

What advocates can do to mitigate the harm of 34,000 Lawfully Present immigrants losing ConnectorCare coverage on January 1, 2026

August 26, 2025

On July 4, 2025, President Trump signed the Reconciliation Act, the GOP's tax and spending megabill making unprecedented cuts to health coverage programs. One of the first cuts to take effect is the elimination of Premium Tax Credit eligibility in 2026 for Lawfully Present immigrants with income that is less than 100% of the federal poverty level who are not eligible for Medicaid based on their immigration status.¹ Further restrictions in immigrant eligibility will take effect in Medicaid in October 2026, and in ConnectorCare and Medicare in January 2027.²

On August 14, 2025 the Health Connector announced that it will eliminate ConnectorCare Plan Type 1 effective January 1, 2026. Plan Type 1 now covers 34,000 Lawfully Present immigrants with income under the poverty level.³ The Health Connector has created a [webpage with updates about federal changes](#) affecting coverage through the Health Connector.⁴

Starting this August, the Health Connector will be sending out preliminary eligibility notices for 2026 to current ConnectorCare enrollees to give them an opportunity to update their information before final eligibility notices are issued later in 2025.



For most enrollees, this will be the first they have heard that their subsidized health coverage will end next year. As Lawfully Present immigrants, they will remain eligible for unsubsidized coverage and this may be an option for a few, but most with income at 100% FPL or less will not be able to afford the full cost of private coverage.

¹ Section 71302 of Pub. L. 119-21 (July 4, 2025).

² See this [Summary](#) from the Protecting Immigrant Families Coalition.

³ Federal law defines the minimum income for an “applicable taxpayer” as income equal to or greater than 100% FPL. 26 USC 36B(c)(1)(A) but the Health Connector regulations define Plan Type 1 as including individuals with income not in excess of 100% FPL. 956 CMR 12.04(1). Individuals in Plan Type 1 with income of exactly 100% FPL will still be eligible for Premium Tax Credits in 2026.

⁴ The announcement also eliminates Plan Type 3D. Plan Type 3D was part of a pilot program initiated in 2024 to extend ConnectorCare to people with incomes of 300-500% FPL. Plan Type 3D now enrolls 19,000 US citizens and Lawfully Present immigrants with income of 400%-500% FPL. Premium Tax Credit eligibility for individuals with income over 400% FPL is scheduled to expire on Dec.31, 2025. The Health Connector’s regulations limit ConnectorCare to individual’s eligible for Premium Tax Credits. 956 CMR 12.03.

Who is enrolled in ConnectorCare Plan Type 1?

As of August 2, 2025, there were over 34,000 individuals enrolled in ConnectorCare Plan Type 1. To be enrolled they must be:

- Massachusetts residents,
- Lawfully Present immigrants who are ineligible for MassHealth Standard, CommonHealth, CarePlus or Family Assistance based on their immigration status,
- Willing to file a federal tax return for the year they receive advance premium tax credits,
- With modified adjusted gross income of 100 % FPL or less,⁵ and
- Not enrolled in Medicare or eligible for other affordable insurance.

From the Health Connector we also know more about them as of July 2025:

- Most are aged 18-65, but 300 are under age 18 and 1300 are age 65 or older;
- 44% are enrolled in Tufts Direct, 43% in Wellsense, 9% in Fallon, 3% in MGB and the remainder in other plans;
- 42% are in mixed households with a child, spouse or other household member enrolled in MassHealth;
- 57% expected to have no MAGI income in 2025, and
- Among the 43% who report some MAGI income, their average income is 64% FPL.

Questions to ask clients and patients who may no longer be eligible for ConnectorCare Plan Type 1 that may lead to other coverage

MassHealth

- Do you have a “Qualified” immigration status that enables you to qualify for MassHealth instead of ConnectorCare? ⁶
 - This may be because of a change in status such as someone who was Lawfully Present based on a pending application for asylum with employment authorization who has now been granted asylum.
 - Or this may be someone who has more than one status such as a Haitian with TPS who was treated as Lawfully Present but who was initially paroled into the

⁵ See note 3 above. Plan Type 1 members with income of exactly 100% FPL will remain eligible for ConnectorCare in 2026.

