H.R. 1 impacts to Apple Health

August 2026

Eligibility Policy Innovation and Community Support

Washington State Health Care Authority

Topics

- Work requirements
- Exclusions
- Medically frail
- Exemptions
- Work requirement activities
- Policy decisions

Topics

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- Application and form updates
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Work requirements

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Work requirements

- Beginning January 1, 2027, a new eligibility criteria for all individuals applying for or renewing Apple Health for Adults will be required
  - Individuals who do not meet an exclusion at the time of application or renewal will need to either meet work requirements or qualify for an exemption
- Work requirements do not apply to any other Apple Health programs
- Centers for Medicare and Medicaid Services (CMS) published the Interim Final Rule (IFR) on June 1, 2026

Timing of work requirement activities

- Whether applying for or renewing Apple Health for Adults coverage, individuals will need to show they recently met work requirements, have an exemption, or have a current month exclusion.
- When an activity counts toward eligibility depends on the type of activity:

Work requirement	At application	At renewal
Work requirement activity	Must meet month before application month	Any one month during your certification period
Exemption	Must meet month before application month	Any one month during your certification period
Current month exclusion	Can have during application month or month before	Any one month during certification period

Exclusions

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Work requirement exclusions

- Some individuals do not need to meet work requirements because they meet a current month exclusion.
- Current month exclusions include:
  - Foster youth or former foster youth under age 26
  - Pregnant or in 12-month postpartum period
  - Parent/caretakers of children under 14
  - Parent/caretaker of individual with disability
  - Tribal members
  - Incarcerated or within 90 days post-release period
  - In a SNAP (food assistance) household required to meet work requirements or compliant with TANF (cash assistance) work requirements
  - Disabled veteran with 100% total disability
  - Medically frail
  - Alcohol or substance use disorder (AUD/SUD) treatment

Foster Care Alumni

- Adults aged 18-26 who were in Foster Care at age 18 are eligible for Foster Care Alumni coverage and will not be enrolled in Apple Health for Adults.
  - Individuals on Foster Care Alumni who turn 27 are redetermined for other coverage.
  - If eligible for Apple Health for Adults program, they do not need to meet work requirements at renewal because they meet a current month exclusion.
- Learn more about Foster Care coverage.

American Indian and Alaska Native

- AI/AN individuals do not need to meet work requirements.
- They will continue to receive a 12-month coverage period instead of a 6-month coverage period.
- View American Indians and Alaska Natives (AI/AN) for more information.

Caretakers explained

- Parents, guardians, caretaker relatives, and family caregivers of people with disabilities or dependent children under 14 do not need to meet work requirements.
- The IFR created new definitions to ensure compliance with this exclusion:
  - **Dependent child** is under age 14 through the month they turn 14.
  - **Caretaker relative** is a relative by blood, adoption, or marriage who assumes primary responsibility for the child or person with disability. There are different relationships that qualify for a dependent child and a person with a disability.

Definitions, continued

- **Guardian** is an adult appointed by a court to care for and make personal decisions for the dependent child or person with a disability.
- **Family caregiver** is an adult family member or other individual that has a significant relationship with and provides care to the dependent child or person with a disability. This relationship is not limited to legally recognized relatives or members of the same household.
- **Person with a disability** is a person who meets the Americans with Disabilities Act definition and does not have to be classified as disabled by Medicaid or Medicare.

Disabled veterans

- Veterans with a total or 100% disability rating from Veterans Affairs (VA) do not need to meet work requirements.
- Veterans with less than 100% disability rating do not need to meet work requirements when they receive 100% compensation.
- For more information, visit U.S. Department of Veteran's Affairs.

