Minnesota Medical Association

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November 18, 2026

John Connolly
Temporary Commissioner and State Medicaid Director
Minnesota Department of Human Services
Elmer L. Andersen Human Services Building, 540 Cedar St.
St. Paul, Minnesota 55101

RE: Request for Minnesota to utilize the optional "hold harmless" period for Medicaid community engagement implementation

Dear Temporary Commissioner Connolly,

On behalf of the Minnesota Medical Association (MMA), the state's oldest and largest professional association for physicians and physicians-in-training, I write to strongly urge the Minnesota Department of Human Services (DHS) to utilize the optional "hold harmless" period for Medicaid community engagement implementation as offered by the Centers for Medicare and Medicaid Services (CMS) on November 13, 2026 (SMD #26-006). As you know, states have until December 11 to notify CMS of their decisions to use or not use the option.

Exercising the "hold harmless" option will help protect eligible enrollees from avoidable coverage disruptions as Minnesota works to test and improve the reporting systems needed to comply with the community engagement requirements in H.R. 1. Minnesota physicians are extremely concerned that these requirements will reduce Medical Assistance eligibility and access to care. The MMA is pleased to see CMS offer this hold harmless period in recognition of the significant challenges states face in implementing the new requirements.

The MMA believes that the state's pursuit of this option aligns with your demonstrated commitment to preserving Medicaid enrollment to the greatest extent federally permissible.

Thank you for your service and consideration.

Sincerely,

Janet L. Silversmith
CEO