

An Early Look at State Approaches to Implementing Medicaid Work Requirements

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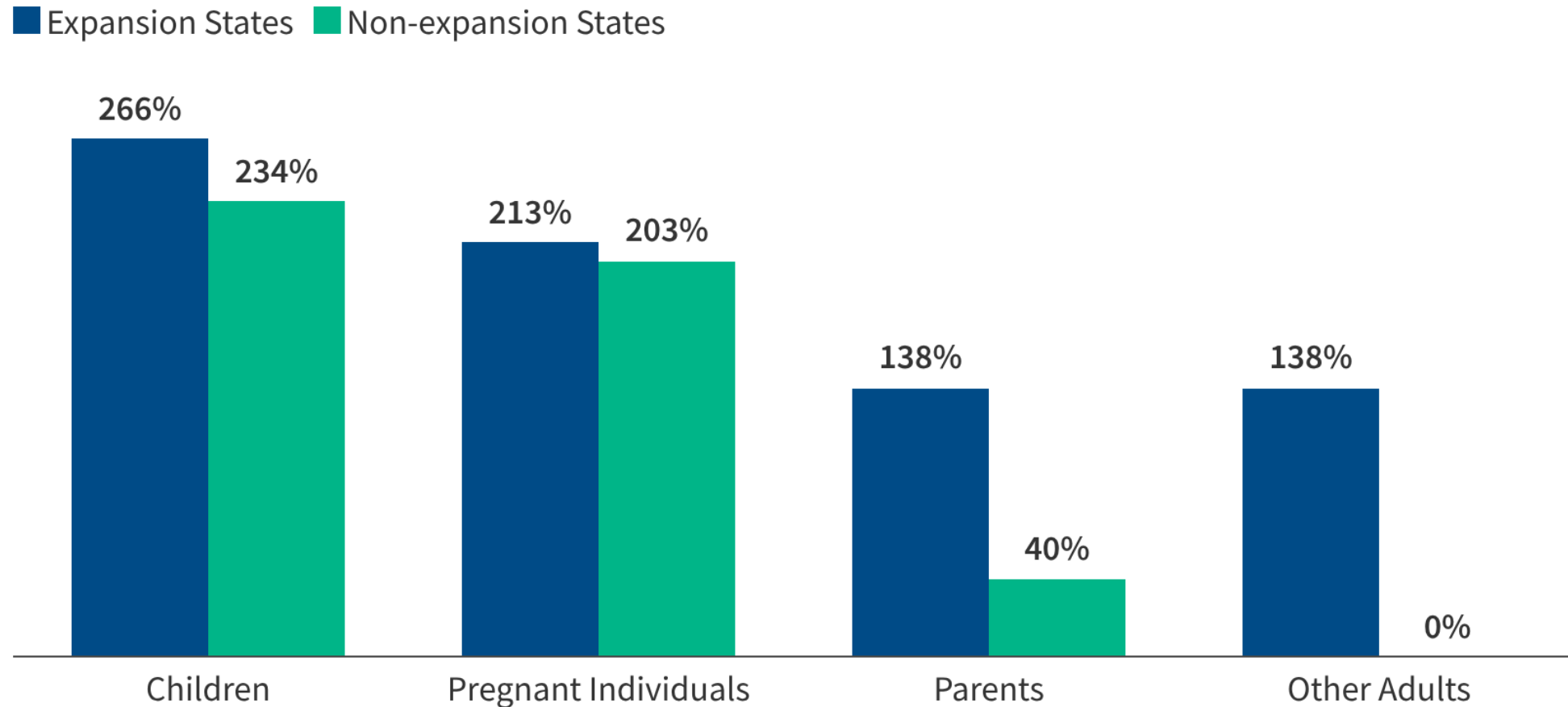


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Medicaid eligibility levels for all groups are higher in expansion states than in non-expansion states.



