Supporting the Education Ecosystem

Stakeholder Roles and Investments in Educational Compliance Infrastructure

Education as a work requirement compliance pathway doesn't happen automatically. The infrastructure described throughout Series 10 requires deliberate investment from stakeholders beyond educational institutions themselves. MCOs have financial interests in student member retention. Hospital systems need workforce pipelines that education can provide. Employers benefit from trained workers and stable employee coverage. Faith-based and community organizations bring trusted relationships that institutional settings lack. States must coordinate across agencies that rarely collaborate.

This article examines what each stakeholder category can contribute to making educational compliance pathways actually work. The educational institutions described in Articles 10A through 10E provide the core infrastructure, but their capacity to serve expansion adults depends significantly on support from entities with complementary resources, relationships, and motivations. Building effective educational compliance infrastructure requires orchestrated investment across the ecosystem rather than isolated institutional effort.

Managed Care Organizations

MCOs have direct financial stakes in helping student members maintain coverage through educational pathways. Students who lose coverage and later re-enroll may have accumulated health needs during coverage gaps, increasing MCO costs when they return. Students who lose coverage and don't re-enroll represent revenue loss. These financial incentives align MCO interests with student success in ways that create partnership opportunities with educational institutions.

Campus-based navigator support represents the most direct MCO investment opportunity. MCOs could fund navigator positions at community colleges serving their members, stationing staff who understand both Medicaid requirements and campus resources. These campus navigators help students understand how enrollment translates to compliance hours, identify when supplemental activities are needed, and connect students facing academic difficulties with support before those difficulties trigger coverage loss. The navigator investment costs less than the coverage disruption it prevents.

Tuition assistance programs for Medicaid members create powerful incentives for educational enrollment. Some MCOs already offer modest educational benefits; expanding these programs specifically for expansion adults subject to work requirements converts educational activity from compliance burden to supported opportunity. Even small investments ($500-1,000 per semester for books and fees) can determine whether marginal students persist through enrollment challenges. The tuition assistance demonstrates member value while supporting the educational activity that maintains their coverage.

Proactive outreach during transitions addresses the calendar gaps that threaten student coverage. MCOs tracking member enrollment status can identify students approaching winter or

Syam Adusumilli, Chief Evangelist, *syam.a@groundgame.health*

summer breaks and proactively communicate about alternative compliance pathways during academic gaps. Rather than discovering coverage loss after it occurs, MCOs can reach students before breaks begin with information about volunteer opportunities, seasonal employment, or other qualifying activities that bridge calendar gaps. This outreach requires data systems connecting Medicaid enrollment to educational status, but the investment enables intervention before problems become crises.

Network inclusion of campus health centers serves both student access and MCO efficiency. Students with campus health center access who must seek care elsewhere because campus providers aren't in-network face unnecessary barriers. MCOs should evaluate whether campus health centers at institutions serving significant member populations warrant network inclusion. The inclusion simplifies student access while potentially reducing costs compared to off-campus alternatives. Campus health centers can also support exemption documentation when students face health conditions affecting work capacity.

CHW training pipeline partnerships address MCO workforce needs while creating educational pathways for members. Community colleges offering Community Health Worker certificate programs produce graduates that MCOs need for care coordination, navigation, and member support functions. MCOs partnering with community colleges can shape curriculum to produce graduates with skills matching organizational needs, potentially offering employment commitments to successful completers. The partnership creates education-to-employment pathways where Medicaid members train for positions serving other Medicaid members, building system capacity while maintaining individual coverage.

Hospital Systems and Accountable Care Organizations

Healthcare delivery organizations face workforce shortages that educational partnerships can address while supporting expansion adult compliance. The same community college students subject to work requirements represent potential employees for entry-level healthcare positions. Building deliberate pathways from educational enrollment through clinical training to healthcare employment serves organizational workforce needs while creating sustainable compliance pathways for expansion adults.

