Upcoming District Health Coverage Changes

Biweekly DHCF Eligibility Meeting

Department of Health Care Finance

June 3, 2026

Presentation Overview

- **New: Interim Final Rule on Work Requirements Released**
- One Big Beautiful Bill (OB3) Eligibility Changes Overview
- Refresher: Medicaid Qualified Immigration Status Changes
- Outreach and Next Steps
- Q&A

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CMS Released a Detailed Interim Final Rule on Work Requirements and DHCF Will Analyze and Share More at Next Meeting

- As required in statute, CMS released an Interim Final Rule on Work Requirements on Monday, June 1
- DHCF will share more about the implications of the Rule and its impact on work requirements implementation in the District at the next meeting and subsequent meetings
- The District is still on track to implement Work Requirements by the mandatory January 1, 2027 date
- Resources:
  - Interim Final Rule with Comment Period
  - CMS Fact Sheet on the Interim Final Rule

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DHCF Aims to Implement Eligibility Changes as a Result of Federal Legislation in a Customer Forward and Transparent Way

- Forthcoming changes we cover below are as a result of federal legislation in the One Big Beautiful Bill Act (OB3) are significant – spanning policy, operations, and outreach

- There could still be changes or clarifications to federal guidance even after the Interim Final Rule
  - We will highlight changes in this meeting as we learn of them

- The District recently initiated a contract with a communications vendor (Market Me Consulting LLC) for services related to OB3 eligibility advertising, outreach, messaging, and related tasks

- DHCF intends to provide outreach and engagement materials like we did for the Public Health Emergency Unwinding/Medicaid Renewal
  - Communications Toolkit
  - Advertising campaign
  - On the ground outreach (participation in health fairs, other city events, etc.)
  - Attend your event or train your team

Changes to Medicaid Will Roll-Out Over the End of 2026 and Beginning of 2027

- **October 1, 2026:** Some persons with legal immigration statuses will lose coverage

- **January 1, 2027:**
  - Some adults will have to show work, volunteer or school hours ("the work
  - requirement") to be eligible for Medicaid
  - Some adults will have to recertify their eligibility every 6 months to keep Medicaid
  - Medicaid retroactive coverage will change from 3 months to either 2 months or 1 month
  - DHCF will allow for the deduction of moving expenses for eligibility for some people
  - DHCF will be required to take action to reduce duplicate or deceased enrollment

- **January 1, 2028:**
  - DHCF will cap the home equity allowed for eligibility from long term services and supports at $1 million

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OB3 Imposes Restrictions on Some Non-Citizens Eligible for Medicaid, Pending Federal Guidance and Injunctions

- Non-Citizen Eligibility Changes - Effective 10/1/26
  - Definition of "Qualified Alien" eligible for Medicaid benefits and ACA Tax Credits amended to only include Lawful Permanent Residents (LPRs), certain Cuban and Haitian immigrants, and Compact of Free Association (COFA) migrants.

  - **What to Know**:
    - CMS provided written guidance clarifying that Lawful permanent residents (LPRs); Cuban-Haitian entrants; and Compact of Free Association (COFA) migrants are available for full-scope federal financial participation.
      - This means Medicaid eligibility ends for certain populations such as refugees, humanitarian parolees, asylum grantees, certain abused spouses and children, trafficking victims, people granted conditional entry prior to 1980, individuals granted withholding of Deportation, and Amerasian entrants –*unless they gain a qualifying immigration status*

Noncitizen Eligibility Changes (Current and Future Groups)

Groups Covered	Currently Covered?	Starting October 1, 2026
U.S. Citizens	✓	✓
Lawful Permanent Residents (LPRs) aka Green Card Holders who meet the 5-Year Bar*	✓	✓
Cuban/Haitian entrants	✓	✓
Members of federally recognized tribes, COFA migrants, etc.	✓	✓
Refugees/Asylees	✓	☒
Victims of Trafficking	✓	☒
TPS and DED holders	✓	☒
Individuals paroled into the U.S. for at least one year	✓	☒

*Note: There are some exceptions to the LPR groups. For example, LPR generally face a 5-year waiting period before Medicaid eligibility, **however,** LPRs here under 5 years who are also refugees or asylees may access Medicaid without waiting if you hold LPR status.

