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State Budget & House of Representatives (H. R. 1) Impacts on Medi-Cal

Presented by: The Department of Workforce and Benefits Administration (WBA)

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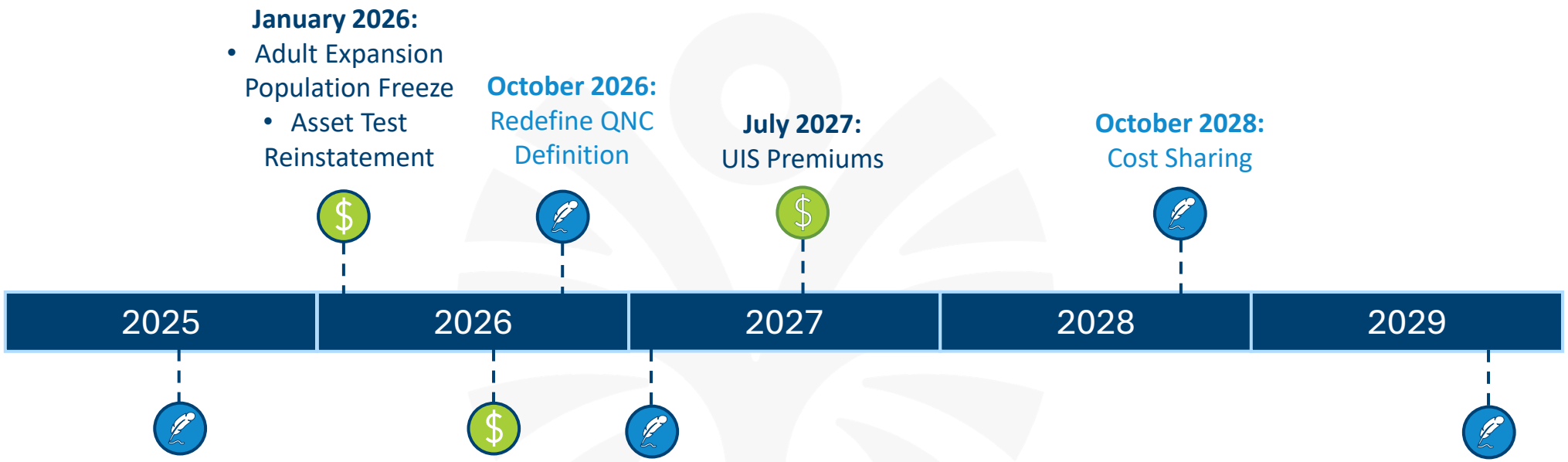
Alameda County Board of Supervisors' Joint Health/Social Services Committee
March 9, 2026

State Budget & HR1 Implementation Timeline



January 2026:
- Adult Expansion Population Freeze
- Asset Test Reinstatement

October 2026:
Redefine QNC Definition

July 2027:
UIS Premiums

October 2028:
Cost Sharing

July 2025:
Moratorium on streamlining eligibility final rules

July 2026:
UIS Adult Dental Reduction

January 2027:
- Address Standards
- 6-Month Redeterminations
- Reduced Retro Medi-Cal Timeframes
- Work/Community Engagement Requirements*
- Deceased Member Verification

October 2029:
Federal Eligibility Database

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Overview

- Update from the 01/12/2026 Alameda County Board of Supervisors Joint Health/Social Services Committee on State and Federal Medi-Cal Policy Changes Affecting Non-Citizens.
- Medi-Cal Work & Community Engagement Requirements Policy Update.
- Medi-Cal Work & Community Engagement Requirements Preliminary Data Analysis.

State and Federal Medi-Cal Policy Changes Affecting Non-Citizens

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Policy Changes Impacting Non-Citizens

- January 1, 2026 – Medi-Cal enrollment freeze for individuals with unsatisfactory immigration status (UIS).
- July 1, 2026 – Reduction of Medi-Cal dental benefits for UIS individuals.
- October 1, 2026 – Redefinition of Qualified Non-Citizen (QNC).

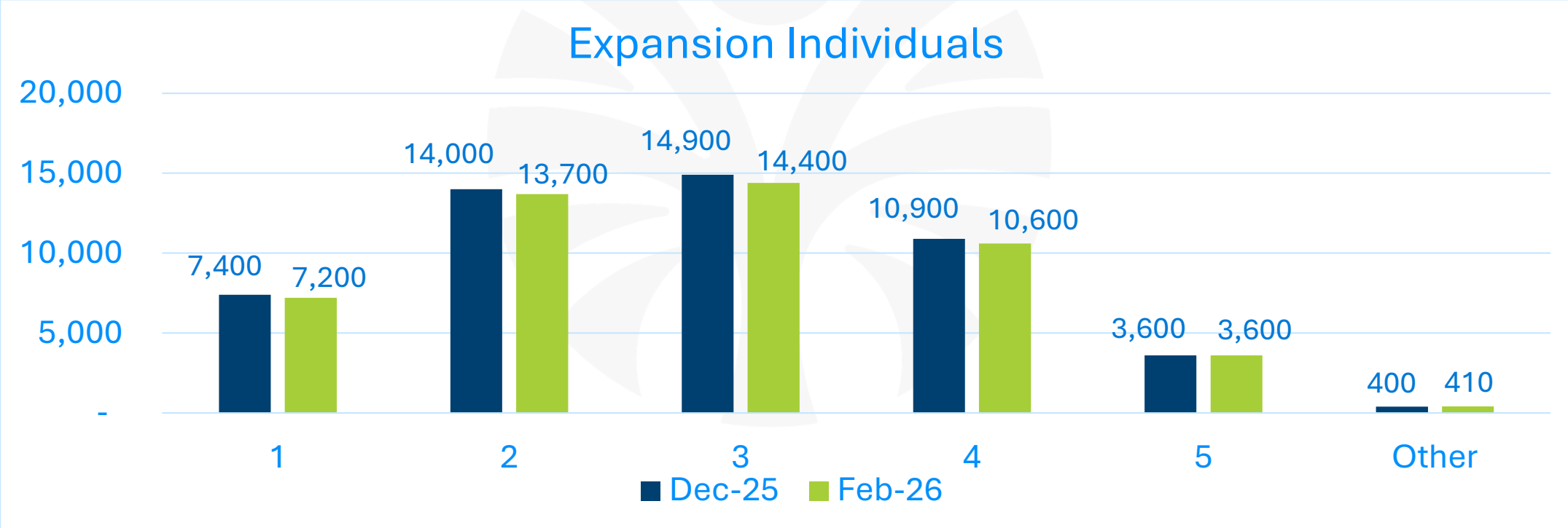
Adult Expansion Enrollment Freeze

- Effective January 1, 2026, a freeze was placed on all enrollments into full-scope Medi-Cal for new applicants 19 years of age or older who have UIS or are unable to establish satisfactory immigration status (SIS) who apply on or after January 1, 2026.

- Expansion Freeze does NOT apply to:
  - Newly Qualified Immigrants (NQI) under the 5-year bar;
  - Qualified Non-Citizens (QNCs);
  - Individuals claiming to be Permanently Residing in the United States Under Color of Law (PRUCOL);
  - Pregnant individuals through the postpartum period, and the Medi-Cal Access Program (MCAP).

Adult Expansion Enrollment Freeze Data

An estimated 49,910 individuals are currently enrolled into full-scope Medi-Cal because of the Young Adult, Adult and Older Adult Expansions. This is a decrease of 1,290 individuals from the 51,200 individuals in December 2025.



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Reduction of Dental Benefits for UIS Individuals

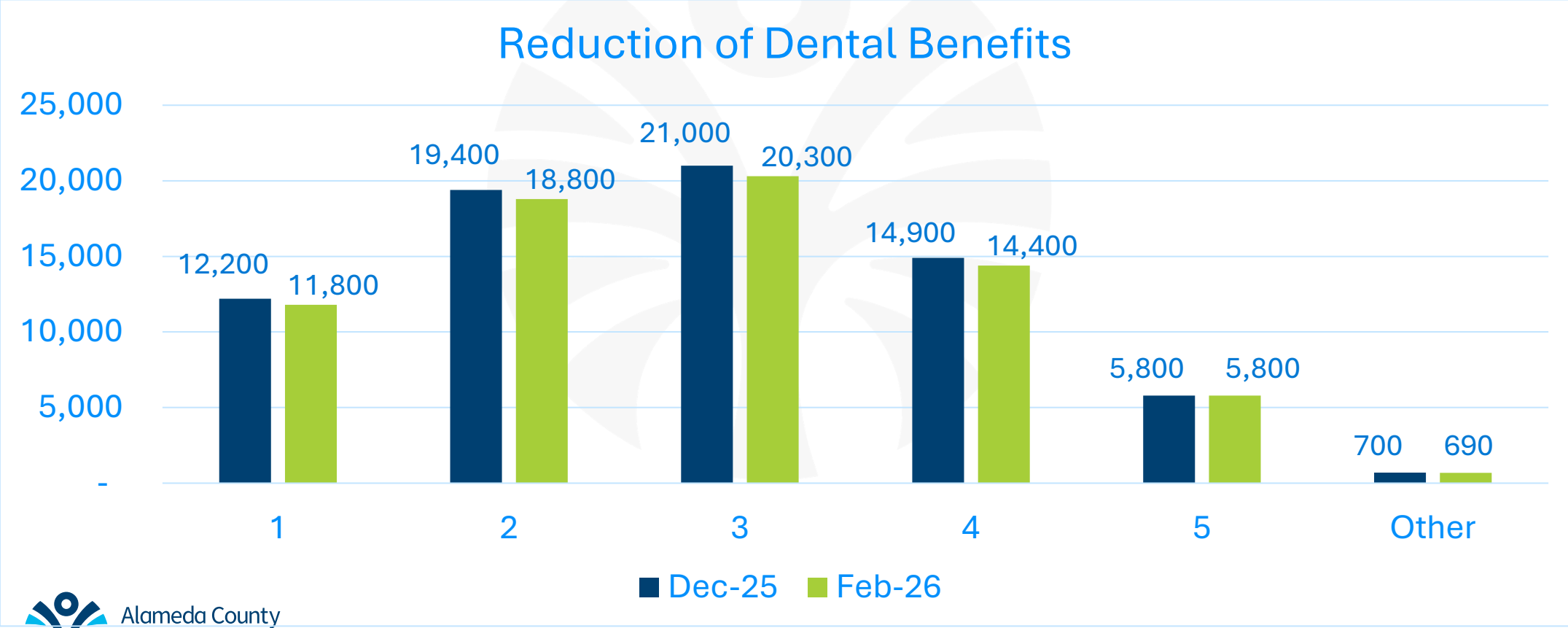
- Effective July 1, 2026, full-scope dental benefits will no longer be available for individuals 19 years of age or older who have UIS or are unable to establish SIS:
  - Routine dental care will no longer be covered for these individuals, but restricted-scope, emergency dental care will be covered.

- Pregnant individuals will receive all necessary services through their pregnancy and 12-month postpartum period.

- This benefit level will be called full-scope Medi-Cal with no Dental.

Reduction of Dental Benefits Data

An estimated 71,790 individuals currently enrolled in full-scope Medi-Cal will potentially have dental benefits reduced as of July 1, 2026. This is a decrease of 2,210 individuals from 74,000 individuals in December 2025.



