

Apple Health Data Privacy

This document provides detailed information for Apple Health (Medicaid) clients, partners, and community-based organizations. We encourage all interested parties to read the full document.

You can also view [frequently asked questions from partners and community](#).

At a glance

What happened?

We believe, but cannot confirm that personal information, such as names, addresses and phone numbers kept by Centers for Medicare & Medicaid Services (CMS), the federal agency that operates Medicaid, was shared with the Department of Homeland Security, (DHS). The Health Care Authority (HCA) learned about this from a news story published on June 13, 2025.

Why did this happen?

According to the news story, CMS was ordered to turn this data over by the leadership of the Department of Health and Human Services (HHS). HHS is the federal agency that oversees several of the Nation's health care programs.

Whose personal information was shared?

We are working to confirm what was reported in the news story but don't yet know exactly what information CMS shared with DHS. We are concerned that DHS has access to the personal information of people receiving services through most Apple Health (Medicaid) programs.

Why does CMS have this information?

Most Apple Health programs pay for services using state and federal dollars. If federal dollars are used to pay for an Apple Health program, we are required to share personal information with CMS.

What data is HCA required to share with CMS?

When a service or program receives federal dollars, HCA is required to share payment, enrollment, and health care visit information with CMS. This information contains two separate datasets, one for claims and health care visits, and one for enrollment and eligibility. Both these datasets contain Apple Health client identifiers.

Why did people enrolled in Apple Health Expansion have their information shared with CMS?

HCA set up Apple Health Expansion as a managed care program. Even though most Apple Health Expansion services are funded by the state, federal dollars are used to deliver the cost of emergency health care visits provided to people enrolled in Apple Health Expansion. As a result, all people enrolled in Apple Health Expansion were and continue to be included in the enrollment files submitted to CMS.

Was my immigration status shared with CMS?

When HCA submitted information to CMS for Apple Health Expansion enrollees, immigration status for almost everyone was reported as ‘qualified non-citizen’ or an emergency services recipient. A very small number of people were categorized as ‘other’.

How will this information be used by DHS?

We don’t know with certainty but are concerned this information may be used for immigration enforcement.

Why didn’t HCA stop CMS from sharing this information?

It is our understanding that historically and by law, this information had never been shared before the Trump administration ordered CMS to turn it over. HCA was not asked if this data could be shared and would not have consented to sharing it with DHS. To this date, HCA has not been informed by the federal government that this information was shared. We were alerted through the news story. We have asked CMS to tell us exactly what information was shared and who it was shared with. We are waiting for CMS’s response.

What if I change my address?

Address changes are updated in HCA’s information system monthly. Because we are required to submit monthly files to CMS, updated address information will eventually be sent to CMS.

If a client cancels their Apple Health Expansion or other Apple Health coverage, will their information stop being shared?

All the information that has already been shared with CMS will stay in their system. Future monthly submissions will show that people are no longer enrolled in the program; however, a person’s name and other personal information cannot be removed.

Did HCA share information with CMS they weren’t required to submit for people enrolled in Apple Health Expansion?

Every time an individual enrolled in Apple Health Expansion seeks emergency services, the federal government requires that individual’s personal data to be submitted as part of the record of that medical encounter. That practice has gone on for many years through previous federal administrations.

However, HCA’s prior practice has been to share information with CMS about non-emergency medical visits and emergency services delivered to Apple Health Expansion enrollees. Because Apple Health Expansion non-emergency medical visits are funded only with state dollars, this information was not necessary to share.

Upon discovery that this non-emergency encounter data had been submitted, HCA took steps to stop this practice. As of May 2025, non-emergency medical visit information is no longer being shared for people enrolled in Apple Health Expansion.

Health care visit information for emergency services will continue to be shared. However, the same personally identifiable information found in the medical visit information is also found in the enrollment file, which must be shared as noted above. Information for all program enrollees is contained in the enrollment file regardless of what services were received.

What should clients do if they are worried about DHS having their information?