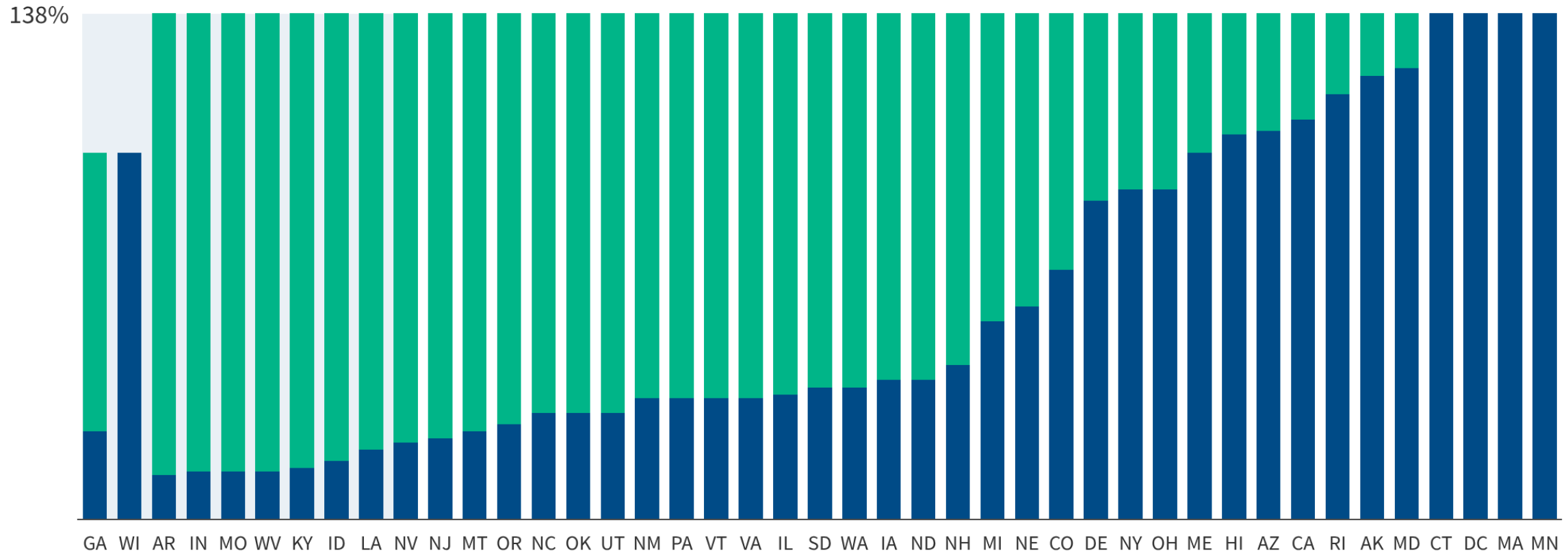
Note: Eligibility levels are based on a family of three for parents and an individual for childless adults. In 2026, the FPL was \$27,320 for a family of three and \$15,960 for an individual. Threshold includes the standard five percentage point of FPL disregard. Florida did not respond to the 2026 survey; eligibility levels reported are from prior year and confirmed through publicly available information.

Source: Based on results from a national survey conducted by KFF and the Georgetown University Center for Children and Families, 2026

Many parents of older children in ACA expansion and waiver states will be subject to new work requirements.

The median eligibility for Section 1931 parents in expansion states is 36%; parents with children ages 14 and older with income above the Section 1931 eligibility level will be subject to work requirements.