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Redefinition of Qualified Non-Citizen

- Effective October 1, 2026, the definition of Qualified Non-Citizen (QNC) will be redefined to only include individuals who are:
  - Lawful Permanent Residents (LPRs);
  - Cuban or Haitian Entrants;
  - Migrants legally residing in the United States and its territories under the Compact of Free Association (COFA).

- Individuals who are QNCs will continue to be eligible for full-scope Medi-Cal with dental coverage if all other eligibility requirements are met.

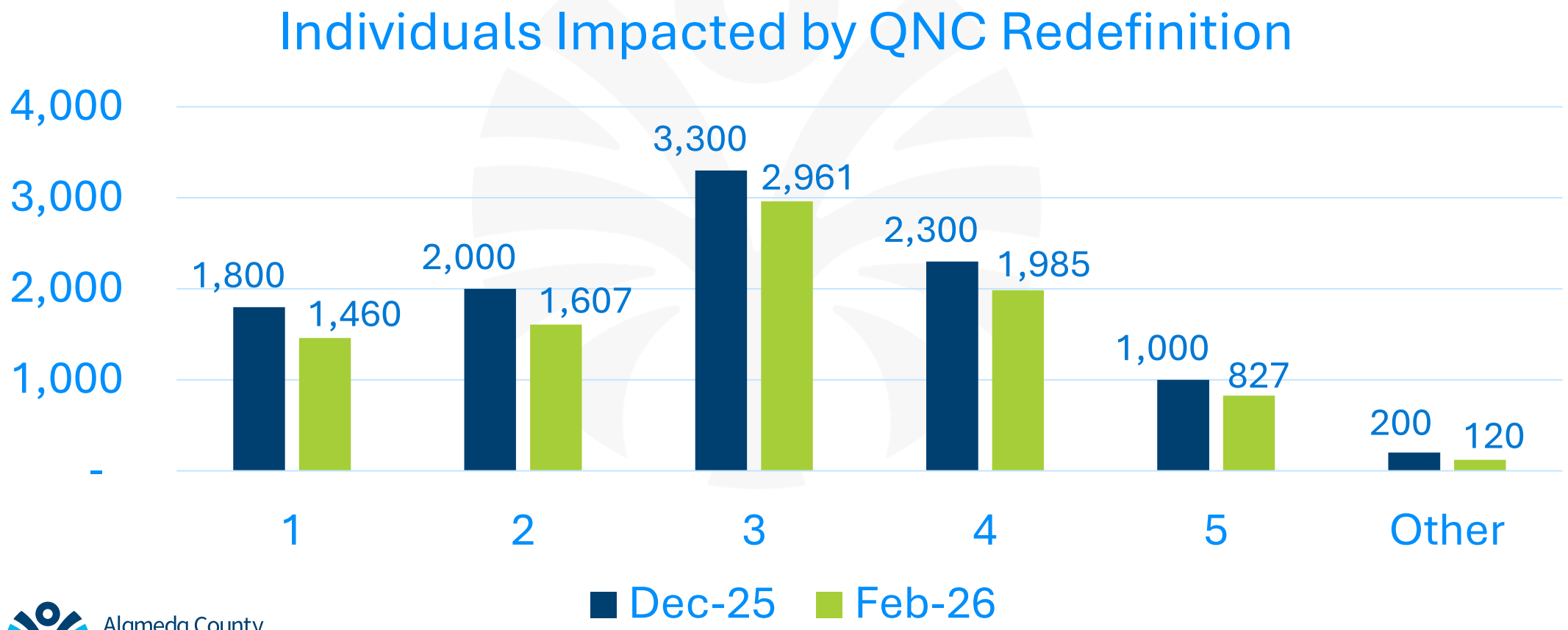
Redefinition of Qualified Non-Citizen

- The new federal definition of QNCs excludes the following immigration statuses:
  - Conditional Entrant before April 1980;
  - Paroled into the United States for one year or more;
  - Battered non-citizen, or parent or child of a battered non-citizen;
  - Refugees;
  - Asylees.

- Individuals whose statuses were removed due to the new federal definition of QNC will only be eligible for restricted scope Medi-Cal, effective October 1, 2026, if state funding is not allocated to provide full-scope Medi-Cal without Dental Coverage to these individuals in the FY 26-27 state budget.

Redefinition of Qualified Non-Citizen Data

An estimated 8,960 individuals will potentially no longer be considered QNCs because of the redefinition of who is a QNC. This is a decrease of 1,640 individuals from 10,600 individuals in December 2025.



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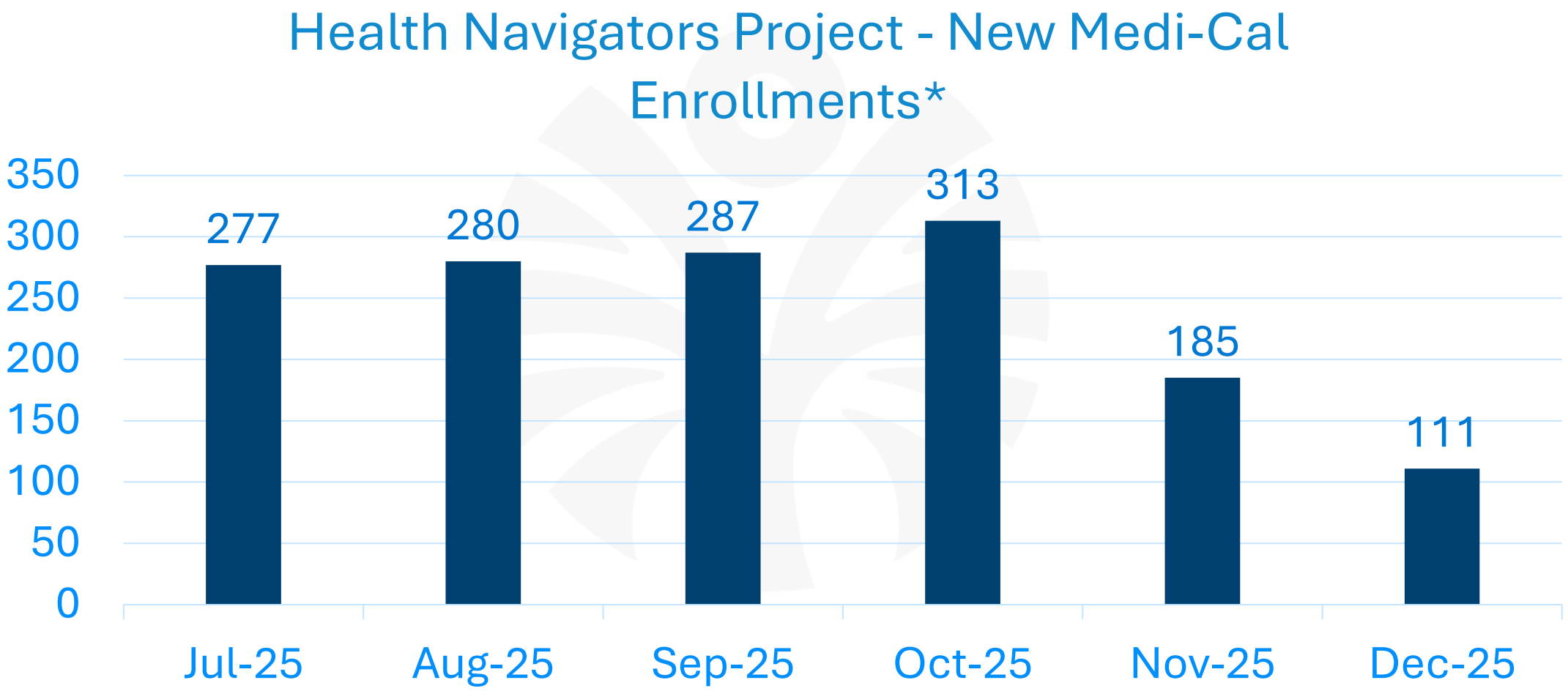
Health Navigators Project Outcomes – Intake Outreach



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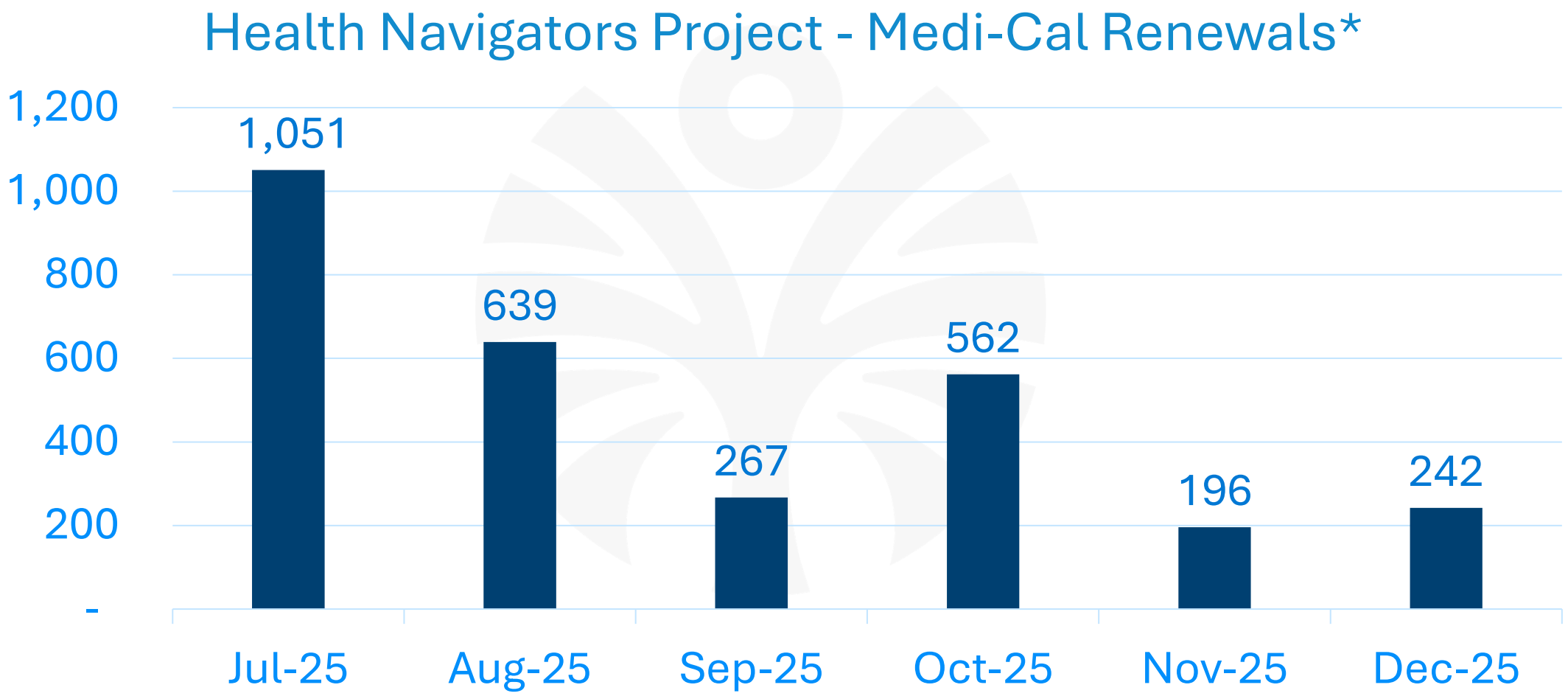
*Includes both non-citizen and citizen new enrollments.

Health Navigators Project Outcomes – Renewal Outreach



*Includes both non-citizen and citizen renewals.

