



**Advocates for Ohio's Future**  
37 West Broad Street, Suite 1100  
Columbus, OH 43215  
[www.advocatesforohio.org](http://www.advocatesforohio.org)

July 28, 2016

Healthy Ohio Program 1115 Demonstration Waiver  
The Honorable Secretary Sylvia Burwell  
Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, DC 20201

Dear Secretary Sylvia Burwell:

Advocates for Ohio's Future (AOF) is a nonpartisan health and human services coalition of over 475 organizations that promotes health and human service budget and policy solutions so that all Ohioans live better lives. We believe in investing in our state's most valuable resource—our people—to ensure that they are safe, healthy, and can afford life's basics.

In recent years AOF has strongly supported Governor Kasich's efforts to expand access to health care to low-income Ohioans. Good health is critical for maintaining a job, earning an education, parenting, and participating in community life. As of January 2016, the Medicaid expansion has successfully provided access to care to 625,000 Ohioans, reducing Ohio's uninsured rate by more than eight percent.

As a coalition, AOF wishes to comment on the Healthy Ohio 1115 Demonstration Waiver submitted by the Ohio Department of Medicaid. Dozens of organizations, including many of our coalition members, oppose the Healthy Ohio waiver. AOF concurs with the concerns our member organizations have expressed. Our chief concerns are described briefly below.

The Healthy Ohio waiver would be a step backwards for Ohio, damaging the progress made toward affordable access to health care without barriers for low-income Ohioans. If implemented, the waiver would reduce access to health care for Ohioans eligible for Medicaid, reduce positive health outcomes for Ohioans using Medicaid, and reduce the efficiency of administering the Medicaid system while increasing the costs of implementation.

The benefits of Ohio's Medicaid expansion are expressed first-hand through AOF's [OhioSPEAKS project](#), a collection of stories from everyday Ohioans that illustrate how investments in health and human services strengthen families and communities. [Charles McClinton](#), whose epilepsy diagnosis led to the loss of his health care coverage and homelessness, received the care he needed to resume participation in the activities he enjoys. [Hazel Connelly](#), who could not afford insurance working part-time, now has a new smile that has given her the confidence to switch jobs and pursue her GED. [Christina Schnetzer](#), who was uninsured for two years after her youngest daughter aged out of Medicaid, now has insurance to proactively address her health concerns. These people, and many [others](#) showcase the positive impact Governor Kasich's decision to increase access to health care has had on thousands of Ohioans. They are also the faces of Ohioans who will struggle to pay premiums and lose coverage when they cannot afford to pay, disrupting coverage and suffering setbacks in the treatment of chronic conditions.



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The Healthy Ohio proposal would require participants to contribute two percent of their annual income or \$99.00 annually, whichever is less, toward the cost of health care. Evidence from states such as Oregon and Vermont show that new premiums often create a barrier to enrollment, leading to significant drops in the number of people with health care coverage. Under the Healthy Ohio plan, if someone misses two monthly payments, coverage is lost. Before regaining coverage, the person must pay what is owed for the two previous months. This would make regaining coverage difficult, especially for the poorest Ohioans who have very little cash income and must make choices between paying for rent, utilities, gas, food and health care.

The Healthy Ohio proposal would reduce positive health outcomes for Ohioans using Medicaid. By adding the requirement of premiums payment, the churn of people entering and exiting the Medicaid program will increase. This churn results in disrupted care, reducing health care outcomes, especially for those managing chronic disease, and leads to increased costs for patients reentering the Medicaid system and increased uncompensated care costs for providers.

The Healthy Ohio proposal increases the complication of using Medicaid for patients and health care providers, increasing the expense of implementation. The challenges of implementation include:

- The need to reach out to beneficiaries to explain the new system;
- The establishment and tracking of health savings accounts;
- Suspending and reinstating enrollees who churn in and out of the Medicaid system;
- The collection and tracking of monthly premiums for Medicaid enrollees by health care providers; and
- The expense of tracking incentive points for certain health activities, like exercise and smoking cessation classes, and the cost of ensuring access to activities for Ohioans in many regions.

Programs like the Healthy Ohio plan are difficult for patients and providers to navigate and expensive to administer. Arkansas recently eliminated health savings accounts and cost-sharing requirements from its Medicaid program, cutting the costs to administer the program in half.

In conclusion, the Healthy Ohio waiver would reduce access to health care, damage health outcomes for Medicaid enrollees, and increase the complexity and expense of administering the Medicaid program. Advocates for Ohio's Future asks the Centers for Medicare and Medicaid Services to reject the waiver proposal and maintain Ohio's Medicaid program in its current state.

Sincerely,

Bill Sundermeyer  
State Director  
Advocates for Ohio's Future



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### **Advocates for Ohio's Future's Steering Committee**

Tamara James	AARP Ohio
Renuka Mayadev	Children's Defense Fund-Ohio
Cathy Johnston	Coalition on Homelessness and Housing in Ohio (COHHIO)
Ron Rees	Corporation for Ohio Appalachian Development (COAD)
Jason Smith	Groundwork Ohio
Rob Alexander	Human Service Chamber of Franklin County
Erin Davies	Juvenile Justice Coalition
Melanie Hogan	Linking Employment, Ability and Potential (LEAP)
Kelly Smith	Mental Health & Addiction Advocacy Coalition (MHAC)
Danielle Smith	National Association of Social Workers (NASW) - Ohio
Beth Kowalczyk	Ohio Association of Area Agencies on Aging (o4a)
Kelly Vyzral	Ohio Association of Child Caring Agencies (OACCA)
Julie DiRossi-King	Ohio Association of Community Health Centers (OACHC)
Dontavius Jarrells	Ohio Association of County Behavioral Health Authorities (OACBHA)
Lisa Hamler-Fugitt	Ohio Association of Foodbanks
Emily Turner	Ohio Association of Goodwill Industries
Teresa Lampl	Ohio Council of Behavioral Health & Family Services Providers
Jane Whyde	Ohio Family & Children First Coordinators Association
Melissa Cropper	Ohio Federation of Teachers
Joel Potts	Ohio Job and Family Services Directors' Association (OJFSDA)
Linda Cook	Ohio Poverty Law Center
Susan Rogers	Ohio RSVP Directors' Association
Mark Davis	Ohio Provider Resource Association (OPRA)
Bobbie Celeste	Ohio Psychological Association
Kerrie Carte	Ohio Workforce Coalition/WSOS
Wendy Patton	Policy Matters Ohio
Mary Wachtel	Public Children Services Association of Ohio (PCSAO)
Tara Britton	The Center for Community Solutions
Valerie Ridgeway	United Way of Central Ohio
Margaret Hulbert	United Way of Greater Cincinnati
Steven Wagner	Universal Health Care Action Network (UHCAN) Ohio
Brandi Slaughter	Voices for Ohio's Children