■ Section 1931 Limit ■ ACA Medicaid Expansion and/or Waiver Limit

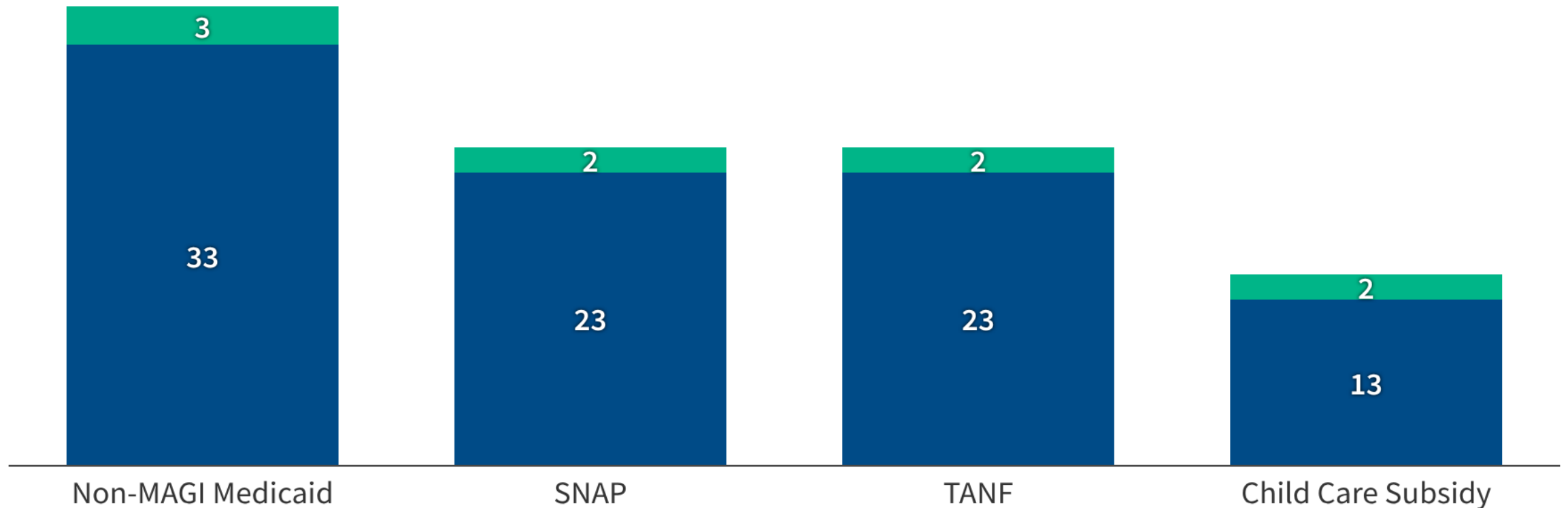


Source: Based on results from a national survey conducted by KFF and the Georgetown University Center for Children and Families, 2026

Half of states have SNAP and TANF integrated into the MAGI Medicaid eligibility system.

Number of states with non-MAGI or non-health programs integrated into the system that conducts MAGI-Medicaid eligibility determinations:

■ Not integrated with Marketplace subsidies ■ Integrated with Marketplace subsidies

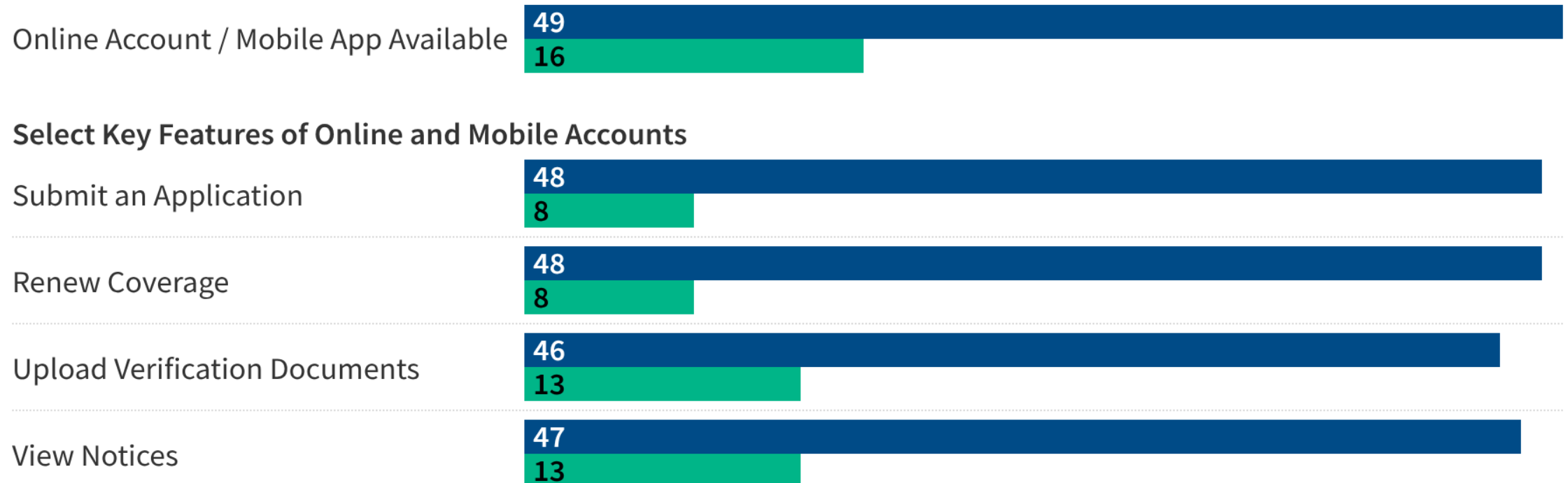


Source: Based on results from a national survey conducted by KFF and the Georgetown University Center for Children and Families, 2026

States continue to add features to online accounts and mobile apps.

