

Public Comments

General Information

Comment Date * 11/14/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Abram

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

Enforce Federal Parity Legislation in Georgia!

It is critically important that mental health parity be a mandated component of any health insurance plan in Georgia. I would like to see any waiver proposal in Georgia move toward the enforcement of federal parity legislation.

Any loss of federal mandated protections for those with mental illness or families seeking mental health care makes it harder for people to shop for comprehensive coverage. It also limits the amount of financial assistance available to Georgians to help lower medical costs. Implementation of parity in our state will ensure that families with mental health care needs have access to care equal to those with physical healthcare needs.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

Enforce Federal Parity Legislation in Georgia!

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(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

Enforce Federal Parity Legislation in Georgia!

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(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Agostoni

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

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Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/15/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Allen

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

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Comment Topic* Georgia Access - Plan Options

Comments*

It is critically important that mental health parity be a mandated component of any of these health insurance plans. We would like to see in any Waiver proposal Georgia move much more decidedly and intentionally toward the enforcement of federal parity legislation. Any loss of federally mandated protections for those with a mental illness or families seeking mental health care makes it harder for people to shop for comprehensive coverage and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity here in the state will ensure that families with mental health care needs have access to care equal to those with physical healthcare needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/1/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Anderson

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State North Carolina

Zip

[REDACTED]

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

This is a public comment for Georgia proposed reinsurance waiver through the Affordable Care Act's Section 1332. I am a research associate at the Duke University Margolis Center for Health Policy. I have written extensively about the Affordable Care Act's individual market with publications in leading peer-reviewed journals such as JAMA Internal Medicine, Health Affairs, and Health Services Research. I have also have written about the Affordable Care Act other publications, such as The New York Times, Health Affairs Blog, Stat, and Morning Consult.

I have two concerns with the reinsurance portion of proposed waiver that the State of Georgia has drafted. First, we believe that the state should consider a state-specific risk-adjustment system once the waiver has been adopted. Not doing so will cause some insurers to effectively be paid twice for the risk they assume for some of their enrollees. Secondly, the projection that this reinsurance waiver will have no effect on the enrollment levels of the subsidized Marketplace population is wrong because reinsurance will alter net premiums.

Risk adjustment is designed to lead insurers to be risk agnostic. The current risk adjustment system used by the Center for Medicare and Medicaid Services is based on national cost estimates for specific conditions. Risk scores are associated with demographic and clinical diagnosis codes of covered individuals. The risk scores are summed and then averaged for each insurer before being normalized across the risk pool's average risk. Funds are then transferred from insurers that assume below-average risk to insurers that assume above-average risk.

Georgia is proposing a "caliper" approach to reinsurance with an attachment point below which claims are not eligible for reinsurance, as well as a reinsurance cap, above which claims are not eligible for further reinsurance. Georgia will pay a proportion of the claims cost that lie between the attachment point and the reinsurance cap. A significant proportion of the individuals whose claims costs will qualify their insurers for reinsurance payments will also have higher than average risk scores.

Three different insurers could have the same average risk score under the current risk adjustment system administered by CMS. The first insurer could cover a population with many low-cost chronic conditions, none of which will ever qualify an individual for reinsurance. The second insurer could cover enrollees that are mostly healthy with no chronic conditions and a modest number of enrollees with conditions that score moderately highly for risk adjustment. The latter group will all qualify for at least some reinsurance, and all of their conditions will not reach the reinsurance cap. The final insurer could cover a population that is overwhelmingly healthy but has a minuscule number of enrollees with extremely expensive conditions, such as history of core organ transplants or hemophilia. A significant proportion of these claims will be above the reinsurance cap.

These three insurers all have the same average risk score. However the three insurers will have very different net of risk adjustment and net of reinsurance claims expenses. The first insurer with many beneficiaries with modest risk scores will bear the entire cost of care with no reinsurance assistance. The second insurer with enrollees who have moderate claim expenses will receive some reinsurance funds. The third insurer which has a small number of enrollees with very high expenses will maximize their reinsurance receipts for a given risk score. The insurers are no longer agnostic to the health status of their enrollees. If the state uses the federal risk adjustment system, insurers will have an incentive to attempt to market their plans to certain populations while minimizing plan attractiveness to other populations.

The state should consider a new risk adjustment system that carves out reinsurance payments so that the risk adjustment system, in conjunction with reinsurance, transfers sufficient funds to pay for care to make insurers risk agnostic instead of risk aware. Risk-aware insurers either become risk seekers or risk avoiders, which is not a behavior the state should encourage in the ACA-regulated markets.

not a behavior the state should encourage in the ACA-regulated markets.

Secondly, Georgia is proposing to have differential payment rates for the reinsurance pool depending on the county of residence for an enrollee. Insurers will have strong incentives to encourage individuals with likely high cost future claims to either stay in Tier 3/ high payout (80% reinsurance regions) or relocate from Tier 1 to Tier 2 or Tier 3 regions. Individuals with \$100,000 in allowed claims living in Jefferson County (Tier 1 county) would cost their insurer \$88,000 in payments net of reinsurance while that same individual, if relocated over the county line to Johnson County (Tier 3) would cost their insurer only \$36,000 net of reinsurance reimbursements. This wedge of \$52,000 invites insurers to be very aware of the reported addresses of their likely to be high cost enrollees. The state of Georgia should be concerned about unusual concentrations of high cost individuals that newly appear under the reinsurance program especially when at least some of these individuals had lived in Tier 1 counties recently.

Additionally, this wedge creates arbitrage opportunities in risk adjustment. Insurers in Tier 3 counties will be overcompensated between reinsurance and risk adjustment for high cost conditions like metastatic cancer and hemophilia than insurers in Tier 1 counties.

Risk adjustment will be a major area of concern with both the reinsurance model and the GAM. The state should spend significant effort to resolve the perverse incentives that will occur between the interaction of the 1332 waiver programs and CMS HCC risk adjustment.

(character limit of 32,500)

Public Comments

General Information

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- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Anderson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** North Carolina

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am a research associate at the Duke University Margolis Center for Health Policy. I have written extensively about the Affordable Care Act's individual market with publications in leading peer-reviewed journals such as JAMA Internal Medicine, Health Affairs, and Health Services Research I also have written about the Affordable Care Act other publications, such as The New York Times, Health Affairs Blog, Stat, and Morning Consult.

I am concerned that the decision to decentralize the enrollment and eligibility functions from the federally facilitated marketplace (Healthcare.gov) to individual brokers and other third party websites will lead to lower enrollment due to the lack of auto-renewal. In a recent paper at JAMA-Internal Medicine (<https://jamanetwork.com/journals/jamainternalmedicine/article-abstract/2751516>), we found that the lack of auto-enrollment options was associated with significant enrollment losses:

"We used multivariate linear regression to estimate the probability that a household re-enrolled as a function of whether it could automatically re-enroll and household characteristics, including the oldest household member's age, household size, whether the household received a premium tax credit subsidy, the post-subsidy premium of the lowest-cost available plan, and indicators for geographic areas and years. We clustered standard errors by geographic areas using the wild cluster bootstrap method. Analyses were conducted in Stata-SE 15.

