



Federal Briefing



Agenda



- Introduction
- Overview of key provisions
- Timeline
- How to support community members



Medicaid (MassHealth) Matters in Massachusetts

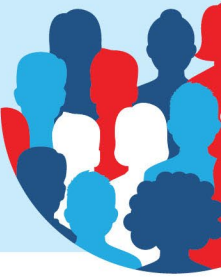


MassHealth provides access to health care for **more people** than many realize, including:



Blue Cross Blue Shield of MA Foundation

Medicaid (MassHealth) Matters in Massachusetts



MassHealth creates and supports jobs in the health care sector

MassHealth represents a significant portion of health care providers' revenues, including:



51%
nursing
facilities



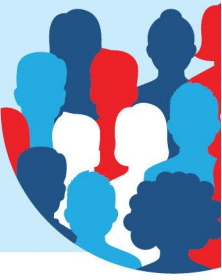
48%
community
health centers



37%
births

[Blue Cross Blue Shield of MA Foundation](#)

Medicaid (MassHealth) Matters in Massachusetts



Medicaid (MassHealth) is a federal and state, joint-funded program

MassHealth brings in **\$12.3 BILLION** in federal revenues to support the state economy



86% of all federal revenue to Massachusetts comes from the MassHealth program



Every dollar of MassHealth spending is reimbursed by at least **50 cents** of federal revenue

[Blue Cross Blue Shield of MA Foundation](#)

