

# H.R. 1 Implementation Update

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# Our Mission:

Improving health care equity, access and outcomes for the people we serve while saving Coloradans money on health care and driving value for Colorado.



# H.R. 1: Overview

- On July 4, 2025 the House Reconciliation bill (H.R.1) was signed into law. This act impacts many federal programs:
  - Medicaid and Child Health Insurance Program (CHIP)
  - Affordable Care Act (ACA) expansions
  - Supplemental Nutrition Assistance Program (SNAP)
- Key challenges:
  - Rewrites major eligibility, financing, and compliance rules
  - Limits funding for states to implement changes and will drive higher administrative and IT costs
  - Increases administrative and bureaucratic burden, coverage loss, and cost shifts to commercial coverage

# H.R. 1 Medicaid Coverage Threats

**Medicaid Expansion population ~ 377,000 Medicaid members:**

- **Federal CHASE Funding Reductions** impact this population and hospitals - also funds Buy-In programs & CHP+ impacting more than 420K members
- **Eligibility redeterminations increased** from every 12 months to every 6, starting Jan. 1, 2027
- **Work requirements** for most “able-bodied adults” ages 19-64, starting Jan. 1, 2027 - some exemptions allowed
  - Working, Going to school, or Volunteering at least 80 hrs/mo to qualify
- **Coloradans may lose coverage** because they don't meet the new requirements or because of administrative complications



**North Star: Mitigate coverage losses and its catastrophic consequences to Coloradans, providers, economy**

# H.R. 1 High Level Implementation Timeline

2025

- Prohibited Entity Funding - July 2025, 14,000 impacted

2026

- “Qualified Alien” Changes - Oct. 2026, 7,000 impacted

2027

- 6 month verifications - Jan. 2027, 377,000 impacted
- Work Requirements - Jan. 2027, 377,000 impacted
- Retro Coverage Rollbacks - Jan. 2027 ~new enrollees impacted