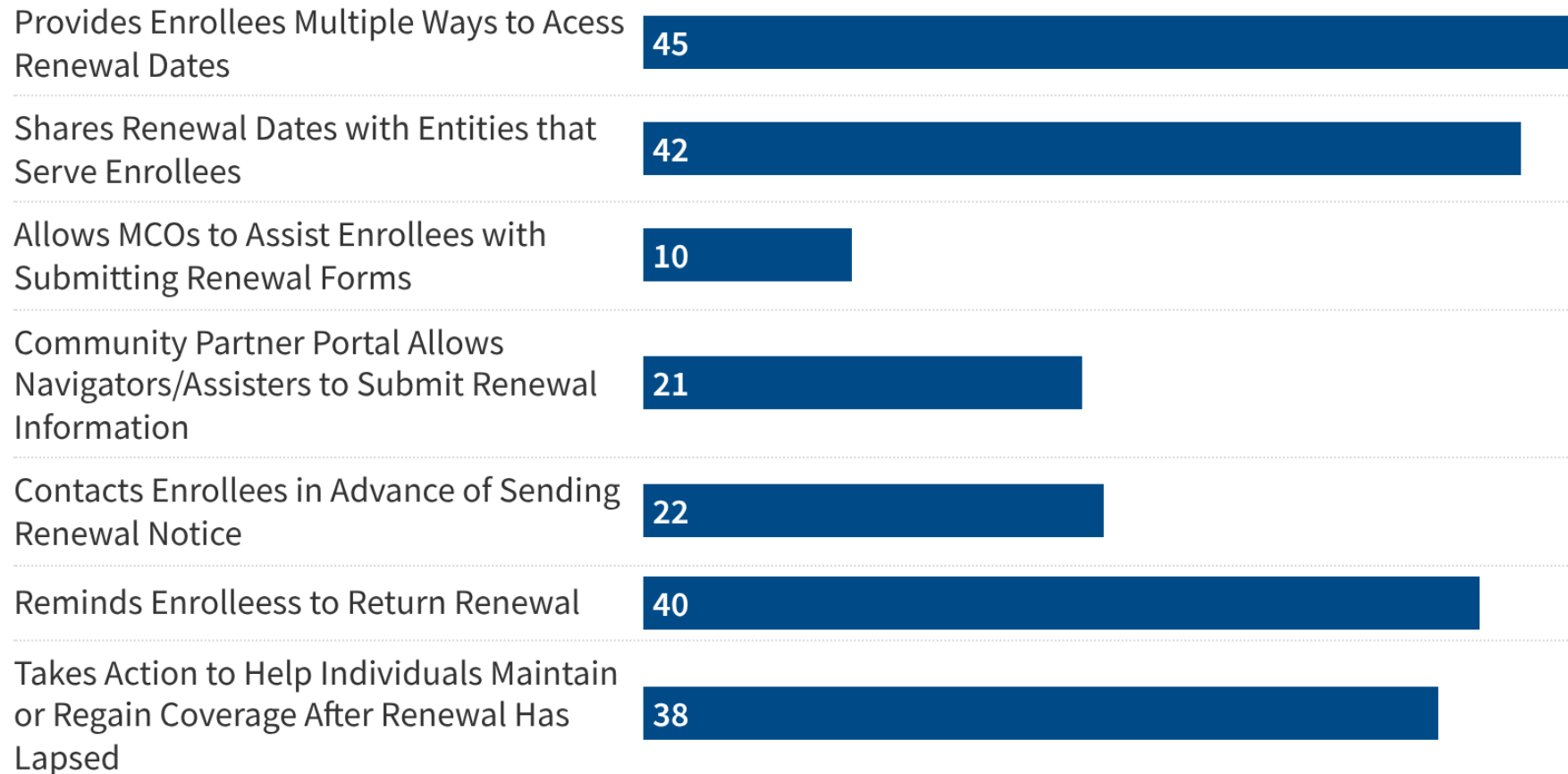
Number of states with online accounts/mobile apps reporting each feature:

■ Online Account ■ Mobile App



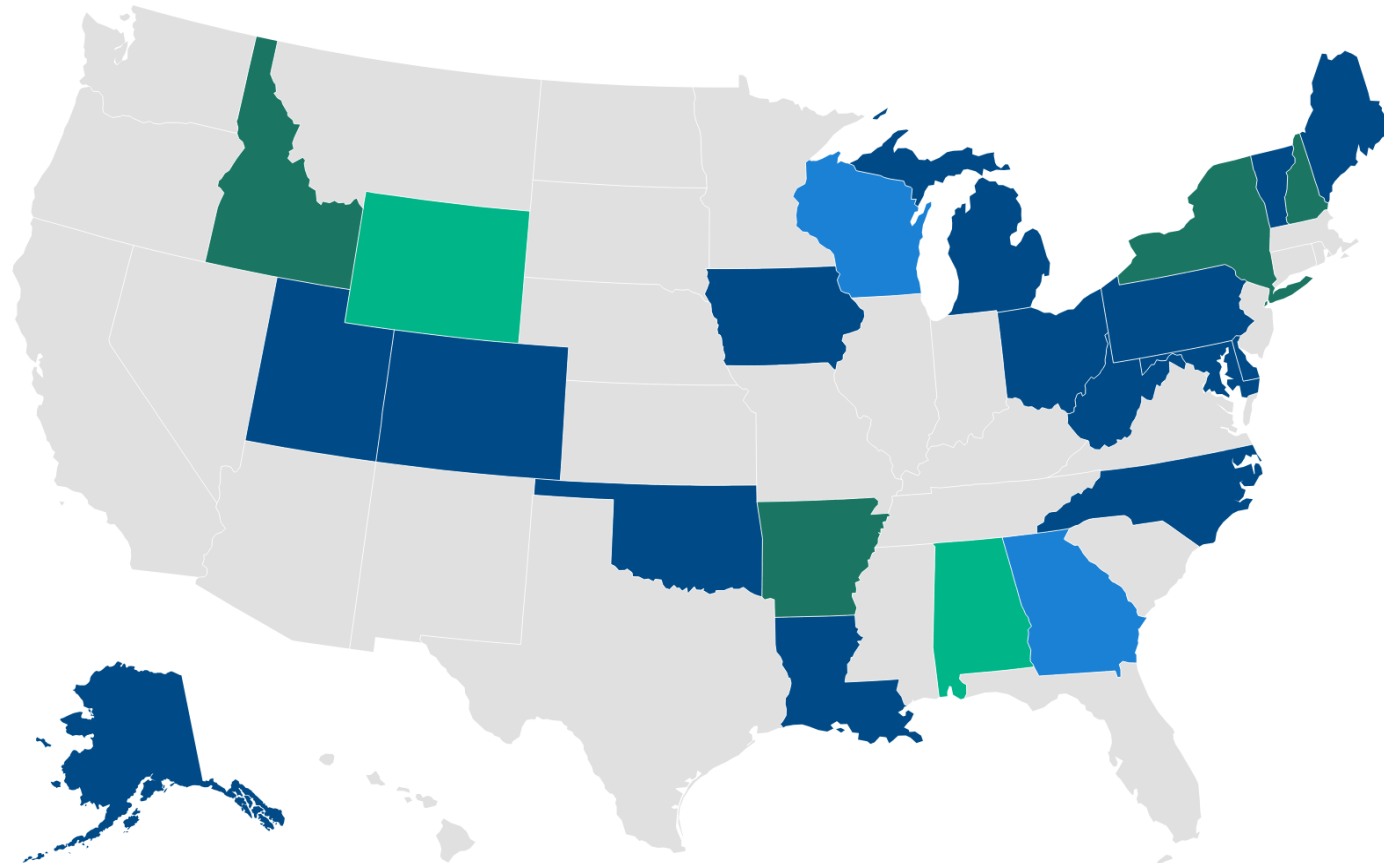
States take a variety of actions to help eligible enrollees retain coverage at renewal.

Number of states reporting each action:



Currently, 19 states charge cost-sharing to Section 1931 parents, and 21 states charge cost sharing to ACA or waiver expansion adults.

■ 1931 Parents and ACA Expansion Adults (15 States) ■ 1931 Parents and Waiver Adults (2 States) ■ ACA Expansion Adults Only (4 States) ■ 1931 Parents Only (2 States) ■ Neither (28 States)



Note: Florida did not respond to the 2026 survey; data reported are from prior year and publicly confirmed.

Alabama and Wyoming have not adopted ACA Medicaid expansion. Georgia and Wisconsin have adopted partial waiver expansions and charge cost sharing for both parents and waiver adults.