MassHealth and Health Connector Members

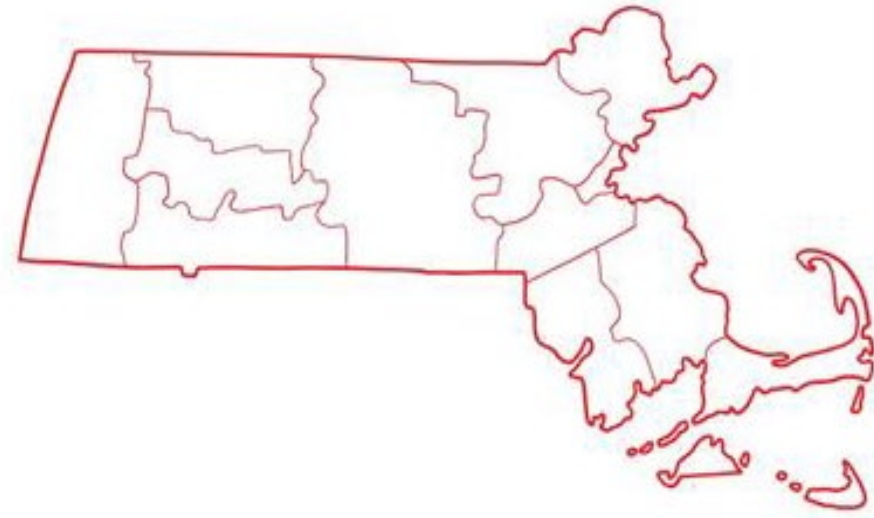


MassHealth covers 1,993,582 individuals

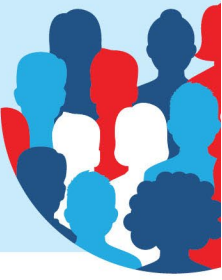
- *State's Medicaid program*

Medicaid expansion, childless adults, age 19-64

- *MassHealth CarePlus covers 281,287 individuals*



MassHealth and Health Connector Members

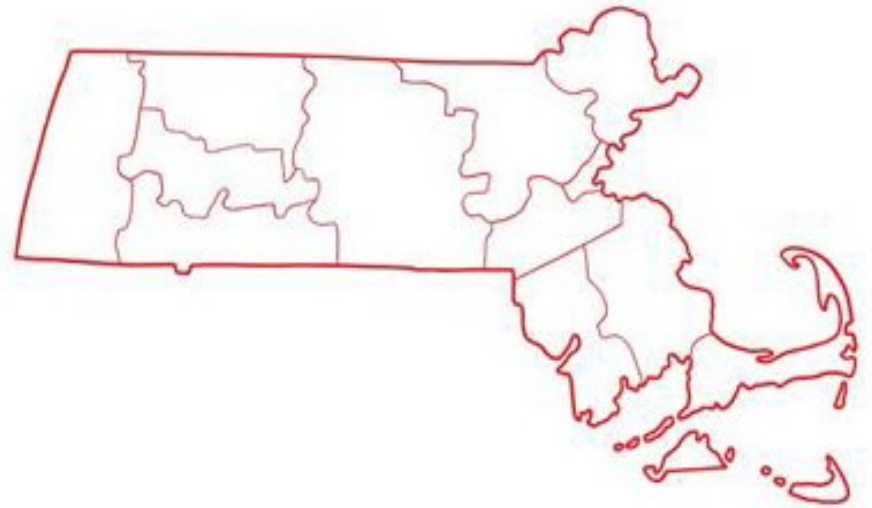


Health Connector covers 370,000 individuals

- *Massachusetts' Marketplace*

ConnectorCare covers 321,950 individuals

- *Subsidized coverage program*





Key Health Care Changes

*Note: MassHealth and Health Connector are still waiting for CMS to inform them on how some of these changes will be implemented.
The logistics are to be determined.*

Overview



- On July 4, 2025, the President signed into law a budget reconciliation bill that addressed many aspects of the country's economy, including health and insurance programs.
- On June 25, 2025, the Centers for Medicare and Medicaid Services (CMS) issued the Final 2025 Marketplace Integrity and Affordability Final Rule.
- Both the new law and final rule significantly impact eligibility for coverage and premium tax credits available to enrollees of Marketplaces like the Health Connector.
- The following slides review policy changes in both the new law and final rule that will be implemented, ranging from this month to 2029



Medicaid (MassHealth) Changes: Immigrants



Effective October 2026

Immigrant Eligibility

- Eliminates Medicaid federal funding for many lawfully present immigrant adults on MassHealth including:
 - Refugees
 - Individuals with asylum status
 - Certain humanitarian visa holders

**Lawfully present children and pregnant people will remain covered, as will qualified legal permanent residents (green card holders), Compact of Free Association migrants and Cuban Haitian entrants.*

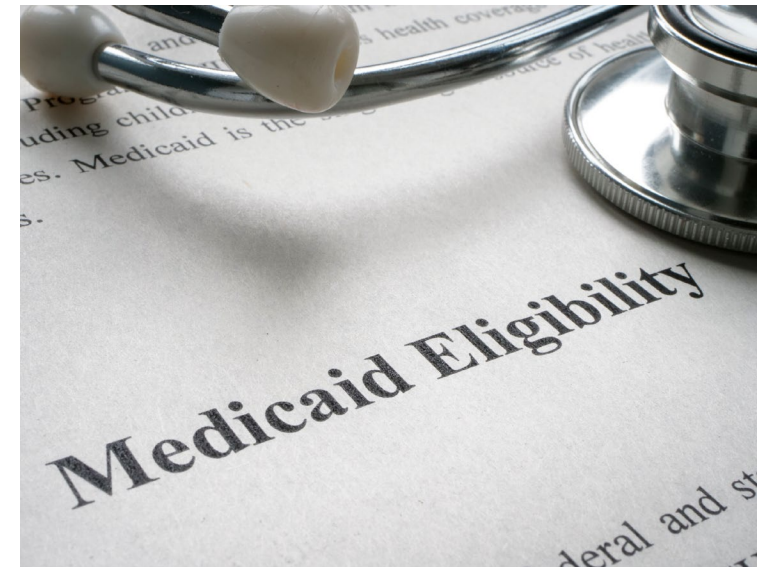
Medicaid (MassHealth) Changes: Enrollment Barriers



Effective January 1, 2027

Work Requirements

- Requires states to institute work reporting requirements for Medicaid expansion (age 19-64, childless adults) by 2027
 - 80 hours per month- includes paid employment, volunteer work, or education
 - Certain exemptions
- "Look back" of **1 to 3 months**
- Could be delayed up to two years

