

Intersectionality and Multiple Simultaneous Barriers

When Compounding Challenges Make Work Requirements Unworkable

When Everything Compounds

Keisha sits in the county health clinic waiting room holding three appointment reminder cards, a handwritten note from her therapist, and her daughter's report card documenting absences. The social worker asked her to bring documentation for her Medicaid work requirement exemption. The problem is deciding which barrier to document first.

She's 38, living in rural Georgia with two daughters, ages 8 and 10. The major depression she's been treating for six years explains some of the difficulty, but not all of it. The depression is linked to the domestic violence she fled three years ago, which is why she moved to her mother's town and why she can't list her previous employer for work verification. She's been in recovery from alcohol use disorder for fourteen months, attending AA meetings twice weekly in town. The chronic pain from a back injury makes it hard to stand for long shifts, which eliminates most retail jobs in her area. She works when she can, cleaning houses and helping at the church, but nothing that generates paystubs.

Her older daughter has ADHD and needs help with homework every evening. Her mother has diabetes and early dementia, which means Keisha is also a caregiver. They live four miles outside town with no broadband internet and unreliable cell service. The car needs transmission work, so getting to appointments means coordinating rides. Her primary language is Spanish, though she speaks functional English. She reads Spanish better than she speaks English.

Each barrier has an article in this series explaining why that single challenge makes work requirements difficult. Pregnancy creates episodic incapacity (Article 11A). Serious mental illness affects executive function needed for navigation (Article 11B). Substance use disorder treatment conflicts with work schedules (Article 11C). Justice involvement creates employment verification challenges (Article 11D). Homelessness makes communication impossible (Article 11E). Caregiving responsibilities limit available work hours (Article 11F). Transitions between life stages create timing cliffs (Article 11G). Domestic violence requires confidentiality incompatible with employer verification (Article 11H). Rural geography eliminates employment options (Article 11I). Limited English proficiency makes portal navigation impossible (Article 11J). Partial disability creates capacity-requirement mismatch (Article 11K). Veterans carry service-connected disabilities that civilian systems don't recognize (Article 11M). LGBTQ+ individuals face discrimination and disclosure risks that constrain employment options (Article 11N). Complex medical conditions consume time that work requirements also demand (Article 11O). Foster care alumni lack family safety nets that buffer every setback (Article 11P). Agricultural workers follow seasonal calendars incompatible with monthly verification (Article 11Q). Structurally locked-out workers face employer hour caps preventing compliance regardless of effort (Article 11R). Appalachian and post-industrial communities live where the formal economy has collapsed entirely (Article 11S).

But Keisha doesn't have one barrier. She has nine, maybe ten depending on how you count. The accommodations designed for each single barrier don't stack neatly. The mental health exemption requires documentation from her therapist, but getting to the therapist requires the car working or coordinating a ride. The domestic violence protection requires confidentiality that conflicts with employer verification, but she doesn't have traditional employment anyway because the rural area offers limited options and her pain limits what she can do. The limited English proficiency means she needs help understanding the forms, but the forms are explaining exemptions for problems she doesn't know how to describe in either language.

The social worker is trying to help. She explains that Keisha probably qualifies for several exemptions. But qualifying and documenting are different things. Each exemption requires separate paperwork, separate verification, separate processes. The social worker asks which barrier Keisha wants to address first, as if they could be separated, as if fixing one would make the others manageable.

Keisha picks the mental health documentation because her therapist's office is closest and most likely to respond quickly. It won't address the caregiving, the language barriers, the rural isolation, the pain, the limited transportation, the lack of broadband, or the confidentiality needs. But it's something she might be able to document by next month's deadline. The other barriers will remain undocumented, making her appear to be avoiding work requirements rather than drowning in compounding impossibilities.

This is what happens at the intersection.

The Intersection Map

Between 3.7 and 6.5 million expansion adults face multiple simultaneous barriers to work requirement compliance. That represents 20 to 35 percent of the population subject to the One Big Beautiful Bill Act's work requirements. These aren't edge cases. They're the core challenge.

