

The Technical Framework

Hours, Calendars, and Verification Infrastructure for Educational Compliance

Work requirements operate on monthly cycles. Academic calendars operate on semester or quarter cycles with breaks between terms. Translating educational activity into work requirement compliance hours requires bridging these mismatched temporal frameworks while building verification infrastructure that educational institutions weren't designed to provide. The technical choices states make in designing this translation significantly impact whether education functions as a viable compliance pathway or becomes an administrative trap for students who thought they were meeting requirements.

This article consolidates the technical mechanics that apply across all educational settings: credit hour conversion ratios, academic calendar alignment, verification timing, institutional credentialing, data sharing frameworks, and the integration requirements connecting educational systems to Medicaid verification infrastructure. These details may seem like implementation afterthoughts, but they determine whether the 18.5 million expansion adults facing work requirements can realistically use education as their compliance pathway.

Credit Hour Conversion

The federal definition of a credit hour assumes roughly one hour of classroom instruction plus two hours of out-of-class work per week for each credit hour over a fifteen-week semester. A three-credit course thus represents approximately nine hours of educational activity weekly, or roughly 135 hours over a semester. This federal framework provides a starting point for work requirement conversion, but state implementation choices create significant variation.

Most states implementing work requirements have adopted a **3:1 conversion ratio** where each credit hour equals three hours of qualifying activity per week. Under this framework, a full-time student enrolled in twelve credit hours accumulates 36 qualifying hours weekly, or approximately 144 hours monthly. This exceeds the typical 80-hour monthly requirement with substantial margin, making full-time enrollment an automatic compliance pathway.

Part-time students face more complex calculations. Someone enrolled in six credit hours accumulates 18 qualifying hours weekly under the 3:1 ratio, or approximately 72 hours monthly. This falls short of the 80-hour threshold, requiring additional qualifying activity through employment, volunteering, or other approved activities. The compliance math for part-time students requires understanding exact hour counts and supplementing educational hours appropriately.

Some states have adopted more generous conversion ratios. A **4:1 ratio** crediting four hours of qualifying activity per credit hour weekly means full-time enrollment generates 48 hours weekly, or approximately 192 hours monthly. This generous conversion provides even greater compliance margin for full-time students and reduces supplemental requirements for part-time students. The

policy argument for generous ratios recognizes that educational engagement involves substantial effort beyond easily measured classroom attendance.

The study time question divides policy perspectives. The argument for inclusion recognizes that effective education requires substantial out-of-class engagement: students who only attend class without studying fail courses. The argument against inclusion notes that study time is self-reported and unverifiable. The practical compromise embedded in credit hour conversion ratios implicitly includes study time without requiring separate verification. A 3:1 ratio assumes two hours of study for each hour of class, matching federal credit hour definitions. Students receive credit for expected study time based on enrollment rather than claimed actual study time, maintaining verification integrity while recognizing educational effort beyond classroom attendance.

The Academic Calendar Mismatch

Academic semesters don't align with calendar months, creating compliance gaps that policy must address. A typical fall semester runs from late August through mid-December. A typical spring semester runs from mid-January through mid-May. This leaves roughly three months of summer plus winter break plus various shorter breaks throughout the academic year when students are enrolled but not actively attending classes.

Consider a student enrolled full-time in both fall and spring semesters. In September, October, November, and most of December, they're in class accumulating educational hours that exceed monthly requirements. In late December and early January, they're on winter break with no classes scheduled. In February, March, April, and most of May, they're back in class meeting requirements. In late May through August, they're on summer break with no enrollment.

The **summer gap** represents the most significant compliance challenge for students. Three months without classes means three months requiring alternative compliance pathways. A student maintaining Medicaid coverage through educational activity during the academic year must find employment, approved volunteering, or other qualifying activities during summer, or lose coverage despite continuous enrollment across academic years.

Winter break presents similar challenges in compressed timeframe. Most winter breaks span roughly three weeks, potentially affecting compliance for both December and January depending on exact dates. A student compliant through mid-December might accumulate insufficient hours to meet December's full requirement, then face January with no classes until mid-month. Two months of marginal compliance could follow a semester of unquestionable compliance.

Policy Solutions for Calendar Gaps

States have several options for addressing academic calendar misalignment with monthly work requirements. Each involves tradeoffs between simplicity, accuracy, and administrative burden.