Medically frail

- Apple Health for Adults individuals whose disability or condition significantly impairs their ability to work do not need to meet work requirements. Individuals are considered medically frail when they have:
  - A substance use disorder (SUD)
  - A disabling mental disorder
  - A physical, intellectual, or developmental disability that significantly impairs their ability to perform one or more activities of daily living
  - A serious or complex medical condition
  - Blindness or disability (as defined in section 1614 of the Social Security Act)

Receiving TANF or SNAP

- Individuals who are part of a household receiving the Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF) qualify for a current-month exemption from the Medicaid work requirements when the:
  - SNAP household is subject to work requirements
  - TANF household is compliant with work requirements
- For more information, visit DSHS Basic Food and DSHS Temporary Assistance for Needy Families (TANF)

Rehabilitation or treatment program

- Individuals participating in a drug or alcohol rehabilitation and treatment program do not need to meet work requirements.
- To meet this exemption, the program must be conducted by a private non-profit organization or institution or a publicly operated community health center and can be either inpatient or outpatient.

Inmate of a public institution or 3 months post-release

- In Washington, individuals may continue to be eligible for the Apple Health for Adults program while being an inmate of a public institution.
  - During this time, their benefits are suspended and they do not need to meet work requirements.
- Individuals also do not need to meet work requirements if they were released from a public institution such as prison within the last three months of application or renewal.
- Learn more about Medicaid suspension.

Medically frail

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Medically frail and IFR

- The IFR added several layers to the medically frail definition not outlined in H.R. 1:
  - Lookback period is 12 months
  - After January 1, 2028, self-attestation is accepted only once
  - Condition must significantly impair ability to comply with work requirements
  - Excludes individuals in recovery for 5 or more years due to being in stable recovery
  - Narrows definition of serious or complex medical condition

Code and conditions list

- HCA published a code set to verify Apple Health for Adults medically frail attestation
- Adopting diagnosis code list and methodology developed by Harvard School of Public Health and adding:
  - Long term care services and supports
  - A set of Z codes approved by CMO

Self-attestation

- Medically frail individuals will complete a screener in Washington Healthplanfinder to see if they meet this exclusion.
- Self-attestation continues to be accepted for all eligibility criteria, including medically frail.
- Beginning in 2028, additional documentation may be required when data sources cannot confirm the attestation.

Work requirement activities

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Exemptions

- Individuals do not need to complete work requirement activities when they are:
  - Under age 19
  - Enrolled in Medicare part A or part B
  - Enrolled in another Apple Health program
  - Have a short-term hardship

Short-term hardship exemptions

Hardship	Automatic/Requested
Travelling outside your community for care related to a serious or complex condition for yourself or your dependent.	Requested
Spending part or all of a month in an inpatient hospital, nursing home, ICF/IID, inpatient psychiatric hospital services, or other services of similar acuity.	Requested
Living in an area where the President has declared a disaster.	Automatic
Living in a county with an unemployment rate that is 1.5 times the national unemployment rate.	Automatic

- There are four short-term hardships.
- Two hardships you must request, while two are automatic when you apply.

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Work requirement activities

- There are several ways to meet work requirements activities, including:
  - Having minimum monthly income of $580
  - Working at least 80 hours per month
  - Being enrolled in an education program
  - Participating in a work program
  - Volunteering or engaging in community service
- You can combine different activities to reach your 80 hours.

Policy decisions

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Verification

- Self attestation will be accepted through 2027.
- Beginning January 1, 2028, states will first use their available data sources to verify work requirements, exclusions, and exemptions.
- If the states are unable to verify information with the data sources, additional documentation will be requested.

Work requirement notifications

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Notices to clients

- States are required to notify all individuals impacted by Medicaid work requirements
  - Letters must be sent in September
  - Multiple modalities
- Over 520,000 households will be notified in September.
  - Beginning week of September 8
- Second modality will be text messaging
- Initial notification letters will continue through January 2027

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Other changes

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6-month redeterminations

- Effective January 2027, Apple Health for Adults certification period is reduced from 12 months to six months.
- Impacts roughly 610,650* individuals.
  - Excludes American Indian and Alaska Native (AI/AN) individuals.
- Additional burden for individuals who must manually renew their coverage
  - Today, about 20% must manually renew
  - Almost 80% are auto-renewed monthly by verifying eligibility with existing verification systems
- View the work requirements and renewals fact sheet
  - Available in 15 languages

*Caseload data from June 2026

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Retroactive coverage period reduction

- Individuals may apply for coverage before their application date when they have outstanding medical bills.
  - View the retroactive coverage fact sheet
    - Available in 15 languages
- Effective January 2027, the retroactive period is reduced from three months to:
  - One month for Apple Health for Adults
  - Two months for all other Apple Health programs
- Individuals with October medical bills will need to apply for retroactive coverage by December 2026.