Traditional policy analysis treats barriers separately. One article on pregnancy, another on mental illness, a third on rural isolation. Each examines its population as if that characteristic were the only challenge. But barriers cluster. The pregnant woman (Article 11A) is also likely to be a domestic violence survivor (Article 11H). The person with serious mental illness (Article 11B) frequently has co-occurring substance use disorder (Article 11C). The justice-involved population (Article 11D) overlaps heavily with homelessness (Article 11E) and foster care alumni (Article 11P). The rural resident (Article 11I) often has limited English proficiency (Article 11J) and partial disability (Article 11K). The veteran with service-connected PTSD (Article 11M) may also experience housing instability and substance use disorder. The LGBTQ+ individual facing workplace discrimination (Article 11N) may also have mental health challenges from minority stress and be geographically isolated from affirming healthcare. The person with complex medical conditions (Article 11O) often has co-occurring mental health needs and caregiving limitations. The agricultural worker (Article 11Q) frequently has limited English proficiency, lives in rural areas with limited healthcare access, and works in an informal economy that generates no documentation. The structurally locked-out worker (Article 11R) often has caregiving responsibilities limiting schedule flexibility and may live in areas where total available hours across all employers don't reach compliance thresholds. The

Appalachian or post-industrial community resident (Article 11S) commonly faces disability from occupational injury, lives where the formal economy has collapsed, and participates in informal economies that generate no verification documentation.

Article 3C's multiply-burdened profiles illustrate common patterns. The gig economy worker with chronic conditions combines medical complexity with administrative barriers. The single mother with mental health challenges combines episodic capacity with caregiving responsibilities. The seasonal agricultural worker combines rural isolation, limited English proficiency, economic instability, and timing mismatches. The homeless veteran with PTSD combines mental health challenges, housing instability, substance use, service-connected disabilities, and administrative capacity limitations. The domestic violence survivor combines confidentiality needs, episodic displacement, trauma, caregiving, and employment disruption. The reentry population member with pain combines justice involvement, partial disability, employment verification challenges, and often substance use history. The foster care alumnus facing workplace instability combines childhood trauma, absence of family safety net, mental health needs, and housing vulnerability. The person managing lupus and diabetes and kidney disease combines complex medical management, appointment burdens, and unpredictable flares that prevent stable employment. The retail worker capped at 28 hours by employer policy combines structural lockout with caregiving responsibilities and schedule unpredictability preventing second job acquisition. The former coal miner in eastern Kentucky combines occupational disability, collapsed labor market, intergenerational poverty, and an informal economy that provides no documentation for actual productive activity.

These aren't separate populations requiring separate programs. They're simultaneous realities within individual lives. The patterns show which barriers co-occur most frequently. Mental illness clusters with substance use disorder at rates of 40 to 60 percent. Domestic violence correlates with mental health challenges at 60 to 80 percent. Rural populations experience disability rates of 27 percent compared to 20 percent in urban areas. Limited English proficiency correlates with both poverty and informal employment. Justice involvement predicts homelessness at seven times the general population rate. Foster care alumni experience homelessness at five times higher rates than peers, and half meet criteria for mental health diagnoses. Veterans with service-connected disabilities have elevated rates of substance use disorder and housing instability. LGBTQ+ populations experience mental health challenges at two to three times higher rates than the general population. People with complex medical conditions frequently have co-occurring depression and anxiety. Agricultural workers have elevated rates of occupational injury, limited English proficiency, and geographic isolation. Post-industrial community residents have disability rates approaching 20 percent, reflecting generations of dangerous occupational exposure.