If you think clients you support have had their information shared with DHS, refer them to [Know Your Rights: Civil Immigration Enforcement in Washington | Washington for All](#).

For more information about how public benefits may affect their immigration status, visit [USCIS public charge processes and procedures](#).

Key Facts

- The state is required to share names, addresses, phone numbers, and details about health care visits, for all individuals enrolled in any Apple Health program that relies in part on federal funding with the Centers for Medicare & Medicaid Services (CMS).
- Apple Health Expansion is inclusive of emergency medical services, which are partly funded using federal dollars. The state is required to share names, addresses, and phone numbers for all Apple Health Expansion program enrollees with CMS. For those who receive emergency medical services, their health care visits information is also included in the reporting to CMS.
- On June 13, 2025, HCA discovered that CMS, an agency overseen by the U.S. Department of Health and Human Services (HHS) shared Medicaid data with the Department of Homeland Security (DHS). HCA does not know what type of data was shared with DHS. The state did not give permission to CMS to share this data with any other federal agencies. The State of Washington shared data with CMS with the understanding that it would be used for health care related purposes only and it strongly opposes the sharing of Medicaid data with other federal agencies.
- HCA does not share the immigration documentation status of non-citizen Apple Health clients with CMS. The state is required to share names, addresses, phone numbers, and details about the health care visits of non-citizen Apple Health clients for services that are wholly or partially funded by federal dollars.

Looking for something specific? Click the links below to learn more.

[Impact on Apple Health clients](#)

[Required reports and details](#)

[Impact on Apple Health Expansion clients](#)

[Impact on non-citizens receiving Apple Health services](#)

[Other frequently asked questions, including:](#)

[What is the state doing to protect client information?](#)

[What do Apple Health clients need to know about their privacy?](#)

[What should community partners do if they think client's information has been shared?](#)

Frequently asked questions – partners & community

Overview

The Centers for Medicare & Medicaid Services (CMS), an agency overseen by the U.S. Department of Health and Human Services (HHS), requires the Health Care Authority (HCA) to submit many reports as a condition of receiving federal funding for Apple Health programs and health care services, including Medicaid and the Children's Health Insurance Program (CHIP).

The state uses federal funding to support whole programs like Medicaid and CHIP. There are other programs that the state uses funding from the federal government to pay for certain services, but not the whole program like Apple Health Expansion or Apple Health for Pregnant Individuals for non-citizens. If the state uses federal funding for a program or for a service, the state is required to provide data to CMS about Apple Health clients and the health care services they receive.

There are different requirements for programs that are provided through a managed care organization. If Apple Health clients have participated in a program that is federally funded or received services the state pays for using federal dollars, the state has shared their name, address, and phone number with CMS.

In late April 2025, HCA discovered Apple Health Expansion enrollee data had been shared with the federal government since the beginning of the program in July 2024. HCA reported this discovery directly to the Governor's Office. The Governor immediately took action and directed HCA to terminate the data sharing for all enrollees unless it's required to receive federal funding for certain services.

On June 13, 2025, Washington became aware that CMS shared Medicaid data from a number of states with the Department of Homeland Security (DHS). This data sharing occurred without HCA's knowledge or consent. The Governor's Office is working directly with HCA to respond to this issue.

Protecting the dignity, privacy, and access to care for all Washingtonians remains HCA's priority, and we are exploring all available options to respond. We are evaluating other ways to provide much-needed health care services, including emergency medical care, that would further limit the enrollment data shared with CMS. HCA is consulting with the Governor's Office, Office of Financial Management (OFM), and other partners and stakeholders and is committed to making necessary programmatic changes as soon as feasible.

For more information, read [HCA's statement on use of Apple Health \(Medicaid\) client data](#).

Impact on Apple Health clients

Apple Health programs cover nearly 2 million clients, including individuals with various immigration statuses, gender identities, ages, disabilities, and health care needs. For all programs that receive full or partial funding from the federal government, HCA is required to share health care information with CMS.

