

Work, Education, or Volunteer Requirements FAQs

January 2026

Overview

What are the new work, education, or volunteer requirements for Medicaid?

A new federal law requires certain adults to work, engage in community service, or participate in a work training or education program for at least 80 hours a month to qualify for Medicaid. These same adults will also have their coverage reviewed every 6 months, instead of every 12 months. Both of these changes will be phased in beginning in **January 2027**.

Who must meet the new work, education, or volunteer requirements?

These new requirements apply only to members enrolled in Virginia's Medicaid Expansion. Medicaid Expansion covers individuals who are between 19 and 64, have income under 138% of the federal poverty limit (FPL), and are not eligible for Medicare. Most Medicaid covered adults in this age range are in Medicaid Expansion.

They **DO NOT** apply to other types of Medicaid, such as coverage for children, pregnant or postpartum individuals, or adults with a disability or who are 65+.

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

Medicaid Expansion members will be sent a notice by the end of September 2026 telling them about the new requirements. This notice will include:

1. Requirement details
2. How to meet them or meet an exemption

This information will also be included on approval notices sent to individuals enrolled in Medicaid Expansion beginning in January 2027.

How to Comply with or be Exempt from Work, Education, or Volunteer Requirements

What must a member do to comply with these new requirements?

The new requirements can be fulfilled in a few different ways. Individuals can:

- Work, participate in a work program, attend school, and/or engage in community service for at least 80 hours a month in total.

- Enroll in school (including higher education, career, and technical education) at least half time
- Have monthly income that is at least equal to the monthly income of someone who works 80 hours a month and is paid the federal minimum wage (\$7.25/hour).
 - If work is seasonal, the average income over 6 months must equal or be more than this threshold.

New applicants must meet the requirement the month before they apply to qualify.

Example: James applies for coverage in February 2027. He will need to have met the 80-hour work/education/volunteer requirement in January 2027 to qualify.

Existing members must have met the requirement during **at least one** of the 6 months before their eligibility renewal date.

Example: A member who is not exempt has a renewal that is due March 2027. They must have met the 80-hour community engagement/work requirement in **one** of the months six months prior (September through February).

What happens if someone is not volunteering, attending school, or working when they apply, but is starting a job in the future?

Future employment **does not fulfill** the requirement. To be eligible for Medicaid Expansion, they would need to engage in community service and/or a work or education program for 80 hours or meet an exemption the month before they apply. If they do not, they can apply the month after they begin working, attending school, and/or volunteering for at least 80 hours.

Can someone who is denied or whose Medicaid ended because they did not meet the new work, education, or volunteer reporting appeal the decision?

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](#).

Who can be exempt from the new requirements?

Some Medicaid Expansion members may be exempt. Exempt members may need to provide documentation of their exemption:

- Children who are 18 or younger
- Adults who are 65 or older
- People with blindness or a disability, such as those receiving Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI)
- People who are pregnant or within 12 months of the end of a pregnancy

- Former foster care children who are 25 or younger
- Parents and caregivers of a child age 13 and younger, or a person of any age with a disability
- Veterans with a 100% disability rating
- Members of federally recognized tribes
- People who have a serious or complex medical condition (“medically frail”)
- People who have a substance use disorder (SUD), and/or are enrolled in a SUD treatment program
- People who are incarcerated, or were released from incarceration in last 3 months
- People who qualify for Medicare Part A or are enrolled in Medicare Part A or Part B
- People who have a disabling mental disorder
- People who have a disability that significantly impairs their ability to perform 1 or more activities of daily living (such as bathing, dressing, feeding themselves or using the bathroom)

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.