The mathematics of intersection explains why this matters. Two barriers don't create twice the difficulty. They create five times the difficulty. Three barriers create ten times the difficulty. **Each additional challenge compounds rather than adds.** Someone with depression can work when managing symptoms. Someone with depression and chronic pain can work in limited capacities. Someone with depression, chronic pain, and caregiving responsibilities faces exponentially greater challenge. Add rural isolation and the difficulty increases again. Add limited English proficiency and systems become nearly impossible to navigate. Add foster care background with no family safety net, and every setback cascades into crisis. Add location in a county where the formal economy

has collapsed, and the barriers become not just individual but structural, geographic, and intergenerational.

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Geographic patterns show intersection concentration. Rural areas combine isolation, transportation barriers, limited employment options, and often limited English proficiency in agricultural regions. Urban areas with high immigrant populations combine language barriers, informal employment, mixed-status family concerns, and housing instability. States with large military installations have higher concentrations of veterans whose service-connected disabilities intersect with civilian employment barriers. Appalachian and Rust Belt regions combine collapsed labor markets, occupational disability, intergenerational poverty, and informal economies. Agricultural regions combine seasonal employment patterns, limited English proficiency, geographic isolation, and healthcare access barriers. States with recent Medicaid expansion have higher concentrations of multiply-burdened populations who delayed enrollment until expansion made coverage available, meaning they carry accumulated health challenges and social complexity.

The intersection population is not monolithic. Some face two barriers that compound significantly. Others face six or seven creating near impossibility of compliance. The challenge isn't identifying whether someone has multiple barriers. The challenge is designing systems that accommodate compounding complexity rather than requiring separate documentation for each discrete challenge.

Why Single Solutions Fail

Systems designed to accommodate one barrier at a time break at intersections. The failure modes are predictable.

Accommodation conflict failure occurs when solutions for one barrier create problems for another. The mental health navigator helps someone understand their depression but can't address the rural transportation barrier preventing appointments. The domestic violence protection requires confidentiality that conflicts with employment verification, but the verification is necessary to maintain coverage. The substance use disorder treatment accommodation provides time for treatment, but treatment schedules conflict with caregiving responsibilities when meetings happen during evening hours when children need supervision. The disability assessment documentation helps prove partial capacity, but getting to the assessment requires transportation the person doesn't have. Limited English proficiency requires in-person assistance with forms, but in-person assistance requires revealing domestic violence history to interpreters who might know the abuser in small communities. The veteran's VA appointments count toward managing service-connected conditions, but not toward work requirement hours even though they consume the same limited time. The complex medical condition requires 15 hours monthly of appointments that enable whatever work capacity remains, but those 15 hours compete with rather than complement work requirement hours. The agricultural worker's seasonal employment pattern means annual averaging would solve the monthly verification problem, but their rural isolation and limited English proficiency mean they cannot access the averaging accommodation that would help. The structurally locked-out worker's good faith effort documentation shows they've sought more hours from their employer, but the employer's hour cap policy creates structural barriers that good faith effort cannot overcome.

***Documentation cascade failure multiplies requirements until they become impossible.***

Someone with depression, substance use disorder, caregiving responsibilities, limited English proficiency, and partial disability needs five separate accommodations. Each requires different documentation: therapist attestation, treatment verification, caregiver status confirmation, language needs assessment, and functional capacity evaluation. Each involves different offices, different forms, different deadlines, different languages for those needing interpretation. A person already struggling with depression and executive function must coordinate five bureaucratic processes while managing symptoms that impair exactly that capacity. The foster care alumnus without family support has no one to help navigate these processes. The agricultural worker's seasonal schedule means documentation must happen during off-seasons when they have time, but that's precisely when they appear non-compliant to monthly verification systems. The post-industrial community resident may not have access to the providers, assessors, and documentation infrastructure that urban systems assume.

Priority triage impossibility happens when multiple urgent needs demand attention simultaneously.