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Health Navigators Project Outcomes – Client Success Stories

Story 1: Shin, his wife, and his 9-year-old blind son sought assistance from one of ACSSA's CBO partners, the Center for Empowering Refugees and Immigrants (CERI), after arriving in the United States. As newcomers to the country and being undocumented, they lacked resources for medical benefits and were having difficulty navigating the US healthcare system. The CBO assisted the family by helping them apply for Medi-Cal and connecting them with other services, allowing them to access the medical care they need.

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Health Navigators Project Outcomes – Client Success Stories (Continued)

Story 2: Hector is an undocumented senior who had over $500 per month in prescription costs and worked part-time at McDonald's to afford his prescriptions. He believed that he was unable to qualify for Medi-Cal as an undocumented resident. He worked with one of ACSSA's CBO partners, Tiburcio Vazquez Health Center (TVHC) who connected him with a legal advocate and assisted with submitting the appropriate documentation to enroll in Medi-Cal. This allowed him to receive his medications at no cost and consistently access critical health care despite his immigration status.

CMS Data Sharing Update

- On January 2, 2026, DHCS News Release 25-20 Statement From the Department of Health Care Services on the Federal Use of Medi-Cal Data and Member Privacy was updated:
  - On December 29, 2025, a federal court ruled that the Centers for Medicare & Medicaid Services (CMS) may share limited information with Immigration and Customs Enforcement (ICE) only for individuals who are not “lawfully residing” in the United States.
  - DHCS is required by federal law to submit monthly reports to CMS , which include basic demographic and eligibility details such as name, address, date of birth, SSN or Medicaid ID, and immigration status.
  - If data of individuals who are not lawfully residing in the United States cannot be separated from the data that is still protected (e.g., data of lawful permanent residents, U.S. citizen data, sensitive health records, etc.), CMS cannot share the data with ICE.

Medi-Cal Work & Community Engagement Requirements Policy Update

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Work and Community Engagement Requirements Policy Background

- H.R. 1 established work/community engagement requirements for the Medicaid Affordable Care Act (ACA) adult expansion group.
- Applies to the MAGI New Adult Group: Adults 19–64, income 109%–138% Federal Poverty Level (FPL), regardless of immigration status.
- Individuals in the MAGI New Adult Group must meet work/community engagement conditions unless they are exempt or a hardship applies to them to receive Medi-Cal benefits.
- Policy is effective January 1, 2027.

Excluded Populations

The following individuals are excluded from having to participate in the Medi-Cal work and community engagement requirements:

- Non-MAGI groups;
- Mandatory Children's group;
- Pregnancy group;
- Restricted-scope Medi-Cal.

Exemptions

Individuals who meet one of the following criteria are exempt from having to satisfy the Medi-Cal work requirement if they are:

- Residing in a High Unemployment County
- Receiving Medicare Parts A/B
- American Indians/Alaska Natives
- Parents/caretakers of a child under 13
- Pregnant/ Postpartum
- Former Foster Youth under 26
- Incarcerated or recently released

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Exemptions (continued):

Individuals who meet one of the following criteria are exempt from having to satisfy the Medi-Cal work requirement if they are:

- Meeting CalFresh/TANF work requirements
- Caregiver of a disabled individual
- Disabled Veterans
- Drug/Alcohol treatment
- Medically Frail
- Short Term Medical hardship
- Disaster/Emergency area

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Qualifying Activities

Individuals can meet the Medi-Cal work requirement through one of the following methods:

Income ≥ $580/month

80 hours of employment, job training or community service per month

Attend school (Full or Part-Time)

Any combination of the above activities

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Demonstrating Compliance

Non-exempt beneficiaries will need to demonstrate compliance with work requirement's qualifying activities at application and during their six-month renewal period.

Application:

-Look back month (30 days prior to application)

- If not verified, a Notice of Non-Compliance will be sent (30 days to respond)

Renewal:

-Must meet the requirement in any month since the last eligibility determination.

-If not meeting, 30 days to comply

Medi-Cal Work & Community Engagement Requirements Preliminary Data Analysis

Summary of Work and Community Engagement Requirements Preliminary Data Analysis

- As of 02/19/2026, an estimated **158,900 individuals** are currently subject to Medi-Cal work and community engagement requirements in Alameda County.

- A review of current case records indicates that:
  - 15,100 individuals appear to potentially meet an exemption
  - 55,900 individuals appear to potentially meet work and community engagement requirements
  - **87,900 individuals** do not currently have a case record that indicates meeting a work requirement or exemption.

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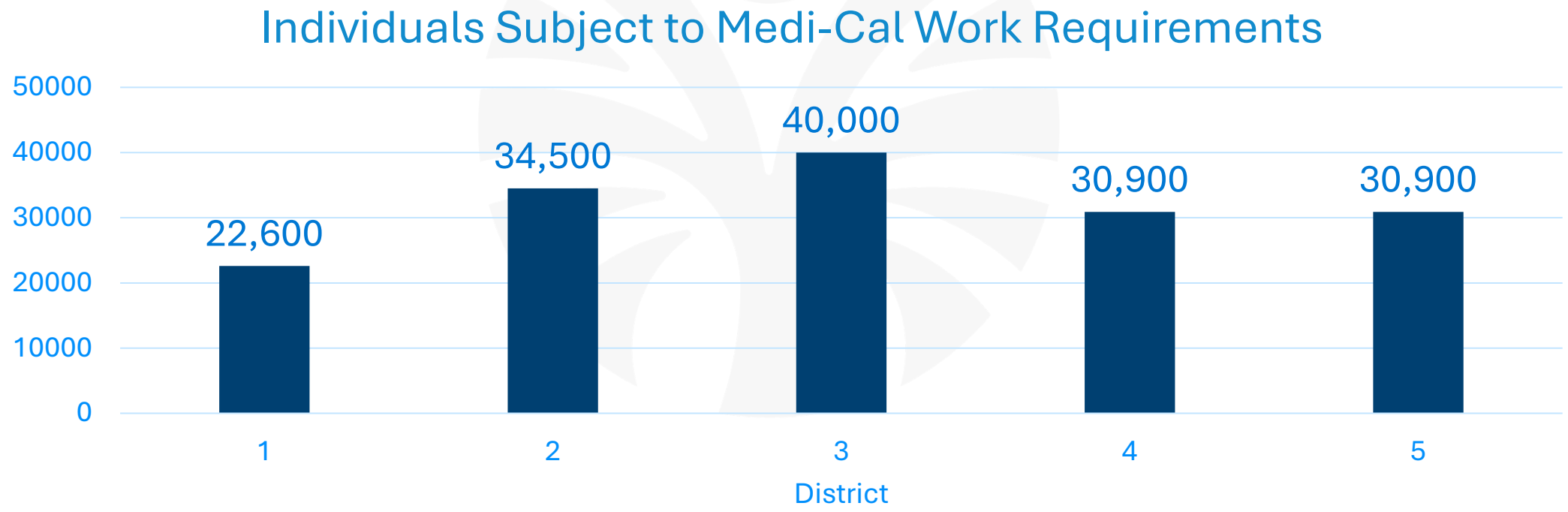
Summary of Work and Community Engagement Requirements Preliminary Data Analysis

- The Department of Health Care Services (DHCS) is projecting the following statewide Medi-Cal caseload decreases due to the implementation of Medi-Cal work and community engagement requirements and 6-month renewal policies:
  - 3.55% initial reduction in the total Medi-Cal caseload for fiscal year (FY) 2026-27. This represents approximately 14,600 individuals in Alameda County.
  - 12.24% overall reduction in the total Medi-Cal caseload by full implementation by 2030. This represents approximately 50,300 individuals in Alameda County.

Work and Community Engagement Requirements Data

An estimated **158,900 Alameda County residents** are currently subject to Medi-Cal work and community engagement. This is a decrease of 2,100 individuals from 161,000 individuals from early February 2026.



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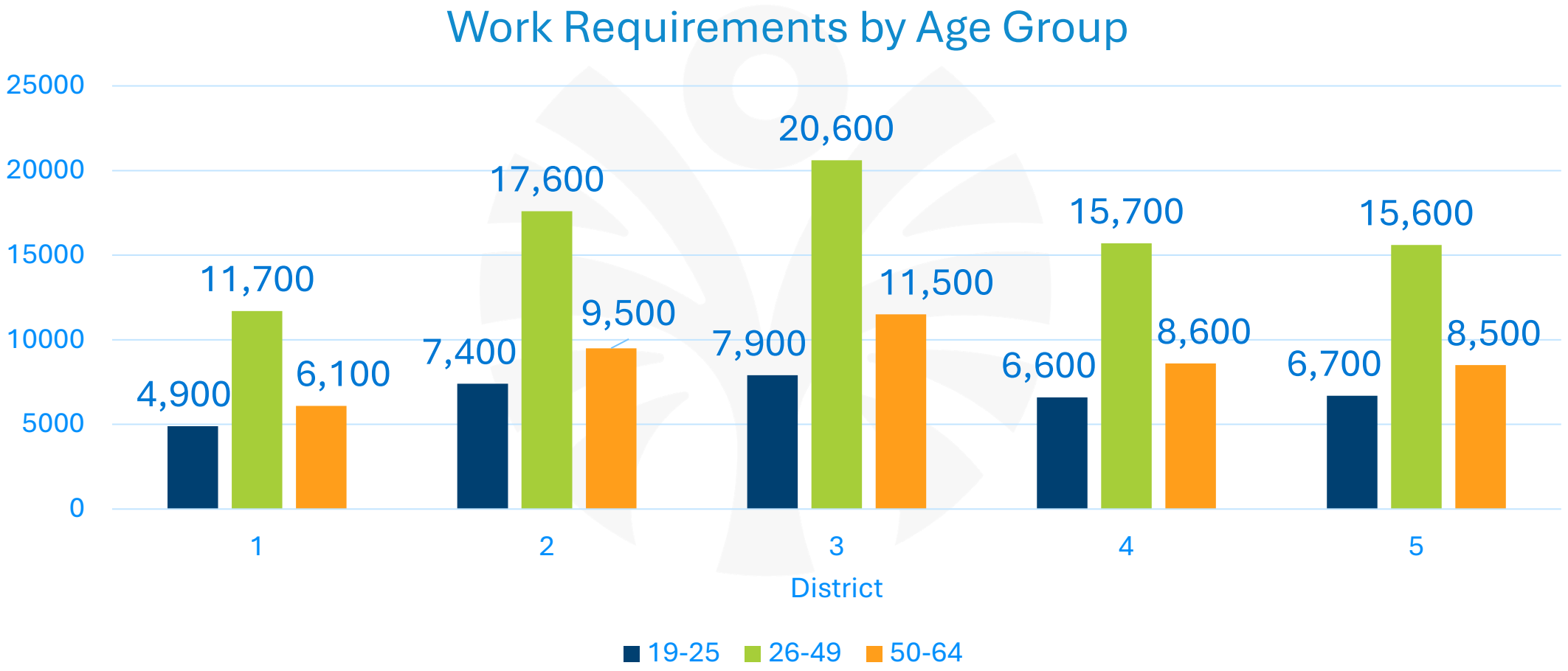
Work and Community Engagement Requirements Data