Noncitizen Eligibility Changes Do Not Pertain to Children Under 21, Pregnant Women, and Emergency Medicaid

Additional impacts beginning October 1, 2026:

- **Children under age 21 and pregnant women who are lawfully residing in the U.S. without meeting the five-year waiting period will continue to be eligible.**

- Currently, **District does not expect impact to the FCEP/Unborn Child eligibility category**, but we are awaiting additional guidance from CMS on FCEP/Unborn impact of this OBBBA provision, if any

- **Emergency Medicaid:** If you no longer qualify for Medicaid due to your immigration status after October 1, 2026, you can still get help for medical emergencies.

District and Federal Implementation of Noncitizen Eligibility Changes

Changes to District Eligibility Systems and Federal Information Hubs

- States and the District verify immigration status electronically by querying federal data hubs (SAVE, Hub VLP). Federal government is pursuing changes to these data hubs to improve Medicaid agencies' ability to determine an applicant's/enrollee's lawful presence
- DHCF is making corresponding changes to DCAS to receive new information from these federal data hubs

DHCF May Need Additional Information from Some Enrollees

- This Summer, DHCF is sending an informational notice to enrollees who may be impacted by the October 'noncitizen eligibility' changes
- DHCF may need some residents to send updated verification of their immigration status if: 1) the resident has had a recent change to their immigration status; or 2) the District is unable to determine the individual's immigration status electronically

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DC Medicaid Has Multiple Ongoing Methods of External Outreach And Wants to Join Your Meetings Too!

- DC Medicaid is hosting regular Biweekly DHCF Eligibility Meetings such as this every 2 weeks- continuing every other Wednesday at 2:30 pm and the **next is Wednesday, June 17, 2026**.
  - Please email *Medicaid.renewal@dc.gov* to join the meetings and related mailing list if not on it already

- DC Medicaid is holding monthly Resident-Focused Eligibility Meetings the 4th Friday of every month– the next is at **6:30 pm Friday, June 26, 2026.**

- DC Medicaid is holding monthly District Direct (DCAS) Trainings for Human Services Benefits at 12:30 pm the 3rd Tuesday every month designed for stakeholders and anyone helping with eligibility– the next one is **Tuesday, June 16, 2026**.