Someone experiencing homelessness and mental health crisis and pregnancy complications faces three urgent situations at once. Traditional case management says stabilize housing first, but mental health symptoms make housing stability impossible. Treat mental health first, but lack of housing prevents consistent engagement with treatment. Address pregnancy complications first, but lack of stable housing and untreated mental health compromise prenatal care. There's no stable ground to stand on while addressing any single issue. Each crisis reinforces others, creating perpetual urgency without clear starting point. The foster care alumnus who loses a job faces immediate housing crisis because there's no family to provide temporary shelter, which triggers mental health deterioration, which makes the next job harder to obtain, which extends the housing crisis. The veteran whose PTSD flares loses the security job that was the only employment compatible with his triggers, which threatens housing, which worsens PTSD symptoms, which makes finding new employment nearly impossible. The retail worker whose employer cuts hours below 80 loses coverage, which interrupts treatment for chronic conditions, which reduces work capacity, which makes finding replacement hours even harder.

Siloed support systems prevent comprehensive response. Mental health services don't coordinate with substance use disorder treatment even though the same person needs both. Domestic violence shelters operate separately from homeless services even though women fleeing violence experience homelessness. Rural health clinics can't provide specialized disability assessment that requires urban medical center travel. VA healthcare operates separately from Medicaid even though veterans need both systems for different conditions. LGBTQ+ affirming providers may not coordinate with mainstream systems that don't understand identity-specific barriers. Disease-specific organizations for complex medical conditions don't connect to employment services or housing programs. Agricultural worker health programs operate separately from Medicaid eligibility systems. Workforce development programs don't coordinate with work requirement verification even though both address employment. Each system has separate intake, separate eligibility, separate documentation, separate reporting, separate timelines. Someone with five barriers needs five separate systems, five separate navigators, five separate verification processes. The administrative burden of accessing support exceeds the capacity limitations that created need for support.

Cumulative administrative burden overwhelms. Each barrier requires documentation. Mental illness needs therapist attestation. Substance use disorder needs treatment verification. Caregiving needs dependent confirmation. Domestic violence needs protective order or advocate statement. Limited English proficiency needs interpreter scheduling. Partial disability needs functional assessment. Service-connected disability needs VA rating documentation translated into Medicaid exemption terms. Complex medical conditions need documentation of appointment burden from multiple specialists. Foster care history needs verification from child welfare systems that may have lost records. Agricultural employment needs employer attestation from farm labor contractors who may resist documentation. Structural lockout needs evidence that employer hour caps prevent compliance despite worker effort. Post-industrial community residence needs documentation that formal employment doesn't exist where the person lives. Five barriers mean five separate documentation processes, five sets of forms, five verification cycles. Someone struggling with executive function due to depression must coordinate five bureaucratic processes simultaneously. The person with limited English proficiency must navigate five different systems, each with separate requirements. The rural resident must travel to five different offices or coordinate five different appointments. The homeless individual must maintain five different paper trails without permanent address.

Navigator turnover breaks continuity when systems assign navigators by barrier type rather than by person. The multiply-burdened individual needs one navigator who understands all challenges and maintains relationship across time. Instead, systems provide mental health navigator, housing navigator, employment navigator, medical navigator, veteran services navigator. When one navigator leaves or rotates, the member must re-explain entire situation to replacement. Trust built through disclosure of trauma, domestic violence history, substance use challenges, foster care background, and family circumstances must be rebuilt. Each time a navigator changes, documentation restarts, relationship resets, understanding deteriorates. For someone with seven barriers, navigator turnover might mean working with ten different people across two years, explaining private painful circumstances repeatedly to strangers.

Exemption stacking complexity emerges when temporary exemptions from multiple sources expire at different times. Pregnancy exemption lasts through postpartum period. Mental health exemption requires quarterly renewal. Substance use disorder treatment exemption lasts 90 days. Caregiving exemption continues while children are young but ends abruptly when youngest child reaches age cutoff. VA disability rating creates permanent impairment but Medicaid doesn't automatically recognize it. Foster care alumnus status might justify accommodation until age 26 but requires documentation the child welfare system may not provide. Agricultural worker seasonal exemption might cover off-season months but requires documentation of seasonal employment pattern. Someone with four simultaneous barriers might have four exemptions expiring in different months, creating four separate verification deadlines, four opportunities for coverage loss, four points where single documentation failure terminates coverage despite ongoing challenges. Systems can't process overlapping exemptions smoothly, so gaps appear between exemption periods even when circumstances requiring exemption continue unchanged.