Results Of the 781 households that could not automatically re-enroll in Covered California due to insurer exit, 21% re-enrolled (Table 1). Re-enrollment rates among the 122,463 households with the option to automatically re-enroll were 51%, a 30-percentage point difference (95% CI, 14-47%; P < 0.001). After adjusting for household characteristics, the average probability that a household re-enrolled decreased by 30 percentage points (95% CI, 9-52%; P < 0.001) in response to losing the option to automatically re-enroll...."

Auto-enrollment is a critical means of maintaining continual enrollment and minimizing variance in the composition of the risk pool over time. The state of Georgia should strongly consider finding pathways to maintain auto-enrollment over multiple open enrollment periods in order to minimize market and coverage disruption.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Anderson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in Georgia who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

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- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Anderson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

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Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Anderson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

JUST EXPAND MEDICAID DONT USE A WAIVER THAT IS MORE EXPENSIVE AND A STRANGE WORK AROUND JUST SO YOU CAN MAKE SOME REPUBLICAN TALKING POINT . MORE PEOPLE COULD BE COVERED AND OUR STATE WOULD BE BETTER FOR IT IF YOU KEMP WOULD JUST EXPAND MEDICAID.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

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- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Andrews

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

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Comment Topic* Georgia Access - Plan Options

Comments*

As you are well aware, income disparity affects so many people living in the state of Georgia. Elected officials are hired by constituents to make a difference in their lives. When you make policies make choices as if you are making them for your family. Let that be your test. What you want for yourself, you should want for others. Please start to consider those who are vulnerable.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/15/2019

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- 1332 Waiver - Reinsurance

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Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Appert

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

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Comment Topic* Other

Comments*

- The plan includes work reporting requirements, which are expensive for the state to implement and not effective in getting more people connected to employment or volunteer activities.
- Georgia will likely miss out on funding to help pay for the program. The federal government pays 90% of the cost of fully expanding Medicaid, but likely only 67% of this current proposal.
- Some Georgians will be required to pay a premium to enroll in Medicaid. Traditionally, premiums are not required to get covered via Medicaid.
- Although 408,000 Georgians in this income range could be eligible for coverage, the Governor's office estimates his plan will cover only around 25,000 for the first year of implementation and a total of only 50,000 within five years.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

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Comment Topic* Reinsurance - Other

Comments*

- The 1332 Waiver moves Georgia from the federal health insurance marketplace (also called healthcare.gov), leaving consumers with no central, unbiased platform where they can compare and purchase comprehensive insurance plans. Instead, of the central source of information, insurers will again have to depend on the insurers themselves and brokers in order to compare and purchase plans. The consumer would lose the ability to compare plans on-line through a central marketplace.
- Allows for the creation and purchase of plans that do not cover essential health benefits. (for example, a man could eliminate maternity coverage). These plans largely target healthy individuals who are a low risk. This proposal concerns advocates of women's health because of concerns that the waiver would subsidize insurance plans that do not cover maternity and newborn care as essential health benefits.
- Providing plans that allow for menu shopping of benefits drives up the cost of other plans which provide comprehensive coverage. (The larger the insurance pool, the lower the costs).

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

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Comment Topic* Georgia Access - Other

Comments*

- The 1332 Waiver moves Georgia from the federal health insurance marketplace (also called healthcare.gov), leaving consumers with no central, unbiased platform where they can compare and purchase comprehensive insurance plans. Instead, of the central source of information, insurers will again have to depend on the insurers themselves and brokers in order to compare and purchase plans. The consumer would lose the ability to compare plans on-line through a central marketplace.
- Allows for the creation and purchase of plans that do not cover essential health benefits. (for example, a man could eliminate maternity coverage). These plans largely target healthy individuals who are a low risk. This proposal concerns advocates of women's health because of concerns that the waiver would subsidize insurance plans that do not cover maternity and newborn care as essential health benefits.
- Providing plans that allow for menu shopping of benefits drives up the cost of other plans which provide comprehensive coverage. (The larger the insurance pool, the lower the costs).

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Public Comments

General Information

Comment Date * 12/2/2019

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1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Arcuria

Email *

Address

City

State Georgia

Zip

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

I urge you to expand Medicaid fully. Your plan will only offer insurance to about 50,000 of the currently uninsured Georgians. Drop the work requirements. Many people do contract work and wouldn't meet that 80 hr a month criteria. Many older people lose their jobs between ages 50-65 and are not eligible for Medicare. However, despite the current optimistic job statistics I know MANY friends and family members who are unemployed in this age group who can't find decent-paying jobs. There is a LOT of age-discrimination in companies' hiring practices. Also many people in the film and music industry work on projects and may not work in specific months.

The volunteer 80-hr option sounds good, but in reality is difficult and expensive to supervise. When I was working for a governmental agency, it took more time to constantly train and manage volunteers that were sent to us by DFCS and other agencies than it was worth. You are constantly having to re-train new people, plus it takes away the time from the organization's managers to perform their regularly-scheduled duties. Just expand Medicaid fully.

Also many Georgians have medical issues that preclude them from working, yet the disability courts etc. are backlogged and don't declare them disabled.

Also DO NOT make any Georgian who doesn't qualify for any GA plan you develop ineligible for participation in federal Affordable Care Act. Especially for those people who earn too little for subsidies, it would allow those who can pay, or for whom family members' pay the premiums, to have good health care coverage for which they might not be eligible through your proposed new GA plan.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

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Comment Topic* Reinsurance - Other

Comments*

Fully expand Medicaid instead.

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Comment Topic* Georgia Access - Plan Options

Comments*

See comments under first section
(character limit of 32,500)

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On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Asbell

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

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Comment Topic* State Program Cost and Budget

Comments*

Please revise this waiver to provide coverage to all Georgians eligible for Medicaid. A fiscal note prepared by the Georgia Department of Audits suggests that expansion would cost less than the combined total for both proposed waivers.

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On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Asbell

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

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Comment Topic* Georgia Access - Other

Comments*

I would like to suggest the following:

Help Georgia consumers make wise choices in selecting a health insurance plan for themselves and their families by providing guidance in evaluating coverage against essential health benefits, provider networks, premiums, deductibles, co-pays, plan limits, and maximum out-of-pocket spending.

Restrict the use of premium subsidies to qualified health plans offering all essential health benefits. Alternatively, revise the waiver to specify the characteristics of non-qualified plans that will be eligible for subsidies and how consumers would be protected.

Remove the cap on the premium subsidies to ensure that everyone eligible can receive them and afford their health coverage.