Semester-based compliance treats full-time enrollment as satisfying work requirements for the entire semester regardless of monthly hour calculations. A student enrolled full-time in fall semester is deemed compliant from August through December without monthly verification. This approach eliminates calendar mismatch problems but creates verification challenges at semester boundaries and doesn't address summer gaps.



Academic year compliance extends semester-based logic across the full academic year. A student enrolled full-time in both fall and spring semesters could be deemed compliant for the entire academic year including summer months. This approach maximizes simplicity and protects students from calendar gaps but may be perceived as allowing compliance without summer activity. The policy rationale treats continuous academic enrollment as demonstrating commitment to self-improvement that work requirements aim to encourage.

Hour banking allows excess hours from high-activity months to carry forward to low-activity months. A student accumulating 150 hours in October (well above the 80-hour requirement) could bank 70 excess hours for use in December when winter break reduces available educational hours. This approach rewards intensive engagement while smoothing calendar irregularities. Administrative complexity increases but creates strong incentives for continuous enrollment.

Summer enrollment requirements address summer gaps by requiring some educational activity during summer months to maintain education-based compliance. Summer enrollment needn't be full-time; even one course providing partial hours combined with part-time employment could maintain compliance. This approach ensures year-round activity but may conflict with students' employment opportunities, family responsibilities, or need for academic breaks.

Georgia's work requirement waiver provides one model, treating enrolled students as compliant during academic breaks if they maintain enrollment for subsequent terms. Advance registration for the next semester serves as evidence of continuing educational commitment, bridging calendar gaps without requiring summer activity. This approach balances simplicity with verification while recognizing educational pathways as legitimate compliance routes.

Online and Asynchronous Education

Online education complicates hour-counting in ways that classroom instruction doesn't. A student enrolled in an online asynchronous course has no scheduled class time; they engage with materials on their own schedule. The credit hour framework provides one answer: treat online courses equivalently to in-person courses, crediting hours based on credit units rather than verified attendance.

But online course completion rates are notoriously low. Students enroll with good intentions, engage minimally, and either withdraw or fail. Crediting work requirement hours based on enrollment rather than engagement risks rewarding non-participation. A student enrolled in twelve online credit hours who never logs into the learning management system would receive full compliance credit despite zero educational activity.

Learning management systems track engagement metrics that could inform compliance verification. Login frequency, time spent in course materials, assignment submissions, and discussion participation all provide evidence of actual educational activity. States could require demonstrated engagement rather than mere enrollment for online courses, with minimum thresholds for activity frequency or completion of course components.

The **verification burden** for engagement-based online verification falls on institutions that may lack capacity or willingness to provide detailed activity data. Small online programs, individual courses at institutions primarily focused on in-person instruction, and non-degree programs may not have systems generating engagement metrics suitable for compliance verification. Requiring

engagement verification could inadvertently disadvantage online education relative to in-person alternatives.



Competency-Based Education

Competency-based education programs present unique verification challenges. These programs advance students based on demonstrated mastery rather than seat time, allowing rapid progress for students who already possess relevant skills and extended time for those requiring more learning. Credit hour frameworks don't apply straightforwardly when progress varies independently of time invested.

A student in a competency-based program might complete a full semester's worth of competencies in six weeks, then enroll in additional competencies for the remainder of the term. Alternatively, they might spend an entire semester mastering competencies that would represent one course in traditional programs. The relationship between effort, time, and credit becomes highly individual rather than standardized.

States should develop competency-based program verification that focuses on **enrollment and progress** rather than hour calculations. Active enrollment in a competency-based program with demonstrated progress (completing competencies, advancing through curriculum, maintaining satisfactory academic standing) could satisfy work requirements without requiring conversion to hourly equivalents. This approach recognizes the educational model's validity while maintaining accountability for genuine engagement.

Withdrawals, Incompletes, and Academic Failure

What happens to compliance status when students withdraw from courses, receive incompletes, or fail? These common academic outcomes create compliance complications that policy must address. The stakes are significant: academic difficulty that might traditionally result in probation or delayed graduation could now trigger healthcare coverage loss.

Course withdrawal mid-semester reduces enrolled credit hours, potentially dropping students below compliance thresholds. Someone enrolled in twelve credits who withdraws from one three-credit course now holds nine credits, generating roughly 27 weekly hours instead of 36. If they were relying on full-time enrollment for compliance, the withdrawal could create a shortfall requiring immediate supplementation through other qualifying activities.

