

Milton J. Little, Jr.
President & CEO

November 26, 2019

The Honorable Brian P. Kemp, Governor
c/o Lavinia Luca
Board of Community Health
Post Office Box 1966
Atlanta GA 30301-1966

RE: Public Comment, Georgia Pathways 1115 Demonstration Waiver

Dear Governor Kemp:

These comments are submitted on behalf of United Way of Greater Atlanta for consideration with respect to eligibility criteria and program administration associated with the proposed 1115 Demonstration Waiver – Georgia Pathways.

We are always pleased when our state's policymakers seek strategies to provide more Georgians with health insurance. Upon our request, United Way of Greater Atlanta was included among the stakeholders convened pursuant to the Patients First Act of 2019 authorizing Georgia's submission of waivers of the Affordable Care Act. However, we had no role in the development or ratification of either the 1115 Georgia Pathways waiver or its companion, the 1332 Georgia Access waiver.

United Way of Greater Atlanta is well-qualified to provide constructive comment on Georgia Pathways because of our long track record working, in collaboration with philanthropic partners, to provide a hand-up to very low-income adults through work and access to health care. Just a few examples include:

- The launch of Atlanta CareerRise, which prepares and trains unemployed and low-income workers to enter and advance in a career pathway that offers sustainable wages.
- Pairing patients with high emergency room utilization with community health workers who improve the patient's well-being to prevent avoidable ER visits through our Choose HEALTH program.
- Helping people with high emergency room utilization who are homeless or unstably housed achieve both long-term housing and medical stability through our Hospital-to-Home program.
- Subsidizing services at free clinics and health centers for the uninsured, underinsured and the homeless.
- We are a founding partner of the Atlanta Regional Collaborative for Health Improvement. ARCHI is dedicated to closing disparities in health outcomes, life expectancy, economic opportunities and educational attainment, thereby reducing health care costs and increasing worker productivity.

As proposed, Georgia Pathways would be open to Georgians aged 19-64, with income at or below 100 percent of the Federal Poverty Line (currently \$12,490 for a single individual), who are not otherwise eligible for Medicaid by virtue of a disability determination by the Social Security Administration. The state estimates that there are some 408,000 such Georgians.

These 408,000 individuals could receive either Medicaid coverage or subsidies to offset the cost of employer-based health insurance but only if they are employed or participate in another qualified activity for at least 80 hours per month. Other qualified activities enumerated in Georgia Pathways include on-the-job training, community service or full-time enrollment in an institution of higher education. Qualified activities that are time-limited include job readiness or rehabilitation, capped at six weeks in a 12-month period, and vocational education, capped at 12 months in a lifetime unless provided by the Technical College System of Georgia's High Demand Career Initiative.

The state estimates that 52,509 Georgians would be enrolled by the fifth year of the Georgia Pathways waiver, almost 13 percent of currently eligible Georgians. To avoid disenrollment, beneficiaries would be required to:

- Submit monthly activity reports with documentation to demonstrate the number of hours worked or engaged in another qualified activity for at least six consecutive months, reporting any changes in hours or employment; and
- Pay monthly invoices for premiums, tobacco use surcharges and service co-payments less the value of any accrued "member rewards" for good health status by most participants who have income at or above 50 percent of the Federal Poverty Line.
- Successfully be re-evaluated for eligibility annually; and
- Meet their own needs for childcare, transportation and other work supports since Medicaid dollars cannot be used for these purposes.

We respectfully recommend:

- That Georgia give serious consideration to simply expanding the Medicaid program for all adults aged 19-64 with as authorized by federal law. Doing this would enable people with opioid and other addictions who too often end up in local jails get treatment, provide access to care among survivors of family violence and trafficking, and pay for the services needed by uninsured people with chronic health challenges who currently get care in emergency rooms at local taxpayer or philanthropic expense. A fiscal note prepared by the Georgia Department of Audits during the 2019 legislative session indicated that an expansion would cost less than the combined total for the Georgia Pathways and Georgia Access waivers.
- The state's low estimate of enrollment into Georgia Pathways comparative with all potentially eligible adults seems to belie confidence that this program can make a significant difference in either employment or health outcomes within the targeted population. This comports with what we, as United Way of Greater Atlanta, know from experience: poor health status often keeps people locked out of the labor force. Likewise, some 40 percent of Georgia adults have a criminal record which hinders employment and volunteerism even many years after the date of the offense or when the offense poses no risk to public safety. Currently Georgia law allows individuals to request expungement only of arrests that did not result in a conviction or convictions that occurred before age 21.

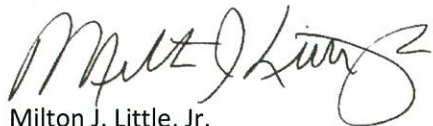
If the state nevertheless chooses to proceed with Georgia Pathways, we recommend that this waiver be refined by convening subject-matter experts knowledgeable of very low-income workers and other public benefit programs that incorporate a work requirement. These should include TANF and SNAP employment and training professionals, the Georgia Department of Labor, the Georgia Vocational Rehabilitation Agency, state and local

Workforce Innovation and Opportunity Act boards, Continuums of Care for the homeless, Housing Authorities, and nonprofits providing employment or health care services for low-income adults. Together, this group could:

1. Align program definitions and standards to specify what is included in countable income for eligibility purposes and qualified work activities across programs. For instance, will the cost of childcare or a child support obligation be deducted from total income for eligibility purposes? How will required monthly hours in qualified unpaid activities such as community service be adjusted when its value, calculated by the minimum wage, exceeds the entire Medicaid per-member-per-month cost? What is the effect upon participants of employment in seasonal occupations or when an employer makes scheduling changes beyond participants' control?
2. Develop strategies to enroll participants and keep them covered. Many participants will be unaware of the program, lack access to a broadband internet connection through which to apply or report monthly activities and will be limited in their ability to remit monthly payments on a timely basis because they are unbanked.
3. Identify and align temporary exceptions and incorporate exemptions to work requirements and administer them consistently. Georgia Pathways does not incorporate a temporary exception to required monthly hours when the participant has experienced an illness nor are any exemptions included. Common exemptions from work requirements in other programs include caring for a young child or an incapacitated family member, unfitness for work, status as a survivor of family violence or participation in an alcohol or drug treatment program.
4. Recommend state funding for work supports like childcare and transportation and strategies to leverage any available through other programs since federal rules preclude the use of Medicaid dollars for these purposes. For example, it might make sense to jointly enroll participants in SNAP or TANF so that these employment and training supports could dually support Georgia Pathways requirements.
5. Recommend that state funding be made available to nonprofit organizations offering community service programs to offset their administrative costs and relieve them from civil liability for a participant's loss of coverage when the nonprofit is unable to provide a community service slot or enough hours to satisfy work activity requirements.

We appreciate your consideration of these recommendations and stand ready to assist you in any way we can be helpful.

Sincerely,



Milton J. Little, Jr.
President & CEO
United Way of Greater Atlanta

cc: Mr. Blake Fulenwider, Deputy Commissioner, Georgia Department of Community Health