Structural barrier invisibility occurs when individual-focused exemption frameworks cannot recognize barriers that exist in labor markets, employer policies, or regional economies rather than individual circumstances. The structurally locked-out worker whose employer caps hours at



28 weekly has no individual incapacity requiring exemption. The problem is employer policy, but exemption frameworks address individual barriers. The agricultural worker whose industry follows seasonal calendars has no individual limitation. The problem is industry structure. The Appalachian resident whose county has no formal employment has no individual work avoidance. The problem is regional economic collapse. Single-barrier solutions assume barriers exist within individuals. Structural barriers exist outside individuals, in employer decisions, industry patterns, and regional economies. No amount of individual accommodation addresses structural impossibility.

These failures aren't hypothetical. They're daily reality for millions of expansion adults facing intersectional barriers. Single-barrier solutions were designed for populations with one challenge and otherwise functional capacity. At intersections, those solutions don't scale. They break.

Framework: Total Burden Assessment

Addressing intersectionality requires different logic than addressing single barriers. The framework starts with acknowledging that complexity itself is disabling.

Barrier counting with graduated requirements recognizes that administrative burden increases faster than barriers. Someone with one or two barriers might manage standard 80-hour monthly requirements with accommodations for specific challenges. Someone with three or four barriers faces exponentially greater difficulty coordinating supports, maintaining documentation, and meeting requirements. Someone with five or more barriers may face impossibility regardless of individual accommodations for each barrier.

A graduated requirement structure could reduce hours based on documented barrier count. One to two barriers might trigger standard 80 hours monthly with accommodations. Three to four barriers might reduce to 60 hours monthly with extended verification flexibility. Five or more barriers might reduce to 40 hours monthly or trigger comprehensive review for permanent exemption consideration. The rationale isn't that people with more barriers can't work. It's that administrative capacity required to document and verify work while managing multiple challenges exceeds capacity available.

Structural barrier recognition extends beyond individual incapacity. When barriers exist in labor markets rather than individuals, exemption frameworks must acknowledge structural impossibility. The worker whose employer caps hours cannot reach compliance through individual effort. The agricultural worker whose industry follows seasonal patterns cannot comply with monthly verification through individual accommodation. The post-industrial community resident whose region has no formal economy cannot find employment that doesn't exist. Place-based exemptions, employer accountability mechanisms, and annual averaging alternatives address structural barriers that individual exemptions cannot.

Permanent supported status criteria matter because some intersections may never be appropriate for work requirements. Someone with serious mental illness, active substance use disorder treatment, caregiving responsibilities for disabled child, rural isolation without transportation, limited English proficiency, and chronic pain faces compounding challenges unlikely to resolve. That person might work occasionally when circumstances align, but expecting

consistent monthly hour achievement ignores reality. The veteran with 70 percent service-connected disability, co-occurring PTSD and substance use disorder, and housing instability faces federally documented impairment that state work requirements ignore. The foster care alumnus with trauma responses affecting employment stability, no family safety net, and mental health needs may cycle through jobs indefinitely without achieving the consistency requirements demand. The former coal miner with black lung, chronic pain, and residence in a county with 30 percent labor force participation faces barriers that are simultaneously individual (disability) and structural (collapsed economy). Permanent supported status isn't giving up. It's honest assessment that for some intersections, work requirements will cause coverage loss without achieving employment goals.