Noncitizen updates

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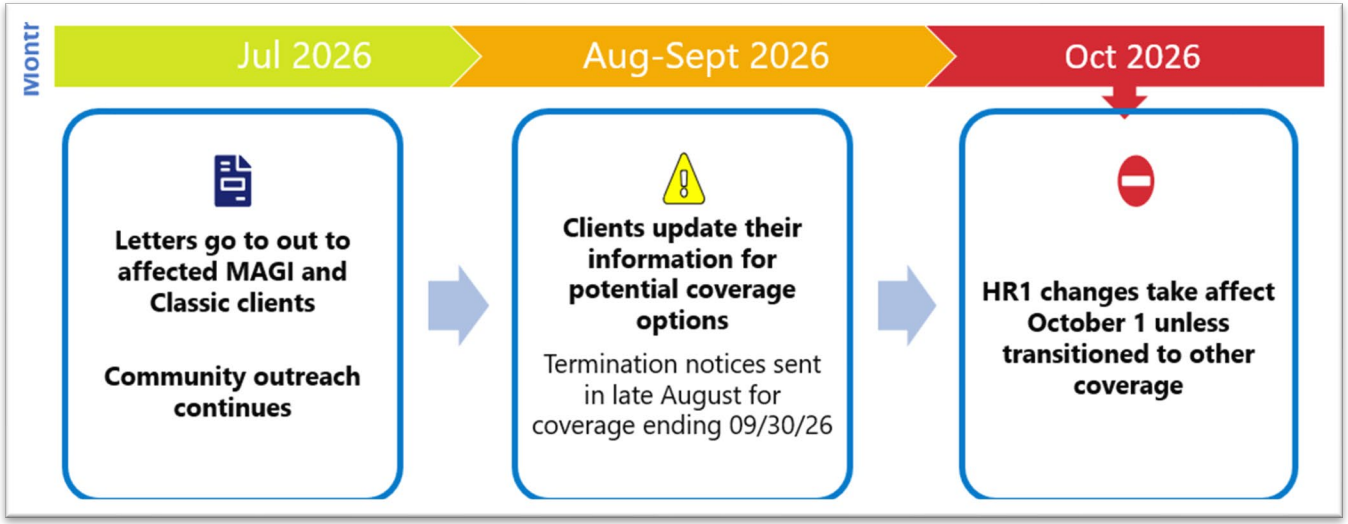
Non-U.S. citizen definition change

- Effective October 2026, eligibility for lawfully-present non-citizens changes
  - Limited to lawful permanent residents, certain Cuban/Haitians and Compact of Free Association (COFA) islanders.
- May be eligible for other programs like Medical Care Services (MCS) or Emergency Medical (AEM)



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Notices to clients

- In July and August, HCA and Department of Social and Health Services (DSHS) sent notices to affected clients. The notice:
  - Explains the federal change
  - Advises them to report if they are pregnant/post-partum, need emergency services (AEM), or have an updated immigration status
  - Explains other coverage options to stay insured
- HCA and DSHS staff reviewed each client's eligibility and circumstances, approving other coverage if eligible.
- In late August, HCA and DSHS sent termination notices to clients explaining Apple Health coverage ends after September 30, 2026.
  - Clients can still use their coverage on September 30

Programs available for noncitizens

- Individuals who lose coverage due to the H.R.1 changes may still qualify for certain coverage types if they meet all other eligibility program requirements, specifically:
  - Apple Health for Pregnant individuals
  - After Pregnancy Coverage (APC)
  - Emergency Medical (AEM)
  - Apple Health Expansion (AHE)*
  - Family Planning Only (FPO)
  - Medical Care Services (MCS)
  - Qualified health and dental plans with savings through Washington Healthplanfinder
  - Refugee Medical Assistance (RMA)

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*At this time, the enrollment limit for Apple Health Expansion has been met.

