostic services, or case management services that would otherwise be available to children under the CHIP State Plan (or waiver of such plan).

We are providing the following in response to your request for additional information (RAI) dated August 27, 2025:

General Comments/Questions Coverage

1. Based on the state's responses, there are some limitations to providing the mandatory 5121 pre-release services prior to release in the non-state facilities who have decided to not participate. Please include the following language, as applicable, to Section 4.1.9.3:

*The state will maintain clear documentation in its internal operational plan indicating which carceral facility/facilities are furnishing required services during the pre-release period but not enrolling in or billing CHIP. This information is available to CMS upon request.*

*The state may determine that it is not feasible to provide the required services during the prerelease period in certain carceral facilities (e.g., identified local jails, youth*

*correctional facilities, and state prisons) and/or certain circumstances (e.g., unexpected release or short-term stays). The state will maintain clear documentation in its internal operational plan regarding each facility and/or circumstances where the state determines that it is not feasible to provide for the required services during the pre-release period. This information is available to CMS upon request. Services will be provided post-release, including the mandatory screening, and diagnostic services, and case management services consistent with coverage otherwise available under the CHIP state plan.*

**LDH RESPONSE:**

**The State has added the applicable language in the CS31 template. The CS31 template became available after the issuance of this RAI. Please see attached.**

2. Medicaid is required to provide targeted case management (TCM) benefit, but CHIP is only required to provide whatever case management is currently available under the CHIP state plan. However, if the state wants to implement TCM to align with Medicaid, the state may do so by indicating in its CHIP state plan that it is in alignment with Medicaid. For example, the state could add the following language, though we defer to the state on wording to accurately describe the TCM benefit (if provided):

*Targeted case management services are available to eligible juveniles up to 19 years of age who are determined eligible for CHIP as a targeted low-income child immediately before becoming an inmate of a public institution or while an inmate of a public institution. The case managers provide services that are identical to Medicaid as defined in 42 CFR 440.169.*

**LDH RESPONSE:**

**The incarcerated CHIP population will receive the same coverage as non-CHIP eligible juveniles including TCM. Section 6.2.18 of the CHIP State Plan has been updated. Please see attached.**

3. In response to the state's answer to question 7 in the questions sent on July 18, 2025, we understand that the state will accept and process Medicaid and CHIP applications for incarcerated youth at any point during their carceral stay. For our understanding, can the state please clarify the approach it is taking for CHIP applications for children who are not within 30 days prior to release and still subject to the CHIP eligibility exclusion for inmates?

**LDH RESPONSE:**

**For CHIP applications for children who are not within 30 days prior to release subject to the CHIP eligibility exclusion, the State will only enroll the child in Medicaid or Medicaid expansion CHIP, if eligible.**

4. We noticed the state did not include the below assurance. Can the state please confirm if they are able to attest to this assurance, and if so, please include in Section 4.1.9.3? Please note that this assurance will also be included as part of the finalized CS31 template when it becomes available.

*Children applying for coverage who are within 30 days prior to their release and are found eligible for CHIP are provided screenings, diagnostic services, and case management services that are otherwise available under the CHIP state plan (or waiver of such plan).*

**LDH RESPONSE:**

**The State has checked off this assurance in the CS31 template. Please see attached.**

5. Thank you for clarifying that incarcerated youth who are in a suspended status and incarcerated youth who are newly enrolled in CHIP are exempt from paying premiums.
  - a. Can the state please describe when the requirement to pay premiums is reinstated?

**LDH Response:**

**The requirement to pay premiums is reinstated at the release of the youth from the carceral facility. The release date must be added to the eligibility and enrollment system and premiums will be reinstated for the youth enrolled in CHIP once that date has been reached.**

- b. Can the state please include the following language at Section 8.2.1 to describe this policy?:

*For eligible incarcerated youth, premiums are waived during the duration of their carceral stay. Premiums will be required (describe policy).*

**LDH Response:**

**The State has updated Section 8.2.1 of the CHIP State Plan. Please see attached.**

- c. Please also update 8.7 in light of the new policy. The first sentence could state the following, although we defer to the state on exact wording to accurately describe the policy:

*Applicants will not be enrolled in LaCHIP Phase V until they pay for the first month's premium, unless they are currently incarcerated and newly enrolling in CHIP.*

**LDH RESPONSE:**

**The State has updated Section 8.7 of the CHIP State Plan. Please see attached plan page.**

Please consider this as a formal request to begin the 90-day clock. As always, we appreciate the assistance and guidance CMS has provided in resolving these issues. We trust this RAI response will result in the approval of the pending SPA. If additional information is required, you may contact Marjorie Jenkins via email at Marjorie.Jenkins@la.gov or by phone at (225) 342-3881.

Sincerely,



Seth Gold  
Medicaid Executive Director

Attachments

SG:MJ:KF