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On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Atkins

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Baker

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Baker

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Baker

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Baker

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

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Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Baker

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

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Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Baker

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

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Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Baker

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

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Comment Topic* Other

Comments*

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(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Baker

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

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Comment Topic* Georgia Access - Other

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(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Baker

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

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Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Baker

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

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Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Balbona

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

I STRONGLY OPPOSE both of these draconian measures!!! Both Waiver 1115 and Waiver 1332 are UNACCEPTABLE!!!

Georgia has the MOST maternal deaths in the US!!! <https://www.wabe.org/maternal-mortality-georgia/>
How dare you attempt to lessen medical coverage in Georgia!!! Have you no shame?! Both of these Waivers are UNTENABLE!!!

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

I STRONGLY OPPOSE both of these draconian measures!!! Both Waiver 1115 and Waiver 1332 are UNACCEPTABLE!!!

Georgia has the MOST maternal deaths in the US!!! <https://www.wabe.org/maternal-mortality-georgia/>
How dare you attempt to lessen medical coverage in Georgia!!! Have you no shame?! Both of these Waivers are UNTENABLE!!!

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

I STRONGLY OPPOSE both of these draconian measures!!! Both Waiver 1115 and Waiver 1332 are UNACCEPTABLE!!!

Georgia has the MOST maternal deaths in the US!!! <https://www.wabe.org/maternal-mortality-georgia/>
How dare you attempt to lessen medical coverage in Georgia!!! Have you no shame?! Both of these Waivers are UNTENABLE!!!

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Ball

Email *

Address

City

State

Zip

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

You want to hear a story to help make a case to do the best thing for my community? You want me to again go through the experience that caused me harm? You want to understand the gaps in treatment systems to make improvements? You want to find a way to assist the homeless population that is visibly growing in the downtown Atlanta area? You want to know... Driving to work you see the homeless. I have personally been a recipient and facilitator of recovery support services and what I know is that I am constantly triggered every single time I leave where I stay. I was a part of getting the information (data) to give to the public servant that said they were for my community. I told my community if we tell them what we need they will give us the help we need. I tried to instill in my children to have faith in the process for change. Unfortunately just like my community my kids see me still trying to be seen and heard. I heard last night that we have been waiting a long time for our public servant to do the public good. How can you truly be the servant you pledge to be when you have the data and can see the public's plight from your office window? I'm nobody though and my children and community doesn't matter. 3 billion dollars in Federal funding that can help build on what we do have answers for and you want to refuse it? We know that what's predictable is preventable and for you to ignore what the public has shown you is a clear example of what i think it means to CANCEL MY CULTURE! Do not support this waiver. EXPAND MEDICAID!

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Balog

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

why on earth wouldn't you just expand Medicaid all the way? 100% FPL isn't an accurate measure of real poverty - you're just preventing people who are already working multiple low wage jobs from getting health care.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Employer Sponsored Insurance

Comments*

How on earth are people earning minimum wage, or close to it, supposed to afford the health insurance offered by walmart or whatever, AND still make rent and feed their kids? you're trapping someone in a no win-situation rather than just taking advantage of what Medicaid expansion is supposed to offer.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Premiums, Copayments, Member Rewards Account

Comments*

If somebody dies because they didn't go to the doctor because they didn't have the copay, I hope you're happy.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

The simplest way to improve Georgia's economy and the health of its workforce is to fully expand Medicaid. This is a bassackward way to try to do that.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

As a taxpayer and Cobb County resident, I'm appalled that you're spending MORE of my money to cover LESS people than if you just expanded Medicaid fully. This is moronic.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

This is a waste of taxpayers' money as currently designed. Please reformulate and make this full Expansion.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Barker

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Barker

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/22/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Barnes

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

I do not support the proposed Georgia Pathways program. We need full Medicaid Expansion without work requirements. This does not affect me directly but I believe that all Georgia residents deserve full and easy access to medical care. We should take back those federal dollars and not leave them on the table. It's the humane thing to do.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Bates

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

Anyone who has ever been poor enough to not have insurance understands how damaging the current plan is. We need to cover MORE people, not fewer. I was without insurance for close to a decade and it was very scary. Something as simple as a broken arm would have wiped me out completely and cancer would have wiped my whole family out-- maybe for the next generation as well.

We should accept the federal money and cover more people, period. This would costs Georgia less money and it would also cost individuals less.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

Doesn't matter what i write, or how much ridiculous and unnecessary work a state-level marketplace makes.

Kemp's gonna Kemp.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Beaman

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Beaman

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

I am writing to express concerns about the Kemp Administration's 1115 waiver proposal. Blood cancer patients and their families understand first-hand that their survival depends on access to affordable treatment and medication.

Governor Kemp's proposed changes to the state's Medicaid program would cover only a fraction of uninsured, low-income Georgians and leaves billions of federal health care dollars on the table. Georgia is turning down \$8 million a day (\$3 billion per year) that could be used to give access to health care coverage to hardworking Georgians.

As cancer patients and survivors know all too well, just one medical bill can send a person into bankruptcy if they are uninsured. Georgians need the security of quality health care coverage when they need it most, without facing huge medical bills or going into bankruptcy.

This proposal does little to help those in the most need and makes little economic sense for the state – it must be stopped.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Beeson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

Please expand Medicaid under the Affordable Care Act instead of implementing a work around that costs Georgians more while covering less individuals. Additionally, the work requirements to enroll in this program are asinine at best. Georgia is failing across the board in terms of quality and access to healthcare. By looking at other states who have expanded Medicaid under the ACA, we could be thriving — but instead our rural hospitals are closing, maternal healthcare ranks the lowest in the nation, and Georgians are struggling to care for themselves and their families.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

Please expand Medicaid under the Affordable Care Act instead of implementing a work around that costs Georgians more while covering less individuals. Additionally, the work requirements to enroll in this program are asinine at best. Georgia is failing across the board in terms of quality and access to healthcare. By looking at other states who have expanded Medicaid under the ACA, we could be thriving — but instead our rural hospitals are closing, maternal healthcare ranks the lowest in the nation, and Georgians are struggling to care for themselves and their families.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

Please expand Medicaid under the Affordable Care Act instead of implementing a work around that costs Georgians more while covering less individuals. Additionally, the work requirements to enroll in this program are asinine at best. Georgia is failing across the board in terms of quality and access to healthcare. By looking at other states who have expanded Medicaid under the ACA, we could be thriving — but instead our rural hospitals are closing, maternal healthcare ranks the lowest in the nation, and Georgians are struggling to care for themselves and their families.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Behm

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

The illusion of coverage

The 1115 waiver would extend Medicaid coverage to residents with earnings below the poverty line only if they meet a burdensome work requirement and pay premiums. There would be no exceptions to the work requirement, meaning people who cannot work due to a disability, serious illness, or caregiving responsibilities could not get coverage.

While the state estimates over 408,000 non-elderly uninsured adult Georgians with incomes below the poverty line are uninsured, Georgia projects that only about 50,000 will eventually enroll in Medicaid through the waiver, due to its burdensome requirements.

