MedChi
The Maryland State Medical Society

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MEDCHI JOINS AMA AND NATIONAL PHYSICIAN ORGANIZATIONS IN CHALLENGE TO FEDERAL MEDICAID WORK REQUIREMENT RULE

Amicus brief argues federal regulations exceed congressional authority, threaten patient access to care, and create unnecessary administrative burdens

BALTIMORE**,** October 30, 2026 — MedChi, The Maryland State Medical Society, has joined the American Medical Association (AMA) and several national physician organizations in filing an amicus brief challenging federal regulations that could make it more difficult for individuals with serious or complex medical conditions to qualify for an exemption from Medicaid work requirements.

The brief, filed in the U.S. District Court for the District of Maryland in *Taylor v. Kennedy*, supports the plaintiffs' motion for summary judgment and argues that the Centers for Medicare & Medicaid Services (CMS) exceeded its statutory authority by imposing additional restrictions on the medical frailty exemption established by Congress under H.R. 1, the One Big Beautiful Bill Act.

Under the law, individuals who are medically frail, including those with substance use disorders or serious or complex medical conditions, are exempt from Medicaid work requirements. However, the challenged federal regulations require individuals to demonstrate that their medical conditions significantly impair their ability to comply with those requirements. The physician organizations argue that Congress did not authorize this additional standard.

The brief also raises concerns about restrictions on states' ability to accept individuals' self-attestation of medical frailty. These restrictions could require patients to obtain additional medical documentation to maintain coverage, increasing administrative burdens and the risk that eligible individuals will lose access to essential health care services.

MedChi CEO, Gene Ransom, states, "Medicaid policy should improve access to care, not create administrative barriers that prevent eligible patients from receiving needed services. Work requirements must not disrupt continuity of care or cause vulnerable Marylanders to lose coverage because they cannot navigate additional bureaucratic hurdles."

Medicaid expansion provides health coverage to approximately 20 million Americans. Research cited in the brief links Medicaid expansion to improved access to treatment and lower mortality among people with serious conditions, including cancer and cardiovascular disease. The organizations warn that unnecessary coverage disruptions could undermine these benefits and compromise continuity of care.

The challenged regulations could also place additional responsibilities on physicians who may be asked to assess patients' eligibility for medical frailty exemptions without clear clinical standards. The resulting administrative work could divert time from patient care and strain the physician-patient relationship.

In addition to supporting the plaintiffs' motion for summary judgment, the AMA, MedChi, and the other physician organizations are asking the court to vacate the challenged provisions of the federal regulations. The brief emphasizes that Congress intended the medical frailty exemption to protect individuals with qualifying medical conditions without requiring them to separately prove that their conditions impair their ability to meet work requirements.

Joining the AMA and MedChi in the brief are the American Academy of Family Physicians, American Academy of Hospice and Palliative Medicine, American College of Emergency Physicians, American College of Obstetricians & Gynecologists, American Society of Addiction Medicine, Association for Clinical Oncology, and American Thoracic Society.

The filing follows other legal challenges to the federal Medicaid work requirement regulations, including *Massachusetts v. Oz*, in which 25 states and the District of Columbia challenged portions of the rule. The AMA, the Massachusetts Medical Society, and other physician organizations have also filed amicus briefs supporting legal challenges to those provisions.

MedChi will continue to advocate for policies that protect access to medically necessary care, preserve continuity of coverage for eligible Marylanders, and minimize unnecessary administrative burdens on patients and physicians.

About MedChi

MedChi, The Maryland State Medical Society, is a non-profit membership association of Maryland physicians. Formed in 1799, it is still the largest physician organization in Maryland today. The mission of MedChi is to serve as Maryland's foremost advocate and resource for physicians, their patients, and the public health of Maryland. For more information, please visit www.medchi.org.