

BAC Annual Report Guide

The [Centers for Medicare & Medicaid Services Access Rule](#) (§ 431.12) requires states to publish an Annual Medicaid Advisory Committee Report, a **critical component of which is a distinct section dedicated to describing the activities of the Beneficiary Advisory Council (BAC)**. The first of these annual reports is due by July 9, 2026.

By adopting the frameworks and tools outlined in this memo, states can create a report that not only meets federal requirements, but also meaningfully validates the contributions of their Beneficiary Advisory Council (BAC).

Reporting Requirements

The official guidance found within the [Access Rule](#) (§ 431.12) on the MAC Annual Report is limited, which allows states significant flexibility to tailor its content to what works best for their needs. The rule states that “we [CMS] want to keep the parameters of our expectations on the content of a State’s annual report to be as broad as possible to give each State the ability to create a report that will help them best document the interested parties’ engagement with the MAC and the BAC and serve as a tool for helping advance programmatic goals over time.”

Below are the elements specific to the BAC report required by the rule:

Content Requirements

The MAC Annual Report must include a dedicated section specifically for the BAC that documents the following four elements: 1) Activities; 2) Topics Discussed; 3) Recommendations; and 4) State Responses.

Process Requirements

- **State Support:** The state is responsible for supporting the MAC in creating this report.
- **Final Review:** The state must provide MAC members with a final review of the report before it is finalized.

Timeline and Publication

- **Deadline:** States have two years from the rule’s effective date (July 9, 2024) to finalize their first Annual Report. This means the first Annual MAC Report is due on or before **July 9, 2026**.
- **Public Posting:** Once finalized, the state must post the report on its public website within 30 days.

Operationalizing the Annual Report

Below, we offer suggestions for how to operationalize reporting elements in the annual report in a way that meets the rule’s requirements while also facilitating a feedback loop among key stakeholders.

Activities and Topics

The Access Rule requires the BAC portion of the annual report to include a section describing its activities and topics discussed. We interpret this to mean a description of what the BAC did during the year (e.g.,

meetings held, recruitment efforts) and a summary of the specific policy or program areas the BAC reviewed. This stems from [guidance on the scope of the BAC](#), which advises the BAC and the state to collaboratively determine which topics to provide advice on, ranging from eligibility processes and service additions to health equity and provider communications. Therefore, this section of the report should begin by summarizing the specific goals and priority topics the group selected for the year and should demonstrate that the scope of work was co-designed rather than assigned.

Once these priorities are framed, we recommend using your [meeting agendas](#) or meeting minutes to populate the specific details about what topics the BAC discussed. We recommend grouping these discussions into thematic “buckets” that align with the regulatory scope (e.g., *“Eligibility and Enrollment,” “Quality of Services,” “Cultural Competency”*) rather than presenting a chronological, meeting-by-meeting list. Next, summarize key activities within each of these buckets, such as guest speakers, facilitated discussions, and consensus-building exercises like round-robin check-ins or straw polls, validating the collaborative nature of the process.

Recommendations and State Responses

Reporting on recommendations and state responses can be informed by prior documentation, including a list of formal recommendations or feedback provided by the BAC to the state, and the state’s specific responses to those recommendations. We also suggest using a [tracking system](#) that provides details on recommendation status – whether they were accepted, whether they were accepted and implemented, or why they were not accepted or not feasible – and state responsiveness.

Documenting Transformational Member Engagement

While the previous two sections above represent the “floor” for reporting, we encourage states to use the report as an avenue to also document community engagement. The stated principles of the CMS rule are to support bi-directional feedback, transparency, and accountability. Through those principles, CMS aims to shift enrollee engagement from [transactional to transformational](#). The rule positions the annual report as an opportunity to document this shift, stating that the annual report should “seek to ensure transparency while also facilitating a feedback loop and view into the impact of the MAC and BAC recommendations.”

Although this information is not specifically required in the rule, states can better reflect the spirit of the rule by adding sub-sections that highlight:

- **Support Structures:** Documenting the logistical support provided to make participation possible (e.g., transportation, technology assistance, interpreter services, stipends) underscores the state’s commitment to equitable access.
- **Co-Creation:** Highlighting instances where BAC members helped shape the agenda or the meeting format itself demonstrates shared ownership. Although not required in guidance, we recommend giving the BAC a chance to review and provide feedback on the BAC annual report (and noting that this opportunity was given) as well.
- **Member-Centric Design:** Reference member participation metrics such as attendance rates and the percentage of members completing their terms. High retention is a proxy for a healthy, supportive culture.
- **Post-Meeting Surveys and Annual Assessment Findings:** To demonstrate a commitment to continuous improvement, states can leverage two types of member feedback: 1) Routine post-meeting surveys (see the [BAC Post-Meeting Survey Tool](#) developed by SHVS); and 2) A comprehensive, annual year-end survey that we refer to as a [“BAC Effectiveness Assessment Tool.”](#) Conducting a year-end survey (or structured interviews) can help measure and document

deeper trends in trust and impact. Summarizing these results in the annual report provides evidence of self-reflection and growth.

- **Elevating Data Through Member Narratives:** States could also consider incorporating qualitative storytelling into the annual report. Specifically, we recommend including brief member narratives, short statements, or "impact spotlights" throughout the BAC section to provide essential context to the data points and information. For example, states could share a brief account of how a specific BAC recommendation changed a member's experience, or a report from a member about why they joined the BAC and their reflections on the process.

Conclusion

Drawing on the recommendations outlined above, please see the [*BAC Annual Report Template*](#) for a customizable outline that states can use to draft their BAC annual report.