Coverage of 50,000 persons out of 408,000 persons is not coverage. Coverage for 1 in 8 is not coverage. Coverage of less than 13% is not coverage. Would we accept 13% of a bridge being built as a bridge? Would our state troopers accept 13% of their compensation as being paid in full? Would teachers work in a school that is 13% built?

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

The paramount duty of government

Article I, Section I, Paragraph II of the Georgia constitution reads, in part, "Protection to person . . . is the paramount duty of government and shall be impartial and complete."

Combined, the state estimates that it will spend about \$322 million – or about \$215 million excluding costs covered by user fees – to extend coverage to just under 80,000 Georgians under the 1332 and 1115 waivers.

Instead of pursuing these two limited waivers, Georgia can and should accept the ACA's Medicaid expansion and allow all residents earning under 138% of the federal poverty line to qualify for Medicaid coverage.

Doing so would extend coverage to between 487,000 and 598,000 residents at a net state cost of \$188 million to \$213 million, according to state estimates.

Doing so would provide coverage for approximately 10-12x as many people as would be covered by the 1115 waiver for less money. And that is without taking into account the savings to other budgets and funding sources at the state, county, and local levels that would not have to pay for care to uninsured patients.

Georgia has the opportunity to expand coverage to hundreds of thousands of people that would result in significant benefits to the state's residents, including fewer premature deaths and improved access to care and financial security for people gaining coverage.

The Georgia constitution provides that protection to person is the paramount duty of government and shall be impartial and complete. The proposed waiver leaves many Georgians unprotected, making it neither impartial or complete.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

The waiver includes a proposal to establish a reinsurance program. Similar programs have been successfully implemented in other states, reducing premiums for unsubsidized consumers. Georgia should move forward with this proposal while dropping the harmful components of the waiver.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

The paramount duty of government

Article I, Section I, Paragraph II of the Georgia constitution reads, in part, "Protection to person . . . is the paramount duty of government and shall be impartial and complete."

Combined, the state estimates that it will spend about \$322 million – or about \$215 million excluding costs covered by user fees – to extend coverage to just under 80,000 Georgians under the 1332 and 1115 waivers.

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Georgia has the opportunity to expand coverage to hundreds of thousands of people that would result in significant benefits to the state's residents, including fewer premature deaths and improved access to care and financial security for people gaining coverage.

The Georgia constitution provides that protection to person is the paramount duty of government and shall be impartial and complete. The proposed waiver leaves many Georgians unprotected, making it neither imparital nor complete.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

The waiver should benefit Georgia's citizens, not insurers at the expense of citizens.

The 1332 waiver allows alarming changes to policies governing the financial assistance people receive to purchase health coverage under the ACA.

Under the waiver, the state would allow tax credits to be used to purchase substandard health plans that exclude coverage for essential health benefits, such as prescription drugs, maternity care, or mental health and substance abuse care.

Allowing tax credits for substandard plans would create adverse selection that would increase premiums, because many healthier people, even those eligible for tax credits, would enroll in cheaper, more limited coverage. Higher premium costs will raise the per-person costs of tax credits, resulting in a higher total cost than the state budgets for and triggering the waiver provision which allows the state to cap enrollment with tax credits.

Consumers shopping after the cap has been reached will lose access to tax credits, forcing them to buy substandard plans that don't meet their needs, pay more for comprehensive coverage, or go without insurance.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Georgia Access - Consumer Experience

Comments *

Why are transparency and accountability not guiding elements of the 1332 waiver? Who should the government be looking to benefit, it's citizens or insurance brokers and companies?

The waiver allows changes to policies establishing where and how consumers purchase health coverage that will undermine consumer protections in the ACA.

Georgia would privatize functions of the marketplace by removing the state from the federally-facilitated exchange platform (HealthCare.gov) without creating their own exchange. Instead, consumers would enroll in coverage only through private web brokers and insurers, exposing them to the same risks posed by direct enrollment in the ACA.

Direct enrollment entities already have a track record of steering consumers towards substandard plans that leave them exposed to catastrophic costs if they get sick, failing to alert consumers of Medicaid eligibility, and not allowing meaningful plan comparisons.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Georgia Access - Other

Comments *

Honor and respect the rule of law.

The 1332 waiver fails to meet the statutory “guardrails” intended to ensure that people who live in states that implement an ACA waiver are not worse off than they would be without the waiver.

Section 1332(b)(1) of the ACA requires that ACA waivers cover as many people, with coverage as affordable and comprehensive, as without the waiver. However, under the proposed waiver, the coverage that many Georgians would have would be less comprehensive, and more people would find themselves with less affordable coverage and out-of-pocket costs than would be the case without the waiver.

Additionally, Georgia may see a reduction, rather than an increase, in coverage under the 1332 waiver. The waiver does not meet the guardrails under federal law and is not approvable.

Trying to administratively veto a statutory mandate cannot stand. The will of the people, as expressed through their elected representatives, must be respected.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** bell

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

As citizens and residents of Georgia healthcare should be a right for every citizen of the great state of Georgia. For we wrestle not against flesh and blood but against principalities against wickedness that dresses up in business and smile's and denies healthcare to the most vulnerable citizens we need to stand up and fight against this new thing that's happening in our country where we are not our brothers keeper We must always stand up for the least of these and never forget such were some of us.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

As citizens and residents of Georgia healthcare should be a right for every citizen of the great state of Georgia. For we wrestle not against flesh and blood but against principalities against wickedness that dresses up in business and smile's and denies healthcare to the most vulnerable citizens we need to stand up and fight against this new thing that's happening in our country where we are not our brothers keeper We must always stand up for the least of these and never forget such were some of us.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

As citizens and residents of Georgia healthcare should be a right for every citizen of the great state of Georgia. For we wrestle not against flesh and blood but against principalities against wickedness that dresses up in business and smile's and denies healthcare to the most vulnerable citizens we need to stand up and fight against this new thing that's happening in our country where we are not our brothers keeper We must always stand up for the least of these and never forget such were some of us.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Bello

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

This is a sad attempt to disrupt the Aca and concedes power to the for profit healthcare system. It still leaves the majority of low income Georgians uninsured and in the hands of the predatory healthcare profiteers. You are playing with peoples lives for the sake of your own political gain. If you are going to steal elections to govern than you need to look out for all Georgians not just your base and donors.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

This is a sad attempt to disrupt the Aca and concedes power to the for profit healthcare system. It still leaves the majority of low income Georgians uninsured and in the hands of the predatory healthcare profiteers. You are playing with peoples lives for the sake of your own political gain. If you are going to steal elections to govern than you need to look out for all Georgians not just your base and donors.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

This is a sad attempt to disrupt the Aca and concedes power to the for profit healthcare system. It still leaves the majority of low income Georgians uninsured and in the hands of the predatory healthcare profiteers. You are playing with peoples lives for the sake of your own political gain. If you are going to steal elections to govern than you need to look out for all Georgians not just your base and donors.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/25/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Bender

Email *

Address

City

State

Zip

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

Just expand Medicaid and use all the federal funds available already. Cover as many people as you can find who are legally eligible. This isn't rocket science.

