

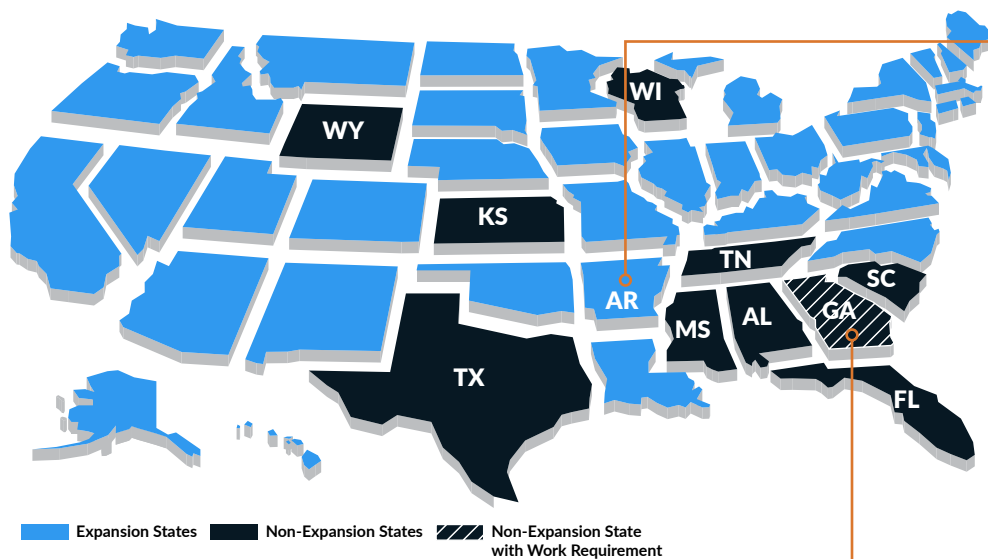
Medicaid Expansion and Work Requirements

Proposals to include work requirements for Medicaid are under consideration at the state and federal level. In 2025, Governor Laura Kelly again proposed expanding Medicaid in the Healthcare Access for Working Kansans (HAWK) Act, which included a work requirement for expansion enrollees with some exceptions. Under the proposal, KanCare would have been expanded to cover adults age 19–64 with income up to 138 percent of the federal poverty level (FPL), approximately \$44,367 per year for a family of four in 2025. Medicaid expansion has been a recurring issue in Kansas

since the U.S. Supreme Court made it optional for states in 2012. While 40 states and Washington, D.C., have expanded Medicaid, Kansas remains among the 10 states that have not. It is important to understand how work requirements would impact the expansion population as discussions continue around instituting work requirements for Medicaid at the federal level.

Experiences in Arkansas and Georgia have shown how a Medicaid work requirement under expansion could impact enrollment. See details below.

Figure 1. Potential Impacts: Experiences From Other States



Arkansas

- The first state to implement a Medicaid work requirement, applying it to the Medicaid expansion population from June 2018 to March 2019.
- Required enrollees to report 80 hours of work per month or other qualifying activities, such as job training, education or volunteering.

Impacts: Enrollees of Medicaid may be at risk of disenrollment despite meeting work requirements due to reporting barriers and administrative complexities.

Georgia

- Georgia is a non-expansion state that implemented a Medicaid work requirement through its Pathways to Coverage program, which officially launched in July 2023.
- Unlike full Medicaid expansion, this program offers limited coverage to adults age 19–64 with income up to 100 percent FPL, who complete 80 hours of work or activities (e.g., job training, education) per month.

Impacts: Work requirements may place additional administrative burdens and costs on state Medicaid programs.

- Georgia initially required monthly verification of work or qualifying activities, but it proved to be complex and resource intensive, leading to higher administrative costs and less potential savings from decreased enrollment.
- In early 2025, Georgia shifted from monthly to annual verification to reduce the administrative burden for both enrollees and the state.
- Because of the work requirement and limited eligibility criteria, Georgia's Medicaid program saw less enrollment than initially projected. As of April 2025, 7,447 individuals were enrolled in the Pathways to Coverage program, representing approximately 29.7 percent of the state's initial first-year projection of 25,028 enrollees. It is estimated that 240,485 uninsured low-income Georgians may be eligible for the program.