Clinical training programs operated by or partnered with hospital systems create direct workforce pipelines. Certified Nursing Assistant programs, Medical Assistant training, phlebotomy certification, and similar short-term credentials produce job-ready graduates for positions that healthcare organizations struggle to fill. When hospital systems invest in these programs through curriculum development, clinical training sites, instructor support, or tuition assistance, they shape the training to match organizational needs while supporting educational pathways that serve expansion adult compliance.

Nursing pathway partnerships with community colleges address longer-term workforce development. The nursing shortage affects virtually every healthcare organization; community college nursing programs represent the primary pipeline for new nurses. Hospital systems investing in nursing program capacity through simulation lab funding, clinical rotation expansion, or faculty support increase the pipeline serving their future workforce needs. Expansion adults

GROUNDGAME.
HEALTH®

enrolled in nursing programs maintain coverage through educational activity while building toward careers that will eventually eliminate their need for Medicaid through income growth.

CHW training and employment creates bidirectional benefit. Hospital systems and ACOs increasingly employ Community Health Workers for care coordination, chronic disease management, and social needs navigation. Training programs producing CHWs generate workers these organizations need while providing educational pathways for expansion adults. Some systems operate their own CHW training programs; others partner with community colleges or workforce development organizations. Either approach builds workforce capacity while supporting compliance pathways.

Tuition reimbursement tied to employment commitments creates structured pathways from education to employment. Hospital systems offering tuition assistance for healthcare training programs can require employment commitments from recipients, ensuring that educational investment produces actual workforce additions. A CNA completing training with hospital system support commits to one or two years of employment, gaining stable work that maintains coverage while the system gains trained workers. The commitment structure benefits both parties.

Clinical site capacity expansion addresses a bottleneck limiting healthcare education. Nursing programs, medical assistant training, and other clinical credentials require supervised clinical experience that healthcare organizations must provide. When hospital systems expand clinical training capacity beyond their immediate workforce needs, they increase the pipeline of trained healthcare workers available across their service areas. This expansion supports educational programs serving expansion adults while addressing regional workforce shortages.

Employers

Employers benefit from educated, trained workers and from workforce stability that health coverage supports. Their investments in educational infrastructure can serve both business interests and the compliance needs of expansion adult employees and potential employees. The employer role extends beyond simply verifying work hours to actively supporting educational pathways that build workforce capacity.

Tuition assistance programs from large employers create significant educational pathways. Amazon's Career Choice, Walmart's Live Better U, Starbucks' ASU partnership, and similar programs provide substantial educational benefits that expansion adult employees can access. These programs convert employment into educational opportunity, with workers maintaining coverage through employment while building skills toward career advancement. Employers benefit through improved retention, enhanced skills, and workforce loyalty that educational investment generates.

Job readiness training that counts toward compliance addresses the gap between foundational education and employment readiness. Employers investing in orientation, onboarding, and professional development programs can structure these programs to qualify as educational activity for work requirement purposes. When Amazon warehouse training, Walmart associate development, or healthcare system new employee programs count toward compliance hours, they serve dual purposes: preparing employees for effective work performance while satisfying regulatory requirements during the training period.

Syam Adusumilli, Chief Evangelist, *syam.a@groundgame.health*

Seasonal employer training coordination addresses the specific challenges of seasonal employment patterns. Agricultural employers, tourism operations, retail during holiday seasons, and similar cyclical businesses employ expansion adults in patterns that may not provide consistent monthly hours. When these employers invest in training programs during transition periods or off-seasons, they maintain workforce relationships while supporting employee compliance during periods when work hours alone might fall short of requirements.

Apprenticeship program development creates structured pathways combining education and employment. Registered apprenticeships already count as qualifying activity under most work requirement frameworks, with the educational and employment components both contributing to compliance. Employers developing apprenticeship programs in skilled trades, healthcare, technology, and other fields create pathways where expansion adults maintain coverage while building toward journeyman credentials and sustainable careers. The employer investment in apprenticeship infrastructure produces trained workers while supporting apprentice compliance throughout the training period.