Determining permanence requires criteria that distinguish temporary intersection from permanent complexity. Temporary might be pregnancy plus mental health plus caregiving, where pregnancy resolves and caregiving diminishes as children age. Permanent might be serious mental illness plus substance use disorder plus partial disability plus rural isolation, where core conditions are unlikely to change and geographic barriers persist. The foster care alumnus may transition from temporary intersection to stability as trauma treatment progresses and coping skills develop, or may face permanent complexity if childhood damage proves irreversible. The veteran's service-connected disabilities are by definition permanent, but intersection with other barriers may be temporary or permanent depending on treatment response and circumstantial stability. The post-industrial community resident faces barriers that are permanent for the community even if individual circumstances might change through relocation. The distinction matters because temporary intersection requires accommodation through crisis while permanent intersection requires exemption from requirements.

Comprehensive navigator model provides single point of contact across all barriers. Instead of assigning navigators by barrier type, assign one navigator per person with training across multiple domains. That navigator maintains continuity regardless of which barrier is most acute at any moment. They understand mental health challenges, substance use disorder treatment, domestic violence safety planning, housing instability resources, transportation coordination, language interpretation, employment accommodation, veteran-specific services, LGBTQ+ affirming resources, complex medical condition management, foster care alumni support, seasonal employment patterns, structural employment barriers, and regional economic contexts. They don't provide all services directly. They coordinate referrals while maintaining relationship that allows member to avoid repeating trauma history, family circumstances, and challenges to each new professional.

What Series 11 Reveals

Articles 11A through 11S document eighteen distinct populations facing work requirement barriers. Each article follows consistent structure: demographic scope, failure modes, accommodation frameworks, counterarguments, stakeholder implications, and honest acknowledgment of limits. Reading across the series reveals patterns that transcend individual populations.

The verification assumption failure appears in every article. Work requirements assume people can document compliance through employer verification, pay stubs, or portal submissions.



Pregnant women (11A) face episodic incapacity that varies week to week. People with serious mental illness (11B) have executive function impairments that prevent consistent documentation. Those in substance use disorder treatment (11C) prioritize recovery over paperwork. Justice-involved individuals (11D) lack employment history to verify. Homeless individuals (11E) lack addresses for verification notices. Caregivers (11F) do unpaid work that systems don't recognize. Those in transition (11G) fall between verification periods. Domestic violence survivors (11H) cannot safely verify employment. Rural residents (11I) lack broadband for online verification. Those with limited English proficiency (11J) cannot navigate English-only portals. People with partial disabilities (11K) work intermittently in ways monthly verification misses. Veterans (11M) have VA documentation that Medicaid systems ignore. LGBTQ+ individuals (11N) face disclosure risks in verification processes. Those with complex medical conditions (11O) spend verification time on appointments. Foster care alumni (11P) lack the navigational support that family provides for everyone else. Agricultural workers (11Q) follow seasonal patterns monthly verification cannot capture. Structurally locked-out workers (11R) work every hour employers allow but still fall short. Post-industrial community residents (11S) work in informal economies generating no documentation. The common thread is that verification as designed assumes circumstances most special populations don't share.

The exemption access paradox appears repeatedly. Exemptions exist for many populations, but accessing exemptions requires capacities the exemption-qualifying conditions impair. Depression exemption requires initiative and follow-through that depression compromises. Disability exemption requires appointments that transportation barriers prevent. Domestic violence exemption requires disclosure that safety concerns prohibit. Language exemption requires navigating systems in a language the person doesn't speak. The exemption exists on paper. Accessing it requires capacities the person lacks. The veteran must translate VA ratings into Medicaid terminology using systems that don't communicate. The foster care alumnus must document childhood circumstances through systems that lost the records. The agricultural worker must prove seasonal patterns during off-seasons when they appear non-compliant. The post-industrial resident must document that employment doesn't exist, which requires proving a negative.