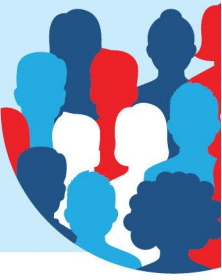




Impact of Work Requirements

- Estimated that 46% of the MassHealth members subject to work requirements would lose coverage, despite 86% already working or meeting exemption criteria

Medicaid (MassHealth) Changes: Enrollment Barriers



Effective January 1, 2027

Additional Enrollment Barriers

- Redetermination for Medicaid expansion (age 19-64, childless adults) twice a year

New Cost-Sharing

- Required co-pays up to \$35 or 5% of income for many services for Medicaid expansion members

Medicaid (MassHealth) Changes: Enrollment Barriers

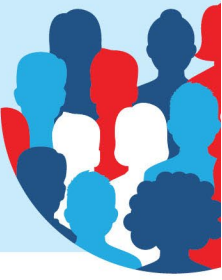


Effective January 1, 2027

Changes to Retro coverage

- Pregnant members and children – retroactive from 90 days to 60 days
- Medicaid expansion - retroactive coverage from 90 days to 30 days

Medicaid (MassHealth) Changes: Financing



FMAP – What the federal government pays back the state for Medicaid expenses

- Reduction in federal matching funds for certain MassHealth Limited members on October 1, 2026

Provider Taxes & State Directed Payments

- Help states fund Medicaid programs and boost payments for certain providers
- The law limits their use immediately, and phases them down over time starting in 2028.
- **Impact:** The state will have less federal funding for Medicaid (MassHealth) over time and payments to some providers may be reduced.

ACA Marketplace Changes: Enrollment Barriers



Key Changes:

- Limits on Special Enrollment Periods
- APTC (ConnectorCare) eligibility
- Shortens annual Open Enrollment period
- Effectively ends automatic re-enrollment year to year
- Requires pre-enrollment verification to receive tax credits
- Immigrant eligibility



End of Automatic 60-Day extension



Effective August 25, 2025

- Individuals who do not submit proof of income within 90 days will no longer be given an automatic 60-day extension
- People can still request additional time, it will just not be automatically extended

Limits on Special Enrollment Periods (SEPs)



Effective August 25, 2025

- People whose incomes drop to 150% FPL or below will no longer count as a qualifying life event, so they will no longer have access to a SEP.
- However, the ConnectorCare SEP will still be available.

Subsidies (Advanced Premium Tax Credits)



Effective January 1, 2026

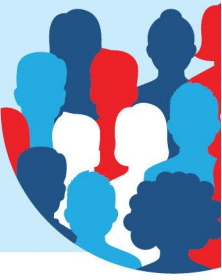
Expiring Advanced Premium Tax Credits – for people with income between 400-500% FPL (ConnectorCare Plan Type 3D)

- Congress did not extend the enhanced premium tax credits/subsidies that sunset at the end of 2025
- Could still extend them in appropriations budget negotiations, but remains unlikely

Ending Subsidies under 100% FPL (ConnectorCare Plan Type 1)

- Subsidies are eliminated for people under 100% FPL beginning January 2026 (32,930 members)

Failure to Reconcile and No Cap on Repayment of APTCs



Effective January 1, 2026

- Deny APTCs after one year of failing to file and reconcile tax credits
- No longer have a cap on repayment of APTCS

Tips:

- Verify during Open Enrollment that people have reconciled
- Inform people to update income/household information right away to not pay back APTCs

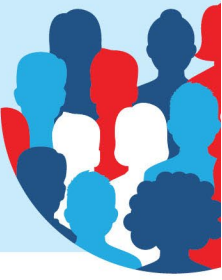
Require Income Verification when Tax Data Unavailable



Effective August 25, 2025

- Health Connector will no longer be able to accept applicant attestation of income if no tax data is available from IRS
 - Affidavit is still acceptable
- If data sources show that income is 100%FPL or lower, income verification will be required