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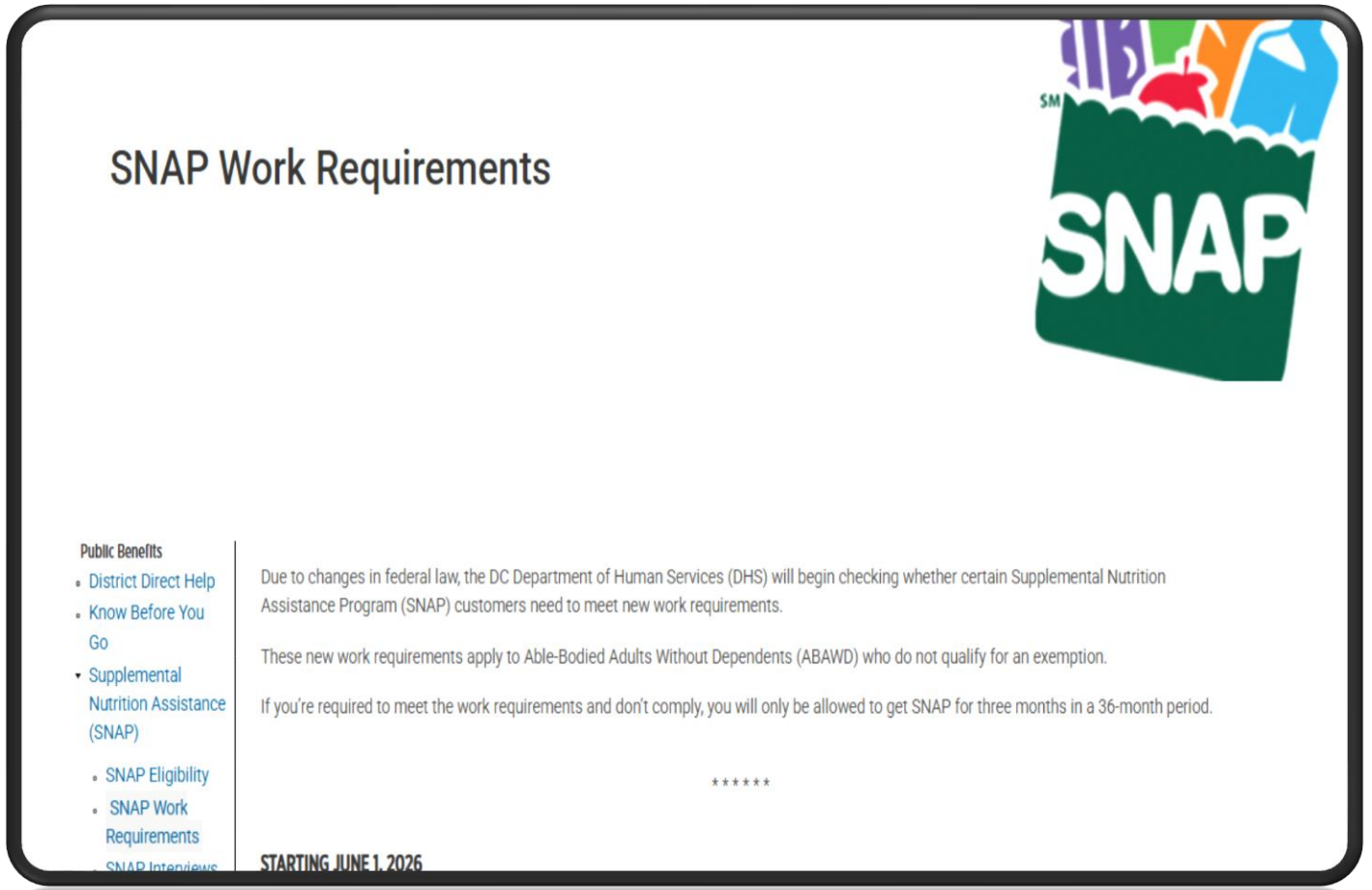
SNAP Work Requirement Rules

New SNAP work rules are here. Find out if you need to work to keep your food stamps.

Visit https://dhs.dc.gov/page/snap-work-requirements to see if the new SNAP work rules apply to you or if you are excused. You can also download important reporting forms and read our Frequently Asked Questions (FAQs) for quick answer.