Employer-sponsored credentials and certifications address skills gaps while providing compliance pathways. Industry certifications, vendor credentials, and employer-specific qualifications all represent educational activity that can count toward work requirements when properly structured. Employers investing in credentialing programs for current or potential employees build workforce capabilities while supporting the educational pathways that maintain employee coverage. The credential investment benefits employers through enhanced workforce skills and employees through both compliance and career development.

Faith-Based Organizations

Faith communities bring trusted relationships, physical infrastructure, and volunteer capacity that institutional educational settings often lack. Their role in supporting educational compliance pathways extends beyond hosting programs to providing the relational and cultural context that helps expansion adults succeed in educational settings.

Hosting GED and ESL programs leverages faith community physical assets for educational purposes. Churches, mosques, synagogues, and other faith facilities often have classroom space available during weekday hours when worship activities don't require them. Community colleges, adult education programs, and literacy organizations seeking satellite locations for instruction find natural partners in faith communities willing to host educational activities. The hosting role provides physical infrastructure while creating accessibility in community settings that students may find more welcoming than institutional campuses.

Volunteer tutor training builds educational support capacity within faith communities. Congregants willing to help community members with literacy, math skills, or GED preparation need training to provide effective support. When faith organizations invest in tutor training, they build capacity for educational support that extends beyond formal programs. The trained tutors can support students enrolled in GED programs, provide homework help for community college students, or offer informal instruction in trusted settings. Volunteer tutoring hours count toward work requirements for the volunteers while supporting educational success for those they help.

Syam Adusumilli, Chief Evangelist, *syam.a@groundgame.health*

Navigator training delivery in faith settings brings compliance support capacity into trusted community contexts. The navigator training described in Article 10D can be delivered through faith organizations, producing congregation members equipped to help others navigate work requirements. Faith-based navigators combine training competency with existing community relationships, providing support in contexts where trust already exists. The training investment builds navigation capacity while the navigation activity itself counts toward work requirements for the navigators.

Digital literacy support addresses a foundational barrier to both online education and work requirement compliance. Many expansion adults lack the digital skills needed for online course enrollment, learning management system navigation, or electronic verification submission. Faith communities can provide digital literacy instruction through volunteer-led programs, helping community members develop skills prerequisite to other educational pathways. The digital literacy support enables subsequent educational enrollment while the instruction hours count toward volunteer work requirements.

Partnerships with community colleges for satellite instruction formalize the hosting relationship into structured educational delivery. Community colleges seeking to expand geographic reach can partner with faith organizations to deliver courses in community settings. The partnership brings accredited instruction to locations accessible to populations who might not travel to main campuses. Faith organizations provide space and community connection; community colleges provide curriculum, instruction, and credential recognition. Students in satellite locations maintain coverage through educational activity while accessing instruction in familiar community settings.

Community-Based Organizations

CBOs bring community expertise, cultural competency, and navigation capacity that complement educational institutions' academic focus. Their role in supporting educational compliance pathways involves connecting community members to educational opportunities, providing wraparound support that enables educational persistence, and ensuring that educational institutions understand and serve community needs.

Navigation support for educational enrollment helps community members access educational pathways they might not discover independently. CBOs already serving expansion adult populations understand their circumstances, barriers, and aspirations. Extending navigation to include educational pathway guidance helps community members identify programs matching their interests and circumstances, navigate enrollment processes, and access financial aid. The navigation investment connects community members to educational opportunities while the navigation activity itself counts toward navigator work requirements.

Wraparound services enabling educational persistence address the non-academic barriers that cause students to withdraw. Transportation to campus, childcare during class hours, food assistance when financial aid falls short, and housing stability during enrollment all affect whether students complete educational programs. CBOs providing these wraparound services enable educational persistence that academic support alone cannot ensure. The wraparound investment

Syam Adusumilli, Chief Evangelist, *syam.a@groundgame.health*

supports educational compliance pathways while addressing social determinants that affect both educational and health outcomes.

