

March 16, 2018

Barbara Sears, Director  
Ohio Department of Medicaid  
50 W. Town Street, 5<sup>th</sup> Floor  
Columbus, OH 43218



**United Way of  
Greater Cleveland**

THE MANDEL COMMUNITY BUILDING  
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Cleveland, Ohio 44115  
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Dear Director Sears,

RE: Group VIII Requirements and Community Engagement 1115 Waiver

On behalf of United Way of Greater Cleveland, we thank you for the opportunity to comment on Ohio's 1115 Medicaid waiver application. We are extremely concerned about the negative impact the proposed work requirements will have on individual Medicaid recipients and our community.

With over 100 years of investing in health and human services in the Greater Cleveland, we understand the critical connection between health and economic prosperity. Through our 2-1-1 Help Center, we know firsthand the challenges of those who are struggling as we help them overcome barriers and get much-needed services to lead to a more stable life, including critical access to Medicaid coverage so they can be healthy enough to work, go to school and avoid spiraling into poverty. Poor health can be both a consequence and cause of financial instability.

A majority of able-bodied adults on Medicaid are already working, but in low wage jobs. Work requirements will harm those working with variable hours or seasonal employment who may lose coverage if they aren't assigned enough hours. The complex eligibility and reporting requirements will create barriers and unnecessary red tape, putting many at risk of losing coverage due to their inability to navigate an inefficient system. While the state estimates one in 20 Medicaid expansion consumers will be affected, others project 10 in 20 will be affected by the waiver. When access to healthcare is reduced, it will exacerbate the already prevalent problem of undiagnosed mental health issues, the opioid epidemic, infant mortality and chronic disease.

Additionally, we strongly recommend the unit of government be changed from counties to cities to avoid increased racial health disparities in urban areas. Across the state, four in ten African Americans live in Columbus, Cleveland or Cincinnati. Additionally, Ohio's black unemployment rate is almost three times the white rate<sup>1</sup>. While the proposal calls for an exemption for 26 counties with high unemployment rates, Cuyahoga County is not exempted. Cuyahoga County's unemployment rate is consistently above the national and state average, and the City of Cleveland's unemployment rate is consistently 2% higher than Cuyahoga County's rate. The Cleveland metropolitan area alone is home to more than one-quarter of Ohio's African American population<sup>2</sup> and their unemployment rate is four times more than white Cleveland residents<sup>3</sup>.

Without changing the unit of government from counties to cities this waiver will disproportionately result in African-Americans losing health care in Cleveland and across the state of Ohio.

<sup>1</sup> [http://www.cleveland.com/business/index.ssf/2015/08/black\\_unemployment\\_rate\\_has\\_de.html](http://www.cleveland.com/business/index.ssf/2015/08/black_unemployment_rate_has_de.html)

<sup>2</sup> <https://www.development.ohio.gov/files/research/P7003.pdf>

<sup>3</sup> [https://www.google.com/search?q=cleveland+unemployment+rates&rlz=1C1CHFX\\_enUS613US625&oq=cleveland+unemployment+rates&aqs=chrome..69i57j0l2j69i64.7039j0j4&sourceid=chrome&ie=UTF-8](https://www.google.com/search?q=cleveland+unemployment+rates&rlz=1C1CHFX_enUS613US625&oq=cleveland+unemployment+rates&aqs=chrome..69i57j0l2j69i64.7039j0j4&sourceid=chrome&ie=UTF-8)

We appreciate the state's continued efforts to achieve cost savings. The state estimates to save \$571M over the course of the 5-year wavier, but does not take into consideration the cost for state and local governments to administrator the waiver or accurately calculate the increase of per member cost due to reduced disenrollment. We believe a work requirement will lead to increased demand for other costly safety net services and override any potential cost savings for the state.

The proposed work requirements run contrary to the core objectives of Medicaid – to provide health coverage for low income people so they can access the healthcare services they need to lead self- sufficient lives. We firmly think access to healthcare is a critical, wise investment. Without it, it will lead to increased demand for other costly safety net services over the long term and create additional stress on the social service safety net – creating a gap that philanthropy cannot fill.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "August A. Napoli". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

August A. Napoli  
President and CEO