Shorter Annual Open Enrollment Period



Effective November 1, 2026

- Open Enrollment Period for plan year 2027 will be shortened to **November 1 - to December 31**



ACA Marketplace Changes: Immigrant Eligibility



Effective January 1, 2027

- Eliminates subsidy eligibility for many lawfully present immigrant populations including:
 - Work permit holders
 - TPS holders
 - Active visa holders

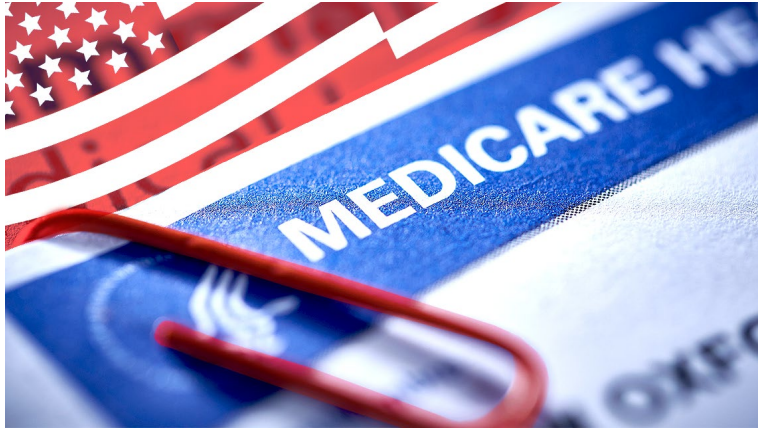
*****Changes will only allow adults and children that are legal permanent residents (green card holders), Cuban & Haitian entrants, and Compact of Free Association migrants to receive subsidies starting in January 2027***

Verification documents required before APTCs



Effective January 1, 2028

- Effectively ends automatic re-enrollment
- Tax credits are not available for any coverage month prior to verification of applicant's eligibility
- If someone needs to submit an RFI, they won't see what APTCs they'll qualify for until they submit any verification documents requested by Health Connector
- Can get coverage at full cost



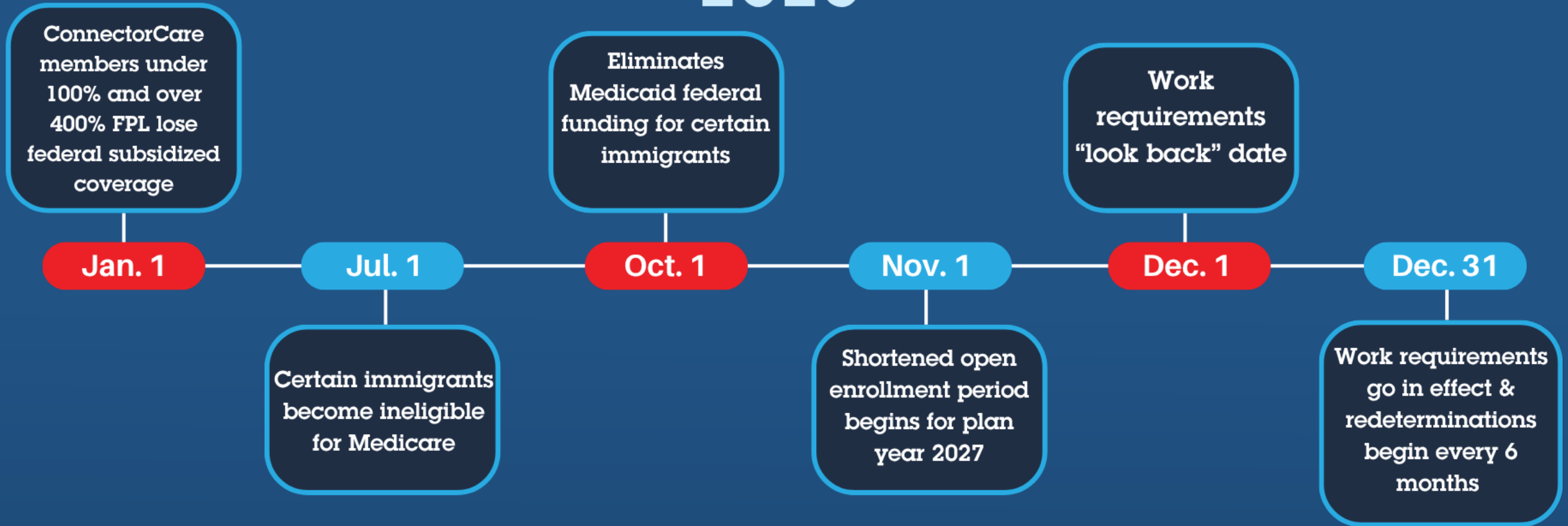
For help with Medicare,
refer to a [SHINE](#) counselor