And stop pretending that it is, FFS.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/23/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [Redacted] **Last Name *** Bene

Email * [Redacted]

Address [Redacted]

City [Redacted] **State** Georgia **Zip** [Redacted]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

As analysts have pointed out, this is an extremely cost-ineffective proposal, compared to going ahead and expanding Medicaid as sensible states did once ACA got going.

You sacrifice the good of many low-income folks and rural hospitals and docs for the sake of ideological rigidity.

Just give it up and expand Medicaid to cover as many folks as possible, for no more cost than this sad plan.
(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

n/a

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

n/a

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Biel

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage. As a lymphoma survivor, I will be impacted by this waiver in an adverse fashion

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Biel

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage. As a lymphoma survivor, I will be impacted by this waiver in an adverse fashion

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Bigby

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

Please expand Medicaid to the fullest extent allowed. I pay your premiums as a taxpayer, and I provide well for you and yours. Return the courtesy to the people you serve.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Please don't make insurance changes that only benefit a few and give the carriers more profits and power. Instead provide a way to expand and make less costly the choices available.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name *

Last Name *

Billings

Email *

Address

City

State Georgia

Zip

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

My son is a blood cancer survivor and I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Bithell

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

Just expand Medicaid. Seriously it is far simpler to just do that and it is better than what you have planned. Stop being stubborn and making us all look stupid just do the right thing. Georgia is an actually filled with incompetent people it would be great if you could do the thing that would prove that instead of wasting our time and yours on your sub par plan.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

Just expand Medicaid. Seriously it is far simpler to just do that and it is better than what you have planned. Stop being stubborn and making us all look stupid just do the right thing. Georgia is an actually filled with incompetent people it would be great if you could do the thing that would prove that instead of wasting our time and yours on your sub par plan.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

Just expand Medicaid. Seriously it is far simpler to just do that and it is better than what you have planned. Stop being stubborn and making us all look stupid just do the right thing. Georgia isn't actually filled with incompetent people it would be great if you could do the thing that would prove that instead of wasting our time and yours on your sub par plan.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Bolton

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

A reoccurring issue for GA residents is supporting those that fall in the gap between inability to afford coverage, but receive income above the poverty line. As a college educated, productive citizen, I have fallen in that gap. I was fortunate enough to do everything 'right' according to the unspoken rules of attaining the American Dream. However, unfortunate enough to fall short of the right to good healthcare. Good health, breeds more efficient employees, affords more productive citizens and is the epitome of a better GA. Let's scratch this plan and begin again.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

N/A

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Under Obama care, health insurance companies took advantage of those with good paying jobs and forced premiums up to ridiculous values. For a family of five, my premiums went from about \$300 to over \$1000 per month. The prescribed plan is stained with loopholes that screams a similar result. Based on my families medical history, I'd be wasting \$1000s of dollars each year to buy into such a ludicrous plan. Let's scratch this plan and begin again.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/1/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Bourque

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

Concerns about cutting occupational therapy services for individuals with chronic illnesses
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/14/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Brands

Email *

Address

City

State Georgia

Zip

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

The state plan should definitely include parity for mental health treatment and coverage of pre-existing conditions.

If these issues are not properly covered, thousands of our most vulnerable citizens will be left defenseless.

Those making these decisions should seriously consider the consequences.

One in four families are touched by mental illness. Many of these families and individuals are impacted financially by these circumstances.

Many additional families are impacted by illnesses which would also be considered pre-existing conditions.

It is heartless to ignore these needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Breen

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

I am a single self-employed home builder and I pay 100% of my own health insurance...
Before Obama-Care came into effect I had good insurance for \$200.00 a month with good coverage.
Then for a couple years I had Blue-Cross that cost me \$800.00 a month with a \$6,000.00 deductible.
The last 2 years all insurance providers pulled out of the Atlanta area and I was left without any providers....
I had to purchase an insurance out of state that has cost me \$573.00 a month and covered nothing...
I only purchased this because if you do not have insurance the Doctors will not accept you as a patient.
In 2018 I paid \$6,987.00 in premiums and \$13,350.00 to the doctors a total of \$20,337.00.
In 2019 to date I paid \$7,120.00 in premiums and \$8,260.00 to the doctors a total of \$15,380.00.

My needs as a self-employed home builder that brings in a lot of revenue for the State of Georgia is for this Governor to stand up for me and get me access to a reasonable Health Insurance that works. My pay scale is above all the government requirements but as I pay these high premiums with no coverage it is putting a heavy burden on me. It is not fair and I expect my Governor to help the ones who put him in office.

Thank you,
Mike Breen

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Breite

Email *

Address

City

State

Zip

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Breite

Email *

Address

City

State

Zip

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

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Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Brett

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [Redacted] **Last Name *** Bridges

Email * [Redacted]

Address [Redacted]

City [Redacted]

State Georgia

Zip [Redacted]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Brown

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

While I absolutely support the expansion of Medicaid to include all Georgians living at or below 100% FPL (including students), I believe the inclusion of work requirements as a eligibility criterium hinders the intended goal.

Qualifying Medicaid eligibility with the addition of work requirements will not result in "healthier Georgians", and will, instead, continue to exclude residents who need coverage the most. As we have seen around the nation already, the addition of work requirements to Medicaid eligibility is unacceptable and damaging and does not result in the extension of coverage to Georgians in need. Withholding necessary coverage on the basis of employment eligibility is cruel and does not reflect the values that I associate with my home state. We do not know the circumstance of peoples' lives or why they may be unable to obtain or maintain employment or training. This waiver assumes certain realities of peoples' lives that may or may not be true and perpetuates exclusion of Georgians most in need of coverage and access to healthcare.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

This waiver removes the guarantee that Georgians have access to full-coverage health insurance options by reducing the number and type of benefits required to be included and covered in a plan. This also leaves residents vulnerable to predatory brokers who are not involved to support the individual, but rather are there to maximize their profit. This perpetuates the harmful reality that our health insurance market is just that - a market - and not a system available for residents. This does NOT improve access to healthcare in Georgia, this degrades coverage and, ultimately, healthcare access.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

This is a dangerous waiver that reduces the availability of coverage options that actually provide Georgians with the coverage choices they need. These leave Georgians with slim (if any) options that cater to the insurance companies' profit margins and do not serve our state's residents. The EHBs put in place by the ACA ensure that enrollees are able to obtain actual coverage that meet their needs, not piecemeal "plans" that serve the insurance companies more than the insured. This waiver dismantles that essential quality of the ACA and puts Georgians at risk of purchasing insurance that does not in fact meet their healthcare needs.

