

Mitigation Opportunities: Equity and Access

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Immigrant Health Coverage – 1332 Waiver

- ▶ Washington’s 1332 waiver allows all Washingtonians, regardless of immigration status, to purchase QHPs & QDPs, and access state subsidies, if applicable.
 - ▶ [Immigrant Health Coverage: Qualified Health Plan Expansion Data Snapshot \(October 2024\)](#)
 - ▶ Updated data available post-OE
- ▶ Waiver approved from Jan. 1, 2024 – Dec. 31, 2028, but is subject to ongoing federal approval.
- ▶ Contingency planning underway — in partnership with Tribes, Governor’s office, AG, OIC, HCA, carriers and community partners.



Immigrant Health Coverage – 1332 Waiver

- ▶ Contingency planning - guiding principles:
 - ▶ Maintain current 1332 waiver as long as possible
 - ▶ Maintain privacy for IHC customers
 - ▶ Avoid mid-year coverage disruption, if possible
 - ▶ Maintain a coverage pathway and access to state subsidies
- ▶ Discussion Q: Are there additional guiding principles that should be prioritized?

Immigrant Health Coverage – 1332 Waiver

- ▶ Potential alternative coverage pathways via Washington Healthplanfinder — for further discussion with implementation partners (Jan/Feb)
 - ▶ Leverage existing off-Exchange plans
 - ▶ New population specific program
 - ▶ Leverage state-only Medicaid programs

Immigrant Health Coverage – 1332 Waiver

- ▶ Recent activity
 - ▶ Monitoring federal transition and peer state 1332 waiver activities
 - ▶ Exploring additional privacy protections (in partnership with Gov. office, AG's office, agency and community-based partners)
 - ▶ Community-based engagement (fear/uncertainty)
 - ▶ Website updates
- ▶ Discussion Q: Are there additional activities that would help address concerns among impacted customers?

Website Updates: Key Messages

<https://www.wahbexchange.org/about-the-exchange/initiatives/>

- ▶ Your safety is important to us.
- ▶ Federal and Washington state laws continue to protect your privacy when you apply for health insurance through Washington Healthplanfinder.
- ▶ Information for individuals without a federally recognized immigration status is not shared.
- ▶ Applying for or receiving insurance through Washington Healthplanfinder – including Washington Apple Health (Medicaid) – does not affect immigration status or citizenship applications

Next Steps

- ▶ 2025 leg session considerations (state subsidy, privacy, authority)
- ▶ Further stakeholder engagement:
 - ▶ Health Equity for Immigrants Campaign
 - ▶ Navigator Lead Orgs
 - ▶ First Friday Forum
 - ▶ Stakeholder workgroups: Cascade Care Workgroup; TCEAC; E&E
 - ▶ Community Health Centers
 - ▶ Association of WA Health Plans
 - ▶ State agency partners (OIC/HCA/Gov)
 - ▶ Health Equity Technical Advisory Committee
 - ▶ Exchange Board
- ▶ Discussion Q: Are there additional forums we should be engaging?
Any additional questions about our planning efforts?

APPENDIX

Deferred Action for Childhood Arrivals (DACA)

- ▶ DACA recipients and other people with qualifying immigration statuses able to access coverage with premium tax credits as of Nov. 1, 2024.
- ▶ Federal rule focus of ongoing litigation and potential future administrative action.
- ▶ Access maintained in WA for time being; contingency planning with HCA and DSHS
- ▶ More information available at <https://www.wahbexchange.org/about-the-exchange/initiatives/daca/>

Fact sheet

Savings available starting Nov. 1, 2024

People with certain immigration statuses now qualify for more savings

Due to a recent [federal change](#), Deferred Action for Childhood Arrivals (DACA) recipients and other people with qualifying immigration statuses can now access increased federal savings through Washington Healthplanfinder™ as of Nov. 1, 2024. These savings significantly lower costs for most — many customers can find a health plan for less than \$10 per month.

Who qualifies?

Immigration statuses include:

- DACA recipients
- Valid nonimmigrant visa-holders
- People with a pending application for adjustment of status
- People granted employment authorization
- Family Unity Program beneficiaries
- Special Immigrant Juveniles with approved petitions
- Certain asylum applicants under age 14

How can someone get their new savings?