Medicare Eligibility & Enrollment

- Increases barriers to enrolling in Medicare Savings Programs
- Eliminates Medicare eligibility for new immigrant applicants, including refugees, TPS holders and asylees beginning in July 2026
- Immigrants currently enrolled in Medicare who no longer qualify based on their status will be disenrolled beginning in February 2027.
- Legal permanent residents (green card holders), Cuban Haitian entrants, and Compact of Free Association migrants will remain eligible for Medicare.

TIMELINE OF PROVISIONS

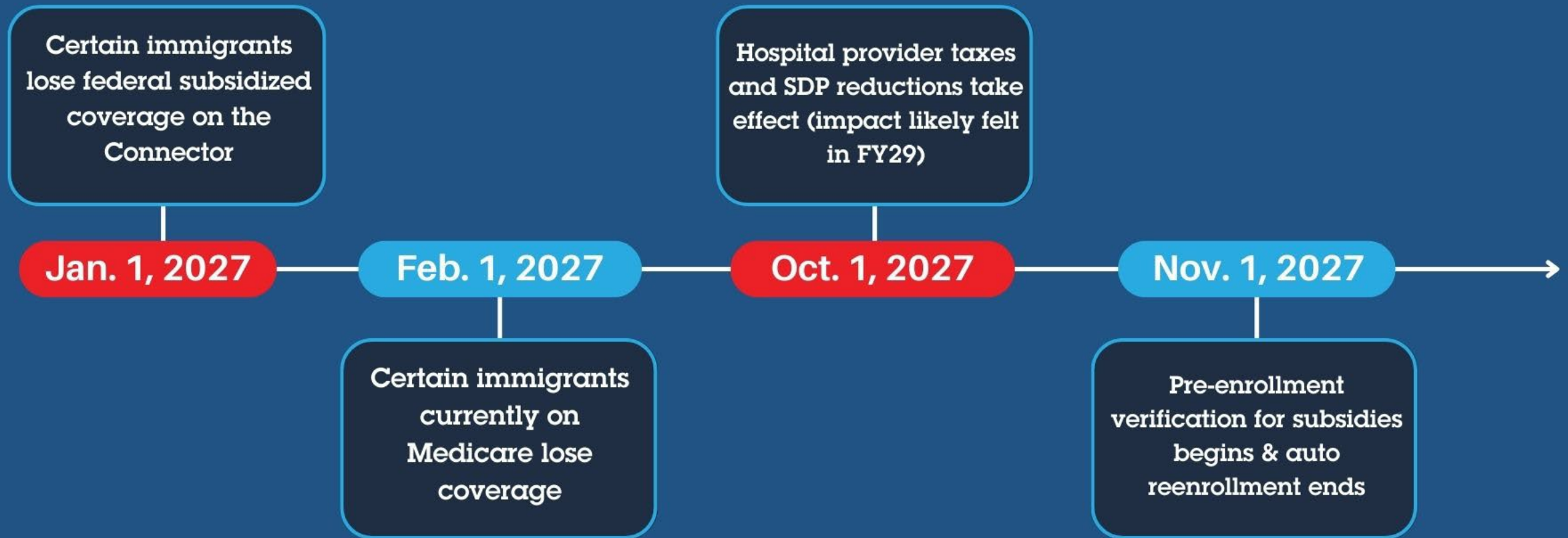
2026





TIMELINE OF PROVISIONS

2027 - 2029



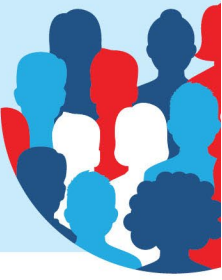
Suggestions for Responding to Community Members



