



**Testimony of Greater Cincinnati Behavioral Health Services
Regarding the Proposed Work Requirements for Group VIII Medicaid Recipients
February 23, 2018**

Thank you for the opportunity to provide comments on the proposal to impose work requirements on Ohio adults who receive Medicaid through the Medicaid expansion.

Greater Cincinnati Behavioral Health Services is a large community behavioral health agency, serving over 20,000 people in Southwest Ohio each year through psychiatric services, care management, vocational services, counseling, and substance abuse treatment. The organization has a long history of coordinating successfully with our local Department of Jobs and Family Services, acting as authorized representative for several thousand clients, and providing support to ensure people may obtain and retain these critical benefits. Most of these individuals fall well below the federal poverty level, and many have no income at all.

Even in the best of circumstances, it is often challenging for people to complete the current recertification processes for Medicaid and other benefits.

We currently serve over 4,000 individuals whose Medicaid coverage would be impacted by these proposed requirements. For many of these individuals, applications for disability have been denied because of co-occurring substance abuse, or because these individuals have symptoms that make the very process of coordinating with complex systems a challenge in and of itself.

We believe that the intention of Ohio Medicaid is to ensure that people who are receiving critical care, and facing the extreme challenges of substance abuse and mental illness, should be able to retain this critical coverage. We understand that the proposed exemptions are meant to ensure this continuity of coverage. The challenge, of course, lies in the details.

We encourage the Department to keep exemption requirements related to substance abuse and mental illness as broad as possible. These requirements are likely to impact people whose very illnesses have created significant barriers to even managing the process of applying for disability benefits. Their lack of income often means they face ongoing homelessness, lack of transportation, and lack of other supports. This often means that treatment may be sporadic, and punctuated by incarceration and/or hospitalization.

We hope the Department will consider clarifying these exemptions to ensure:

- They encompass as many levels of treatment engagement as possible
- Providers may somehow submit documentation of these exemptions directly
- Denial of a disability claim should not make someone ineligible for the exemption related to being physically or mentally unable to work. ”

Thank you for the opportunity to submit comments and feedback regarding the 1115 Waiver.

Submitted by Diane M. Wright, LISW-S
Director of Quality Management and Client Rights Officer
Greater Cincinnati Behavioral Health Services
1501 Madison Rd.
Cincinnati, OH 45206
dwright@gcbhs.com 513-354-7104