

Federal Medicaid Work Requirement FAQs

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Overview

1. What are Medicaid work requirements?

A new federal law requires certain adults to meet or be exempt from the work requirement to qualify or remain enrolled in Medicaid expansion coverage. To meet this work requirement and be eligible for Medicaid, a person must:

- Work, volunteer, and/or participate in a work training or education program for at least 80 hours a month;
- Be enrolled in an education program at least half time; or
- Have qualifying household income of at least \$580 per month.

These same adults will also have their coverage reviewed every 6 months, instead of every 12 months. Both changes will be phased in beginning in **January 2027**.

2. Who must meet the new federal work requirement?

The new work requirement applies only to members in Virginia's Medicaid Expansion. Medicaid Expansion covers adults who are between 19 and 64 years old, have income under 138% of the federal poverty level (FPL, around \$22,000/year for an individual or \$45,000/year for an adult in a family of four), and are not eligible for Medicare. Medicaid Expansion covers about 550,000 Virginians.

Important: The new work requirement **DOES NOT** apply to other types of Medicaid, such as coverage for children, pregnant or postpartum individuals, or adults with a disability or who are age 65 or above.

3. How will someone know if they are enrolled in Medicaid Expansion?

Current members will receive a letter by the end of **September 2026** telling them about the new work requirement, how to meet it, and available exemptions. This information will also be included on their Medicaid approval notices beginning in January 2027.

To find out if they are enrolled in Medicaid Expansion, members can also call Cover Virginia at 855-242-8282, chat with a live agent at coverva.dmas.virginia.gov, or contact their local Department of Social Services.

4. When will the new Medicaid work requirement begin?

The new work requirement and six-month renewals will take effect in 2027. This means:

- **Applicants** applying on or after **January 1, 2027**.
- **Members** with a scheduled renewal date of **March 31, 2027 or later**.

5. How does someone show they have met the work requirement or are exempt?

Fill out your application or, if requested, renewal form from Virginia Medicaid in full, including all activities you perform. If we need more information, we will reach out.

In general, whenever possible, Virginia Medicaid will use information already available to the state to process an application or renewal, including determining whether someone has met the work requirement or is exempt. If we need more information, we send a notice asking for the specific information we need with instructions on how to provide it.

In 2027, in most cases, the information you put on your application or renewal will be all you need to show you qualify for an exemption or have met the work requirement. (This is also sometimes called “self-attestation”). Additional requirements will apply in 2028.

Exemptions from the New Federal Work Requirement

6. Who will be exempt from the new work requirement?

Individuals do not need to meet the work requirement if they are exempt. An individual is exempt if they have an ‘exclusion’ or an ‘exception’, described below:

Exclusions: An individual is excluded from the work requirement if any of the situations below apply:

- Parent, guardian, caretaker relative, or family caregiver of a dependent child age 13 or younger, or of a person of any age who has a disability (as defined in the Americans with Disabilities Act)
- Have a serious health condition, serious mental health condition, substance use disorder, or physical, intellectual, or developmental disability that impacts your ability to work, volunteer, go to school, or participate in a work training program. This exclusion is also referred to as being “medically frail.”
- Participate in a treatment program for substance use disorder
- Meet TANF or SNAP work requirements
- Pregnant, or within 12 months of the end of a pregnancy
- Former foster care youth who are 25 or younger

- Have a 100% disability rating from the U.S. Department of Veterans Affairs
- American Indian or Alaska Native
- Incarcerated

Exceptions: An individual can be exempt if any of the situations below apply. To count, the exception must have happened either (for applicants) the month before their Medicaid application or (for current members) anytime since their last renewal:

- Being under age 19
- Being enrolled in certain other types of Medicaid coverage (children's coverage, pregnancy coverage, coverage for Supplemental Security Income recipients)
- Incarcerated in the past 3 months
- Any of the exclusions described above
- Living in a locality with a certain unemployment rate (at least 8% or 1.5x the national unemployment rate)
- Living in a locality under a federal emergency or disaster declaration
- Received inpatient hospital care, nursing facility care, or institutional care (including psychiatric), or care of similar acuity level (***Note: more information on how to request this exception will be provided at a later date.***)
- Traveled to get medical care for themselves or a dependent. The care must be for a serious or complex medical condition, and care cannot be available in their community (***Note: more information on how to request this exception will be provided at a later date.***)