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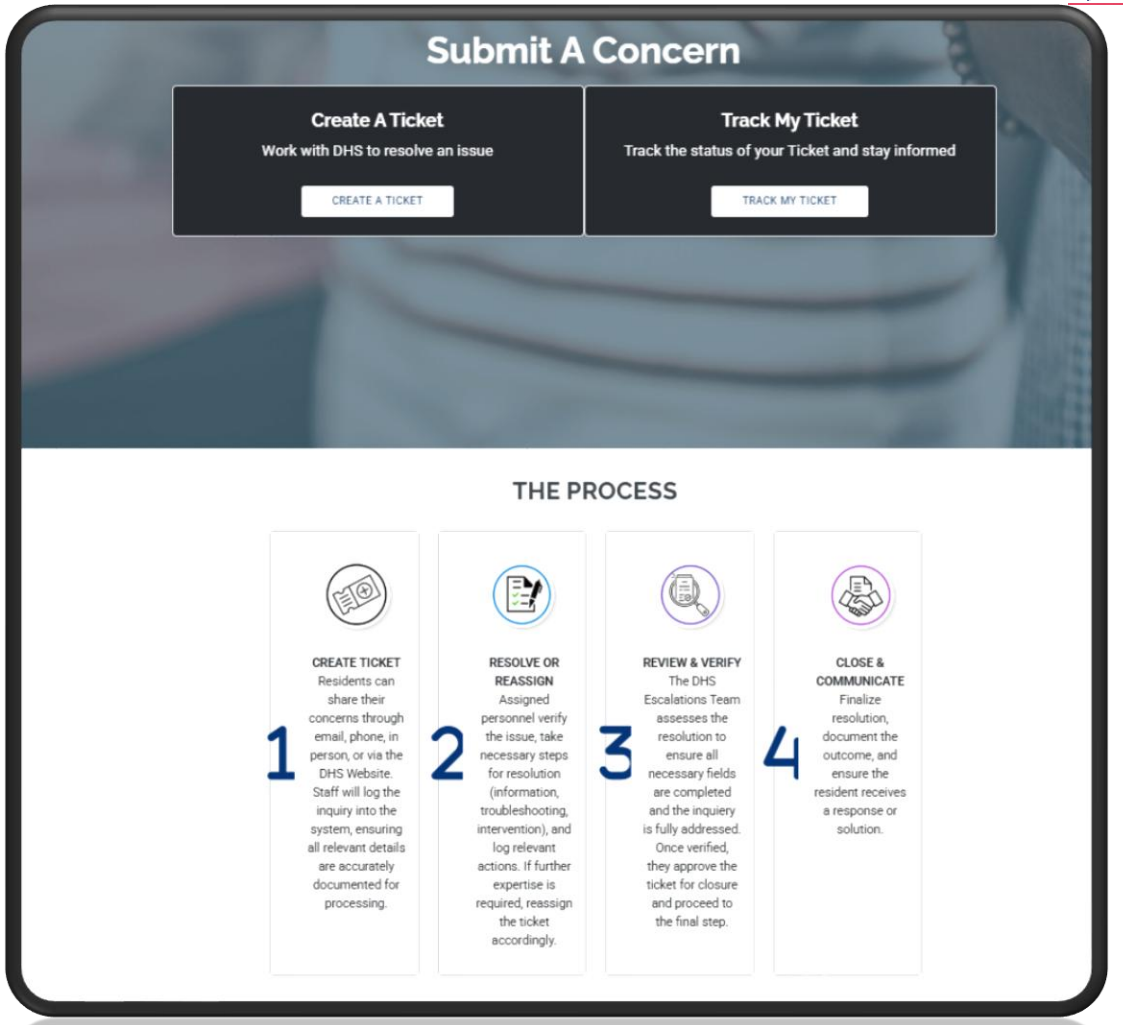
Identify the Issue, Submit a Ticket and Fix the Gap

Need help with your DC benefits?

If you have a problem with your SNAP, TANF, or Medicaid, do not wait. Go online to https://dhs-asks.dc.gov/ and click "Create a Ticket." A helpful worker will look into your issue and contact you with answers. It is fast, easy, and helps you stay covered!



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Questions and Comments

Learn more about Alliance and Medicaid Program Changes: https://dhcf.dc.gov/Alliance-Program-Changes and https://dhcf.dc.gov/medicaid-program-changes

Contact DHCF on Eligibility Issues: Medicaid.Renewal@dc.gov

For Assistance Navigating Health Care in DC: Office of the DC Health Care Ombudsman and Bill of Rights: 202-724-7491

For information on your benefits or to take action: Public Benefits Call Center, 202-727-5355

For Providers Navigating the New MMIS Transition to Gainwell: The Provider Services number is 866-752-9233' the Web Portal Services number is 866-407-2005. Email dcprovideringuiry@gainwelltechnologies.com with any inquiries

For information on your Healthy DC Plan or Marketplace coverage or to take action: DC Health Link Contact Center, (855) 532-5465