Types of questions people might ask:

1. Does this apply to me?
2. When does this start?
3. What additional information or resources are available?
4. What happens to people who become uninsured?
5. Can I still enroll in Health Connector when ConnectorCare Plan Type 1 and 3D are not available?

Suggestions for Responding to Community Members



1. Does this apply to me?

- MassHealth eligibility is complicated with multiple programs and many factors contributing to eligibility
- Childless adults ages 19-64 on MassHealth CarePlus and immigrants will be most impacted

Suggestions for Responding to Community Members



2. When does this start?

- See timeline of key provisions (slides 25 and 26)
- Loss of Coverage by Date and Program document (see next slides)

Loss of Coverage by Date and Program



Coverage End Dates Resulting from Federal Action

Date	Coverage Type	Population Impacted
8/25/2025	Health Connector	Members who are DACA recipients
1/1/2026	Health Connector	ConnectorCare members under 100% FPL (Plan Type 1) and over 400% (Plan Type 3D) are no longer eligible for premium subsidies
7/1/2026	Medicare	Eligibility for new applicants is limited to legal permanent residents, Cuban Haitian entrants, and COFA migrants only

Loss of Coverage by Date and Program



Coverage End Dates Resulting from Federal Action

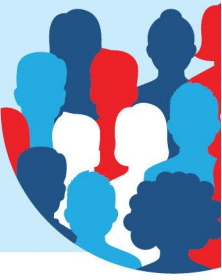
Date	Coverage Type	Population Impacted
10/1/2026	Medicaid/MassHealth	Only legal permanent residents, Haitian Cuban entrants, COFA migrants, pregnant women, and lawfully present kids will still get federally funded Medicaid. Refugees, aliens granted asylum, victims of trafficking, certain abused spouses and children will no longer qualify.

Loss of Coverage by Date and Program



Coverage End Dates Resulting from Federal Action

Date	Coverage Type	Population Impacted
1/1/2027	Health Connector	Most lawfully present immigrants will no longer qualify for subsidies. Only legal permanent residents, Cuban Haitian entrants, or COFA migrants will be eligible
2/1/2027	Medicare	Current immigrant recipients will no longer be eligible in accordance with the new guidelines (only legal permanent residents, Cuban Haitian entrants, and COFA migrants qualify)



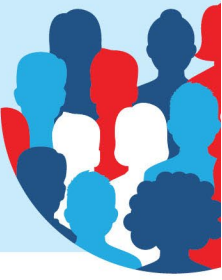
3. What additional information or resources are available?

- HCFA HelpLine – 1-800-272-4232
- Explainer: [Medicaid cuts: The how and why](#)
- Line by line summary: [Health Provisions in the 2025 Federal Budget Reconciliation Bill](#)
- [Implementation Dates](#) for 2025 Budget Reconciliation Law



4. What happens to people who become uninsured?

- MassHealth Limited
- Health Safety Net
- Qualified Health Plan without tax credits



5. Can I still enroll in Health Connector when ConnectorCare Plan Type 1 and 3D are not available?

- Yes, but it will be much more costly without the state or federal tax credits to help offset the cost. For folks losing Plan Type 1, they should be screened to see if they could be eligible for other programs beyond MassHealth Limited/HSN.



Questions?



@healthcareforallma



@Health Care For All



@hcfa



Subscribe to newsletter for updates from HCFA
in addition to the In the Loop – Massachusetts
newsletter!

Thank you!



@healthcareforallma



@Health Care For All



@hcfa