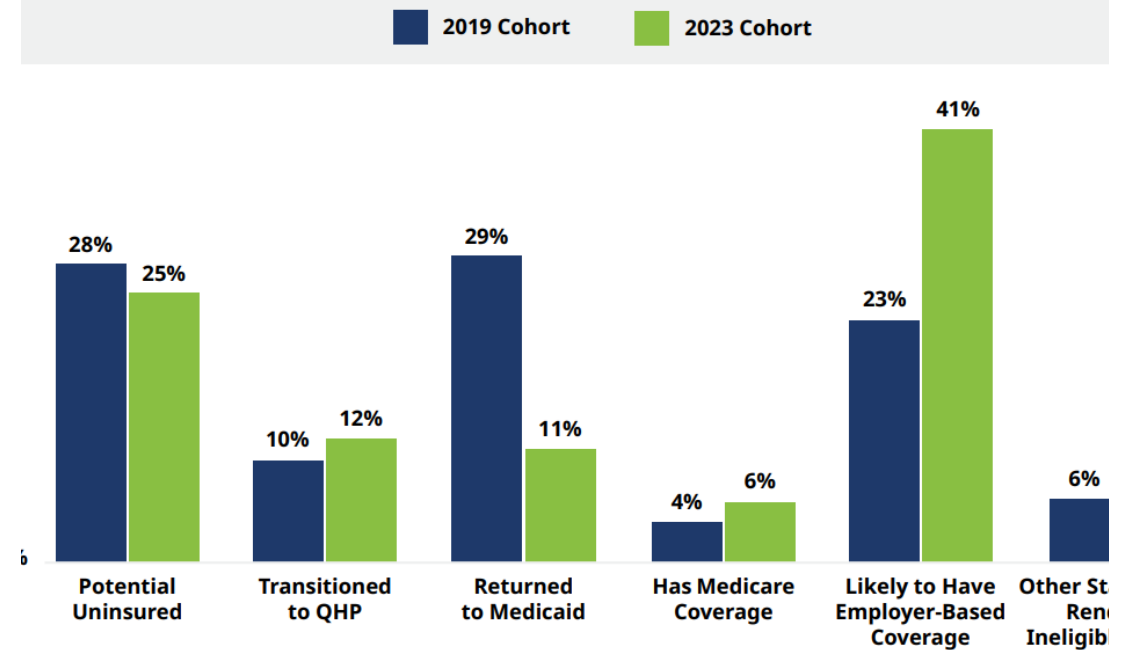
Any household member affected by the recent change needs to select "Yes" to the question, "Is this household member lawfully present in the U.S.?" in their Washington Healthplanfinder application. Those who may be affected (current customers and people who recently applied to Washington Healthplanfinder) were notified of the change in their preferred language. Assisters are also reaching out to people with qualified statuses who they previously helped.



Additional Potential Continuity of Coverage Challenges

- ▶ Changes in federal eligibility criteria significantly affect Washington Healthplanfinder customers
 - ▶ Federal changes to marketplace, Medicaid or Medicare eligibility would raise continuity of coverage challenges.
 - ▶ Recent example — Medicaid Unwind. Detailed DSHS analysis available in recently submitted legislative report ([continuing health coverage for people losing Medicaid](#)).
- ▶ Affordability efforts critical to helping mitigate potential coverage losses and helping to address current health disparities.

Figure 1: Distribution of adults leaving Medicaid by post-exit coverage status



The 2023 cohort was affected by the unwinding of pandemic-era Medicaid eligibility rules. As a result, this cohort experienced a higher rate of transitions to employer-based coverage, relative to the 2019 exit cohort. The rate of transition to employer-based coverage is expected to be lower in subsequent cohorts, and the proportion exiting to the status of "potentially uninsured" is expected to be higher, in the absence of policy changes to impact these rates.

Recent Legislative Report

Continuing health coverage for people losing Medicaid

- ▶ On Dec. 31, 2024, the Exchange submitted a Legislative report that explored ways to move people from Medicaid to QHPs. The report was requested per SB 5950.
- ▶ The study focused on three areas:
 - ▶ State-based marketplace landscape scan
 - ▶ DSHS data analysis on monthly enrollment rates and demographic and employment information; and,
 - ▶ Feasibility analysis.

Note: Exchange currently provides automated support for customers joining Medicaid and renewing Medicaid or QHP coverage.

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