This information includes client names, addresses, phone numbers, the type of health care services that were provided, and the name and address of the health care provider who delivered these services. This information is intended only to be used to improve health care programs and not for non-health care related purposes.

Prior to the notification that CMS was sharing Medicaid data with DHS on June 13, 2025, CMS was asking questions about two reports that HCA submits, the CMS-64 and the Transformed Medicaid Statistical Information System (T-MSIS).

Required reports

The first report, CMS-64, is a quarterly report submitted by HCA and all other states seeking federal funding to support its programs. The CMS-64 provides aggregate data about the state's expenses for all programs and services that are federally funded.

As part of CMS' oversight activities, they may request additional information about the state's CMS-64. The state provides responses to these requests, and sometimes those responses include client level data.

The second report, T-MSIS, is submitted by all states monthly. T-MSIS collects Medicaid and CHIP data from states, territories, and the District of Columbia into the largest national resource of beneficiary information. This data has historically been used to support research and policy development for CMS program administration. HCA is required to share data about all clients and health care services that are funded by federal dollars. HCA is not required to report information about individuals receiving services that are funded only by state dollars.

Information in T-MSIS report

The T-MSIS report contains two types of datasets:

- The first T-MSIS dataset contains enrollment and eligibility data including client's names, addresses, and phone numbers for all Apple Health clients. HCA is required to submit enrollment data for all Apple Health clients enrolled in a managed care plan. In addition, data for any fee-for-service clients who received any medical service that qualifies for federal funding must also be reported.
- The second T-MSIS dataset contains health care claims and encounter data. This data includes details about services delivered to Apple Health clients, the location where those services were delivered, and the provider's name and addresses. HCA is required to provide this data for all services that receive federal funding.

The information shared in the T-MSIS report does not include information about whether an individual's immigration status is undocumented or not. It is important to note that eligibility data for Apple Health Expansion enrollees denotes that the individual in the record is not otherwise eligible for Medicaid. For more information see the state's response to the question "[What impact does this have on noncitizens enrolled in Apple Health?](#)"

T-MSIS enrollment data is refreshed on a monthly basis. Each month, the agency adds new enrollees' information to the enrollment file. If an individual is disenrolled from an Apple Health program, their information is retained, and the end date of their enrollment period is updated on the report.

Report details

View the table below to learn about what data was submitted in which reports.

Details	CMS-64	T-MSIS: Enrollment and eligibility dataset	T-MSIS: Claims and encounters dataset
Frequency of submission	Quarterly	Monthly	Monthly
Data submitted	Aggregated financial data	Personally Identifiable Information (PII): Client-level eligibility and demographic data	Protected Health Information (PHI): Client-level diagnoses, procedures, services, providers, and payments data
Personal information submitted	No	Yes: Client ID, name, address, phone, immigration status*	Yes: Client ID which links to Enrollment dataset
*Immigration status submitted	No	Yes: For Apple Health Expansion enrollees: <ul style="list-style-type: none"> • 85% are noted as emergency services recipients, • 14% are noted as qualified non-citizens, and • 1% are noted as other. 	Yes: Client ID which links to Enrollment dataset
Apple Health Expansion client data submitted	Aggregated financial data	Yes: Client ID, name, address, phone, immigration status*	Yes: Only if client receives a federally funded service such as emergency medical services
How long does a client's data persist in the submitted dataset	N/A	<ul style="list-style-type: none"> • New enrollees are added each month to the dataset, which includes all enrollees whose data were previously submitted, • If an individual disenrolls, their information is retained in future monthly data submissions, and the end date of the enrollment is updated, and • When a client updates their information in Washington Healthplanfinder, the updated information is included in the data submission in the following month. 	<ul style="list-style-type: none"> • Only contains claims and encounters for which federal funds were used to pay for all or part of the service, • Contains claims and encounters from the previous calendar month, and • May contain claims and encounters from the months prior to the previous month if they have been updated.