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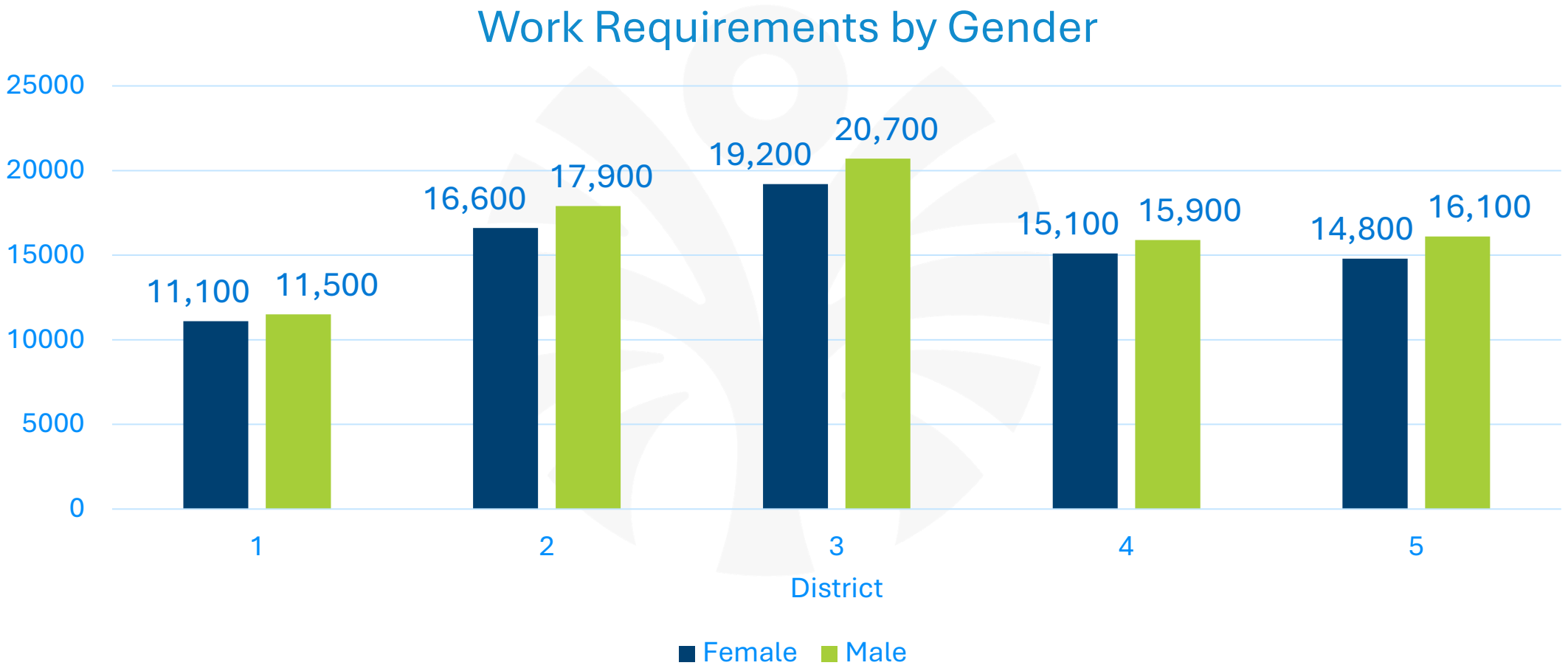

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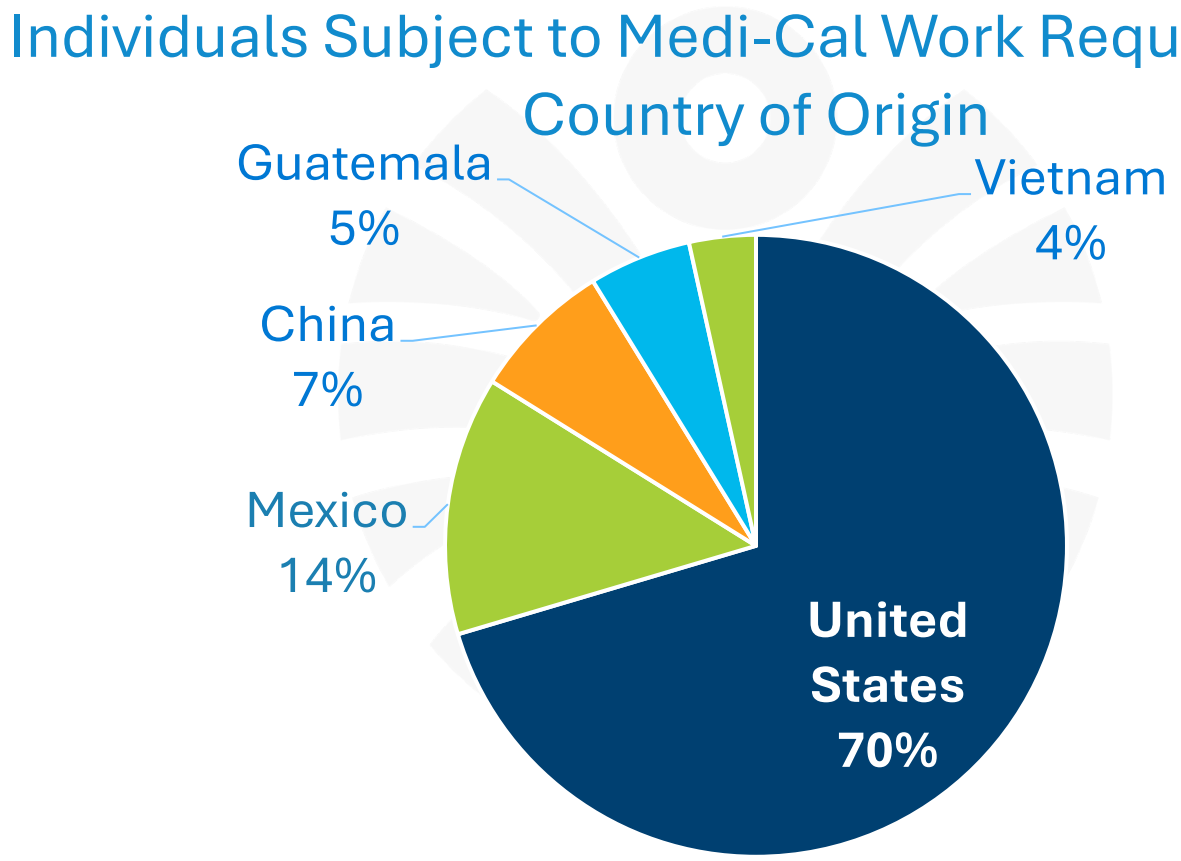

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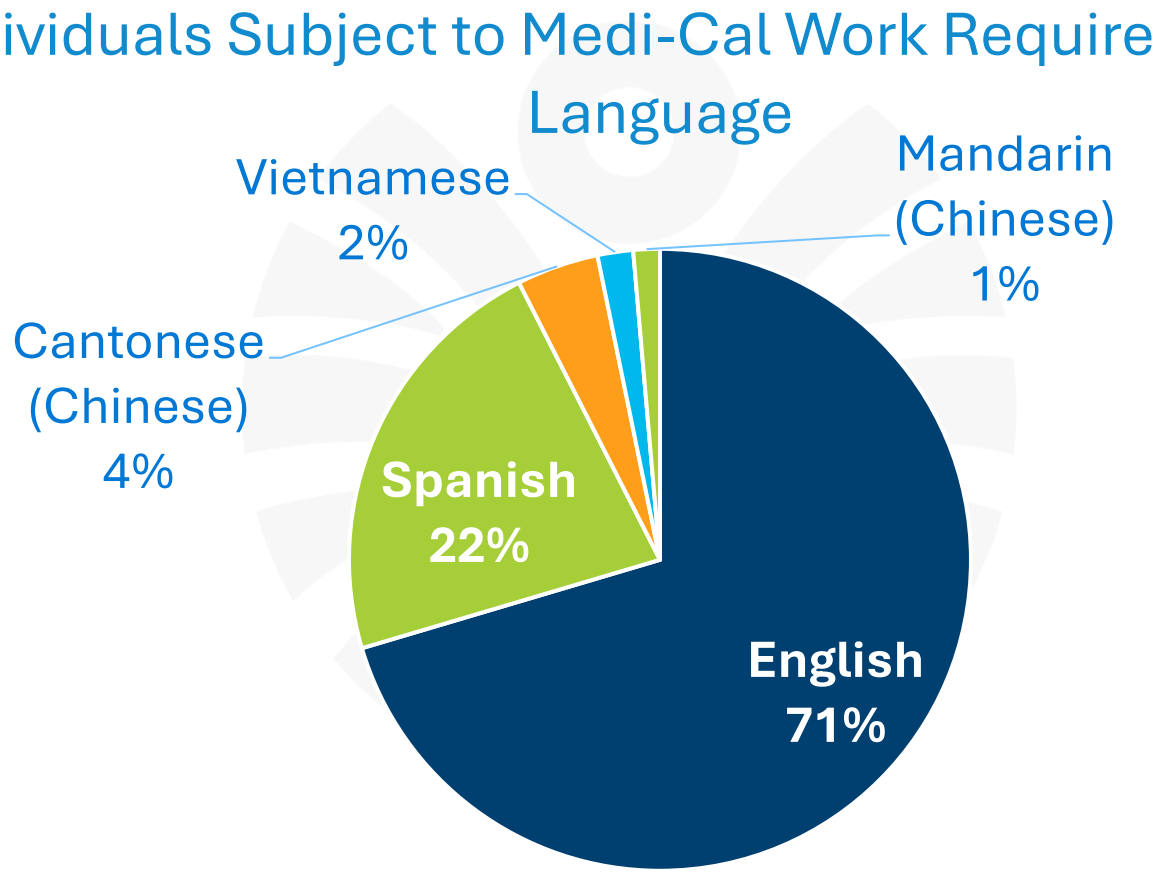

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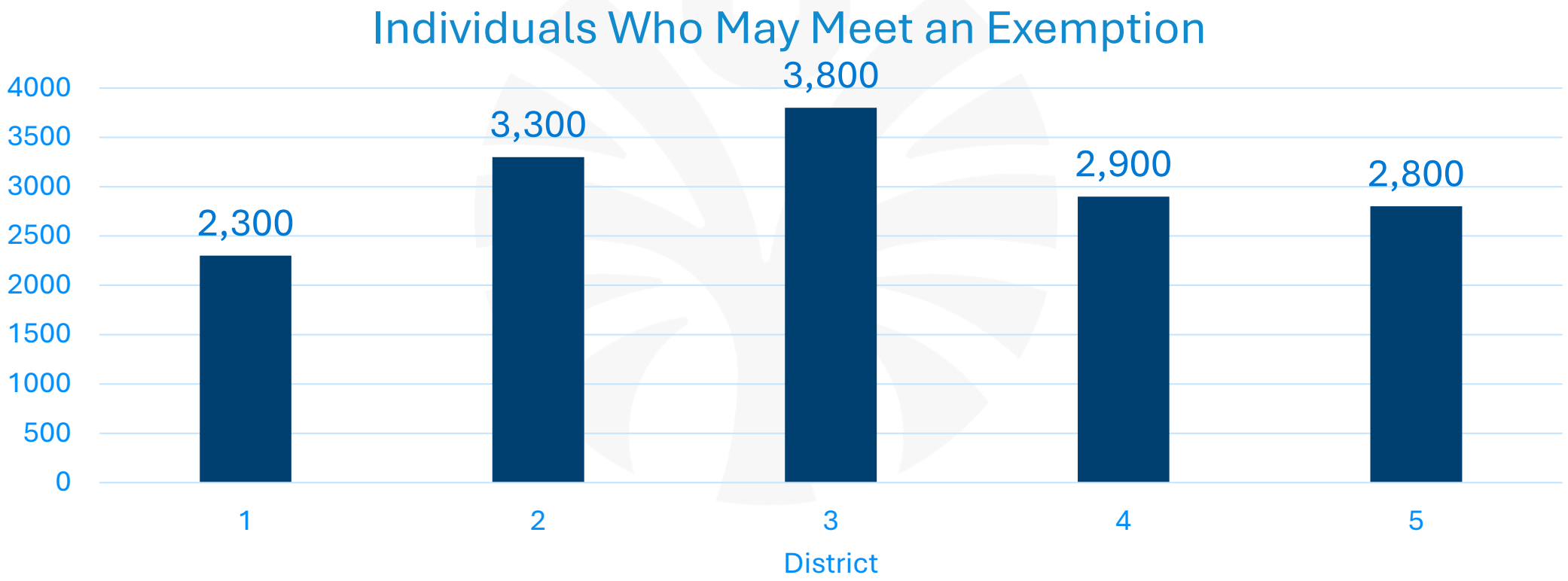
Individuals Who May Be Exempt

Approximately 15,100 individuals may be exempt from Medi-Cal work and community engagement requirements based on current case records.