Outreach and engagement

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H.R. 1 landing page

- Consolidates current resources, webpages, and materials.
  - hca.wa.gov/whats-changing-ah

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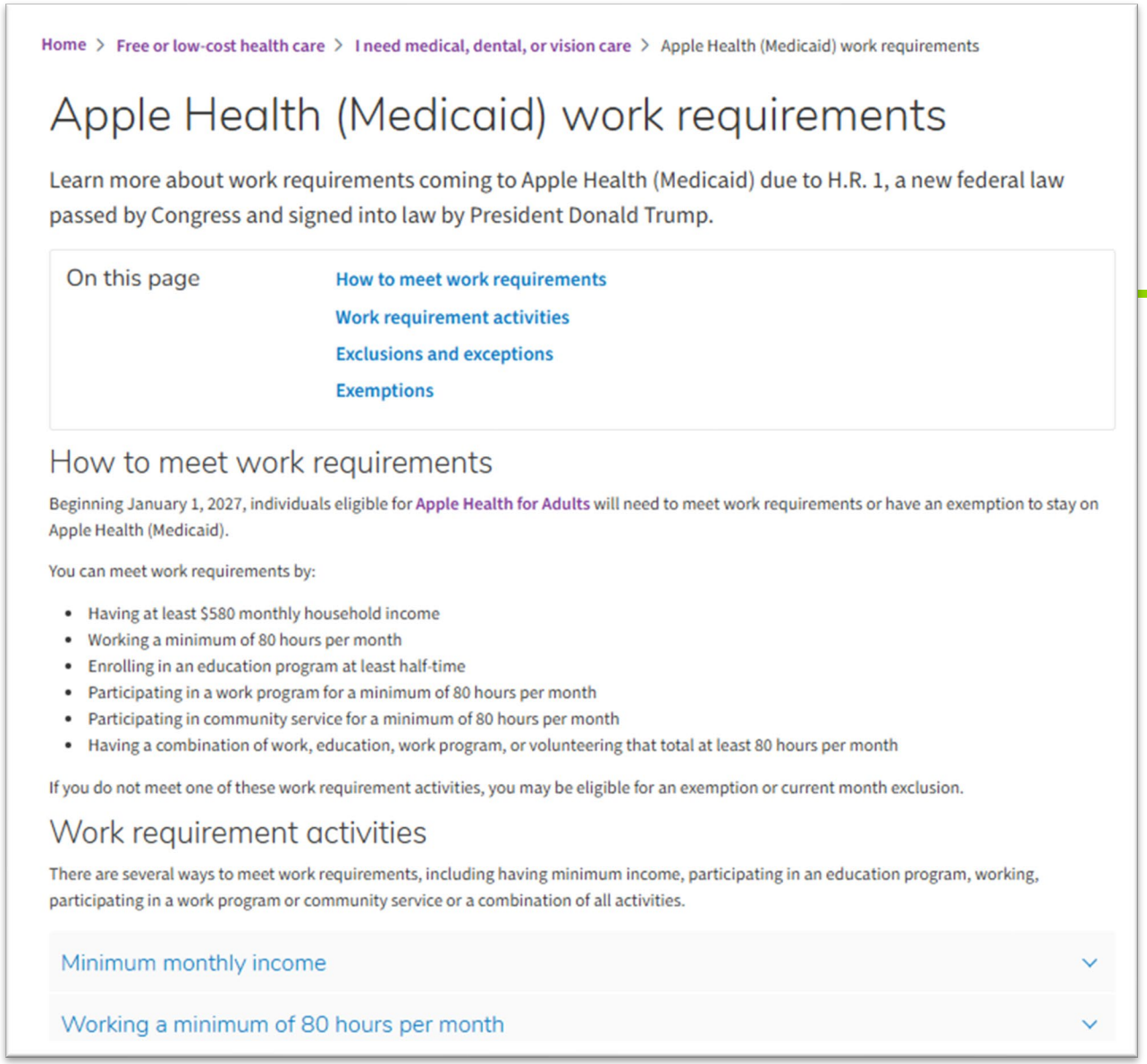

