

# Key Dates for H.R.1 Implementation for National Council Members

NATIONAL  
COUNCIL  
for Mental  
Wellbeing

Highlighted dates mark the most important milestones.

START  
HERE

**JULY 4, 2025**

Prohibition on new/ increased provider taxes in all states.

**DEC. 8, 2025**

Centers for Medicare and Medicaid Services (CMS) issues initial guidance on Medicaid work requirements.

**DEC. 29, 2025**

CMS announces Rural Health Transformation Program awards to states.

**MARCH 6, 2026**

CMS issues guidance on more frequent Medicaid eligibility redeterminations.

**JAN. 1, 2026**

Sunset date for 5% enhanced Federal Medical Assistance Percentage (FMAP) in states that have not yet expanded Medicaid.

**JUNE 1, 2026**

Date by which H.R.1 text requires CMS to issue an interim final rule on Medicaid work requirements.

**OCT. 1, 2026**

Implementation date for citizenship/immigration status requirements for Medicaid and CHIP benefits. Implementation date for limit on FMAP for emergency Medicaid services offered to noncitizens.

**JAN. 1, 2027**

States are required to begin conducting eligibility redeterminations every six months for Medicaid expansion adults.

**JAN. 1, 2027**

Date by which states must begin implementing mandatory Medicaid work requirements unless granted a good-faith exemption by CMS.

**JAN. 1, 2027**

Limits retroactive coverage to one month prior to application for coverage for expansion enrollees and two months prior for non-expansion enrollees, down from current law which permits three months of retroactive coverage for all enrollees.

**OCT. 1, 2027**

For expansion states with existing provider taxes, beginning of provider tax safe harbor threshold phasedown; maximum taxable amount reduced to 5.5%.

**JAN. 4, 2027**

Implementation date for citizenship/immigration requirements for Medicare enrollees.

**OCT. 1, 2028**

For expansion states, provider tax rate safe harbor threshold is reduced to 5%.

**OCT. 1, 2028**

Implementation date for cost-sharing requirements. Primary care, mental health, and substance use disorder services are explicitly exempt, and there are also facility-specific exemptions that exempt all services rendered by CCBHCs, FQHCs, and RHCs.

**OCT. 1, 2029**

For expansion states, provider tax safe harbor threshold is reduced to 4.5%.