

Action Alert: Tell CMS to Stop Harmful Medicaid Work Reporting Requirements (Comments Due July 31, 2026)

The Centers for Medicare and Medicaid Services (CMS) just released a new interim final rule (IFR) that tells states how to implement **mandatory Medicaid work reporting requirements**¹—changes tied to **H.R. 1**, passed by Congress in July 2025.

Here's the problem: **most people on Medicaid are already working, in school, caregiving, or managing a health condition or disability**. Work reporting requirements don't "encourage work"—they create paperwork, confusion, and system errors that can cause eligible people to **lose coverage**.

CMS is accepting public comments on this rule until **July 31, 2026**—and **your voice can make a real difference**.

Why Your Comment Matters²

When a federal agency changes rules, it's required to ask the public for input under a law called the **Administrative Procedure Act**. That means:

- **CMS must review the comments submitted.**
- Public comments become part of the official record used to justify—or challenge—the rule.
- If the rule is finalized and challenged in court, **comments help build the case** to stop harmful policies.

Even a short comment helps.

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¹ Families USA. (July 7, 2026). Medicaid work reporting requirements interim final rule comment guide. Retrieved from [Families-USA-Medicaid-Work-Reporting-Requirements-IFR-Comment-Guide.pdf](#)

² Youdelman, Mara & Douglas, Dania. (November 2025). Do my comments really matter? Demystifying the public comment process. National Health Law Program. Retrieved from [Do My Comments Really Matter? Demystifying the Public Comment Process \(Updated November 2025\) - National Health Law Program](#)

Template Comment (copy/paste + personalize)

Below is a brief template to assist you in filling out and submitting your own comment for the public record. Use as much or as little as you'd like—whatever makes you the most comfortable.

My name is [insert your first and last name] and I live in [insert your city and state]. I rely on Medicaid for my health care and I oppose this interim final rule.

The Administration's proposed rules on work requirements take an extremely strict approach to medical frailty exemptions, making it harder for people with serious illnesses to receive and/or maintain their health coverage—including people with serious mental health conditions like eating disorders.

I live with an eating disorder [insert specific eating disorder(s) if desired] [insert additional health conditions, if desired/applicable]. My ability to work can change depending on my mental illness. [Optional: add 1–2 sentences about how symptoms, treatment, relapse, or appointments affect work.]

Additionally, the IFR would remove my ability to self-report my medical condition after next year. Requiring documentation from a medical provider every 12 months (or more often) is burdensome and stigmatizing, and it creates unnecessary barriers to health coverage.

These requirements set people up to lose Medicaid due to paperwork—not because they are ineligible. Losing coverage would put my health at risk and ultimately increase costs for me, my family, and the state.

I ask that the Administration not finalize this interim final rule as written.

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How to Submit Your Comment (takes ~ 5 minutes)

1. **Go To:** [Federal Register :: Medicaid Program; Community Engagement Requirement for Certain Individuals](#) and your screen should look like this:

Medicaid Program; Community Engagement Requirement for Certain Individuals

A Rule by the Centers for Medicare & Medicaid Services on 06/03/2026



Comments on this document are being accepted at Regulations.gov.

SUBMIT A PUBLIC COMMENT

4076 comments received. [View posted comments](#)

This document was corrected by a document published on 06/29/2026.

VIEW CORRECTION

PDF

Document Details

Document Dates

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DOCUMENT HEADINGS
Department of Health and Human Services
Centers for Medicare & Medicaid Services
42 CFR Parts 431, 435, 438, 457, and 600
[CMS-2454-IFC]
RIN 0938-AV98

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2. Click on the **green button** that says “**SUBMIT A PUBLIC COMMENT**” and this page will come up:

Thank you for taking the time to create a comment. Your input is important.

Once you have filled in the required fields below you can preview and/or submit your comment to the Health and Human Services Department for review. All comments are considered public and will be posted online once the Health and Human Services Department has reviewed them.

You can view [alternative ways to comment](#) or you may also comment via Regulations.gov at <https://www.regulations.gov/commenton/CMS-2026-2047-0002>.

Comment *

3. You can:

- Type your comment into the text box; or
- Copy and paste your comment into the text box; or
- Attach your comment by clicking the **green button** that says “+ Add a file”

4. In the drop-down menu that says “**What is your comment about**” select “**Health Plan or Association**”

Scroll Down



5. Scroll down and complete the rest of the form by including:

- Your email
- Checking the “An individual” in response to the “Tell us about yourself!” “I am...” question
- Your first and last name
- Checking the “I read and understand the statement above”
- Click the **SUBMIT COMMENT** button

Email

this will NOT be posted on regulations.gov

☐ Opt to receive email confirmation of submission and tracking number?

Tell us about yourself! I am... 

 ☐ An Individual

 ☐ An Organization

 ☐ Anonymous

You are filing a document into an official docket. Any personal information included in your **comment text and/or uploaded attachment(s)** may be publicly viewable on the web.

☐ I read and understand the statement above.

[Preview Comment](#)

Please review the [Regulations.gov privacy notice](#) and [user notice](#) .

You're all done! Thank you for your advocacy!