

June 10, 2026

NDSC Statement on CMS Final Rule on HR1 Work Requirements

Washington, D.C. – The National Down Syndrome Congress (NDSC) is reviewing the [interim final rule](#) recently released by Centers for Medicare & Medicaid Services (CMS) implementing the Medicaid community engagement, or work requirement, provisions enacted as part of H.R. 1. The rule requires certain adults in the 31 states and the District of Columbia who are enrolled in Medicaid through the Affordable Care Act expansion pathway to document at least 80 hours per month of work or other qualifying activities in order to maintain coverage. NDSC is deeply concerned that these requirements will cause eligible individuals, including many people with disabilities, to lose healthcare coverage due to administrative barriers, paperwork burdens, and reporting requirements.

Many people with Down syndrome receive Medicaid through the Supplemental Security Income (SSI) disability pathway or another disability-based eligibility pathway and therefore will not be subject to these requirements. However, people with disabilities enrolled through the Medicaid expansion pathway will be directly affected by the rule's restrictive approach to the medical frailty exemption and may face additional documentation and verification requirements to maintain coverage. More broadly, NDSC remains opposed to Medicaid work requirements, which have historically resulted in significant coverage losses and unnecessary administrative complexity without improving employment outcomes.

While we have serious concerns about the rule overall, NDSC supports the broad family caregiver exemption, which excludes parents, guardians, caretaker relatives, and family caregivers of a dependent child or person with a disability from the work requirements. Family caregivers play a critical role in helping people with disabilities live, work, and participate in their communities, and caregiving should be recognized as valuable work. NDSC will be submitting comments to CMS and encourages advocates to share their experiences and perspectives with CMS before the July 31, 2026 deadline.