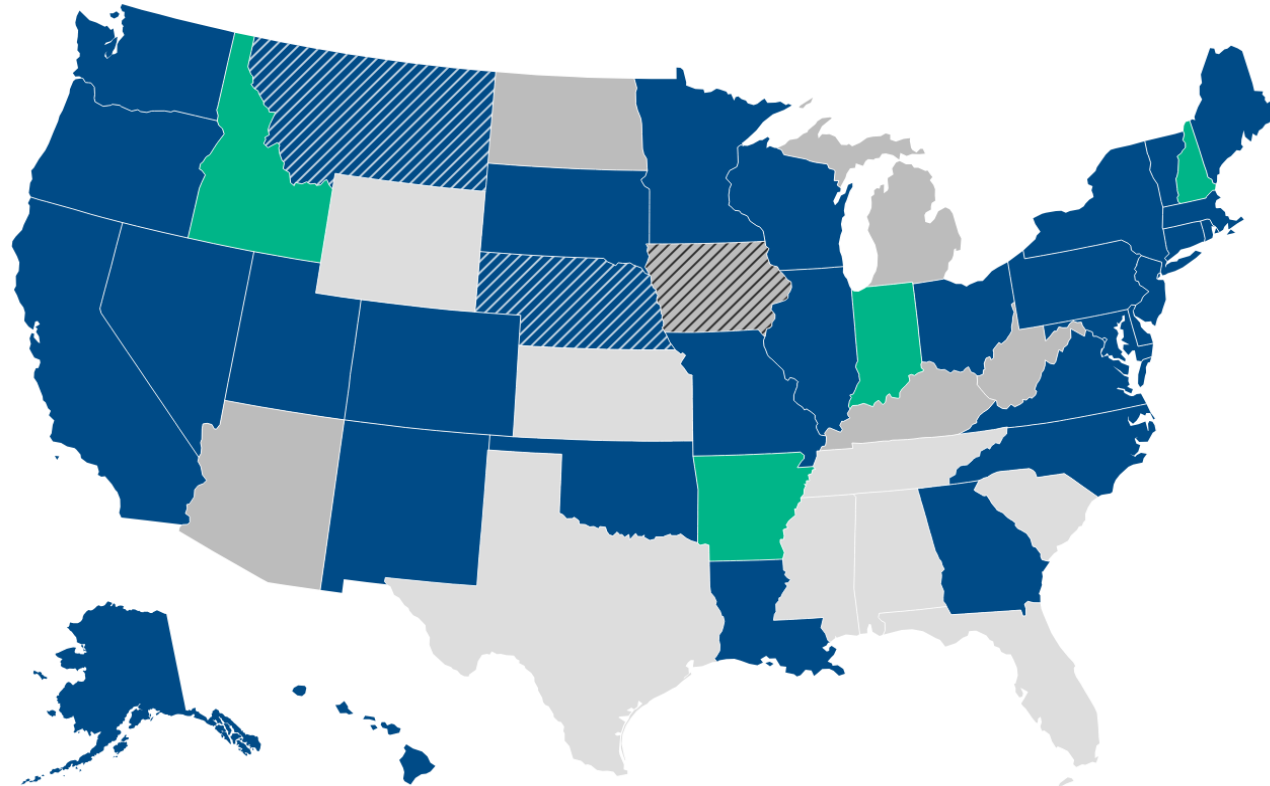
Source: Based on results from a national survey conducted by KFF and the Georgetown University Center for Children and Families, 2026

State Policy Decisions on Implementation of Work Requirements

Most states will look back one month at application and renewal to verify compliance with work requirements or exemption status.

■ 1 month lookback at application and renewal (33 States) ■ More than 1 month lookback at application or renewal (4 States) ■ TBD (6 States)