⁶ See, MLRI, [Understanding Immigrants’ Eligibility for MassHealth and Other Subsidized Coverage, \(March 2025\)](#)

US or who has also applied for asylum and therefore is fully qualified as a “Cuban or Haitian Entrant.” ⁷

- Also look out for Lawful Permanent Residents who are treated as Qualified Barred but who have had any combination of Qualified statuses for at least 5 years or who should be exempt from the 5-year bar.
- Are you pregnant or has your pregnancy ended in the last 3 months?
 - MassHealth Standard is available during pregnancy and 12 months post-partum and is retroactive for up to 3 months.
- Do you have a medical condition that interferes with your ability to work?
 - MassHealth Family Assistance is available to low income Lawfully Present adults under 65 who have been certified as blind or determined disabled by MassHealth’s Disability Determination Unit at U Mass or by SSA. A disability must have lasted or be expected to last for 12 months. This process can take up to 90 days and begins by submitting a [disability supplement](#).
 - EAEDC is a cash assistance program available to Lawfully Present disabled adults with very low incomes and it has its own [disability criteria](#). Applications are through DTA. EAEDC recipients are automatically eligible for MassHealth.
- If you are Lawfully Present age 65 or older and ineligible for MassHealth due to assets-
 - Are you able to safely spend-down your assets?
 - Have you considered applying for EAEDC cash assistance? It no longer has an asset test (except for rest home residents). EAEDC recipients automatically qualify for MassHealth. It is administered by DTA.

ConnectorCare Plan Type 2 or 3

- Can you raise your annual income to 100% FPL or more in 2026?
 - If the estimated annual MAGI income of your tax household is 100% FPL or more, you may still qualify for ConnectorCare in 2026. Reductions in the size of your tax household as well as increases in your MAGI income may raise your income to 100% FPL or more.
 - Coverage in Plan Type 2A for people from 100 -150% FPL is still available with no member premium contribution, but there will be co-payments for certain services.
 - The Health Connector will use the 2025 FPL to determine eligibility for 2026. For purposes of 2026 coverage, the poverty level is \$15,650 for a household of one; \$21,150 for two, and \$26,650 for three.⁸

⁷ See MassHealth’s [Eligibility Operations Memo 22-03, Eligibility for Cuban and Haitian Entrants \(Feb 2022\)](#).

⁸ See this [Table](#), for the poverty level for larger family sizes.

- If your estimated income is 100% FPL or more but the income on your past tax return was lower, you may be asked to verify your estimated income. If your estimate turns out to be too high and the income reported on your taxes for the coverage year is under 100% FPL, the IRS has in the past treated taxpayers as if their income were 100% FPL so long as they had not intentionally or recklessly supplied incorrect information to the Marketplace.⁹

Student Health Insurance

- Will you be a post-secondary student in 2026?
 - In Massachusetts full-time post-secondary students are required to either purchase health insurance offered by their schools or show they have other comparable coverage.¹⁰ International students enrolled in Plan Type 1 in 2025 who obtained a waiver of the requirement to purchase student health insurance will have another opportunity to purchase student health insurance in 2026 when they are disenrolled from ConnectorCare.
 - The Health Connector regulates Student Health Insurance, and, under its rules, students who lose their other health insurance have 60 days to sign up for the school's health insurance with premiums prorated based on the month of enrollment in the student plan.¹¹

Other Affordable Coverage Options

- Do you have a family member with employer-sponsored insurance that covers dependents?
 - 4,700 Plan Type 1 members are under 26 and could be eligible for coverage under the plan of a parent with employer-sponsored coverage that covers dependents. There may be no added premium cost if the parent already has family coverage for other family members.
 - 42% of Plan Type 1 members are living with a family member who qualifies for MassHealth. A child or spouse enrolled in MassHealth who has access to family coverage from an employer may be able to obtain MassHealth premium assistance to enroll in a family plan that will also cover the Plan Type 1 member.
- Are you HIV-positive?
 - There is a public health program that assists HIV-positive uninsured individuals with the costs of obtaining HIV medication or health insurance coverage that includes

⁹ See the [2024 instructions for Form 8962 Premium Tax Credits](#) which describe this good faith mistake exception to the 100% minimum income rule in the instructions for completing line 5.

¹⁰ Whether students can obtain a waiver will depend on the school's policies, but if waivers are allowed, ConnectorCare counts as comparable coverage. See, 956 CMR 8.05.

¹¹ See [956 CMR 8.04\(2\)\(g\)](#).

coverage for HIV medication. Information about how to apply is here:

<https://crihealth.org/drug-assistance/hdap/>

Health Safety Net and MassHealth Limited

If ConnectorCare Plan Type 1 members lose their health coverage and become uninsured, almost all will still be eligible for the Health Safety Net and MassHealth Limited. The Health Safety Net reimburses acute care hospitals and community health centers for treating uninsured and underinsured state residents and protects them from medical debt. MassHealth Limited only pays for treatment of emergency medical conditions. To obtain these benefits, it will be important to respond to all requests for information in a timely way. ConnectorCare, MassHealth and the Health Safety Net all use a common application form, and failure to respond can result in loss of all benefits.

This fact sheet was prepared by the Massachusetts Law Reform Institute and is current as of August 25, 2025. If you know of other programs that assist with the costs of health insurance coverage or have other questions or comments about this fact sheet, please email vpulos@mlri.org.