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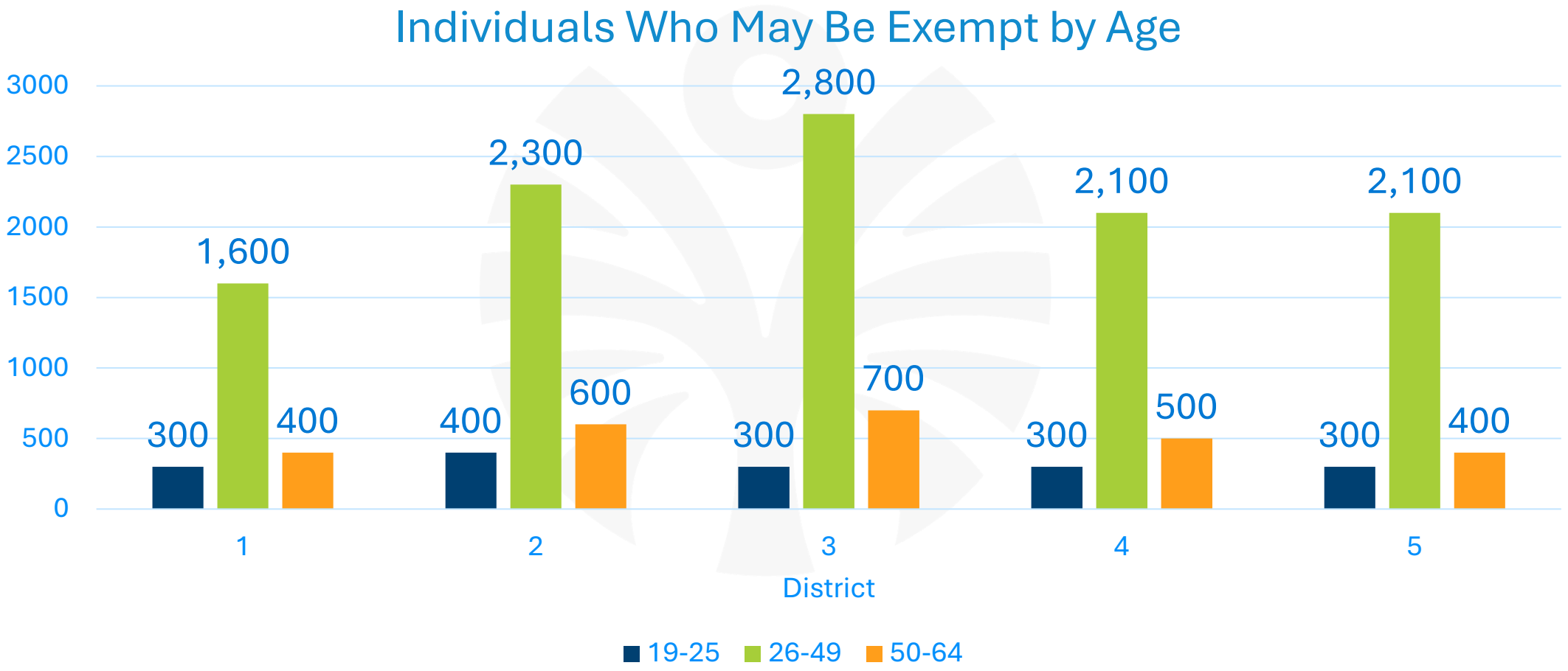

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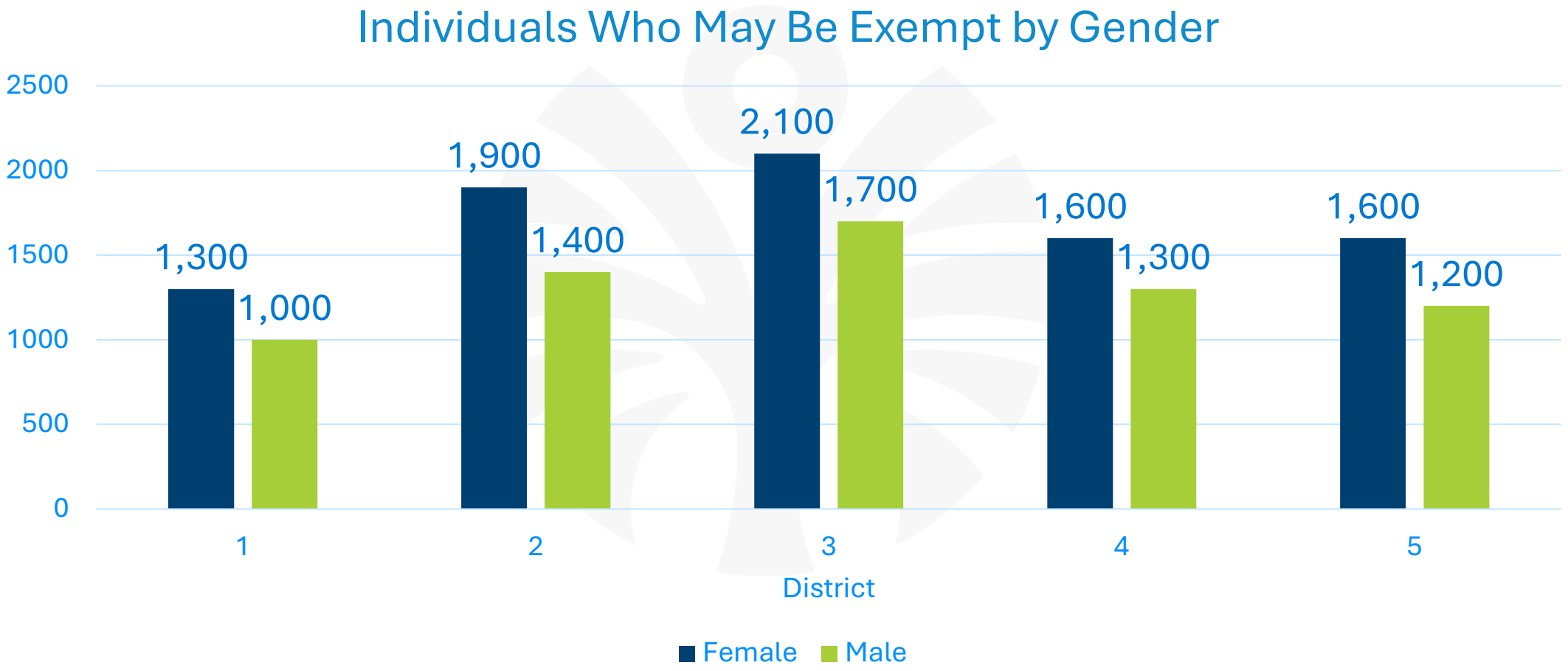

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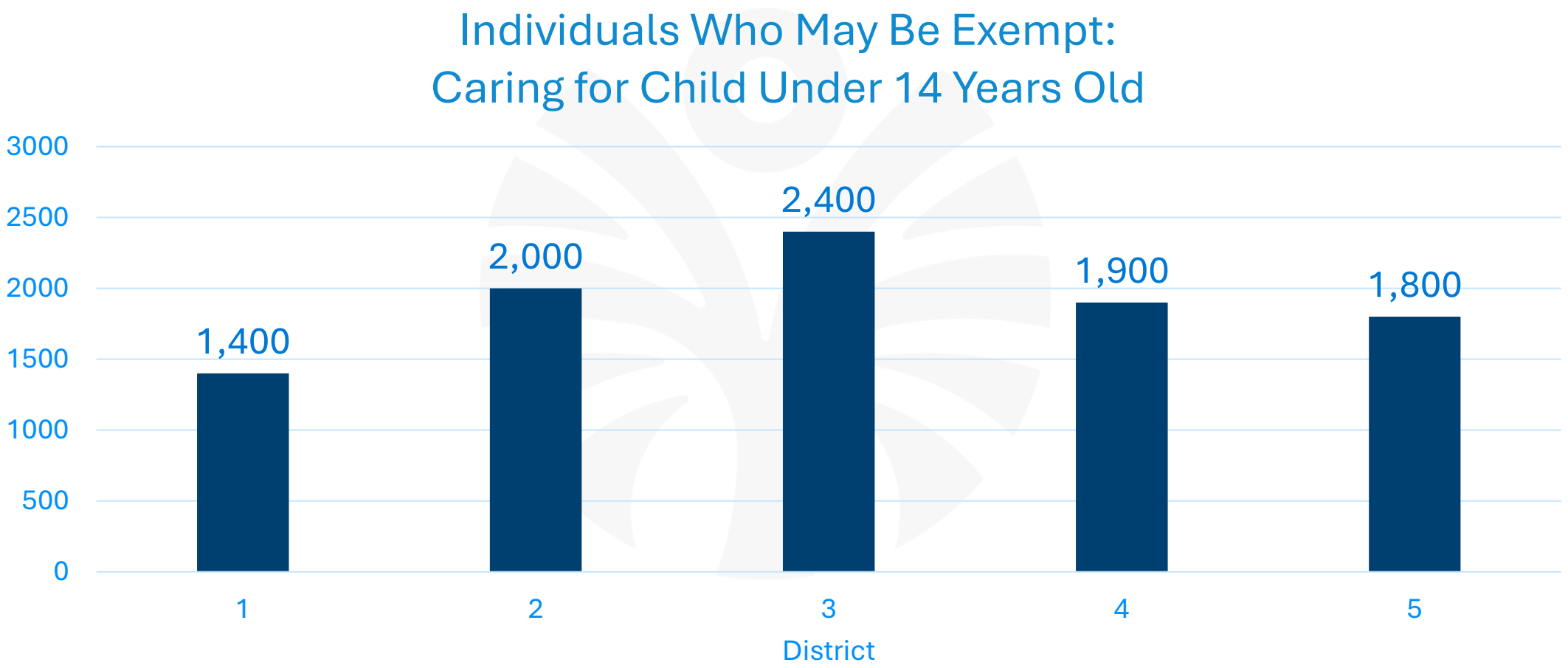

