NCUIH Calls for Meaningful Urban Indian Organization Engagement in State Implementation of New H.R. 1 Medicaid Community Engagement Requirements

Category: Policy Blog
written by Alex Sampson | September 17, 2026

On July 31, 2026, the National Council of Urban Indian Health (NCUIH) submitted written comments to the Centers for Medicare and Medicaid Services' (CMS) Administrator, Dr. Mehmet Oz, regarding CMS' interim final rule with comment period (IFC), "Medicaid Program; Community Engagement Requirement for Certain Individuals." In the written comments, NCUIH recommended that CMS advise states to engage meaningfully with Urban Indian Organizations (UIOs) through Urban Confer when developing, modifying, or implementing policies, procedures, or operational processes related to the American Indian and Alaska Native exclusion.

Background on the IFC

On July 4, 2025, the President signed the H.R. 1 into law. The H.R. 1 delivers many elements of President Trump's legislative agenda, including new requirements for access to Medicaid and Supplemental Nutrition Assistance Program (SNAP). Indians, Urban Indians, California Indians, and individuals determined eligible as an Indian for the Indian Health Service under regulations promulgated by the Secretary are excluded from the Medicaid requirements in the H.R. 1 and included in exclusions for the SNAP work requirements.

On June 3, 2026, CMS published the (IFC) in the Federal Register to interpret and implement the community engagement requirement in the H.R. 1.

NCUIH's Recommendations

In its comments, NCUIH recommended CMS:

- Advise states to accept self-attestation as sufficient to establish eligibility for the American Indian and Alaska Native exclusion
- Advise states to partner with UIOs, Tribes, and Tribal Organizations to prevent procedural disenrollments of American Indian and Alaska Native beneficiaries
- Require states to collect data on implementation of the American Indian and Alaska Native exclusion
- Use strong, consistent language in every instance of the final rule when discussing states not reverifying American Indian and Alaska Native status
- Advise states to engage meaningfully with UIOs through Urban Confer when developing, modifying, or implementing policies, procedures, or operational processes related to the American Indian and Alaska Native exclusion

NCUIH will continue to closely follow the development and implementation of CMS' final rule.

NCUIH Resources:

- **Overview of the Impact of Medicaid on Health Care for American Indian and Alaska**

Native People: This updated resource explains why Medicaid matters for American Indian and Alaska Native people and UIOs. It provides data, background, and information that UIO staff and leaders can use for education and understanding Medicaid's role in Native health care.

- **Medicaid Is Changing:** This quick-reference resource explains the new Medicaid work and renewal requirements, who may be protected by the American Indian and Alaska Native exemption, and the basic policy changes that staff, leaders, and patients should understand.