



Work and Community Engagement Activities Under H.R. 1

Under H.R. 1, **Medicaid expansion adults** must complete 80 hours of work and community engagement activities each month or demonstrate a monthly income of \$580 unless they are excluded or exempted. This requirement begins for most Medicaid expansion adults on or after January 1, 2027.

This short paper provides domestic violence (DV) and Sexual Assault (SA) survivors, advocates, and programs with information about what constitutes work and community engagement activities according to the statute and a federal rule that provides implementation guidance to states. It is our hope that this information will clarify the work and community engagement requirements and help survivors know what counts as work and community engagement requirements so that they can obtain and/or maintain their Medicaid healthcare.

What are Work and Community Engagement Activities Under H.R.1?

Work and community engagement activities are:

- Working at least 80 hours,
- Completing at least 80 hours of community service,
- Participating in work programs for at least 80 hours,
- Attending an educational program at least part-time, or
- Engaging in a combination of the above activities for at least 80 hours a month.

Work and community engagement requirements can also be met by:

- Having an income of at least \$580 a month, or
- Being a seasonal worker and making an average monthly income of at least \$580 a month over a 6-month period.
- For individuals who do not meet the monthly income requirement, their income can be converted to hours and combined with the activities listed above.

¹ H.R. 1 notes that seasonal worker is defined under 26 U.S.C. 45R(d)(5)(B), with an average monthly income over the preceding 6 months that is not less than the federal minimum wage multiplied by 80 hours, would also meet the monthly "community engagement requirements." 1 Pub. L. No. 119-21, Section 71119(a)(2)(G), 139 Stat. 72 (2025).

Definitions of Work, Community Service, Work Programs, and Education Programs

Work

- Traditional paid employment, self-employment, in-kind work, and unpaid work.
- Unpaid work is different from community service because it can benefit a private entity or individual, such as internships or trial work periods.
- Includes owning and running a business as well as independent contractors.



Community Service

- Unpaid work/volunteer service completed under a structured program that is run by a public agency or nonprofit organization – does not have to be 501(c)(3) entity.
- Must benefit or address a civic, public, or community need; cannot benefit one person or be partisan in nature.
- Does not have to be supervised, but the activities should be monitored and operated with sufficient oversight.
- Organizations must have a process in place to track the community service completed by individuals and include information such as the (1) type of community service activity, (2) dates and hours of the service, and (3) a point of contact that can confirm the hours completed.
- Court-ordered community service or diversion programs also count toward the required hours.

Work Programs

- Programs that help individuals get ready for work by providing training or work experience.
- Must be run or pre-approved by federal or state governments.
- May include supervised job search/training if the activity is less than half of the required 80 hours as well as job search activities conducted to comply with unemployment insurance requirements.

Education Programs

- Institutions of higher education.
- Career or technical education programs.
- High schools as well as state-approved high school equivalency programs.
- Clarifies that enrollment status continues through normal vacation and recess (e.g. summer break).
- Defers to the institution whether a student is enrolled full-time, half-time, or less than half-time.
- Establishes a credit hour conversion standard for students enrolled in classes for less than half-time (e.g. 1 credit =3 hours).



States Will Implement the Work and Community Engagement Requirements

The 40 expansion states, along with the District of Columbia, Georgia, and Wisconsin, are responsible for implementing the work and community engagement requirements. While the statute and federal rule provide the legal requirements and guidance, there may be implementation differences among the states. It is important to consult with the Medicaid agency/department in your state and regularly visit the agency's website for the most up-to-date information about the implementation of the work and community engagement requirements in H.R. 1.

Futures Without Violence launched its **Survivor Health Access Project** in the fall of 2025 to help educate survivors, DV/SA program staff, and policymakers about changes resulting from the passage of H.R. 1. This series highlights **how the changes to Medicaid will impact survivors of violence**, and **what program staff and policymakers can do** to help ensure that survivors understand and can demonstrate compliance with the new standards.

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This document is for educational and informational purposes only and does not constitute legal advice.

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