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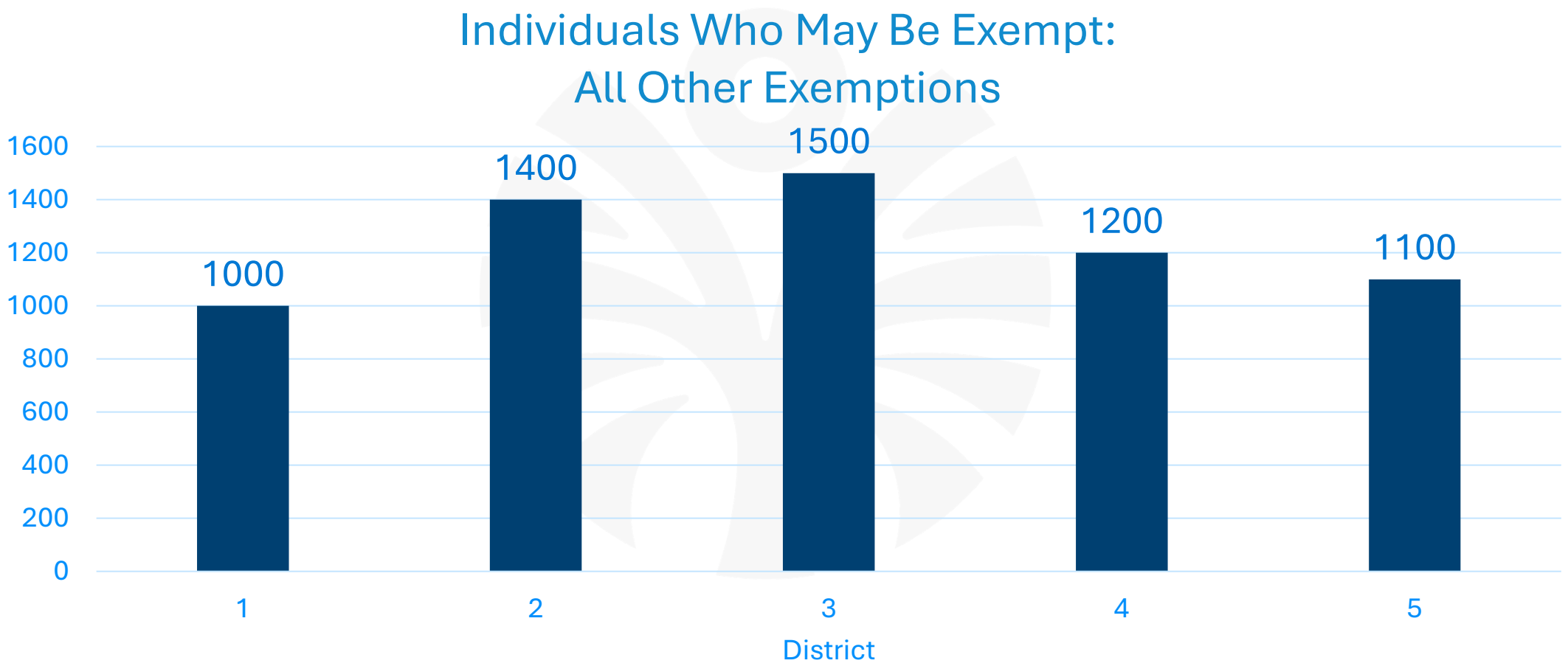

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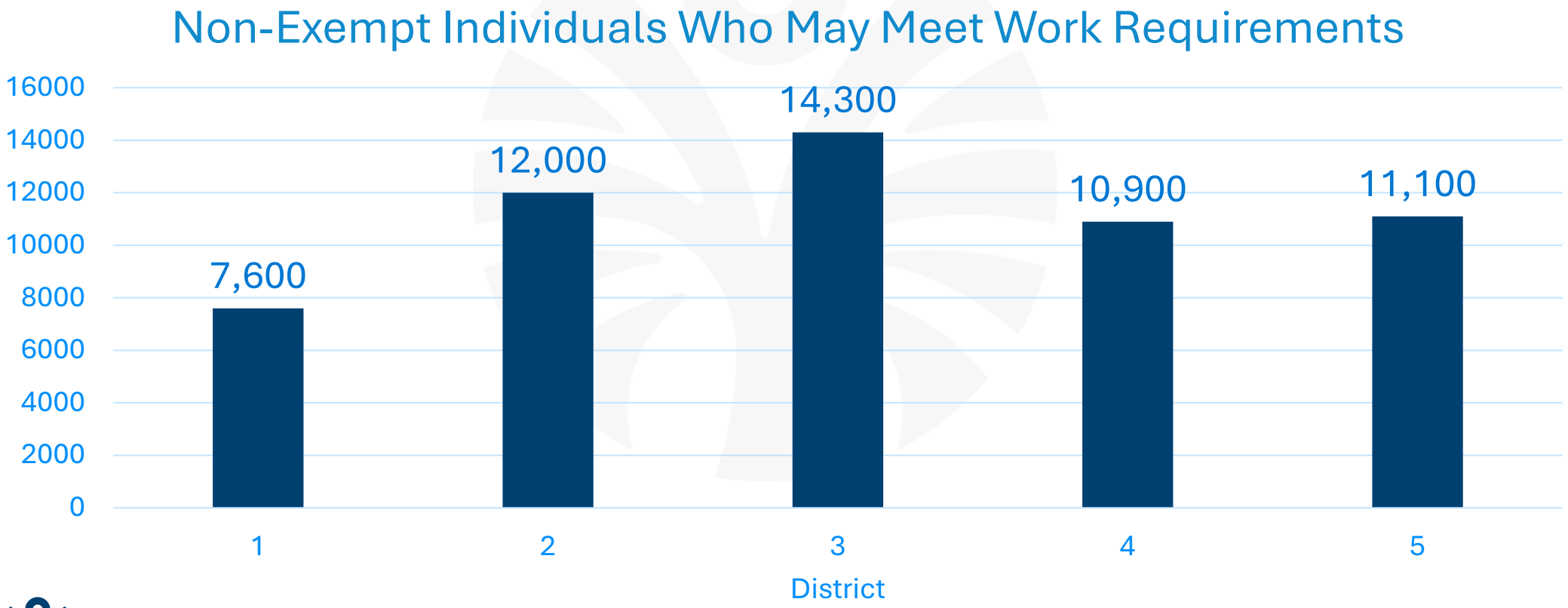
Individuals Who May Meet Work Requirements

Approximately 55,900 individuals may currently meet Medi-Cal work and community engagement requirements based on current case records.



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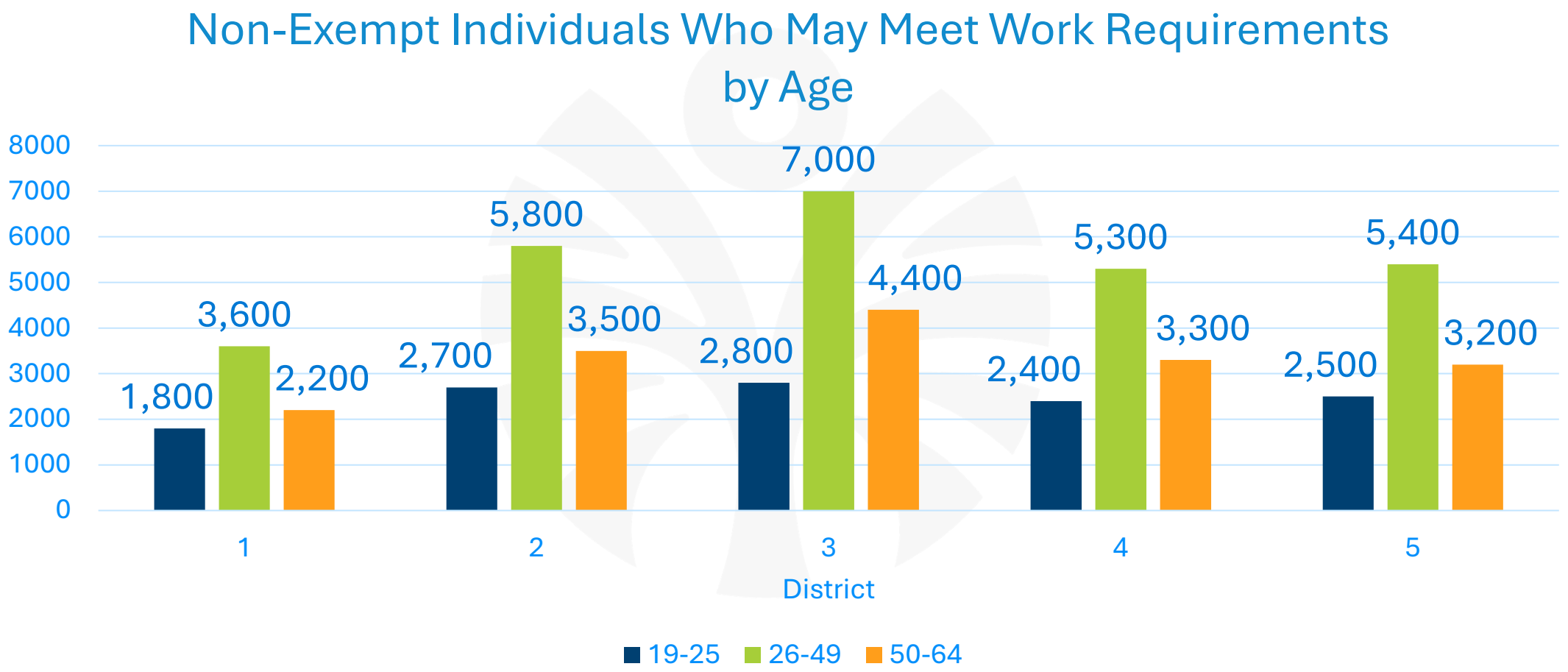

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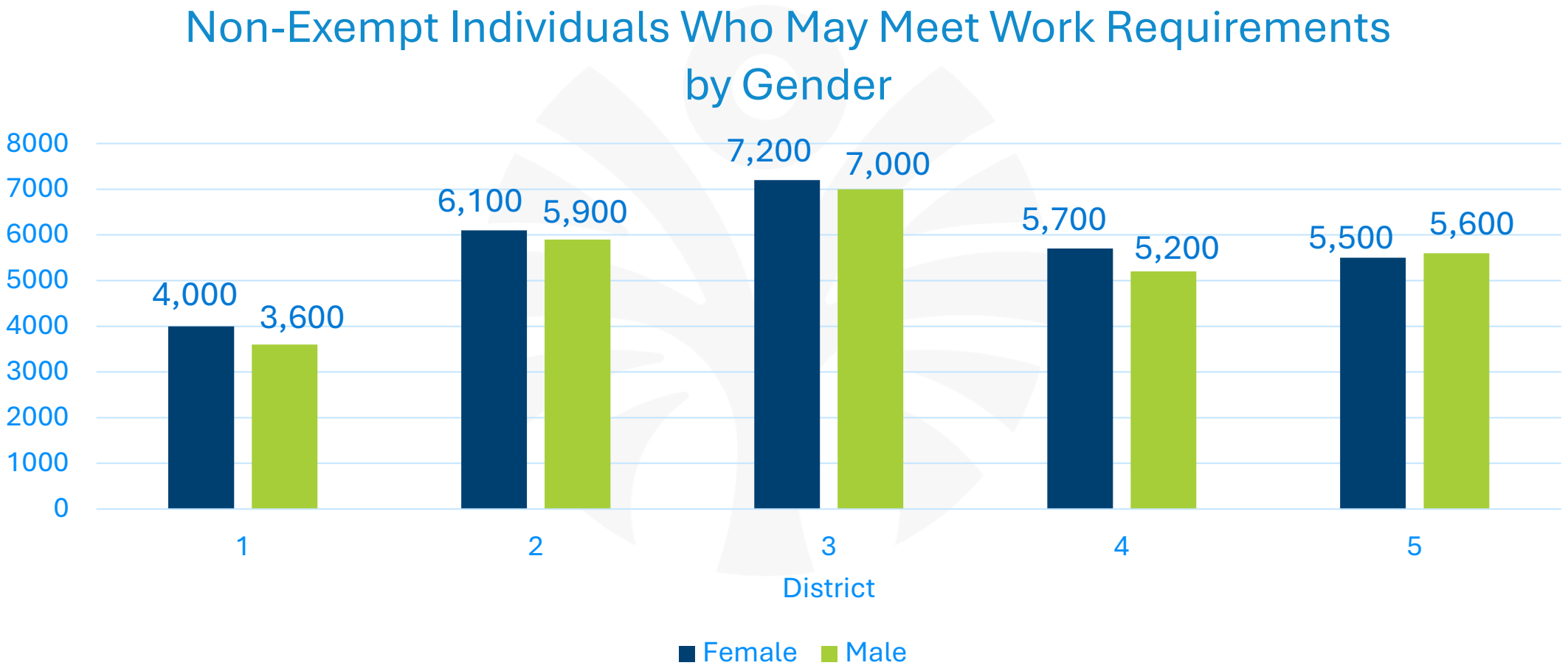