The timing of withdrawal affects compliance differently depending on how states count educational hours. If hours are credited prospectively based on enrollment at semester start, withdrawal mid-semester might not affect prior months' compliance. If hours are credited retrospectively based on semester completion, withdrawal could retroactively invalidate previously counted compliance hours. States must clarify how enrollment changes affect compliance across affected time periods.

Incomplete grades indicate coursework not finished by semester end, typically with arrangements for later completion. Whether incomplete courses count toward compliance hours depends on whether the incomplete represents temporary delay or effective withdrawal. States should establish clear rules for incomplete treatment, potentially counting incompletes if students complete coursework within standard timeframes.

Course failure raises different questions. The student attended class and engaged in educational activity; they simply didn't demonstrate sufficient mastery for passing grades. Penalizing compliance status for academic failure effectively punishes students twice: once academically through the failing grade and again through potential coverage loss. Most states count educational hours based on enrollment and attendance rather than academic performance, avoiding this double penalty. But repeated failure might indicate enrollment without genuine engagement, raising questions about whether continued educational compliance credit is appropriate.

The National Student Clearinghouse Opportunity

The National Student Clearinghouse aggregates enrollment data from over 3,600 colleges and universities covering approximately 97% of enrolled students nationwide. Institutions report enrollment status, credit hours, and degree completion to the Clearinghouse for financial aid verification, loan servicer notification, and various government program requirements. This infrastructure could potentially serve Medicaid work requirement verification with appropriate data sharing agreements.

The efficiency gains from Clearinghouse integration could be substantial. Rather than each state building individual connections to thousands of educational institutions, states could query the Clearinghouse for enrollment verification. Rather than students gathering documentation from registrars and submitting to Medicaid agencies, verification could flow automatically. Rather than institutions responding to individual verification requests, they would satisfy all requirements through existing Clearinghouse reporting.

Several barriers must be addressed for Clearinghouse integration. Data sharing agreements between each state Medicaid agency and the Clearinghouse require negotiation and legal review. FERPA compliance for educational records sharing to healthcare programs needs careful structuring. Technical integration between Clearinghouse systems and state Medicaid verification portals requires development. Cost allocation for Clearinghouse queries at scale needs resolution. None of these barriers is insurmountable, but none resolves automatically.

States should pursue Clearinghouse integration as **a high-priority infrastructure investment**. The alternative is manual verification processes requiring institutional resources, student effort, and state agency processing that Clearinghouse automation could eliminate. Early investment in integration pays dividends across the entire implementation period, while delayed integration means years of inefficient manual processes affecting millions of students.

FERPA and Data Sharing

The Family Educational Rights and Privacy Act governs disclosure of student education records, creating legal framework that Medicaid verification must navigate. FERPA generally requires student consent before educational institutions disclose personally identifiable information from education records. Enrollment status, credit hours, and attendance records all constitute education records subject to FERPA protection.

Student consent provides the most straightforward FERPA compliance pathway. Students authorize their institutions to share enrollment information with state Medicaid agencies for work requirement verification. This consent can be obtained during enrollment, through separate

authorization forms, or through electronic consent processes integrated with verification systems. Clear consent language explaining what information will be shared, with whom, and for what purpose ensures students understand the authorization they're providing.

FERPA includes exceptions that might enable disclosure without individual consent in some circumstances. The **audit or evaluation exception** permits disclosure to authorized representatives of state educational authorities conducting audit or evaluation of federal or state supported education programs. Whether Medicaid work requirement verification qualifies under this exception depends on state legal interpretation and may vary across jurisdictions.

State-level data sharing agreements between education agencies and Medicaid agencies can facilitate verification while maintaining FERPA compliance. These agreements establish legal framework for data exchange, specify permitted uses, and implement privacy protections. Where state education agencies already receive enrollment data from institutions, extending data flows to Medicaid agencies requires interagency agreement rather than new institutional reporting. This approach reduces burden on individual institutions while maintaining FERPA-compliant data governance.

Credentialing Educational Institutions

States must establish processes for credentialing educational institutions as authorized verification submitters. Not every entity claiming educational function should automatically qualify; the credentialing process distinguishes legitimate educational providers from organizations that might game work requirements through fraudulent enrollment verification. But credentialing requirements that are too stringent could exclude legitimate programs, particularly smaller vocational providers and community-based educational organizations.

Accreditation status provides one credentialing criterion. Institutions with regional accreditation recognized by the Department of Education have already demonstrated educational legitimacy through established quality assurance processes. Automatically credentialing regionally accredited institutions reduces administrative burden for both states and institutions while ensuring verification comes from established educational providers. Most community colleges and universities would qualify through this pathway.