Impacts on Apple Health Expansion clients

When developing the Apple Health Expansion program in 2024, the state decided to seek federal funding where it is possible to maximize state funding and access to the program. The Apple Health Expansion services that are eligible for federal funding include emergency services, cancer and dialysis treatment, and post-transplant care. These services are sometimes referred to as AEM or emergency medical.

Apple Health Expansion is a managed care program that receives some federal funding. HCA is required to submit both the T-MSIS eligibility and enrollment and claims and encounter datasets. HCA began submitting this data to CMS in July 2024. This data includes Apple Health Expansion client's names, addresses, phone numbers, and details about the health care services clients received.

In April of 2025, HCA discovered that it was sharing both the required data detailing the federally funded services received by Apple Health Expansion clients and the state funded services in its T-MSIS data submission. The state is not required to submit details about state funded services and as of May 2025, HCA stopped sharing this data.

HCA now only submits the required T-MSIS data subsets: claims and encounters for clients who have received emergency services and eligibility and enrollment for all Apple Health Expansion clients, regardless of the type of services they've received.

As noted above, the information shared in the T-MSIS report does not include an individual's immigration status, including if they are undocumented or not. For clients enrolled in Apple Health Expansion, their immigration status is reported as follows:

- 85% are noted as emergency services recipients,
- 14% are noted as qualified non-citizens, and
- 1% are noted as other.

It is important to remember that T-MSIS enrollment data is refreshed on a monthly basis. This means that the enrollment and eligibility data for Apple Health Expansion remains in the data shared with CMS.

For more information, see the state's response to the question "[What is the state doing to protect client information?](#)" below.

Impacts to non-citizens receiving Apple Health services

HCA is required to share names, addresses, phone numbers, and details about health care for any individual enrolled in an Apple Health program that receives federal funding.

For non-citizens who receive federally funded Apple Health services without a managed care plan, HCA sends both T-MSIS datasets anytime a client receives services. For example, if an Apple Health client receives services in an emergency room, HCA is required to report the client's enrollment and eligibility and the claim or encounter data for that visit to receive federal funding. This means the client's name, address, phone number, and the details about the services are provided to CMS.

For more information, see the state's response to the question "[What is the state doing to protect client information?](#)" below.

Partners and community - Frequently asked questions

Why does HCA submit reports to the HHS?

Federal statutes and Centers for Medicare & Medicaid Services (CMS) regulations require every state to submit reports as a condition of receiving federal funding for Medicaid and Children's Health Insurance Program (CHIP) services. Health Care Authority (HCA) sends the reports to CMS, which is part of the Department of Health and Human Services (HHS).

What information is shared with CMS?

HCA, similar to all state Medicaid agencies, is required to share names, addresses, phone numbers, and details about their health care visits, for all individuals enrolled in any Apple Health (Medicaid) program (including Apple Health Expansion) that relies on partial or full federal funding.

HCA does not report information to CMS about people on the waitlist for Apple Health Expansion unless the person receives health care services under a different federally funded Apple Health program (such as emergency Medicaid, referred to as AEM). HCA does not share information with CMS about individuals who were denied Apple Health coverage and who never enrolled in an Apple Health program.

For more information, see the state's response to the question "[What is the state doing to protect client information?](#)" below.

Did CMS ask or inform the state of Washington before releasing data to the Department of Homeland Security (DHS)?

- The state was not asked before CMS released data to DHS.
- The state was not informed in advance that any information we submitted to CMS would be shared with DHS.
- The state did not have any opportunity to weigh in or intervene before CMS transferred information to DHS.
- HCA cannot confirm exactly what data has been shared at this point. We have asked CMS for clarification.

Why did the state release the data to CMS? Was this routine?

- The reporting from HCA to CMS is routine and required to maintain compliance with federal Medicaid law, as a condition of the state receiving federal Medicaid funding.
- CMS has not confirmed the nature or extent of the data it provided to DHS.
 - Until the state receives clarification from CMS, we must assume CMS provided DHS with all the data HCA provided to CMS in its federally required monthly reporting.
- The state was not made aware that any of this data would be repurposed beyond administering the Medicaid program.