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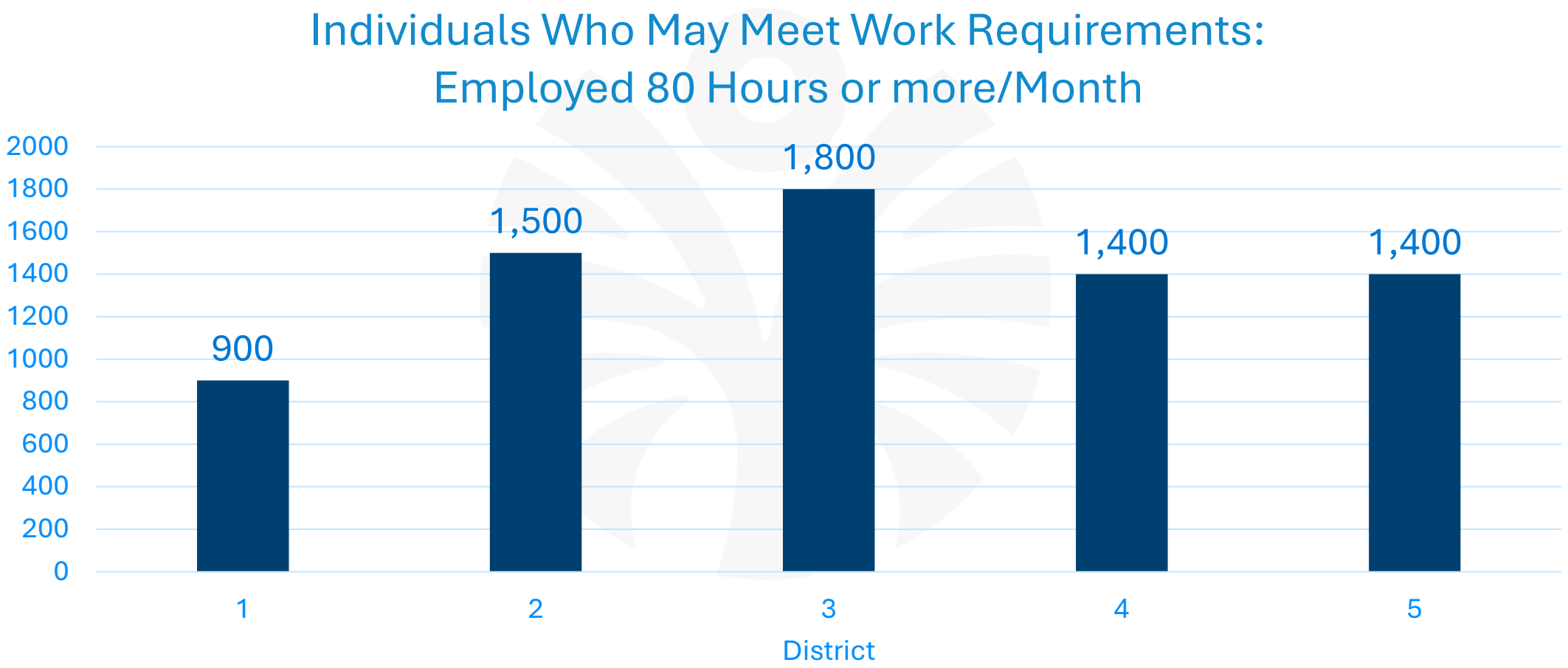

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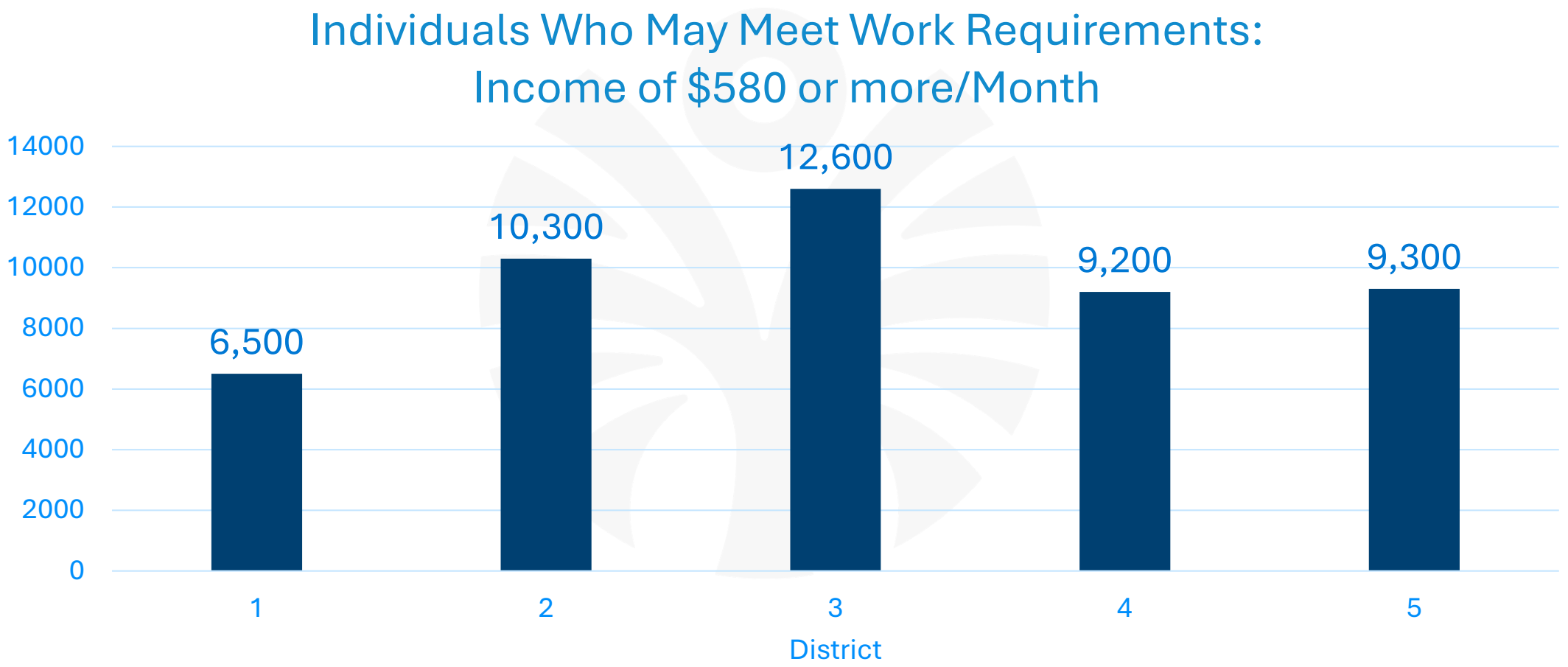

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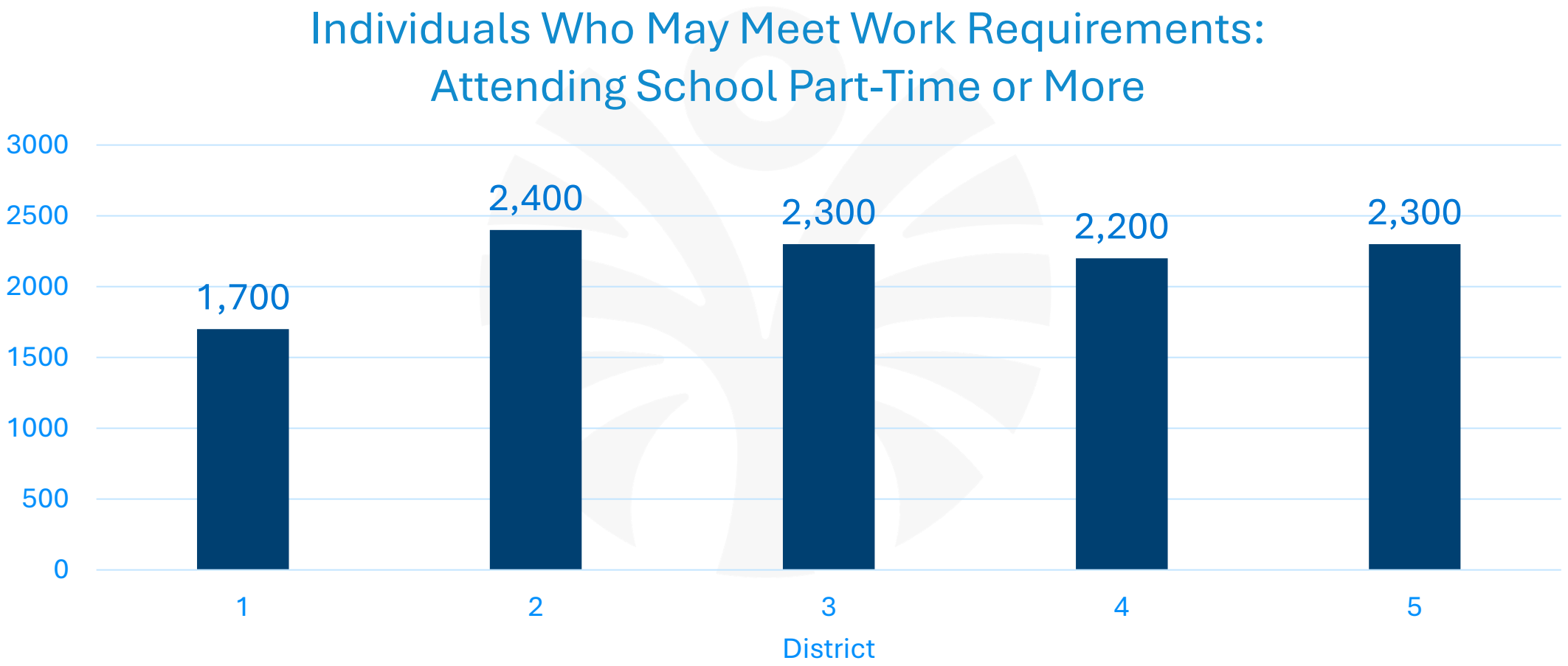

