

# Policy Choices: Public Health Consequences

Medicaid System Readiness and  
Public Health Impacts of Federal  
Immigration Enforcement



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**Arizona Rural & Public Health Policy Forum**  
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# Learning Objectives

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Understand the scope and timeline of upcoming Medicaid work and reporting requirements



Recognize why early investment in AHCCCS IT systems and testing is essential to prevent coverage loss



Assess why rural Arizonans face disproportionate risk under new Medicaid eligibility rules

# Learning Objectives

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Explain how ICE and CBP enforcement practices undermine community health and trust



Identify policy safeguards needed to protect civil liberties and public health during enforcement actions



Be familiar with AzPHA's advocacy to restrict activities and build accountability for ICE and CBP



## Medicaid Work Requirements: What's Coming

Work / community  
engagement requirements  
begin January 2027

Applies to adults classified  
as able-bodied

Approximately 300,000  
AHCCCS members affected

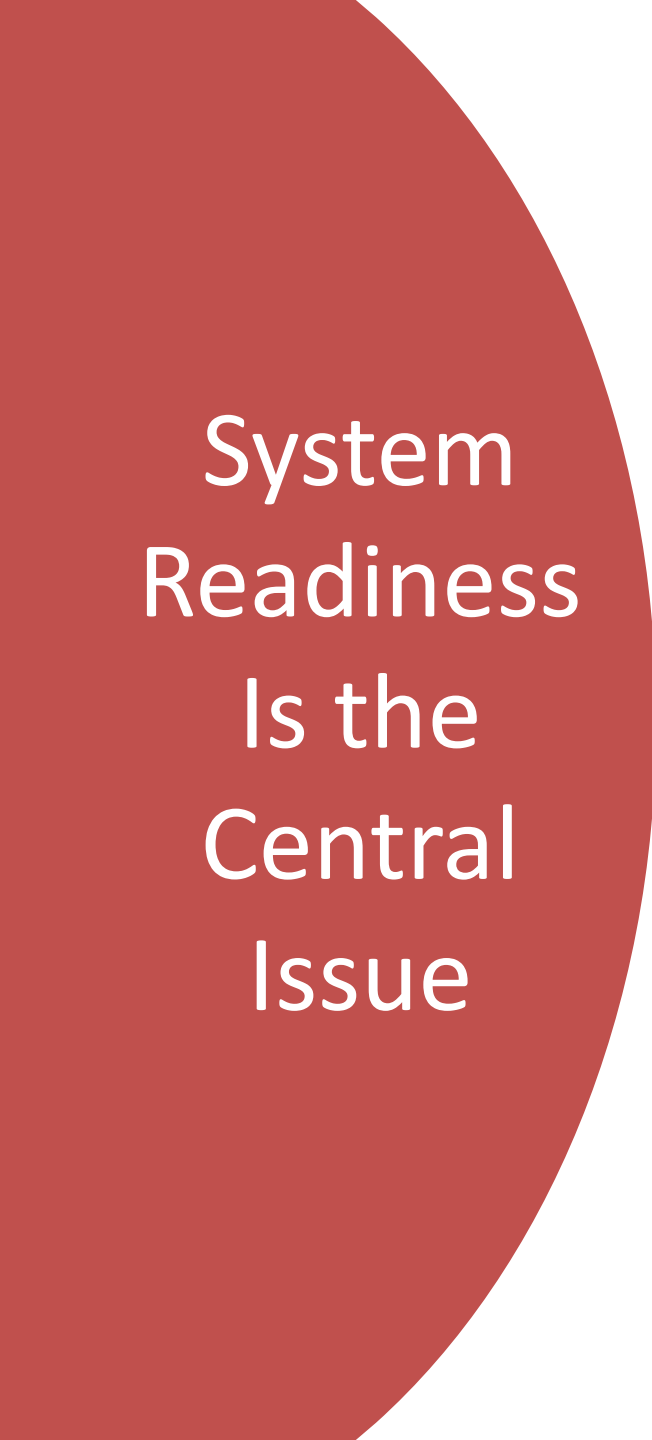


Member  
Responsibilities  
Under the New  
Rules


Members must regularly document work or community engagement

Reporting will be required on an ongoing basis

Failure to report risks loss of coverage



System  
Readiness  
Is the  
Central  
Issue

- AHCCCS must build and test large-scale reporting systems
  - Systems must be intuitive and low-burden for members
  - Even modest friction can cause mass disenrollment
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# Testing Must Be Real- World

Systems must be tested with actual Medicaid members


Testing across browsers, computers, and mobile devices is essential

Why  
Preparation  
Must Start  
Now

Design, testing,  
refinement, and  
training take time

January 2027  
leaves little  
margin for error

Call to  
Advocacy  
Action:  
Governor  
Hobbs'  
Budget  
Request

- \$19 million requested for implementation
  - \$70 million in spending authority
  - Supports IT modernization and staffing
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Administrative  
Capacity Will  
Be Stretched

