



**Neighborhood
Family Practice**
COMMUNITY HEALTH CENTERS

www.nfpmedcenter.org

**Ridge Community
Health Center**
3569 Ridge Rd.
Cleveland, OH 44102
216.281.0872

**Tremont Community
Health Center**
2358 Professor Ave.
Cleveland, OH 44113
216.334.2800

**Detroit Shoreway
Community Health Center**
6412 Franklin Blvd.
Cleveland, OH 44102
216.961.2090

**Puritas Community
Health Center**
14037-A Puritas Ave.
Cleveland, OH 44135
216.928.1950

**W. 117 Community
Health Center**
11709 Lorain Ave.
Cleveland, OH 44111
216.367.1004

August 1, 2016

The Honorable Secretary Sylvia Burwell
Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Dear Secretary Burwell,

I am writing to express our concern about the Healthy Ohio 1115 Medicaid Demonstration Waiver and ask you to reject the proposed waiver.

Neighborhood Family Practice (NFP), a federally qualified community health center serving Cleveland's west side, has been providing services for over 35 years. NFP partners with the community for everyone's best health by providing quality health care services regardless of ability to pay; treating patients with compassion, dignity and respect; protecting confidentiality; and offering culturally sensitive services and community outreach. In 2015, NFP served more than 17,000 patients, 63% of which are Medicaid beneficiaries. Additionally, 70% of our patients are 100% below the FPL and 85% are 200% below the FPL.

Neighborhood Family Practice's opposition to the 1115 waiver as written, is not aligned with our core guiding principal, that all people should have access to high quality primary and preventive health care, regardless of their ability to pay. As a foundation, we believe that everyone deserves health coverage that provides affordable access to high quality care and financial barriers to receiving care should be minimized for everyone, especially people with low incomes.

NFP has identified the following concerns to the Healthy Ohio 1115 Medicaid Demonstration Waiver as currently written:

- The proposed waiver will not increase and strengthen overall coverage for low-income individuals. The small monthly fee/premium being charged to even the poorest patients can be a burden for families living paycheck to paycheck. Premiums have led to declines in enrollment in other states. For example, in Oregon, enrollment dropped by 77% after the premiums were instituted. It is estimated that almost one million Ohioans could lose coverage. Moreover, falling behind in payments to their Buckeye Accounts for 60 days will mean expulsion from Medicaid for a full year. This can only result in significant reductions in the number of people receiving Medicaid and ultimately, their medical care.
- The proposed waiver does not increase access to and strengthen providers and provider networks. The proposed waiver would institute health savings accounts and debit cards which will be costly to administer and make it more complex and challenging for people to use Medicaid. Additionally, the operationalization of this process will be costly and for organizations similar to NFP with limited staffing, capacity, and resources.
- The proposed waiver will not improve health outcomes for Medicaid recipients and other low income populations. Health outcomes have been repeatedly

High quality, affordable care in your neighborhood.

demonstrated to be improved when patients have easy access to comprehensive, integrated care through their established providers without financial barriers. The monthly premiums or contributions under the plan serve as financial barriers. Research for decades has shown that copays and deductibles may save money in the short term, but patients cut back as much on necessary care as on unneeded care. Control of chronic diseases for low income patients often deteriorates. Losing Medicaid coverage for many will result in poorer health outcomes, untreated conditions, and increased emergency visits.

Further, many consumer wellness requirements make assumptions about low-income consumers' abilities to access transportation, physical fitness facilities, and other resources that support healthy behaviors, such as better nutrition. The success of these requirements depends upon access to many services that are inadequate or simply not readily available in the communities we serve.

- Another major limitation that is expected from the 1115 Waiver is the annual limit that will be placed on each individual's policy. Contrary to what is acceptable and that aligns with the Affordable Care Act, the 1115 Waiver will create a monetary limit on how much an individual can accumulate within a calendar year for health care services. This is a catastrophic stipulation that the 1115 Waiver will implement if it passes through. This shows a complete setback to the patient as they will have to be selective and even have to avoid certain services as a way to moderate how much they have accumulated in cost for services. The annual limit coverage is just one of the many unfavorable drawbacks of the 1115 Waiver.
- The waiver will not increase the efficiency and quality of care for Medicaid and other low income populations. The usage of health savings accounts and debit cards are costly to administer and manage, increasing the complexity of access and maintenance to care for the patient. Furthermore, it is unclear how "unbanked" consumers in the state will interact with the necessary formal financial systems to ensure timely payment of their required costs.

Thank you for your consideration of our concerns and recommendations for the Healthy Ohio 1115 Medicaid Demonstration Waiver.

Respectfully,


Jean Polster, RN, MS
President and Chief Executive Officer
Neighborhood Family Practice

July 2016

To: The Honorable Secretary Sylvia Burwell
Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Regarding: Comments on the Proposed Healthy Ohio 1115 Medicaid Waiver

To The Honorable Secretary Sylvia Burwell:

I oppose the "Healthy Ohio" Medicaid Waiver because the proposed changes will make health care unaffordable, complicated, and challenging for me and the over one million other Ohioans on Medicaid. This proposal would hurt the recent progress Ohio has made in increasing access to quality health care.

My current Medicaid coverage allows me to receive much needed high quality primary health care at Neighborhood Family Practice, a community health center in Cleveland. I know I have a health care provider that I can see on a regular basis and who can help me maintain my health. Under "Healthy Ohio" if I can't afford to pay my premium, I will lose my health coverage which means I won't be able to receive the health care I need.

I know that I am not the only one in this situation and I urge the Center for Medicare and Medicaid Services to reject Ohio's "Healthy Ohio" Waiver request.

Respectfully,

Jrs Taus

Address:

3062 W 51th

Cleveland Ohio 44102

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Idalia Ortiz / Daniela Ortiz

Address:

2717 Tate Ave. Apt.
Cleveland, Ohio 44109

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Maria J. Brown

Address:

3151 W 58 Street
Cleveland Ohio 44102

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3434 W 129 St

Cleveland OH 44111

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Patricia Reilly

Address:

4311 Leading Ave
Clev, oh 44109

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7500 Denison Avenue
Cleveland Ohio 44102

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Erikah Johnston

Address:

3187 W. 46

Cleveland, OH 44102

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Andra Garcia Pouse

Address:

3442 W. St 65 Cleveland Ohio

44102