



# Medicaid Work Requirements and What the SCD Community Needs to Know

## Background

On June 1, 2026, the Centers for Medicare & Medicaid Services (CMS) issued a rule that requires certain Medicaid enrollees to show they are working, volunteering, or participating in other “qualifying activities” for **at least 80 hours each month**. This rule takes effect July 31, 2026 and must be implemented by state Medicaid offices by January 1, 2027.

This FAQ provides information about the rule as well as how the sickle cell disease (SCD) community may be affected.

## ◇ The Basics ◇

### Who will be impacted by this rule?

◇ The rule applies to non-pregnant adults ages 19–64 who are enrolled in Medicaid under the adult expansion group and are not co-enrolled in Medicare.

### How does CMS define a “qualifying activity”?

◇ Those affected can meet the work requirement through any combination of the following activities, as long as the total time spent on these activities adds up to 80 hours each month:

- Employment
- Participation in a work program
- Community service or volunteering
- Enrollment in schooling at least part-time
- Earning at least \$580/month

### How do I show proof of employment?

◇ **If you are a new applicant**, you must meet the work requirement for at least one month before applying for Medicaid coverage.

**If you are a current enrollee**, you must show compliance with the requirement at your next renewal. States retain the option to check compliance more frequently if they choose.

## ◇ Medically Frail Exemption ◇

### Am I automatically exempt from the work requirement if I live with SCD?

◇ **Not automatically.** However, you may qualify for an exemption as an individual with a '**medically frailty**'. Qualifying for the medically frail exemption will depend on your medical documentation and the interpretations of the state in which you reside.

The medically frail exemption may be invoked by:

1. Blind or disabled individuals
2. Individuals with a substance use disorder
3. Individuals with a disabling mental disorder
4. Individuals with a physical, intellectual, or developmental disability that significantly limits one or more activities of daily living (ADLs)
5. Individuals with a serious or complex medical condition

**SCD patients may qualify** for exemptions under the fourth and fifth circumstances depending on the severity of their condition and available documentation. There is no specific guidance to direct states in applying these categories. State interpretations may vary.

### Can states add SCD to the list of exemptions?

◇ **No.** CMS explicitly prohibited states from expanding the medically frail definition beyond the five circumstances listed above.



## Are there other exemptions beyond those for medical frailty?

The rule also exempts:

- Pregnant and postpartum individuals
- American Indian and Alaska Native beneficiaries
- Parents and caregivers of young children or people with disabilities
- Individuals already meeting Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF) work requirements
- People who qualify for a short-term hardship exemption (at state discretion)

## I am a caretaker for someone with SCD. Am I exempt from the work requirement?

**Possibly.** If you are the parent, guardian, caretaker relative, or family caretaker of a dependent child 13 years or younger, or of a disabled individual, you are exempt.

- A **caretaker relative** is a parent or other relative living with a dependent child or disabled individual **who assumes primary responsibility** for the care of the dependent child or disabled individual.
- A **family caretaker** is an adult family member or other individual who **provides consistent assistance and care** to an individual with a chronic or other health condition. A family caretaker does not need to live with the individual receiving care.
- A disabled individual **is an individual of any age who meets the ADA** definition of disability.

**NOTE:** Caregiving can also qualify for the work requirements if it is tied to 80 hours per month of care.

## ◇ Proving Exemptions ◇

### Can I self-identify as medically frail without documentation?

Right now, yes, but this is going to change soon. You can ‘self-attest’ that you qualify as medically frail without documentation. However, starting January 1, 2028, states may only accept self-attestation once at the initial enrollment.

At your renewals, **the state in which you reside will use the records of your medical care to verify your status as exempt.** This means that if you do not use Medicaid-covered SCD services, there may be less medical history documentation to rely on at renewal.

### What should I do now to protect my coverage?

- Ensure all of your medical information and contact information is up to date. Talk to your hematologist and/or primary care provider about including documentation in your medical records that addresses the severity and impact of your SCD. It is especially important to record how SCD affects your ability to work or complete daily activities.
- Ensure you are using your Medicaid coverage for all care related to managing your SCD. It is important that your ICD-10 codes appear throughout your medical documentation. An ICD-10 code is used to classify diagnosis, symptoms, and injuries and guarantees a record of your condition exists in the claims system.

### What if I do not regularly seek care?

States may offer short-term hardship exemptions in some cases, but it is important to work with your care team ahead of time to determine documentation of your condition is already on file in your medical records and within your Medicaid documentation. Be sure to ask your provider to document your condition proactively.

# Call To Action

Submitting a public comment to the Centers for Medicare & Medicaid Services (CMS) is an important way for the SCD community to share their perspectives on proposed policies and programs. **There is still time to activate and advocate before the comment period for the IFR closes on July 31, 2026.**

Submit your comments to [Regulations.gov](https://www.regulations.gov) as soon as possible. Comments submitted through Regulations.gov become part of the official public record and are reviewed by CMS during the decision-making process.

Looking for instructions on how to submit your comment?  
**Check out our toolkit:**

[Submit a Public Comment to CMS Toolkit](#)



◇ **Additional Questions? We're here to help.** ◇

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