Eligibility redeterminations  
move from annual to every  
six months

Dramatically increases  
workload

Additional staff and systems  
are required

Rural  
Arizona  
Faces  
Higher  
Risk

Per-capita Medicaid participation is roughly twice as high in rural areas

Access barriers and broadband gaps persist


System failures will hit rural communities hardest

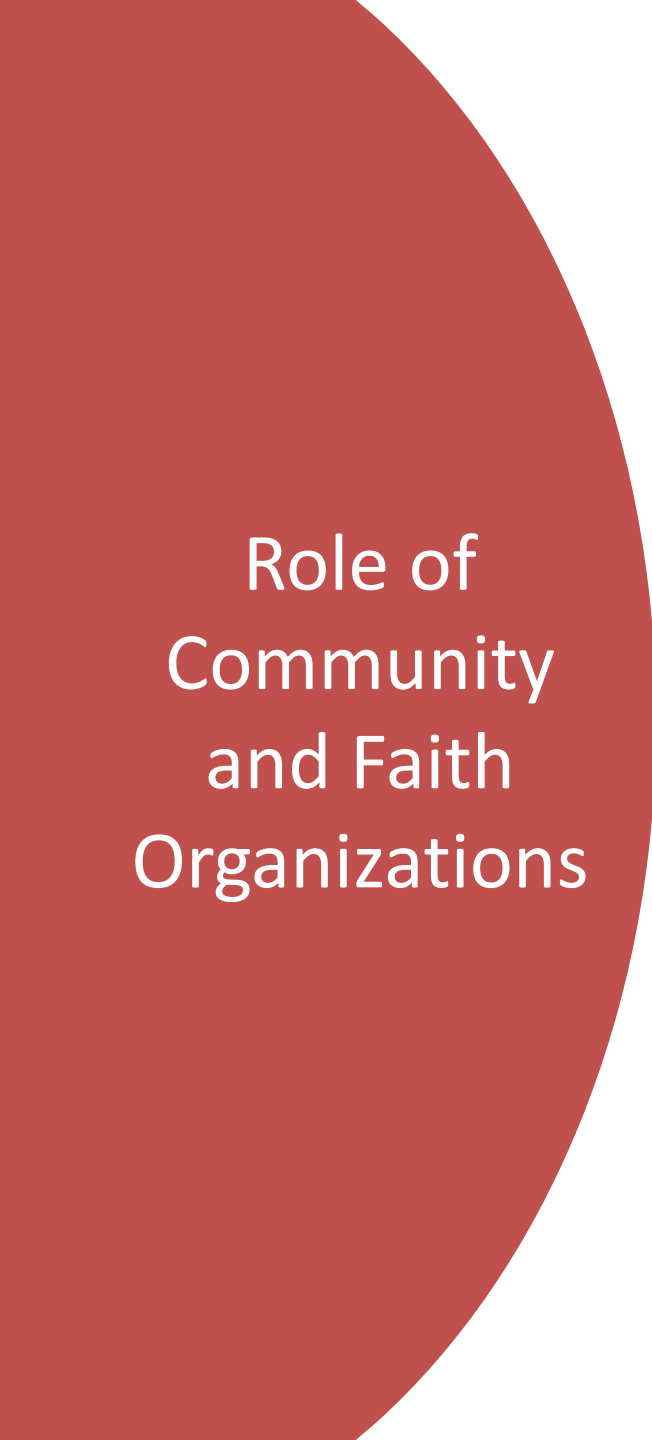
## Why Ease of Use Matters in Rural Communities

- Members may have limited access to in-person help
- Digital systems must work the first time
- IT help centers needed



# What Counts as 'Work' Still Unclear

- CMS guidance has not yet been issued
  - Possible alignment with SNAP standards
  - Volunteer work and education may qualify
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## Role of Community and Faith Organizations

- Provide structured volunteer opportunities
- Help members document engagement
- Can reduce coverage losses



# Federal Immigration Enforcement and Public Health

ICE and CBP tactics extend beyond immigration enforcement

Practices grossly violate civil liberties, undermine trust in public institutions, and harm public health

ICE and CBP are even actively conducting medical deportations

Fear suppresses care-seeking and service use

Communities disengage from health systems

ICE and CBP actions at schools and other community locations are greatly harming the social determinants of health

# Health and Mental Health Impacts


Delayed treatment  
and reduced  
preventive care

Chronic stress,  
trauma, and  
anxiety

Children and  
families  
disproportionately  
affected

# AzPHA Took a Stand

- Public statements issued
- Letters sent to Senators Gallego and Kelly
- Urged withholding DHS funding absent reforms
- [See our letter to Senator Gallego](#)
- [See our letter to Senator Kelly](#)
- [Public Health, Human Rights & Federal Immigration Enforcement: Why We Took a Stand](#)



Core  
Accountability  
Demands

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1. Independent oversight outside DHS chains of command

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2. Legally enforceable limits on use of force

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3. Protections for children and families

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Additional  
Required  
Reforms

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4. Independent  
accountability for  
rights violations

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5. Stronger hiring  
standards and  
enhanced training

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6. Judicial warrants  
only; end roving  
patrols

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## Additional Required Reforms

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7. Clear prohibition on ICE and CBP presence at voting sites

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8. Roll back CBP/ICE funding to FY 2024 levels for the remainder of FY2026 to limit the agencies operational capacity

# Wrap Up

Medicaid agency operational readiness for HR1 work requirements is essential to keeping Medicaid members covered

Operational readiness will depend on good leadership strategy decisions AND approval of Hobbs' budget request for implementation

Medicaid work requirements demand early investment in systems, staffing, and testing—especially to protect rural Arizonans

## Wrap Up (cont'd)

Immigration enforcement practices that rely on fear and force undermine trust, health, and democratic institutions

Public health requires accountability, preparation, and policies that reduce harm rather than amplify it