National accreditation and programmatic accreditation require more nuanced treatment. Some nationally accredited institutions provide legitimate education; others have been associated with predatory practices. States might credential nationally accredited institutions while requiring additional verification of educational quality, such as graduation rates, employment outcomes, or federal financial aid eligibility. The goal is enabling legitimate programs while screening problematic ones.

Non-accredited programs present the most complex credentialing questions. Workforce development programs, employer-sponsored training, and community-based education often operate outside accreditation frameworks while providing genuine educational value. States should develop **alternative credentialing pathways for non-accredited providers**, potentially requiring state approval, demonstrated outcomes, or sponsorship by credentialed organizations. Excluding non-accredited programs entirely would eliminate important educational options for expansion adults.

The credentialing process should involve registration, verification, training, and agreement to verification protocols. Registration provides basic institutional information. Verification confirms accreditation status or alternative qualification criteria. Training ensures institutional staff understand verification requirements and submission processes. Agreement to protocols establishes expectations for accuracy, timeliness, and data security. Annual recertification maintains credentialing currency while creating accountability for verification quality.

Technical Integration Requirements

Educational institutions vary enormously in technical capacity for automated verification. Major universities operate sophisticated student information systems capable of automated data exchange with external systems. Small community colleges may have legacy systems with limited integration capability. Trade schools and vocational programs may lack electronic enrollment management entirely. Verification infrastructure must accommodate this diversity.

For institutions with capable systems, **API-based integration** enables automated verification without manual intervention. Students consent to verification, and their enrollment status flows automatically to state systems without requiring institutional staff to process individual requests. This approach scales efficiently for high-volume institutions and eliminates processing delays. Technical specifications should follow common standards enabling vendors to build integration once for use across multiple state systems.

For institutions lacking API capability, **batch file submission** provides intermediate automation. Institutions generate periodic files containing enrollment data for students who have consented to verification. Files upload to state portals using standardized formats. This approach requires some institutional processing but avoids individual verification handling for each student. Weekly or semi-monthly batch submission maintains reasonably current verification while accommodating limited technical infrastructure.

For institutions with minimal technical capacity, **manual verification** must remain available. State-provided templates enable institutional staff to complete verification forms for individual students. Web portals allow direct entry of verification data. These approaches don't scale well but ensure that students at under-resourced institutions aren't excluded from educational compliance pathways due to their institutions' technical limitations.

The Registrar Function

Registrar offices serve as the institutional hub for enrollment verification. They maintain official enrollment records, process verification requests from employers and lenders, certify enrollment status for various purposes, and manage the data systems underlying verification. Adding Medicaid work requirement verification to registrar functions represents a new volume of requests that may exceed current capacity at many institutions.

Current registrar workload varies by institution size and student population characteristics. A large university might process several hundred verification requests monthly. A community college serving many low-income students might handle similar volumes despite smaller enrollment. When work requirements add Medicaid verification for potentially 30% of enrolled students,

request volumes could increase dramatically. Registrar offices need staffing and systems that can absorb this increase.

Automation addresses volume concerns but requires investment. Electronic verification systems that process requests without manual intervention handle volume increases more readily than manual processes. Institutions should invest in verification automation both to manage work requirement demands and to improve efficiency for existing verification functions. State Medicaid agencies might consider providing technical assistance or funding support for institutions serving high concentrations of expansion adult students.

Verification turnaround time matters for compliance. A student needing verification for a current compliance period can't wait weeks for registrar processing. States should establish turnaround expectations, perhaps requiring verification within five to seven business days of request. Institutions unable to meet these expectations might need to implement expedited processes or face accountability for delays affecting student coverage.

Verification Timing and Reporting Cycles

When should educational verification occur relative to compliance periods? Prospective verification at semester start confirms enrollment that should generate compliance hours over coming months. Retrospective verification after semester end confirms that students actually attended and completed enrolled courses. Each approach has advantages and limitations that states must balance.

Prospective verification enables real-time compliance status, letting students and agencies know current standing without waiting for semester completion. But prospective verification based on enrollment doesn't account for subsequent withdrawal, failure, or attendance problems. A student verified as compliant based on September enrollment might withdraw in October, creating retroactive compliance gaps that prospective verification didn't anticipate.

Retrospective verification provides accurate information about actual educational activity but delays compliance confirmation. A student wouldn't know their fall semester compliance status until December verification occurred after final grades posted. This delay creates uncertainty during the semester and prevents proactive intervention when students face compliance shortfalls.

