

In The Loop's Federal Briefing on August 6, 2025

Questions and Answers

1. Does being self-employed count as work for work requirements?
 - a. Yes, however, the real question is how people who are self-employed will need to verify that they are self-employed. Usually, when self-employed people get asked for income verification right now, they submit their taxes or quarterly profit and loss statement. However, the work requirement is asking for proof that someone is working 80 hours a month. We don't know how CMS and MassHealth expect people to document and submit their hours worked. These are the types of questions that we still need answers to, and we'll really rely on the guidance from CMS and the implementation plan from MassHealth. And we will definitely make sure to have conversations with all of you, once there's more information on that.
2. What will happen if my work permit is expired and I'm waiting for the new one to arrive in the mail?
 - a. If your work permit document is expired, and you're waiting for a new one to come in the mail, technically your work permit status has not expired and you are still lawfully present. If the status has expired and the government has knowledge that you are in the country, and that you are not actively in deportation hearings, you could be considered PRUCOL. If you earn below 300% FPL, you would be eligible for MassHealth Family Assistance. BUT, these are general guidelines. Every case is unique.
3. Do we expect premiums to go up significantly under the Connector Care program and the Health Connector marketplace? Good question.
 - a. ConnectorCare will continue to have protections like the benchmarks that keep plans at lower premium amounts. Because MA offers additional subsidies, there are protections in place to prevent premiums going up.
 - b. For people who don't qualify for ConnectorCare, or people who don't qualify for subsidies, there will definitely be an increase in premiums due to all the changes that are happening, which will make the overall cost for private insurance go up. That is something to be aware of, especially as we go into open enrollment.
4. Will the 20% margin of error when reporting income still apply?
 - a. This question refers to the difference in what you report based on your income and what data sources say. During COVID, it was 20% - if the income you report and the income coming from data sources match within 20% of

each other, that's acceptable and you won't need to submit additional verification.

- b. We don't have information that the compatibility threshold has been reduced.
5. How would TPS holders who no longer qualify for a ConnectorCare plan receive confirmation of health insurance coverage for tax filing purposes? Will they be fined for not having a state accredited health insurance?
 - a. The tax penalty in Massachusetts is based on whether you have access to affordable health insurance. If you don't have access to affordable health coverage anymore, then you can get an exemption and not be penalized. We don't know if there will be any changes to the penalty, but we think that there will be a lot of people who are exempt from the penalty because they don't have access to affordable coverage.
 - b. But, if the TPS holder is Haitian or Cuban, or falls into one of the other immigration exemptions, then they might still be able to qualify for full coverage under MassHealth.
6. Where does an H2A visa fall in immigrant eligibility?
 - a. Usually, H2A visa holders are in the "lawfully present" category. So, in 2027, they would no longer qualify for ConnectorCare.
7. Has MassHealth, the Health Connector or Medicare considered creating notice in different colored envelopes or on colored paper to the various members who are impacted by these changes? Is there a way to advocate for this with at least MH and the HC?
 - a. Great suggestion! We will bring this idea to MassHealth and the Health Connector.
8. Since a lot of people will be losing access to subsidies, do you think they will significantly increase the FPL levels so that more people qualify for MassHealth?
 - a. There will be a lot less money going into MassHealth, so unfortunately, it does not seem likely that this would happen.
9. Sometimes information is not processed in timely manner when it is sent for verification – how will retroactive coverage work in these situations?
 - a. The Health Connector doesn't usually have retroactive coverage, as coverage usually starts the first of the following month.
 - b. It will be important for us to work with the state to ensure that verification is processed in a timely manner in order to get onto subsidized coverage as soon as possible. As for the changes to retroactive coverage for MassHealth – there will be a reduced retroactive coverage period to just one or two months back, depending on what population you're in, based on changes in 2027.

We'll have to work with the state and flag any time that we're seeing processing delays that are impacting people's ability to get affordable coverage.

10. What will happen with regards to work requirements for people who work seasonally?
 - a. If seasonal worker is applying and or reporting their income while they're working, that is clear-cut – they must meet the 80-hour monthly requirement.
 - b. If a seasonal worker is reporting their income or applying while they are not working, this is where guidance from the state will be important. If there is a one-month lookback or two-month lookback, we don't know how this will work yet.
 - c. There are many people who work seasonally, and the number varies throughout the year. This is something we'll have to talk about once we have more guidance from the state and the CMS.
11. What will happen to folks who don't have a status or who still have a pending status with an ITIN number?
 - a. The changes we discussed today are going to affect mostly lawfully present immigrants. The eligibility for emergency Medicaid is not changing, so people who don't have an active status or any immigration status will still be eligible for MassHealth Limited. For those with a pending status and an ITIN number, they may be eligible for MassHealth Family Assistance because they would be considered PRUCOL.
 - b. For programs like MassHealth Family Assistance, which is fully funded by the state, eligibility will not change. But, we do know that the state's budget is under significant strain, and that may impact how much money Family Assistance will have invested. We will continue to track this and make sure people have up-to-date information once we have it.
12. Since the MassHealth retroactive coverage start date will now be the 1st of the month, if someone's deemed ineligible going forward, do we know if they would give the member until the end of the month before shutting off coverage?
 - a. Currently, coverage end dates are different for certain populations. For some it's 14 days after the adverse decision, for others it's at the end of the month. We don't have a reason to think that that's changed. If we get different information, we will let you know.
13. Do we expect to see hospitals closing in rural Mass
 - a. Given that hospitals will be impacted by getting less funding, and less people insured, there will be a lot more uncompensated care. That does put more

burden on hospitals so there is a serious and real concern that hospitals could close. We hope for the best, but that is a real concern.