



March 18, 2018

Barbara Sears, Director  
Ohio Department of Medicaid  
50 W. Town Street St. #400  
Columbus, Ohio 43215

RE: Comments in Opposition to Group VIII Work Requirement and Community Engagement  
1115 Demonstration Waiver

These comments are offered in opposition to the Group VIII Work Requirement and Community Engagement 1115 Demonstration Waiver. Universal Health Care Action Network (UHCAN) Ohio is a non-profit organization committed to assuring everyone's access to affordable, quality health care. We believe that the people impacted should have a significant voice in health care policies and decisions.

Listening to the people who will be impacted is an important aspect of making sound policy decisions. That is the reason UHCAN Ohio believed it critical that the Ohio Department of Medicaid (ODM) provide a public comment period of at least 90 days and conduct public information sessions across the State. Instead, ODM hosted the first public meeting two business days after posting the proposal and the location of that hearing was so difficult to access that even Director Sears had difficulty in locating the venue. **ODM should directly and effectively inform all Medicaid expansion enrollees of the potential changes and allow for input before considering a proposal submission to CMS; this comment period ending Sunday March 18<sup>th</sup> was ineffective and insufficient.**

UHCAN Ohio with its partners was able to inform only a small fraction of those affected. However, those informed were seriously concerned. UHCAN Ohio gave them an opportunity to voice their concerns to ODM either by e-mailing ODM directly or completing a UHCAN Ohio survey to capture their comments. Nearly 600 people completed the survey and those comments accompany this letter. A number of people indicated that they were concerned or opposed the waiver without providing further comment. However, many provided details on how this waiver would hurt them, their family and their community.

These comments provide a real view of what it is like to live with little to no income. For those looking at the comments with an open mind and an open heart, they show not just how this will hurt the health of many people who struggle to work but also how real people struggle to navigate the bureaucracy.



**A few excerpts from the accompanying comments shows the damage this waiver will cause to people and communities:**

**My son's high blood pressure & diabetes are being treated.** He has been unable to find a job since his conviction 8 years ago. No one will hire him.

My community has benefited from Medicaid because a healthy community is a happier community. Everyone should have access to medical care, regardless of if they work. There are a growing number of homeless people in my community who would not be able to clear the work requirement because they are literally trying not to die on the streets.

Adding more bureaucracy to already bureaucratically burdened individuals who already need help to access the benefits they need doesn't make a lot of sense. Clients aren't allowed to have direct extension or email address for their case workers so instead they spend hours waiting on the phone to leave them a message. They can spend hours waiting in line to scan docs to the case workers or getting paperwork to landlords and others. Lets not make life harder for those who need the most help in our society. These systems are already TOO difficult to access.

I'm only receiving Medicaid Benefits because I'm disabled and unable to work. I'm trying to get to a point where I can work again. No one likes to be broke.

My son suffers with Substance Use Disorder (heroin). This has caused both mental and physical strains on his body and mind. He has been hospitalized several times near death from various infections and diseases. Medicaid has always been there to get him the best of care. There have been times when he has worked, but the majority of the past 4 years are spent in the depths of his addiction and he could barely function on some days. He has been to treatment a couple of times, but relapsed. Taking this Medicaid from him could take his chance of recovery forever away. Every life matters. As long as he has breath- there is HOPE. Don't take away the only thing that could be between his life and death.

My daughter could not fulfill any work or community activity requirement due to a disabling medical condition she has. However, I am concerned that since she does not have the legal protection of a disability determination from social security that she will be deemed "able bodied" when she is not. A mandatory work requirement will be a huge burden for her as she will have to prove that she should be exempt due to her illness.

I am a Breast Cancer survivor that lost my health insurance thru divorce. I am not able to hold a full time job To lose my healthcare would be a death sentence to me

It has provided me with life-saving cancer treatment Work requirements will add another layer of unnecessary bureaucracy and hardship for me, my doctors, facilities, my family.



It will also create additional stress , what will happen if I do not meet the qualifications/exemptions? How will I continue to receive the chemotherapy and medications I need to stay alive? If I lose health care, how I am able to continue working/volunteering? It will add a burden of extra paperwork to the doctors and facilities that treat me. I am unable to drive so transportation to gather and file the necessary paperwork will be challenging

Other organizations will provide the department with the accurate legal and administrative reasons that this waiver proposal is illegal and bad policy. However, the agency, and the Ohio legislators that proposed this policy, need only look to the comments above and those accompanying this letter to realize that this policy is NOT good for the heart of Ohio. This policy will hurt the vulnerable people struggling just to get by. This waiver proposal should not be submitted to CMS.

Everyone deserves access to health care coverage without burdensome barriers. Medicaid allows people to become healthy so that they can work, care for others or be part of their community. The State of Ohio should improve access to health care for all of its citizens not create burdens. UHCAN Ohio opposes this waiver.

Sincerely,

Steve Wagner, MPH, JD

Executive Director