7. I have a serious medical condition or disability. Am I exempt?

You may be exempt from the Medicaid work requirement if you have a serious medical condition, serious mental health condition, disability, or substance use disorder, so long as your health condition or disability impacts your ability to work, volunteer, or go to school. **We will be providing more guidance on this exemption.**

8. Do I need a doctor to sign off on my medical, mental health, or disability exemption?

No. For 2027, you are not required to provide any documentation of your medical condition or disability. As with other exemptions, the state will try to use information we already have to determine whether you qualify. You can also provide us with information related to this exemption directly on your application or renewal form. Additional documentation requirements will apply in 2028.

9. Does receiving Social Security disability benefits qualify me as

exempt?

Yes, you are exempt if you receive Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI).

Meeting the Work Requirement

10. How can I comply with the Medicaid work requirement?

Individuals can satisfy the new work requirement by completing any of the activities below in a given month:

- Work, participate in a work program, attend school, and/or volunteer for at least 80 hours during at least one month in their review period (see question 11).
- Be enrolled in school (including high school, GED program, higher education, career, and technical education) at least half time (as defined by their school/institution).
- Have a monthly income of at least \$580 per month. Seasonal workers can meet the requirement by having an average monthly income of at least \$580 over 6 months.

11. When does someone have to have done the activity for it to count?

Individuals must have worked, gone to school, been in a work program, volunteered, or earned \$580 during a specific month (also called a “review period”):

For applicants: the month before they apply.

Example: James applies for coverage in February 2027. He must have worked, gone to school, or had another qualifying activity in January 2027 to have coverage effective February 1.

For existing members: for **one month** since their most recent eligibility renewal.

Example: Sarah’s coverage is effective April 1, 2026-March 31, 2027. To continue to be eligible for Medicaid Expansion at her next renewal in March 2027, if she is not exempt, she must have worked, gone to school, or had another qualifying activity for at least 1 month since April 1, 2026.

If she meets the work requirement, Sarah will be renewed from April 1, 2027-September 30, 2027. When she is up for renewal in September, she must have a qualifying activity for at least 1 month since April 1, 2027 to meet the work requirement.

12. What types of work count?

The following types of work meet the work requirement:

- Paid work
- Self-employment
- Contract work (working as a contractor for someone else)
- In-kind work, which means the person gets ‘paid’ in non-cash goods and services, like food, housing, or transportation (for example, a property manager who receives free rent in exchange for building duties)
- Unpaid work, which includes activities like internships, work done during a trial-period, and unpaid family caregiving. It *does not* include helping friends, family or neighbors, in an informal way or time spent doing regular chores and responsibilities for your own home.

13. What types of education programs count?

Education includes enrollment in:

- High school, or a high school completion or equivalency program recognized by the state (GED programs)
- Higher education (such as an associate’s degree program, college, or graduate or professional degree)
- Technical or career education programs.

14. How is enrollment in education counted?

You can meet the work requirement by being enrolled in an education program at least half-time. In most cases, your school defines your enrollment type (full time vs. half time, for example). In general, 6 credit hours in adult education per week is equivalent to half-time enrollment. We will ask questions on the application regarding your enrollment status.

15. Can I count education if I am an enrolled student but there is a summer break?

Yes. If a person enrolled in an education program applies or is renewed for Medicaid during a regular break (ex: summer break), they are still considered enrolled in the education program. This is true even if the person is moving from one type of education to another (e.g., from high school to college).

16. What type of community service or volunteer work counts?

Certain requirements apply for community services to count. The activity must:

- Be unpaid
- Completed for the direct benefit of the community (i.e., not only to assist one

individual, like mowing a neighbor's lawn)

- Cannot be partisan (e.g., canvassing for a particular political candidate, party or cause)
- Done through a public or nonprofit organization that supervises and is able to track the time spent on community service activities.

17. What type of work programs count?

Work programs include:

- Those offered by Virginia Works under the Workforce Innovation and Opportunity Act (WIOA) or the Trade Act of 1974
- State administered or supervised work program (such the SNAP Employment and Training program)
- Work programs offered by the U.S. Departments of Labor and Veterans Affairs for the training and employment of veterans.