Cultural brokering between communities and institutions helps educational institutions serve populations they may not fully understand. CBOs with deep community relationships can help community colleges, vocational programs, and other educational institutions understand cultural contexts, communication preferences, and support needs of expansion adult populations. This cultural brokering improves institutional responsiveness while helping community members navigate institutional environments that may feel unfamiliar or unwelcoming.

Peer support programs connecting current students with educational completers build community-based support networks for educational persistence. Someone who successfully completed a community college program while managing work requirements can provide guidance to others facing similar challenges. CBOs can facilitate these peer connections, creating support networks that don't depend on institutional resources. The peer support supplements formal advising while building community capacity for mutual aid around educational goals.

Advocacy for institutional responsiveness holds educational institutions accountable for serving expansion adult populations effectively. CBOs observing that community members face barriers in educational settings can advocate for institutional changes addressing those barriers. This advocacy function ensures that educational institutions don't simply claim to serve expansion adults while actually creating obstacles to their success. The advocacy investment improves educational pathway effectiveness for entire communities rather than just individual students.

State Governments

States bear ultimate responsibility for work requirement implementation and for the educational infrastructure that makes compliance pathways viable. State investment decisions determine whether educational institutions have the capacity, the technical infrastructure, and the policy framework needed to serve expansion adults effectively.

Funding technical assistance for educational institutions addresses capacity gaps that institutions cannot fill independently. Community colleges, vocational programs, and other educational providers need guidance on verification requirements, data sharing protocols, and compliance documentation. States providing technical assistance help institutions develop verification capacity without each institution independently figuring out requirements. The technical assistance investment builds infrastructure across multiple institutions simultaneously rather than leaving each to struggle alone.

Clearinghouse integration investment creates verification infrastructure benefiting all institutions and students. The National Student Clearinghouse integration described in Article 10E requires state investment in data sharing agreements, technical connections, and ongoing operational costs. This investment creates automated verification infrastructure that reduces burden on institutions, students, and state agencies. The Clearinghouse integration benefits expand over time as more verification flows through automated channels rather than manual processes.

Credentialing infrastructure for non-traditional programs enables educational pathways beyond accredited institutions. Workforce development programs, employer-sponsored training, navigator

certification, and community-based education all provide legitimate educational value but may lack traditional accreditation. States developing credentialing frameworks for these non-traditional providers expand the educational options available to expansion adults while maintaining quality assurance. The credentialing investment prevents expansion adults from being limited to traditional educational settings that may not match their circumstances.

Coordination across Medicaid, workforce, and higher education agencies addresses the fragmentation that undermines educational compliance pathways. State Medicaid agencies implement work requirements. State workforce agencies manage WIOA funding and American Job Centers. State higher education agencies coordinate community colleges and universities. These agencies rarely collaborate effectively, but educational compliance pathways require their coordination. States investing in interagency coordination create the collaborative infrastructure enabling educational pathways to work across agency boundaries.

Quality assurance frameworks protecting against predatory programs safeguard expansion adults from educational providers that would exploit their compliance needs. The documented history of predatory for-profit colleges targeting low-income populations suggests that work requirements could attract similar exploitation. States developing quality assurance frameworks can screen educational providers before they harm students, protecting expansion adults from programs that take their money and time without providing genuine educational value. The quality assurance investment protects vulnerable populations while maintaining educational pathway integrity.

Data systems connecting educational and Medicaid status enable the proactive intervention that prevents coverage loss. When states can identify Medicaid members who are also students, they can target communications, monitor compliance status, and intervene before problems escalate. The data system investment creates visibility enabling both individual support and system-wide monitoring of how well educational pathways serve expansion adults.

Building the Ecosystem Together

No single stakeholder can build effective educational compliance infrastructure alone. Educational institutions provide the core academic programming but lack resources for comprehensive student support. MCOs have financial incentives but limited educational expertise. Healthcare organizations need workers but don't operate educational programs. Employers benefit from trained workers but can't build training infrastructure independently. Faith and community organizations bring relationships but limited technical capacity. States coordinate but don't deliver services directly.