The stakeholder coordination theme appears across every article. Effective accommodation requires infrastructure across state Medicaid agencies, MCOs, healthcare providers, community organizations, employers, social service agencies, legal services, veteran service organizations, LGBTQ+ affirming providers, disease-specific organizations, foster care alumni support networks, agricultural worker advocacy groups, labor unions, workforce development agencies, and regional economic development entities. No single stakeholder can accommodate special populations independently. Fragmented approaches create gaps where members fall through. Coordinated infrastructure is expensive, complex, and difficult to build within the implementation timeline. But absence of coordination makes accommodations symbolic rather than functional.

The intersectionality revealed most starkly in this synthesis shows that population counts across Articles 11A through 11S don't sum to total affected population. They overlap extensively. The same person appears in multiple articles because they face multiple barriers. ***The 20 to 35 percent facing intersectional complexity aren't additional population beyond those examined in***

previous articles. They're the reality that most expansion adults requiring accommodation face multiple compounding barriers, not single discrete challenges.

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This creates the hardest acknowledgment. For some portion of the 18.5 million expansion adults subject to work requirements, intersection complexity may make requirements inappropriate regardless of accommodation quality. That portion might be 2 percent, might be 8 percent, might be 15 percent depending on permanence criteria and exemption scope. The percentage matters less than the recognition that compounding barriers can exceed what accommodation addresses. Work requirements might advance policy goals for majority of expansion adults while being counterproductive for minority facing permanent severe intersection. Policy can acknowledge both realities without declaring work requirements uniformly good or uniformly harmful.

The series has avoided advocacy. It has presented multiple perspectives on work requirements, accommodations, exemptions, and implementation. It has documented barriers without declaring whether work requirements should be implemented. That neutrality remains important because states will implement work requirements regardless of individual opinions about their merits. The useful question isn't whether implementation should proceed but how implementation can occur with eyes open to challenges, tradeoffs, and real populations affected.

Keisha's Path Forward

Keisha returns to the health clinic six weeks later. The therapist documentation didn't arrive before her verification deadline. She lost coverage for February. She's re-enrolled for March but now faces new verification deadline. The social worker suggests different approach. Instead of documenting single barriers sequentially, attempt comprehensive exemption assessment.

The assessment takes two hours with bilingual assessor. They document depression, recovery program participation, caregiving for both children and mother, chronic pain, rural isolation, limited transportation, lack of broadband, and domestic violence history requiring confidentiality. Nine barriers. The assessor recommends permanent supported status for intersection population based on total burden assessment. The state approves for one year with annual reassessment.

This means Keisha maintains coverage without monthly work verification. It doesn't solve her other problems. She still needs transportation, still struggles with pain, still caregivers for three people, still lives without broadband. But she's not navigating verification bureaucracy while managing nine compounding challenges. She can focus on stability rather than documentation.

A year later, circumstances have changed. Her mother moved to assisted living. Her older daughter no longer needs intensive supervision. Treatment reduced depression severity. The caregiving burden decreased enough that Keisha can consider part-time work. The annual reassessment evaluates whether intersection still creates permanent exemption justification or whether reduced burden allows graduated requirements.

This individual story doesn't resolve policy debates. It illustrates what intersection-aware policy might look like. Recognition that nine barriers compound beyond what single accommodations address. Comprehensive assessment rather than separate verification for each challenge.

Permanent exemption when appropriate with reassessment allowing status change as

circumstances evolve. Focus on stability and healthcare rather than monthly verification adding burden to overwhelming circumstances.

Whether this approach is appropriate policy depends on values, priorities, and acceptable tradeoffs. It acknowledges intersection complexity. It reduces administrative burden for multiply-burdened populations. It maintains coverage for people unlikely to comply with monthly verification regardless of effort. It also creates substantial exemption population, requires expensive assessment infrastructure, and depends on trust that exemptions will be granted appropriately rather than routinely.

Series 11 has examined special populations with clinical precision and analytical neutrality. It has documented barriers, suggested accommodations, acknowledged limits, and presented competing perspectives. The final determination about how to serve multiply-burdened populations under work requirements belongs to policymakers, regulators, and citizens who must make explicit choices about priorities. The analysis can inform those choices. It cannot make them.

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