Programs can include supervised job search or job search training activities, as long as the time spent on these activities is less than half of the total program required hours.

Find out more about these programs:

- Virginia Works: www.virginiaworks.gov
- SNAP Employment and Training Program: (www.dss.virginia.gov/relief/food-assistance/snap/snap-employment-and-training-et/)

18. Can I count future work, education, or volunteering activity?

No, future employment **does not fulfill** the requirement.

19. Can I combine activities to meet the work requirement?

Yes. If you work, volunteer, or participate in a work program less than 80 hours in a month, or if you are enrolled in an educational program less than half-time, the hours spent in any of these activities can be combined to meet the work requirement. **It is important to report all information so that we can add all of your activities together.**

Example: Eric is enrolled in a community college in two courses for a total of four credit hours a week; he also works at a pet store 15 hours a week, and volunteers 3 hours a week on the weekends. Virginia Medicaid will combine his 60 monthly hours of work, his 16 monthly hours of educational program credit, and his 12 monthly hours of volunteering to equal 88 hours of combined activities. This meets the work requirement.

Challenges Meeting the Requirement

20. What if Virginia needs more information to determine my eligibility for work requirements?

Always complete your application or renewal form in full as that will give us most of the information we need. However, we may reach out with a checklist or notice to let you know if we need something more.

For work requirements, you may receive a Notice of Non-Compliance, letting you know that we need you to provide information to determine your compliance or exemption status to remain enrolled in Expansion coverage. This notice will include instructions on what we need and how to submit it; individuals must submit the requested information within 30 days.

You can submit any requested information by:

- **In Person/Fax/Mail:** mailing to the Cardinal Care Correspondence Center, PO Box 1198, Richmond, VA 23218 or submitting to your local agency (your local agency information will be listed on the checklist).
- **Online:** www.commonhelp.virginia.gov is the online platform for all benefit programs including the ability to log in and upload documentation. In the coming months, Virginia Medicaid will provide more information about a new online portal to help Virginians report, track, and submit information regarding work requirements and exemptions.
- **By Phone:** Individuals can call Cover Virginia at 855-242-8282 (TTY: 888-221-1590) as some information can be given over the phone as self-attestation. If more information is needed, the call representative will tell the individual how to return their verifications.

21. Can someone appeal if their application is denied or if they are disenrolled?

Yes, applicants and members can appeal eligibility decisions related to work requirements. Individuals who wish to appeal should follow the appeal instructions in the Notice of Adverse Action that they receive. Get [additional information about appeals here](#).

Where to Learn More About the New Work Requirement

22. When will I learn whether work requirements apply to me?

Members with Medicaid Expansion coverage will receive a notice by mail, text, and/or email by September 30, 2026 letting them know that they may need to meet a work requirement beginning in 2027. This notice is sent to all Medicaid Expansion members, many of whom will be exempt from the work requirement.

23. What steps can I take now to stay covered?

Members should ensure that Virginia Medicaid has their updated contact information to receive important communications from Virginia Medicaid.

Changes to contact information can be reported online at commonhelp.virginia.gov, or by calling Cover Virginia at 855-242-8282. (TTY: 888-221-1590).

24. Where can I go with questions about my coverage?

DMAS is hosting virtual townhalls this fall to provide an opportunity for members, health care providers, and other community members to ask questions about these changes. Please join us and see our schedule [here](#). These townhalls will be recorded and posted online.

Additionally, you can call Cover VA at: 855-242-8282 (TTY: 888-221-1590).

In the coming months, we will provide more information about the rules and processes related to the new federal work requirement. Look for edits to this FAQ document as well as updated information on our websites as new and updated information is released.

Members can also visit the Virginia Medicaid website, dmas.virginia.gov and follow Cardinal Care on social media channels for updates.

Instagram: @CardinalCare

Facebook: @CardinalCare

LinkedIn: @Virginia Department of Medical Assistance Services

Scan below for more information about the new Federal Medicaid Work Requirement:



Please note: all information in this document is based on current understanding. Additional forthcoming federal guidance may result in changes. We will update this document as new information is received.