Home > Free or low-cost health care > I need medical, dental, or vision care > Apple Health (Medicaid) work requirements

Apple Health (Medicaid) work requirements

Learn more about work requirements coming to Apple Health (Medicaid) due to H.R. 1, a new federal law passed by Congress and signed into law by President Donald Trump.

On this page

- How to meet work requirements
- Work requirement activities
- Exclusions and exceptions
- Exemptions

How to meet work requirements

Beginning January 1, 2027, individuals eligible for Apple Health for Adults will need to meet work requirements or have an exemption to stay on Apple Health (Medicaid).

You can meet work requirements by:

- Having at least $580 monthly household income
- Working a minimum of 80 hours per month
- Enrolling in an education program at least half-time
- Participating in a work program for a minimum of 80 hours per month
- Participating in community service for a minimum of 80 hours per month
- Having a combination of work, education, work program, or volunteering that total at least 80 hours per month

If you do not meet one of these work requirement activities, you may be eligible for an exemption or current month exclusion.

Work requirement activities

There are several ways to meet work requirements, including having minimum income, participating in an education program, working, participating in a work program or community service or a combination of all activities.

Minimum monthly income

Working a minimum of 80 hours per month

Apple Health (Medicaid) work requirements

- Web page on work requirements
  - Apple Health (Medicaid) work requirements
- Provides detail about work requirements, exclusions, and exemptions

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Community partners

Supporting clients with changes to Apple Health

This page shares information for stakeholders to support Apple Health (Medicaid) clients preparing for and navigating upcoming changes to their health coverage.

On this page

- Background
- Who may be impacted
- Expanded changes and timing
- How you can help clients
- Tools and resources
- Need language assistance?

Tuesday, September 15, 2026 8:30 - 9:30 a.m.	Navigators and volunteer assistors | Register
Tuesday, September 15, 2026 12:30 - 1:30 p.m.	Community members and stakeholders | Register

- *Apple Health Community Connectors* meets monthly to share updates.
  - Ambassador-style program for trusted community partners and stakeholders to share with Apple Health clients
  - Register for a forum or view past material
- Next forums are September 15.

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Stakeholder webinars

- HCA holds quarterly stakeholder webinars providing H.R.1 updates
  - February 26 | H.R.1 overview and work requirements
    - View online
  - June 4 | Impacts to noncitizen eligibility
    - View online
  - **September 3 | H.R.1 Work requirements/Medically frailty**
    - Join Teams meeting (no registration required)
  - December 3
- Details are posted online Stakeholder training and education webpage

Resources

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Other materials

- HCA continues to develop materials to share information about the upcoming changes.
- Fact sheets: available for the noncitizen changes, work requirements, and retroactive coverage changes.
  - H.R.1 noncitizen fact sheet
    - 15 languages
  - H.R.1 work requirements and renewals fact sheet
    - 15 languages
  - H.R.1 retroactive coverage fact sheet
    - 15 languages
- Toolkits: providing language, talking points, and approved messaging.
  - H.R. 1 communications toolkit
  - H.R.1 social media toolkit
  - H.R. 1 provider toolkit

Resources

- FAQ:
  - H.R.1 frequently asked questions
- Stay connected with us:
  - Sign up for Apple Health updates
    - Select Apple Health programs and eligibility “general information and updates”
- Questions?
  - **Email:** HCA Apple Health Eligibility Policy

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Questions?

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