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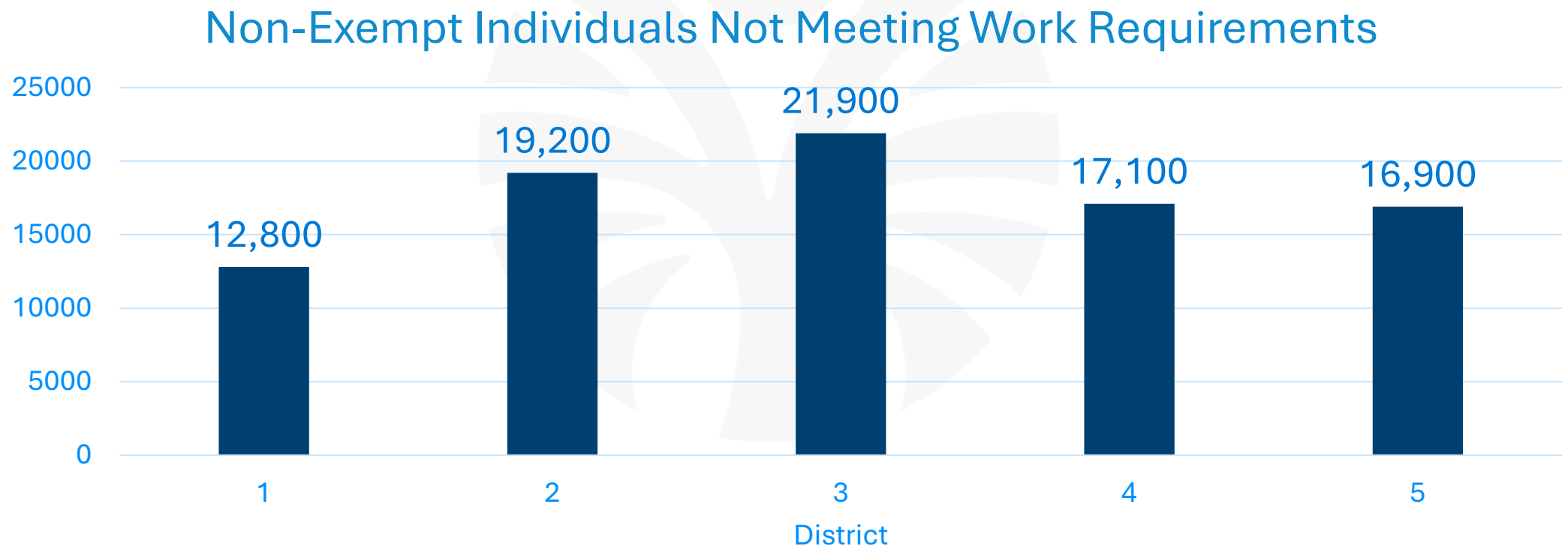
Non-Exempt Individuals Who Currently Do Not Meet Work Requirements

There are approximately **87,900 individuals** who are not exempt from and do not meet Medi-Cal work and community engagement requirements based on current information in case records.



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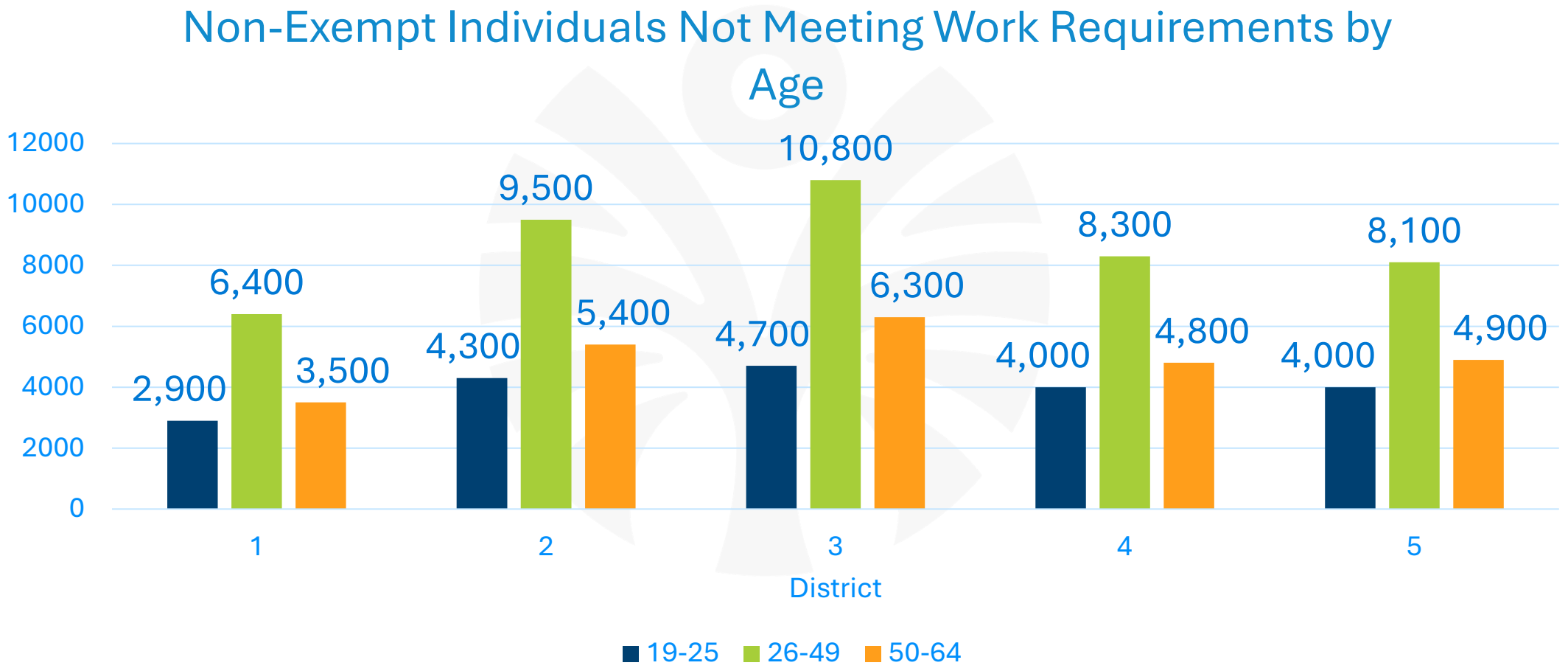

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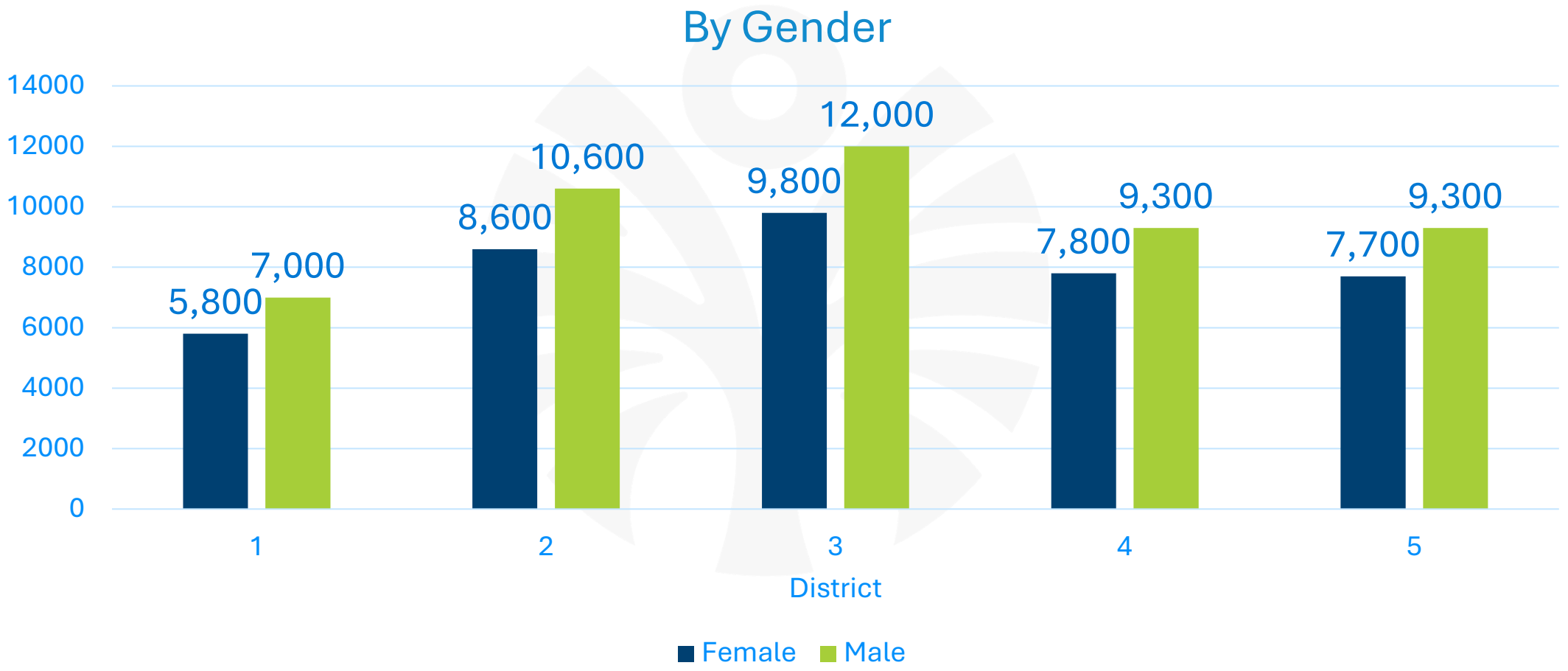
Non-Exempt Individuals Who Currently Do Not Meet Work Requirements



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Data Analysis Development

- Data is preliminary based on current case records and will change leading up to implementation and after implementation, when clients will be required to report work requirement and exemption information.

- DHCS:
  - Creating an exemption and work reporting form.
  - Leveraging current data sources and building bridges to new data sources to automatically identify exemptions and verify work requirements.
  - Developing guidance with additional details on exemption criteria and work requirement definitions.

- ACSSA:
  - Continuing to work with CalSAWS to optimize Medi-Cal work and community engagement requirements data queries.
  - Evaluating the viability of additional data points to more accurately identify individuals who are exempt from or meet work requirements.

Statewide Outreach

- Timeline:
  - Phase 1: February-July 2026: Build member awareness
  - Phase 2: October 2026-July 2027: Support members in responding to new requirements

- Communication Channels:
  - Direct mail
  - Text messaging
  - Websites & social media
  - Toolkit: Flyers, FAQs, and messaging guides
  - Outreach by managed care plans & community partners

- DHCS Coverage Ambassador Program
  - Coverage Ambassadors are trusted community members (i.e., CBOs) who share important information with Medi-Cal members.
  - Assist people in their community find, better understand, or keep their health coverage.
  - Website: Coverage Ambassadors (https://www.dhcs.ca.gov/ambassadors/Pages/home.aspx)
  - Email: Ambassadors@dhcs.ca.gov

Work and Community Engagement Preparation

- CalSAWS, CalHEERS, and BenefitsCal system updates, including automation and eligibility determination enhancements.
  - Expected to be implemented by January 1, 2027.

- Internal ACSSA workgroup to develop a plan for staffing, training, outreach, and engagement with the goal of keeping Alameda County Medi-Cal beneficiaries informed and covered.

- Current Local Outreach Efforts:
  - Health Navigators Project;
  - Multimedia Marketing Campaign.

Questions?

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Thank You!

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