- We have serious concerns about the ethical appropriateness of CMS sharing this data with federal entities not directly involved in Medicaid, especially since the data may include both personally identifiable information and protected health information.

Did the state do anything to protect the data or identity of undocumented immigrants who enrolled in an Apple Health program?

- The information that HCA shared with CMS does not disclose an individual's immigration documentation status. However, this reporting does disclose if an individual reports as a qualified non-citizen, lawfully present, emergency services recipient, or "other."
- CMS did not inform the state that HCA submitted data would be used outside the Medicaid context. As a result, there was no opportunity for HCA to apply additional safeguards in this instance.
- HCA strongly opposes the misuse of health data in ways that compromise privacy or trust, especially for communities that may already face barriers to care.

What is the state doing to protect client information?

- The state is taking steps to limit data-sharing to the extent possible. This includes limiting information shared regarding the health care services that clients receive unless data sharing is required by law.
- The state has stopped sharing medical services (claims) information for all Apple Health Expansion enrollees, except claims for received emergency services, cancer or dialysis treatment, or post-transplant care.
 - For these specific services, the state must continue sharing information with CMS, because they are supported by federal funding. All individuals enrolled in Apple Health Expansion currently have their personal information included in the data submission.
- HCA is exploring other ways to provide much-needed health care services, including emergency medical care, that would further limit the enrollment data shared with CMS. HCA is consulting with the Governor's Office, Office of Financial Management (OFM), and other partners and stakeholders and is committed to making necessary programmatic changes as soon as is feasible.

What impact does this have on noncitizens enrolled in Apple Health?

- HCA is required to share names, addresses, phone numbers, and details about their health care for any individuals enrolled in an Apple Health program that receives federal funding.
- **The information that HCA shared with CMS does not disclose whether an individual is documented or not.** However, this reporting does disclose if an individual reports as a qualified non-citizen, lawfully present, emergency services recipient, or "other". [View the Citizenship and Immigration Status Guide for more information.](#)
- Information about Apple Health Expansion enrollees has been included in this report since the start of the program in July 2024. This is because the program is partially supported by federal

funds and HCA is required to provide information to CMS for all enrollees where a program is funded in part by federal funds.

- HCA is taking steps to ensure it submits to CMS only the required information for all programs. Note, if a client is enrolled in Apple Health Expansion, their enrollment data and data about any services received in an emergency room, cancer or dialysis treatment, or post-transplant care, are required to be reported to CMS.
- If a client has received, or is receiving, services included in emergency Medicaid (AEM), but are not enrolled in Apple Health Expansion, the state must share their information with CMS to receive the federal funding it relies on to provide these services.

What happens if Apple Health Expansion enrollees change their address?

- When a current or former Apple Health Expansion enrollee updates their address or contact information, that updated information is included in the next month's T-MSIS enrollment file submission.
- CMS retains the previously submitted T-MSIS files and will continue to have access to both the current and updated address and contact information.
- Clients who wish to change their address can visit hca.wa.gov/report-a-change to learn how. Instructions are available in many languages.

What do Apple Health clients need to know about their privacy?

We want all Apple Health clients to know:

- HCA is committed to keeping their health information safe in compliance with state and federal law.
- If a client is enrolled in an Apple Health program that receives federal funding, including Apple Health Expansion, their name, address, phone number, certain claims data, and health care services information has been shared with CMS, as federal law requires us to do.
- HCA cannot control how CMS uses submitted data despite legal protections restricting data use.

What should community partners do if they think their client's information has been shared?

If you think clients you support have had their information shared with DHS, refer them to [Know Your Rights: Civil Immigration Enforcement in Washington | Washington for All](#).

For more information about how public benefits may affect their immigration status, visit [USCIS public charge processes and procedures](#).