A hybrid approach combines prospective enrollment verification with retrospective adjustment. Students receive provisional compliance credit based on enrollment, with adjustment after semester end if actual activity differed from enrolled credits. This approach provides real-time status information while maintaining accuracy. Administrative complexity increases but serves both student experience and verification integrity.

Reconciliation processes for prospective-retrospective mismatches need careful design. If a student received provisional compliance credit based on twelve enrolled credits but withdrew to nine credits mid-semester, how should the resulting compliance shortfall be addressed? Grace periods allowing catch-up through alternative activities, averaging across the semester rather than monthly calculations, or accepting minor shortfalls without penalty could all provide workable approaches depending on state policy priorities.



Campus Employment as Dual Pathway

Campus employment offers students the opportunity to accumulate compliance hours through both education and work at the same institution. A student enrolled in nine credit hours generating approximately 27 compliance hours weekly who also works 15 hours weekly in the campus bookstore accumulates roughly 42 hours weekly, or about 168 hours monthly. This substantially exceeds the 80-hour threshold through combined activity within a single institutional context.

The verification advantage is significant. The same institution documenting educational enrollment also documents campus employment hours. Students avoid coordinating between separate educational and employment verification processes. Institutions can provide **consolidated verification** covering both types of qualifying activity through unified administrative processes. This simplification benefits students, institutions, and state verification systems.

Federal Work-Study funding could support positions that serve both student employment needs and institutional functions. Community colleges allocating Work-Study slots strategically create institutional employment meeting compliance needs while providing student services. Students working as peer navigators, tutors, or student services assistants simultaneously meet their own work requirements while building institutional capacity.

States should explicitly recognize consolidated educational and employment verification from single institutions. Verification systems should accommodate submissions documenting both enrollment status and employment hours. Credentialing processes should authorize institutions to submit both types of verification rather than requiring separate credentials for educational and employment documentation.

Student Health Services Intersection

Campus health centers serving Medicaid-enrolled students create interesting intersections between educational and healthcare systems. Can student health services bill Medicaid for services provided to enrolled members? Do campus providers participate in MCO networks? Can campus health staff help students document medical exemptions from work requirements? These questions lack clear answers at many institutions despite their practical importance.

Medicaid billing by student health services varies by state and institution. Some campus health centers are enrolled Medicaid providers billing for covered services. Others operate outside Medicaid and serve students regardless of insurance status through institutional funding. Institutions not currently billing Medicaid might consider enrollment if substantial student populations have Medicaid coverage.

MCO network participation creates additional complexity. Even if student health services can bill Medicaid, students enrolled in managed care plans can only use in-network providers without authorization. If campus health centers aren't in MCO networks, Medicaid-enrolled students might need to seek care off-campus despite having campus services available. MCOs should consider including campus health centers serving significant member populations in their networks.

Campus health providers could play important roles in exemption documentation. Physicians and nurse practitioners seeing students regularly understand their health conditions and functional limitations. They can document medical exemptions, provide attestations of incapacity for work,

and connect students with appropriate specialists for complex exemption situations. Training campus providers on exemption categories and documentation requirements enables them to serve this function effectively.

Getting the Technical Details Right

Hour-counting, calendar treatment, and verification infrastructure seem like implementation details, but they determine whether education functions as a viable compliance pathway. Technical rules that don't account for academic calendar realities will catch students in compliance gaps through no fault of their own. Verification systems that don't leverage existing infrastructure like the National Student Clearinghouse will impose unnecessary burdens on institutions, students, and state agencies.

States designing these technical rules should involve educational institutions in policy development. Community colleges, universities, and vocational programs understand academic calendars, enrollment patterns, and student realities better than Medicaid agencies developing rules in isolation. Collaborative policy development can identify problems before implementation rather than discovering them through student coverage losses.

The goal is technical rules that make education a realistic compliance pathway while maintaining verification integrity. Overly complex rules that students can't understand fail regardless of their technical elegance. Overly simple rules that don't address calendar realities create compliance traps for students following the rules as they understand them. The sweet spot involves rules simple enough to communicate clearly while sophisticated enough to address academic calendar complexity. Finding that sweet spot requires deliberate attention to technical details that might otherwise be treated as administrative afterthoughts.

Next in series: Article 10F, "Supporting the Education Ecosystem: Stakeholder Roles and Investments"

Previous in series: Article 10D, "Navigator Training, Volunteer Training, and Job Readiness Programs"

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