2028

- Expansion Cost Sharing - Oct 2028, 60k+ impacted

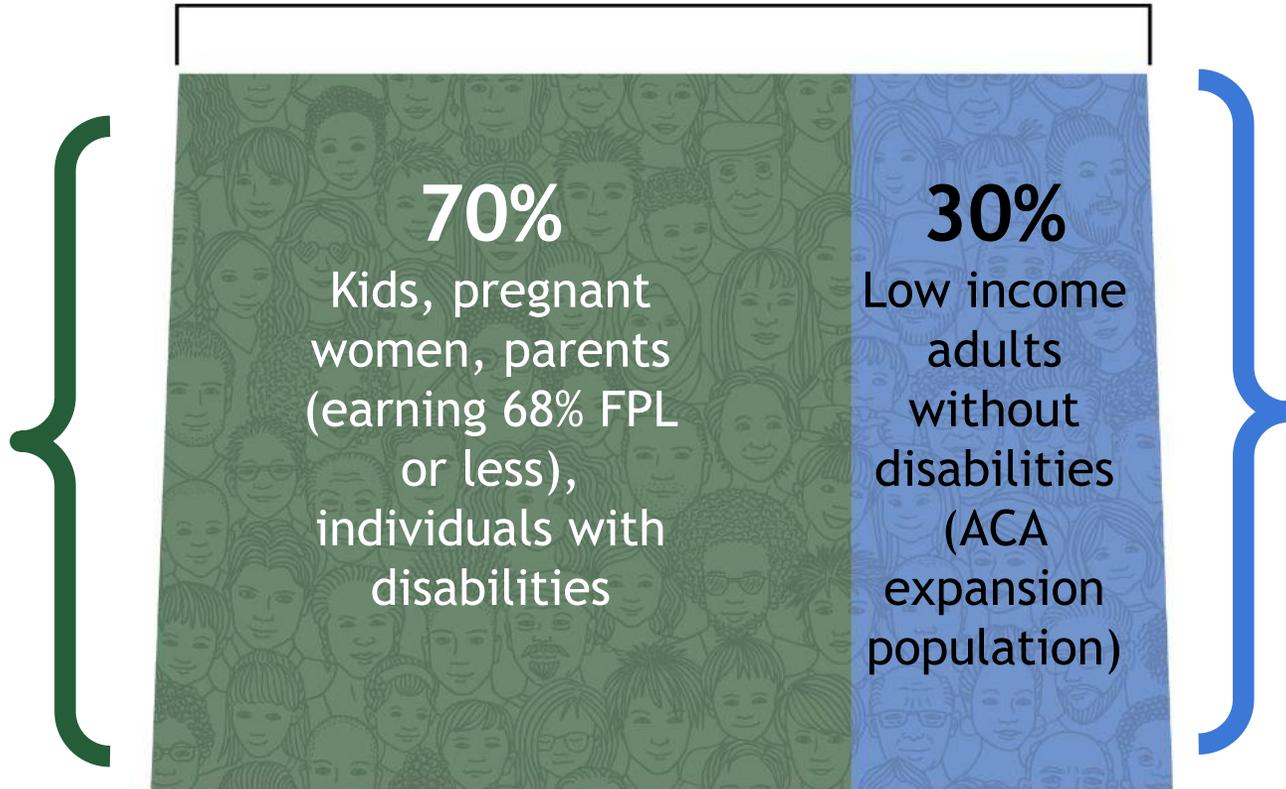
# Expansion Population Impacts

## 6 Month Renewals & Work Requirements starting Jan. 2027

**1,230,633**

Total Colorado Medicaid enrollment

**Does NOT**  
have to meet  
the work  
requirement or  
do twice a year  
renewals



**MAY** have to meet  
Work Requirement  
**MUST** do every 6  
month renewals

# Medicaid Work Requirements: Minimum Viable Product (MVP)

- Preliminary, basic guidance from CMS issued in late November and December - States will have less flexibility than what we expected under the law
  - Limited ability to leverage self-reporting or “self-attestation”
  - Feds will NOT let states define Medically Frail
  - Strong emphasis on everything being auditable
- Colorado should not expect any CMS waivers to delay implementation.
- CMS is encouraging a Minimum Viable Products (MVP) at launch.
  - Must be operational by all States by January 1, 2027
  - Colorado is designing its MVP model now



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# Rural Health Transformation Program

H.R. 1's RHTP provides \$50 billion in federal grants, to be allocated to approved states over 5 federal fiscal years, with \$10 billion of funding available each year, beginning in FFY 2026 and ending in FFY 2030.

**CMS announced on December 29, 2025 that Colorado was awarded \$200 million annually through the RHTP, representing \$1 billion over the 5 year period.**

Funds will be used towards:

- Chronic disease management and prevention
- Fostering collaboration and developing the rural and frontier workforce
- Right size rural health care delivery systems
- Innovate models of care including value-based and alternative payment

For more information visit our [website](#).

# Stakeholder Engagement: Survey Results

A survey was sent out to Health First Colorado members and other stakeholders to understand their concerns with the upcoming H.R. 1 changes.

Over 740 responses were received, and 65% were members. Primarily from urban regions, but 42 counties across the state including rural and frontier areas.

1. 65% Members
2. 17% Health Care Providers
3. 13% Nonprofit or Advocacy
4. 6% Other Providers
5. 3% Counties
6. 9% Local, State, or Federal Government



# Stakeholder Concerns

Topics are listed in order of concern based on average response score (0-5):

- **Top three concerns:**

- Services covered by Medicaid (average rating = 4.26)
- State budget challenges and Medicaid sustainability work
- Provider fees, payments and tax provisions

- **Medium:**

- Completing the renewal process more often because of federal changes
- Upcoming community engagement or work requirements to keep Medicaid coverage (such as volunteering, going to school, or meeting an exemption)

- **Of least concern:**

- Coverage for reproductive health care providers
- Rural Health Transformation Program
- Immigration coverage topics (average rating = 2.96)



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# Stakeholder Next Steps

- Planning for broad engagement across all stakeholder groups including workgroups to dig into implementation topics and stakeholder concerns
- Understanding members' lived experience to develop tools for partnering with CBOS to better connect with members on new requirements prior to implementation
- Keeping in touch with stakeholders needs through surveys, comment forms, email inbox, and attending meetings on request

Hosting an informational H.R. 1 webinar on February 24, from 9 to 11 a.m. covering recent federal guidance, timeline changes such as semi-annual renewals and community engagement/work requirements, and opportunities for stakeholders to engage with us in the process.

[Register now!](#)

# Our Ask of YOU: Share Resources and Partner with us on implementation of federal changes

- Share Our [Member Message](#) from Exec. Dir. Bimestefer with colleagues and members - a short, high-level overview of what is in H.R. 1 and when members may see changes.
- Bookmark our [resource center](#), and sign up for HCPF newsletter
- Send all questions, comments, and feedback to [hcpf\\_HR1@state.co.us](mailto:hcpf_HR1@state.co.us)
- Attend the H.R. 1 [webinar](#) on 2/24

Thank you for your partnership and engagement as we work together to implement H.R. 1 and focus on our North Star.



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<https://hcpf.colorado.gov/impact>