This would also dramatically disrupt the hundreds of thousands of Georgians currently enrolled in coverage through the Federal Marketplace.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** brown

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

These proposals are absolutely absurd and politically motivated. More people could be covered, at a lower rate, if the Medicaid expansion was just accepted as originally intended. One need look no further than states where these waivers have been shut down and in states where the expansion has been accepted like KY. The proposed "skinny plans" are useless and they don't even portend to cover the minimum requirements of pre-existing conditions requirements. The waivers are simply kickbacks to insurance companies that become enriched while serving a bare minimum of constituents at a greater cost than what true Medicaid expansion would require. Georgians deserve better - especially the elderly, children and those living with lifelong medical conditions such as HIV.

Stop playing political games with Georgians health care.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/23/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Brown

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

As a controller for multiple small companies I strive to make sure the companies I serve use their dollars in the most economical way possible. Spending more money to cover less people is not good economics. Not in just pure dollars but a healthy society is a society that can contribute more to Georgia's overall economy.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

As a controller for multiple small companies I strive to make sure the companies I serve use their dollars in the most economical way possible. Spending more money to cover less people is not good economics. Not in just pure dollars but a healthy society is a society that can contribute more to Georgia's overall economy.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

As a controller for multiple small companies I strive to make sure the companies I serve use their dollars in the most economical way possible. Spending more money to cover less people is not good economics. Not in just pure dollars but a healthy society is a society that can contribute more to Georgia's overall economy.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Brown

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Enforce Federal Parity Legislation in Georgia!

It is critically important that mental health parity be a mandated component of any health insurance plan in Georgia. I would like to see any waiver proposal in Georgia move toward the enforcement of federal parity legislation.

Any loss of federal mandated protections for those with mental illness or families seeking mental health care makes it harder for people to shop for comprehensive coverage. It also limits the amount of financial assistance available to Georgians to help lower medical costs. Implementation of parity in our state will ensure that families with mental health care needs have access to care equal to those with physical healthcare needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Bruce

Email *

Address

City

State Georgia

Zip

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

Many people have part-time jobs, contract jobs, seasonal jobs, physical and mental handicaps. I am temporarily unemployed myself, due to medical issues, and have an engineering degree and an MBA. Insurance should not depend on one's job. Healthcare is a basic human right. Most first-world countries provide healthcare for their citizens. Why can't the USA act like a first-world country? Expand Medicaid to low/no income people and/or Medicare to everyone.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Georgia should definitely participate in healthcare.gov. GA's government's role should be taking care of its citizens, not only the rich. Without this site, we will no longer have access to tools to compare health plans. Junk plans will proliferate and consumers will get the short end of the stick. Mental health care costs will rise, and protections for pre-existing condition coverage will disappear. I remember Governor Kemp promising that he wouldn't do that during the campaign.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/15/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Bryson

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

4105

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

These waiver applications all seem designed to favor insurance companies over customers. Customers would receive a better deal via Obamacare -- better subsidies, more choices, and more protection.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

These waiver applications all seem designed to favor insurance companies over customers. Customers would receive a better deal via Obamacare -- better subsidies, more choices, and more protection.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

These waiver applications all seem designed to favor insurance companies over customers. Customers would receive a better deal via Obamacare -- better subsidies, more choices, and more protection.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Buono

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.

Governor Kemp, in your campaigning, you assured us that you would protect Georgia's citizens by ensuring comprehensive coverage for pre-existing conditions, and even shared that members of your own nuclear family have pre-existing conditions. This must include holding healthcare insurance companies accountable to offering health insurance plans without hidden loopholes and money-saving agendas. Coverage needs to be "coverage." We are counting on you to ensure this.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Burke

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Butler

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

Removing access for Georgians to the ACA platform and pushing them to private brokers is flat wrong. This is unproven and only adds more complexity to an already complex system. Which plan is best? Which broker to choose? Does this cover this? This is not an improvement. I do not support this.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Removing access to ACA plans and replacing them with private brokers is wrong. This is merely adding complexity to an already complex and overwhelming to understand medical system. It is unproven and needlessly shifts bureaucratic (and expensive) oversight from the federal to state level. How exactly would Georgians working hard each day find time to evaluate different private brokers? Will the state educate them on how? I do not support this.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/18/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Cahoon

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

Please help GA citizens get the help we need and deserve even if we can't afford premium therapy prices. More people will seek help if they know they can afford it. All people want to get better but if that is limited to only people that have enough money than that person and their family and all other connections suffer.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Camardelle

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

This Medicaid proposal includes harsh, burdensome, ineffective, & quite frankly immoral work requirements. This is an ineffective and costly policy that will do far more harm than good to people struggling with the sky-high costs of healthcare in Georgia. According to the proposal, enrollees must be employed or in education/training a minimum of 80hrs/month. Also, "individuals that do not meet the hours and activities will be provided information about workforce development resources". Information is not enough. Instead, why doesn't the proposal commit to invest in a robust, aligned system of workforce referral services? What evidence suggests work requirements don't work? Scores of evidence exist that show the unintended consequences of work requirements in public benefits programs. The proposal touts TANF as a successful model citing increase in wages for TANF participants. Research shows program's work requirements do not significantly reduce chronic poverty. In fact, A 2018 study conducted by the Center for State and Local Finance at Georgia State University on Georgia's own TANF program found most cash assistance recipients who find work are guided into 'low-skill' jobs that pay well below the poverty threshold. According to the report, "TANF leavers appear to graduate into the ranks of the working poor, and the very poor at that, with only 13-15 percent rising above the poverty line." Georgia only spends 7% of it's TANF block grant on work activities/supportive services. This is not the right model from both the program and investment perspective. Georgia's top industries pay well-below livable wage. So to gain coverage, we're forcing already poor Georgians who need Medicaid to fill jobs with low wages, inconsistent schedules and no benefits such as paid sick leave for a minimum of 80 hours a month. Job training will also count as meeting the requirement, but training is limited to 12 months, unless enrolled in the "high demand career initiative". Not sure if the state is not fully aware of the programs that exist, but HDCI is not a program. It is an initiative to get employer feedback about 'hot careers' in the state. The lack of mobility in Georgia's rural areas is particularly challenging for people subject to work requirements. A report from the United States Department of Agriculture on SNAP requirements found "participants often drop out b/c there is no public transportation in the area, and they do not have a reliable car." For example, the nearest job training provider for someone seeking Medicaid and living in Crawfordville, GA (a place with a 21% uninsured rate and 6% unemployment rate - 2x the state's average) is about one hour away. The lack of accessible wraparound support signals again that the 'activity' criteria for evaluating Medicaid eligibility is a lost cause without investment in essential support services such as transit and child care for low-income workers. Even hospitals express deep disappointment in the proposal, which prioritizes work over health. According to the Georgia Hospitals Association, the plan "does not significantly move the needle for the rural and safety-net hospitals who care for the state's uninsured patients". There is no evidence that taking away economic security because of challenges completely out of their control helps people gain employment. In fact, the opposite is true. When people have affordable and quality healthcare, they are more likely to be equipped to find and keep employment. We must reject this proposal and fully expand Medicaid.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Campbell

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

There are too few people covered for more money - the plan would mean more people would be without coverage than if we expanded Medicare.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Campbell

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

Medicare for all!!

