



Apple Health for Adults H.R.1 Changes: Hospital Checklist and Timeline for Action



Changes at a glance



OCTOBER 1, 2026

Additional eligibility restrictions will apply to some Apple Health for Adults clients with certain immigration statuses.



JANUARY 1, 2027

New Medicaid work requirements, changes to retroactive coverage, more frequent eligibility renewals will begin.

Next Steps



A lot of work must happen to ensure hospitals are ready to navigate these changes.



This resource outlines steps hospitals can take now and in the future to help patients maintain or obtain Medicaid coverage and minimize the impact of changes to retroactive coverage.



Use this guide to develop resources and training for frontline staff on changes to retroactive coverage, coverage for non-citizens, work requirements and eligibility redeterminations.

Medicaid Program Work Requirements

- Beginning January 1 2027, Apple Health for Adult enrollees will be required to verify that they are working, in school or engaged in community volunteer work for at least 80 hours a month.
- Waivers or exemptions will be available for people with children under the age of 13 or who are medically frail, and other defined groups.

Timeline for Action: Summer 2026

☒	ACTIVITIES
☐	Assess internal training needs for frontline staff, including registration, financial assistance and billing staff. (See WSHA developed timeline and talking points).
☐	Review electronic health record (EHR) workflows to possible exemption determination for medical frailty.
☐	Begin outreach to community partners (Community Health Centers (CHCs), Federally Qualified Health Centers (FQHCs), patient groups, social service agencies) to discuss how you can partner to help reach patients affected by changes to the Medicaid program.
☐	Determine an internal and external communications plan. This could include: - MyChart messaging, - Clinic registration scripting, - Financial counseling training - Printed and digital education materials - CHC/Community partner referrals

Timeline for Action: Late Summer-End of 2026

☒	ACTIVITIES
☐	Begin development of public facing communications for the public about changes coming to Medicaid.
☐	Educate providers about assessing if patients with medical frailty (example: cancer, sickle cell anemia, kidney disease, substance abuse disorder) are capable of working.
☐	Ensure workflows, documentation standards, and EHR configurations support HR 1 requirements for the appropriate members of your staff. This could include: - Determine if you can see whether enrollees are in traditional or expansion Medicaid - Coordinate with EHR vendor on eligibility and verification workflows - Review EHR documentation fields - Identify training, job aids, build updates needed

Retroactive Coverage for New Enrollees

- Beginning Jan. 1, 2027, Medicaid enrollees will receive only 30 days of retroactive coverage (Apple Health for Adults/expansion) or 60 days (traditional Apple Health).
- This is a significant reduction from the current 90-day retroactive coverage window.
- Shorter retroactive periods will make it harder for new enrollees, especially those admitted in acute care settings, to complete enrollment in time. Hospitals could receive no payment for the earliest and most expensive phases of care.

Timeline for Action: Summer 2026

☒	ACTIVITIES
☐	Assess internal workflows for applications for retroactive coverage.
☐	Examine the average time from admission to application submission. Consider: • How long did it take from application commencement to submission to HCA to approval? • What barriers delayed this process and what can you do to remove those barriers?

Timeline for Action: Late Summer-End of 2026

☒	ACTIVITIES
☐	Make a plan for determining whether 30 or 60 day eligibility is likely. Consider: • What process can you put in place to make your best guess about whether future patients will be Medicaid expansion (Apple Health for Adults) or Medicaid traditional enrollees? • What is the escalation process when a patient has not yet been approved and is coming close to the 30 or 60 day deadline?
☐	Identify and implement changes to accelerate enrollment, particularly for those who are very sick or injured. Consider: • What changes can you make to speed this up?

Resources

WSHA has created a designated [webpage with information and resources on H.R.1](#) impacts for hospitals. This page will be updated regularly as new federal guidance becomes available. Resources available now include:

- [H.R.1 Timeline Flier for Staff](#)
- [H.R.1 Talking Points](#)
- [Washington State Health Care Authority HR1 webpage](#)

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