

# Built so that Louisianans don't lose Medicaid for the wrong reasons.

*For state legislators, county officials, advocacy directors, faith leaders, and the policy nonprofits that hold the line for Medicaid beneficiaries.*

The federal compliance infrastructure is publicly broken across programs, and the federal government has said so itself. The HUD Office of Inspector General reports that for the eighth consecutive year, HUD was unable to estimate improper payments for its two largest rental assistance programs (about \$50 billion in expenditures). HUD's own FY2025 Agency Financial Report acknowledges \$5 billion in potential payment errors and approximately 30,000 deceased tenants still on the rolls. HUD pushed its own HOTMA recertification compliance deadline to January 1, 2027, the same date as Medicaid §71119. Roughly 60 percent of HUD-assisted Medicare Advantage enrollees are also on Medicaid. Arkansas already showed what happens when tracking fails: 18,000 lost coverage in seven months, and the disenrolled only found out when they tried to seek medical care.

Civitas Compliance is the infrastructure built so that the next §71119 deadline does not produce the next Arkansas. The full page is at [civitascom.com/champions](https://civitascom.com/champions), with sourced citations and an eight-persona index. This brief is for handoff: print it, share it, hand it to a colleague.

## Eight commitments. Each enforced in code.

1. **Zero wrongful disenrollments by code refusal.** Disenrollment-deadline violation throws an exception in code, not a policy warning. (*ADR-006.*)
2. **100% statutory due process.** Every disenrollment passes through 15 sequenced phases. None can be skipped. (*ADR-006; 42 U.S.C. § 1396a(xx)(6).*)
3. **Cure-period protection during state capacity shortages.** The countdown legally suspends when placement capacity runs out. (*ADR-007. Precedent: Gresham v. Azar, 950 F.3d 93; Stewart v. Azar, 366 F. Supp. 3d 125.*)
4. **15 languages from day one,** including right-to-left for Arabic, Urdu, and Persian. (*/civicpath §2.*)
5. **17 of 17 statutory exclusion categories evaluated.** Every § 1902(xx)(7) category is enforced at the database layer. (*/safeguards; ADR-005.*)
6. **No AI denials, ever.** The determination engine has no AI input path. CivicAI is read-only by architecture. (*ADR-008.*)
7. **Audit-trail integrity that survives subpoena.** Every determination is written to an immutable ledger. (*ADR-001; ADR-002.*)
8. **Offline mode** for rural bus routes, transit dead-zones, and the audience the legacy systems forgot. (*/civicpath §3.*)

## Real Louisianans the platform is built to protect.

1. **Patricia Ann Decuir.** Volunteer compliance, New Orleans. 85 hours at NOLA CAN, AI auto-approved on the approval side, full compliance posture.
2. **Travis Wayne Fontenot.** Rural compliance, Rapides Parish. 45-mile waitlist due to state-side capacity gap. Cure-period legally suspends. (*Gresham + Stewart precedent.*)
3. **James Allen Dardar.** Federal exemption, United Houma Nation member. § 1902(xx)(7) tribal exemption, IHS eligible. The platform recognizes membership at the database layer.
4. **Darius Wayne Celestin.** Re-entry transition, Louisiana. Inside the federal 90-day post-release exemption window. Aligned with Louisiana's pending Section 1115 Reentry Demonstration waiver, signed by Governor Landry on September 26, 2024 (currently anticipating CMS approval).
5. **Reginald Wayne Batiste.** Faith-based volunteer, New Orleans. Hours flow through the partner attestation portal, AI assists on the approval side only.
6. **Ethel Mae Treme.** Senior with delegated access, age 74. Daughter manages the account. Audit trail intact.
7. **David Anthony Arceneaux.** Federal exemption, disability (SSI/SSDI-linked, permanent exclusion under § 1902(xx)(7)).
8. **Jerome Duval Landry.** Re-enrollment after prior compliance failure. Same procedural rigor, no shadow rule.

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Sourced specifics referenced above: Louisiana incarceration rate 596 per 100,000 (Bureau of Justice Statistics, 2022); 73% of Louisiana incarcerated have substance use disorder (Louisiana DPSSC); 5th highest drug overdose mortality (CDC); United Houma Nation indigenous to Louisiana; 60% of HUD-assisted Medicare Advantage enrollees also on Medicaid (HUD USER, August 2024); Justice-Involved Pre-Release Enrollment Program in place since 2017 (Louisiana Department of Health). Personas drawn from the canonical persona catalog the compliance platform engineers test against.

## Five rules the platform holds itself to.

1. **Every claim traces.** Every architectural claim on [civitascom.com/champions](https://civitascom.com/champions) cites a public ADR, a statute, or a code-enforced mechanism. Every stakes claim cites a HUD audit, a federal letter, or a published study.
  2. **AI cannot deny benefits.** No AI input path on the determination engine. CivicAI is read-only by architecture.
  3. **The audit trail survives subpoena.** Append-only ledger enforced by row-level database triggers, not by policy.
  4. **Real Louisianans, never composites.** Documentary photography only when ready; abstract typographic restraint until then; never stock photography, never AI-rendered.
  5. **No persona is fictional in the sentimental sense.** Every persona maps to a canonical entry in the engineering catalog.
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## We will come to your town hall.

If you want to bring this to your community, get in touch. We will come to your town hall, your parish council, your advocacy convening, your faith-leader gathering.

**[hello@civitascom.com](mailto:hello@civitascom.com)**  
**[civitascom.com/champions](https://civitascom.com/champions)**

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Civitas Compliance is a product of Myrmidon Industries, LLC. The full architectural register is at [civitascom.com/decisions](https://civitascom.com/decisions). The full brief and source citations are at [civitascom.com/champions](https://civitascom.com/champions). Last revised: 2026-04-29.