



Taylor v. Kennedy (D. Md.)

Topics Covered: Medicaid & Medicare

Issue

The issue in this case is whether a recently announced Interim Final Rule, which purports to narrow the definition of “medical frailty” for purposes of Medicaid work requirements, is unlawful.

AMA Interest

The AMA has long opposed work requirements as a condition of Medicaid eligibility.

Case Summary

Public Law 119-21 (known as the One Big Beautiful Bill Act or H.R. 1) established new Medicaid work or other community engagement requirements for certain adults as a condition of Medicaid eligibility. Recognizing that some individuals should not be subject to these requirements, Congress excepted several categories of individuals, including those who are considered medically frail, defined as individuals who are blind or disabled or with a substance use disorder, disabling mental disorder, a serious physical, intellectual, or developmental disability, or a serious or complex medical condition.

On June 1, 2026, CMS published an Interim Final Rule, which requires that, to qualify for an exception from work requirements on the basis of medically frailty, an individual must not only have a qualifying health condition but also demonstrate that the condition significantly impairs their ability to comply with the work requirements. The additional requirements in the Rule are not found in the statute.

On September 18, 2026, a coalition of Medicaid enrollees, the American College of Physicians, the American Academy of Pediatrics, the New Hampshire Medical Society, and others filed a lawsuit in the federal District of Maryland challenging the Rule. The complaint alleged violations of the Administrative Procedure Act.

On October 20, 2026, the plaintiffs filed a motion for summary judgment.

Litigation Center Involvement

The Litigation Center and the Maryland State Medical Society filed *amicus* briefs in support of the Plaintiffs’ motion for of summary judgment.

United States District Court Brief