CMS Releases Informational Bulletin about Medicaid Provisions with Summary of Tribal Exceptions in the One Big Beautiful Bill Act

Category: Policy Blog
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The Centers for Medicare & Medicaid Services (CMS) recently released an informational bulletin outlining updates to Medicaid and CHIP included in the *One Big Beautiful Bill Act*, which is also known as the "Working Families Tax Cut" legislation. The bulletin features a summary of exceptions for American Indian and Alaska Native people in the Act (see page 32). CMS notes that it is still reviewing how these provisions affect AI/AN Medicaid beneficiaries and is committed to collaborating with tribes to develop further guidance. NCUIH has advocated to CMS to continue to consult with Tribes to ensure proper implementation of exemptions for American Indian and Alaska Native people.

Appendix D. Applicability to American Indians and Alaska Natives

This is a summary of the Tribal exceptions in the WFTC legislation. CMS is still analyzing the impacts of the provisions on American Indian and Alaska Native (AI/AN) Medicaid beneficiaries and is committed to continuing to work with Tribes on future guidance.

Section	Provision	Applicable to American Indians and Alaska Natives?
Section 71107	Eligibility Redeterminations	Does not apply to AI/ANs described in subsection (xx)(9)(A)(ii)(II)[58]
Section 71119	Requirement for States to Establish Medicaid Community Engagement Requirements for Certain Individuals	Does not apply to AI/ANs described in subsection (xx)(9)(A)(ii)(II)[59]
Section 71120	Modifying Cost Sharing Requirements for Certain Expansion Individuals under The Medicaid Program	Does not apply because existing cost sharing exemptions for certain American Indians and Alaska Natives are not changed by this section and still apply[60]

[58] Specifically, the exemption applies to: an Indian or Urban Indian (as such terms are defined in paragraphs (13) and (28) of section 4 of the Indian Health Care Improvement Act); a California Indian described in section 809(a) of such Act; or those who have otherwise been determined eligible as an Indian for the Indian Health Service under regulations promulgated by the Secretary.
[59] See footnote 45.
[60] See section 1916(j) of the Act.

- CMCS Informational Bulletin

Additional Information

On July 4, 2025, the President signed the One Big Beautiful Bill Act (OBBBA) into law. The OBBBA is a major bill that delivers many elements of President Trump's legislative agenda, including new

requirements for access to Medicaid and SNAP. Fortunately, Indians, Urban Indians, California Indians, and individuals determined eligible as an Indian for the Indian Health Service under regulations promulgated by the Secretary are exempted from the Medicaid requirements in the OBBBA and included in exemptions for the Supplemental Nutrition Assistance Program (SNAP) work requirements.

- Resource: Overview of the One Big Beautiful Bill Act Exemptions for American Indian and Alaska Native People (November 25, 2025)