Expand it so we can be a smarter stronger and healthier to make a better world.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

HiThe proposed plans change who can enroll in Medicaid and how the private insurance marketplace works. If implemented, they will only cover about 80,000 more Georgians and cost the state \$215 million to implement. Meanwhile, if Georgia fully expanded Medicaid to the extent allowed under federal law, the state would spend \$213 million to cover almost 500,000 more Georgians.

We need Medicare for all!!
(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

The proposed plans change who can enroll in Medicaid and how the private insurance marketplace works. If implemented, they will only cover about 80,000 more Georgians and cost the state \$215 million to implement. Meanwhile, if Georgia fully expanded Medicaid to the extent allowed under federal law, the state would spend \$213 million to cover almost 500,000 more Georgians.

We as Georgians need Medicare for all.
Same price for everything.
Free healthcare for all would be cheap.
I work full time and need medical insurance.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/28/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Cannarella

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Premiums, Copayments, Member Rewards Account

Comments*

I do not support these changes to health insurance coverage contained in the "Pathways" and "Access" waivers, especially in the context of the better outcomes that could / would be realized with the full utilization of Medicare expansion that is available. My biggest objection is the abandoning of the state portal for accessing insurance options that is contained in the Access waiver, as this forces people needing coverage to go through an additional agent, which essentially introduces a "middle-man" seeking profit into the process, which drives up costs and/or reduces coverage quality for consumers. This is absolutely senseless and contradicts what should be the state of Georgia's goal for health insurance for our citizens. I also oppose the minimum of 80 hours / month requirement in the Pathways waiver, as it hurts the chances of obtaining insurance for many of the most vulnerable in Georgia. From reports that I have seen, it is accepted by nearly everyone who has analyzed these proposals that these changes would cost more and cover fewer people than what would be possible if we were to utilize the resources we are allocated to expand Medicare coverage throughout Georgia, and in that light it would be irresponsible for these waivers to be adopted.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

I do not support these changes to health insurance coverage contained in the "Pathways" and "Access" waivers, especially in the context of the better outcomes that could / would be realized with the full utilization of Medicare expansion that is available. My biggest objection is the abandoning of the state portal for accessing insurance options that is contained in the Access waiver, as this forces people needing coverage to go through an additional agent, which essentially introduces a "middle-man" seeking profit into the process, which drives up costs and/or reduces coverage quality for consumers. This is absolutely senseless and contradicts what should be the state of Georgia's goal for health insurance for our citizens. I also oppose the minimum of 80 hours / month requirement in the Pathways waiver, as it hurts the chances of obtaining insurance for many of the most vulnerable in Georgia. From reports that I have seen, it is accepted by nearly everyone who has analyzed these proposals that these changes would cost more and cover fewer people than what would be possible if we were to utilize the resources we are allocated to expand Medicare coverage throughout Georgia, and in that light it would be irresponsible for these waivers to be adopted.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/28/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Cannington

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

Expand Medicaid fully according to the available Federal program and help all Georgians achieve a minimum level of health!

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Cargal

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Cargal

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

Hello, my name is Alexia Cargal. As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government. Its irresponsible to put fellow Georgians dealing with major medical needs like my three-year-old son, James. We depend on our elected officials to watch out for us and our children, the future of Georgia.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government. Please, please, think about our loved ones, our children - Georgias future. Their lives shouldnt be put at risk. We keep getting closer to living better lives with the medical advancements the CF Foundation has made. This waiver will make us the only state in this country to hinder the progress being made to ensure our loved ones live longer and healthier.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/12/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Carpenter

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

Enforce Federal Parity Legislation in Georgia!

It is critically important that mental health parity be a mandated component of any health insurance plan in Georgia. I would like to see any waiver proposal in Georgia move toward the enforcement of federal parity legislation.

Any loss of federal mandated protections for those with mental illness or families seeking mental health care makes it harder for people to shop for comprehensive coverage. It also limits the amount of financial assistance available to Georgians to help lower medical costs. Implementation of parity in our state will ensure that families with mental health care needs have access to care equal to those with physical healthcare needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Carroll

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

Say no to this waiver Kemp is proposing..I sent a long opinion,but something happened,to,it..check the complaints aboutmthewaiversnwenjave.checkmthe care of these three people with community health.thebdept. Of family and children,the offices of all senators,Chris Carr..the list is long....Breanna Bustamante..Lonnie Sellers...Sharon Carroll..complaints no support surgery gone wrong....day program complaints .ThebColumbusbGroup complaints Piedmont Newnan hospital,complaints regarding Lonnie sellers,the cdc..etc.my second try to comment..

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Carstarphen

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/1/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Carter

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

I am Not in Support of Waiver 1132. (A voter who voted for Kemp last time. Not next time if this is implemented as is) Questions at end I would Like Answered.

As stated in the proposed 1132 Waiver the estimated projected impact on Individual Market Enrollment is only +0.4%. This really is not any measurable impact whatsoever. The only real objective here is for the state of Georgia to have more control over federal dollars. I see this whole proposal doing more harm than good to people like myself and others that I have spoken to about this. This Waiver will result in a negative impact upon people who rely on the individual market such as myself. This Waiver is not well thought out to benefit Georgians. It is planned mostly by people who do not rely on the individual marketplace for their own healthcare. How many people that were involved in writing this Waiver rely on the Individual Marketplace for their own coverage?

I voted for Kemp this last election. If Waiver 1132 is pushed through and signed by Kemp I can promise I will not vote for him next time. I have spoken to multiple people who have stated the same as me. I can overlook a lot of things but on healthcare I will not waiver. I also do not support a medicare for all program by the way. The only part I can support in the Waiver is keeping the Pre-existing condition waiver in place. Besides that this plan has horrible sections in the Waiver. I do not support the idea of being forced to look to brokers, commercial channels (misleading websites) or have to check with each carrier to find the right plan. This will add an extra long workload on the people to do their research instead of logging into one website (healthcare.gov) which has an unbiased presentation of plans. I have had horrible experiences in the past using brokers and commercial websites to purchase healthcare. I have been through a lot of health insurance plans since the early 90's and never once had a good experience buying a plan until healthcare.gov. The Affordable Healthcare Acts definitely has flaws but the private insurance market has worked the system to make it work in my case. I definitely do not want the State of Georgia running the program as Georgia government it is one of the worst in customer service. Just look at the DMV, Department of Revenue, Secretary of State, Department of Labor. Owning a small business I have had to deal with them all and I find it is almost always a horrible experience. If the state can't manage its current programs I can only imagine the disaster that is coming. It will be like playing Russian Roulette with peoples lives.