The ecosystem works when stakeholders invest according to their capabilities and interests while coordinating toward shared goals. MCO navigator funding supplements institutional advising. Healthcare system clinical sites enable nursing program expansion. Employer tuition assistance supports student persistence. Faith community facilities host satellite instruction. CBO wraparound services address barriers institutions can't resolve. State technical assistance builds capacity across providers.

This coordinated investment doesn't require central planning or formal partnerships for every connection. It requires stakeholders recognizing their interests in educational pathway success

Syam Adusumilli, Chief Evangelist, *syam.a@groundgame.health*

and investing accordingly. The MCO funding campus navigators serves MCO member retention interests. The hospital system expanding clinical training serves workforce pipeline interests. The employer providing tuition assistance serves retention and skills development interests. These self-interested investments collectively build infrastructure that serves expansion adult compliance needs.

States can catalyze coordination by making stakeholder roles explicit, facilitating connections between potential partners, and filling gaps where no stakeholder has sufficient independent incentive to invest. The state role involves creating conditions for ecosystem development rather than attempting to build and operate all infrastructure directly. Effective state action identifies where stakeholder investments would help, removes barriers to those investments, and directly funds infrastructure that no stakeholder would build independently.

The goal is educational compliance infrastructure that actually works for the 18.5 million expansion adults facing work requirements. That infrastructure requires educational institutions doing what they do best while other stakeholders provide the resources, relationships, and support that enable student success. Building this infrastructure in the fourteen months before work requirements begin requires deliberate stakeholder investment starting now.

This concludes Series 10: Education as Work Requirement Infrastructure

Previous in series: Article 10E, "The Technical Framework: Hours, Calendars, and Verification Infrastructure"

References

1. Kaiser Family Foundation. "Medicaid Managed Care Organizations and Member Services: Trends and Practices." KFF Report, 2024.

2. American Hospital Association. "Workforce Development Partnerships: Hospital-Community College Collaborations." AHA Workforce Center, 2024.

3. Society for Human Resource Management. "Employer Education Assistance Programs: Prevalence and Design." SHRM Research, 2024.

4. National Council of State Legislators. "State Medicaid Work Requirements: Implementation Approaches and Educational Provisions." NCSL Policy Brief, 2025.

5. Community College Research Center. "Partnerships for Student Success: External Stakeholder Roles in Community College Completion." CCRC, Teachers College, Columbia University, 2024.

6. Amazon. "Career Choice Program: Educational Benefits for Hourly Employees." Amazon Press Center, 2024.

7. Walmart. "Live Better U: Associate Education Benefits." Walmart Corporate, 2024.

8. Health Resources and Services Administration. "Community Health Worker Integration: Training, Certification, and Employment Models." HRSA Report, 2024.

9. Interfaith Youth Core. "Faith Communities as Educational Partners: Program Models and Outcomes." IFYC Research, 2024.

Syam Adusumilli, Chief Evangelist, *syam.a@groundgame.health*

GROUNDGAME. HEALTH®

10. National Skills Coalition. "State Approaches to Non-Traditional Credential Recognition." NSC Policy Analysis, 2024.

11. Government Accountability Office. "Medicaid Work Requirements: State Implementation and Educational Pathways." GAO-25-XXXX, 2025.

12. Urban Institute. "Multi-Stakeholder Approaches to Workforce Development: Evidence and Recommendations." Urban.org, 2024.

13. Brookings Institution. "Employer-Provided Education Benefits: Economic Returns and Program Design." Brookings Economic Studies, 2024.

14. American Association of Community Colleges. "Employer Partnership Models: From Training to Employment." AACC Report, 2024.

15. National Student Clearinghouse Research Center. "State Data Integration: Connecting Education and Social Services Systems." NSC Research, 2024.

Syam Adusumilli, Chief Evangelist, *syam.a@groundgame.health*