

The Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES
STATE HOUSE, BOSTON 02133-1054

MINDY DOMB
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3rd Hampshire District
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CHAIR
Chair, Joint Committee on
Mental Health, Substance Use
& Recovery

June 24, 2026

Secretary Robert F. Kennedy
Department of Health and Human Services
200 Independence Ave, SW
Washington, DC 20201

Dr. Mehmet Oz
Administrator for Centers for Medicare and
Medicaid Services
7500 Security Blvd.
Baltimore, MD 21244

Opposition to CMS-2454-IFC

Dear Secretary Kennedy and Administrator Oz,

I am writing to express my strong opposition to CMS-2454-IFC, which further restricts access to Medicaid. I wholeheartedly oppose work requirements outlined in Section 1902xx of the Social Security Act and the Community Engagement Requirement for Certain Individuals Interim Final Rule, Docket CMS-2454-IFC. It increases the harm done in Section 1902xx by making access to healthcare uniquely challenging for those with chronic illnesses like cancer, human immunodeficiency virus (HIV), multiple sclerosis (MS) and Amyotrophic Lateral Sclerosis (ALS), and those with intellectual and developmental disabilities.

An individual's ability to seek medical care should not be tied to their economic output. Section 1902xx of the Social Security Act was one of many provisions in the July 4th, 2025 H.R. 1 bill that punished poverty and contributed to the erosion of a social safety net under the guise of motivating economic output. Not only is this inhumane, but it is misguided; [the vast majority](#) of medicaid enrollees who will become subject to these rules already meet these work and community engagement requirements.

For those with chronic illnesses, however, the new definition of "medically frail" in CMS-2454-IFC may cause enrollees who experience fluctuating symptoms and/or treatment side effects to be ineligible for a waiver and force them to meet work requirements despite their incapacitating condition. For example, for a patient undergoing radiation meeting the 80 work hour minimum per month may be manageable some of the time. However, appointment changes and side effects can be experienced inconsistently. This could prevent the enrollee from meeting



the 80 hour measure during some months. With the acceptance of CMS-2454-IFC, an enrollee in this situation would lose their medicaid coverage.

With a serious medical condition, enrollees also may be unable to complete the necessary paperwork to prove that their condition interrupts their ability to work. In addition to proving that the individual has a serious medical condition, the individual must also prove that their ability to work is compromised. For those who are unable to work due to their medical condition, extraneous and complex paperwork may be prohibitively burdensome. This could result in a loss of coverage for those who are simply too sick to jump through arduous administrative hoops because of the qualifying medical condition.

For those with intellectual and developmental disabilities, accessing services through the Department of Developmental Services (DDS) in many states like Massachusetts requires individuals to demonstrate that they have an intellectual disability as defined by law. This definition requires proof of mental or physical impairment that results in substantial functional limitations, among other requirements. CMS-2454-IFC requires individuals prove they cannot work, even if they already meet the Massachusetts definition. Using the state's measure would reduce the time, resources, and energy needed to meet the exemption.

Lastly, this narrow definition of medical frailty will compound the administrative cost burden to states. The verification process will require additional staff to process paperwork and answer applicant's questions, thereby **increasing the administrative cost to states while limiting consumer access to medical care.**

The Trump Administration has outlined two reasons for work requirements to be included in Medicaid requirements: to increase social connection, and to limit healthcare to only those who are "deserving." While social connection is important, access to high quality doctors and life saving medicine cannot be replaced and should not be contingent on employment or education. **No one is undeserving of high quality medical care.**

I oppose the work requirements in Section 1902xx of the Social Security Act and CMS-2454-IFC in its entirety, and urge this rule be withdrawn and Section 1902xx work requirements be repealed.

Sincerely,

A handwritten signature in black ink, appearing to read "Mindy Domb", with a stylized, cursive script.

MINDY DOMB

State Representative

3rd Hampshire District