- More than 18,000 individuals, or approximately a quarter of expansion enrollees subject to the requirement, lost coverage within the first nine months, primarily due to noncompliance in reporting, not necessarily because they were unemployed.
- The policy faced significant legal challenges, and in March 2019, a federal judge blocked the work requirement, citing concerns about coverage losses and the program's failure to fulfill Medicaid's purpose of providing health care.
- Research found no evidence that employment rates and number of hours worked increased.



Medicaid Expansion and Potential Impacts of Work Requirements Under Consideration

Federal and state proposals to implement work requirements for Medicaid enrollees are currently under consideration, but no proposal has passed. The details of these proposals vary, which would result in different impacts on Medicaid enrollment and coverage.

Work Requirement Proposals

- **Federal:** Would apply nationwide to adults without disabilities and dependents, with some exemptions. It would require more frequent reporting requirements (e.g. every six months) which may lead to coverage losses (e.g., Arkansas experience).
- **State:** Vary by state, with different exemption criteria and reporting requirements. The Kansas HAWK Act, if implemented, would apply only to expansion enrollees and require verification of employment at the time of application and at redetermination.

Kansas Medicaid Expansion proposed in the HAWK Act includes a work requirement similar to the one proposed in 2024. It would require:

- Adults age 19–64 in the expansion population must demonstrate employment in the previous 12 months at the time of application and renewal completed at their renewal date. Includes exemptions for parents or guardians of a dependent child under 18 years of age or of an incapacitated adult, full-time students, full-time caregivers, veterans, volunteers, individuals experiencing homelessness, Kansans with medical conditions and former foster youth under age 22, among others.

At the federal level, work requirements are being considered as a part of an overall effort to reduce spending. Recent legislation was passed by the U.S. House of Representatives, but it is not yet law. It would require:

- Adult Medicaid enrollees without dependents to work, attend school or a job training program, or participate in community service for at least 80 hours per month. Exemptions include individuals with disabilities or health-related barriers to employment, individuals who are pregnant, primary caregivers of dependents or an individual with a disability, foster youth and former foster youth under age 26, individuals who are already complying with TANF or SNAP work requirements, and persons who are incarcerated or released within the past 90 days.

Potential Impacts of a Work Requirement on Medicaid Expansion in Kansas:

If a work requirement were in place, analysis of adults age 19–64 likely eligible for Medicaid if expanded (not discounting for take-up rates but excluding those already enrolled in Medicare or Medicaid) indicates:

- Approximately **7 in 10 (71.3 percent)** are working and would meet the HAWK Act requirement.

Likely eligible Kansas adults age 19–64 who are not employed (28.7 percent) may meet some exceptions to the proposed work requirement in the HAWK Act. Analysis

indicates that among individuals who are not employed in the expansion population:

- 33.1 percent have a child under age 18 in their household and could potentially be eligible as parents or guardians.
- 14.9 percent are individuals with disabilities.
- 25.7 percent are current students.
- 2.1 percent are veterans.

Note: Characteristics are not mutually exclusive.

Projected Impact of Work Requirements on Medicaid Expansion Enrollment in Kansas

Analysis of available data suggests that Medicaid enrollment in Kansas would likely decline if a work requirement were implemented as proposed in the HAWK Act. Specifically, new enrollment as a result of expansion would be projected to decrease from **120,157 to 99,921**, reflecting a 16.8 percent reduction from a traditional expansion scenario. This estimate accounts for likely enrollees who are unemployed but likely would qualify for exemptions, including parents of children under age 18, students attending higher education, veterans and those with a disability.

However, the analysis does not factor in all exemptions outlined in the HAWK Act for which data is less readily available, such as:

- Parents or guardians of incapacitated adults, individuals not fit for employment as determined by the Kansas Department of Health (KDHE) secretary, or those with pending applications for supplemental security income or social security disability insurance (many of whom would be included as individuals with disabilities).
- Volunteers working at least 20 hours per week at nonprofit organizations.
- Homeless individuals.
- Former foster youth under age 22.
- Individuals experiencing hardship as determined by the KDHE secretary.

Incorporating these additional exemptions would likely increase the number of eligible individuals and result in higher enrollment than current estimates suggest.