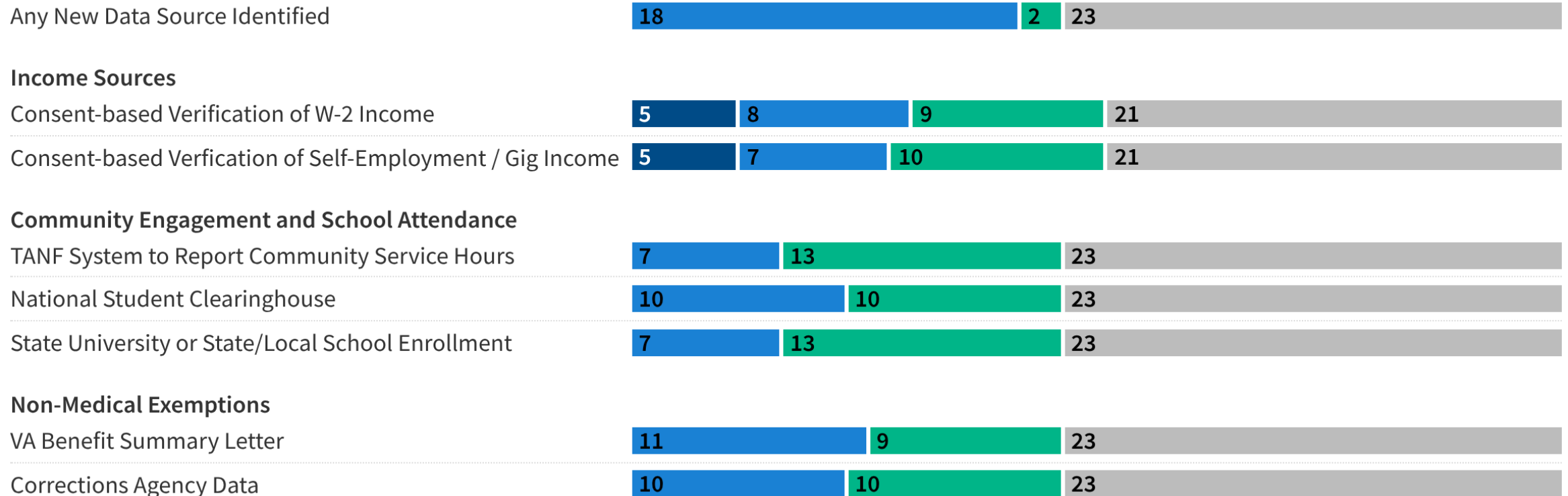
/// Implementing Before January 2027



Eighteen states said they plan to access new data sources to verify work compliance and non-medical exemptions.

Number of states planning to use each data source:

■ Currently use and plan to use
 ■ Plan to newly use
 ■ Do not currently use or do not plan to use
 ■ TBD



States face multiple challenges establishing linkages with new data sources.

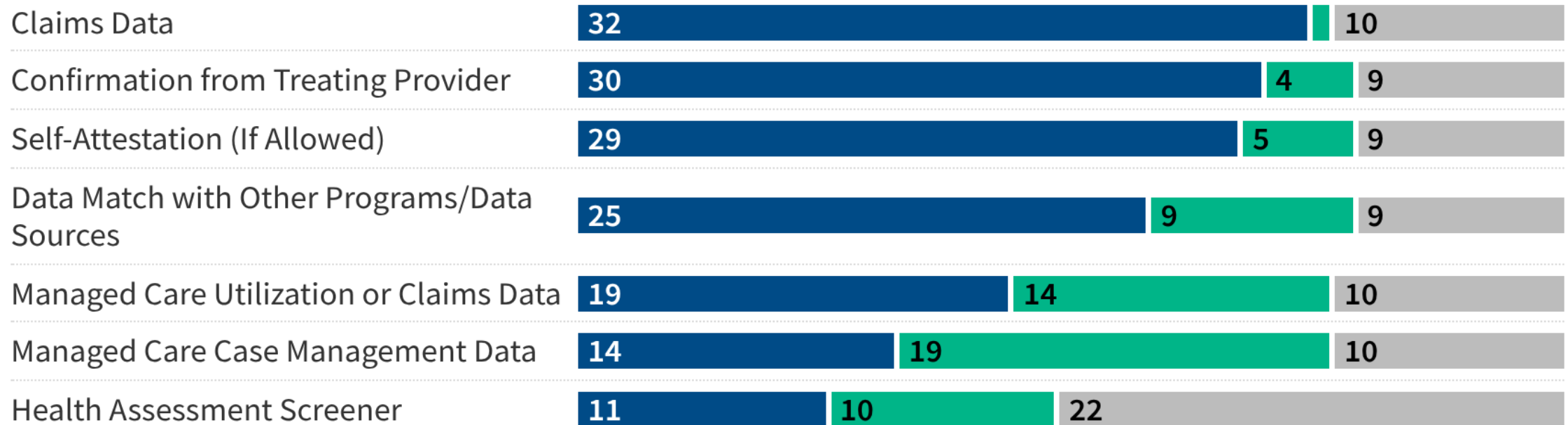
Number of states reporting each challenge:



States are exploring ways to verify medical frailty, including using data to automate the process.

Number of states using each verification source:

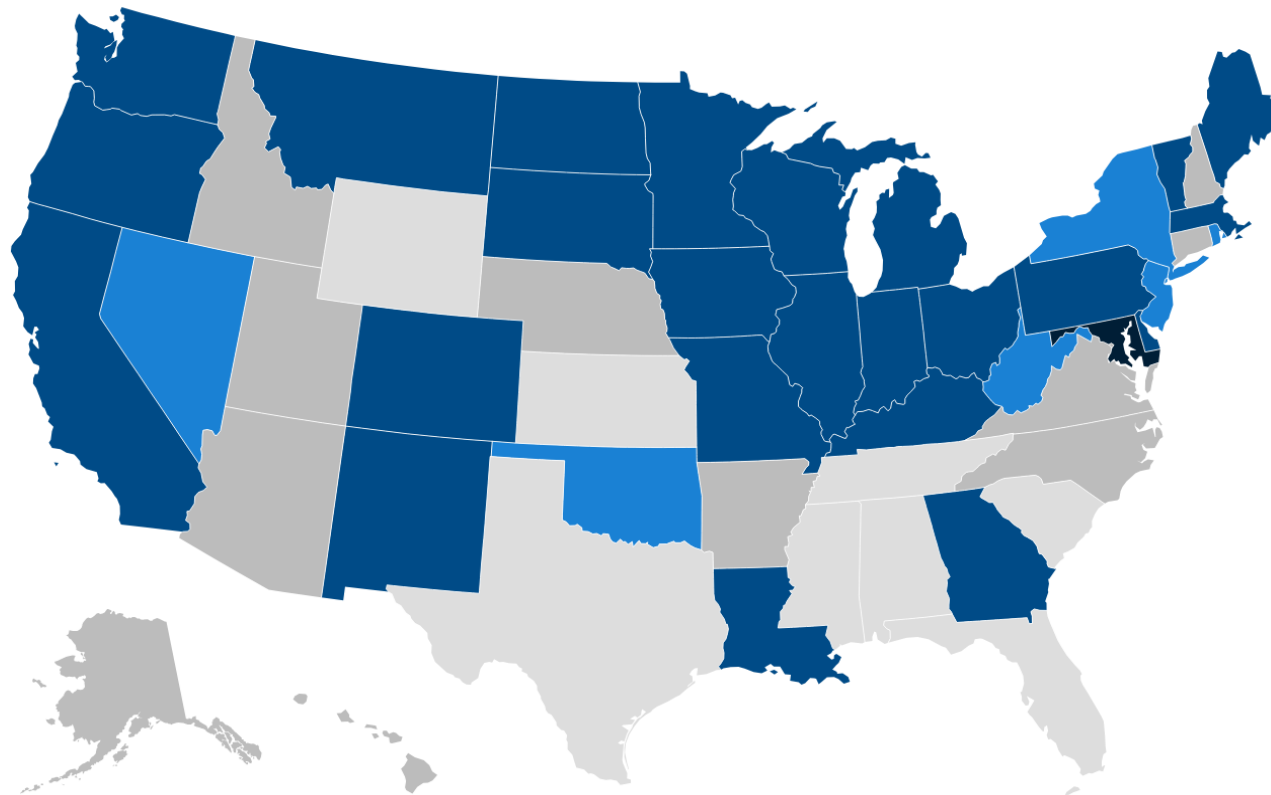
■ Yes ■ No ■ TBD



Source: Based on results from a national survey conducted by KFF and the Georgetown University Center for Children and Families, 2026

Most states plan to use existing vendors to make needed systems changes given the short implementation timeline.

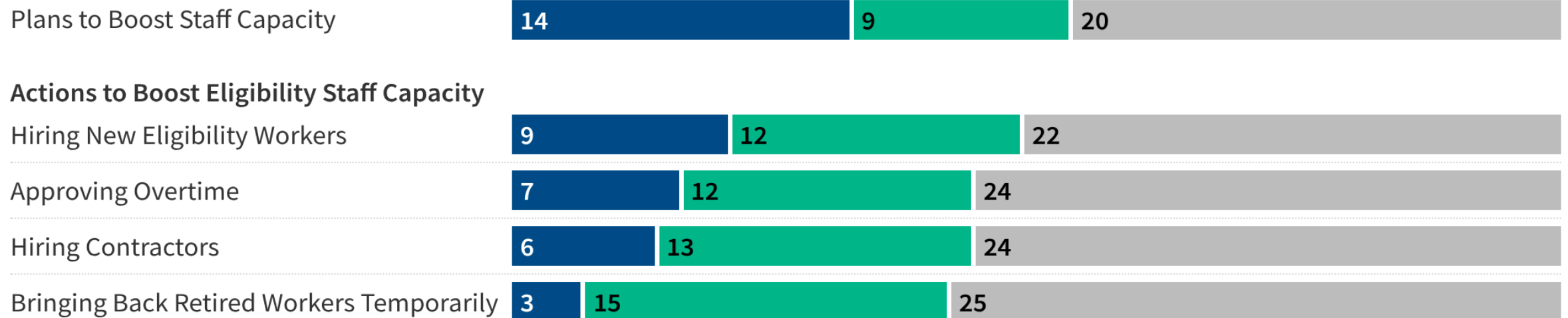
■ Contract with existing vendor (24 states) ■ Contract with both existing and new vendor (6 states) ■ N/A, state operates its own in-house eligibility system (1 state) ■ TBD (12 states)



Fourteen states said they plan to take action to increase the capacity of eligibility staff to implement work requirements.

Number of states reporting actions to boost staff capacity:

■ Yes ■ No ■ TBD



THANK YOU

For more information, contact: jennifert@kff.org