My premiums have been reduced under the ACA each year for the past 2 years with Alliant Health Plans. The fact Waiver 1132 looks to create new risk pools by region, control how the subsidies are used, control co-pays, deductibles, reduced or stripped benefits, I am afraid will result in increased premiums, more out of pockets costs, less benefits, fewer provider choices and more bankruptcies for people. As someone who was healthy prior to the AOC becoming in effect and then after becoming sick under the ACA I am now thankful for the preexisting condition clause. However, I had many symptoms and conditions that resulted in having to go to 65 (doctor/provider/Imaging/labs/hospital) visits before I was finally diagnosed with an autoimmune condition on my 65th visit. Now I have frequent labs and scheduled visits to maintain my condition. QUESTIONS: 1) What assurances are provided (based upon previous 3 sentences) that this new Waiver 1132 will keep total costs the same or lower and provide me the same or better benefits (ie emergency rooms) quality of care, provider choices, no limit doctor visits, no referral requirements and the same or lower prescription costs?. QUESTION: 2) How many people were involved in crafting Waiver 1132 that use the Individual Marketplace for their own healthcare needs vs. those with state or employer provided healthcare? Please answer these 2 questions.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

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(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Clark

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

The Medicaid proposal expands coverage to those who make up to the poverty level versus covering those who make up to slightly more than the poverty level as permitted by federal law. As a result, hundreds of thousands of people who cannot afford private insurance will languish.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

The majority of enrollees in the ACA individual market receive premium tax credits that cap the amount they must pay for coverage at a percentage of their income. For this group, reinsurance doesn't reduce the premium contributions they must pay; instead, by reducing sticker price premiums, it reduces their subsidy provided through the premium tax credit.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

This waiver caps the amount of financial assistance those who are unable to afford private insurance can receive.

The waiver also eliminates the requirement that health care coverage includes mental health services

The waiver makes it easier for insurance companies to offer subpar plans that don't cover all basic health services.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Clawson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

I am deeply concerned about the eligibility restrictions for this waiver. They will act as a barrier to enrollment. Requiring participants to report their work/school/volunteer hours will result in people dropping on and off coverage, particularly because there isn't a grace period if you miss a month of reporting. Moreover, this requirement will prevent caretakers, seasonal workers, and part time students from enrolling, even though they are the most in need of medicaid access. I think this is a poorly designed policy that does not meet the needs of Georgians. This waiver does not respond to Georgian's desire for traditional medicaid expansion.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Premiums, Copayments, Member Rewards Account

Comments*

I think it is insulting to make someone below the poverty line pay a premium. Every penny of their income is accounted for, and even a nominal premium or copay could be used for food or transportation. By expanding eligibility, you recognize that this group deserves support, yet you are continuing to punish them with cost-sharing schemes that are untested.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

This is an incredibly costly program to cover a small percentage of those that are in the coverage gap. This leaves behind hundreds of thousands of Georgian's that are in desperate need of health insurance and healthcare. Why are we covering AT BEST 80,000 people for the same price that we could cover over 400,000 people. This is fiscally irresponsible and a terrible deal for Georgia. Approving a traditional medicaid expansion with the 90/10 match from the federal government is a much better deal that we should pursue.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

I think in general a Reinsurance program is a good idea when combined with responsible insurance reform. Unfortunately, I fear that any benefits from a reinsurance program will be negated by the reckless policies in the Georgia Access part of the waiver.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am horrified that this waiver seeks to replace the healthcare marketplace with private insurance brokers. I have used healthcare.gov to purchase my health insurance and it is helpful, convenient, and clear. I appreciate that I am the customer. By using private insurance e-brokers, the primary client is the insurance company and the website is designed to help the insurer, not me. This is a bad deal for health insurance consumers. I appreciate the side-by-side comparisons on healthcare.gov and the guarantee that all plans on the marketplace cover the 10 Essential Health Benefits. This waiver completely undercuts those protections and will take us backward in time to when the insurer holds all the power and benefits and the consumer holds all of the risk. I STRONGLY oppose the consumer experience proposals in this waiver. I think it will allow for deceitful, insufficient, and harmful health plans in our system and cause Georgians to suffer. This waiver is clearly meant to help insurance companies, not Georgians buying healthcare.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Allowing junk plans back into the healthcare marketplace is NOT providing better choices for Georgians. This would disproportionately impact people with high health needs that can't get by with a skimpy health plan. It will effectively create a high risk pool of consumers that need comprehensive health plans, with the result that their premiums and healthcare costs will go up. This is discriminatory to those living with chronic illnesses and disabilities. It is also predatory to those who think they are buying a comprehensive plan, not knowing that plans are no longer required to cover the 10 essential benefits. It also sets up consumers to go into medical debt by purchasing a skimpy plan, thinking they don't need emergency room care or mental health care, only to have unexpected life events that leave them swimming in medical debt because of the junk health plans that this waiver would subsidize. This completely undermines the guardrails in the ACA and is in direct contradiction with the law. Moreover, removing mental health parity is the exact OPPOSITE of what our state needs right now. With the opioid crisis becoming an increasing problem, allowing insurance companies to remove mental healthcare from their plans or charge more for mental health care, will only harm Georgians. This plan will exacerbate the opioid crisis in Georgia and further victimize it's citizens.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

I oppose the extra cost of setting up a state subsidy and rebate program that coordinates with private insurance brokers. State agencies already have enough on their plate without making them provide a service that the federal government is effectively and seamlessly providing through healthcare.gov. This is NOT an effective use of taxpayer dollars.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Subsidies

Comments*

Capping subsidies is unconstitutional. Citizen's access to benefits they are entitled to should not be determined by what time of year you purchase health insurance. Those experiencing a life status change at the end of the year should have the same access to subsidies as those enrolling during the open enrollment period. If you are qualified for a benefit, you should receive that benefit. It is unfair and unacceptable to allow that kind of inequality in our system with subsidy caps and waiting lists. Subsidies should continued to be distributed through the federal government in concert with healthcare.gov. Georgia does not need to set up it's own subsidy system, and government subsidies should ONLY be allowed to supplement insurance plans that cover the 10 Essential Benefits.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Clements

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

I am excited at this positive step in stabilizing the care afforded to Georgians with high health care costs! I hope that this reinsurance plan can be used on its own merits of respect for everyone's right to quality health care access, with special attention to those who need it most. Using public funds to subsidize costs for those with higher health care bills is a model way of providing for the well being of all Georgians. Let's take a step in a direction of equity and moral responsibility and keep this portion as is!

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

A few things disturb me about the changes proposed in this portion of the act.

First, with no mandate for health insurance companies to cover mental health care, we undermine the notion that well-being is every bit mental as it is physical, and that as humans we are mind, body and soul. By eliminating this necessary coverage, you would disenfranchise vulnerable Georgians to paying out of pocket for the vital health care they need to sustain a good life. If we are "endowed by our Creator with certain inalienable Rights, that among these are Life, Liberty and the pursuit if Happiness," is not mental health care coverage fundamental to the pursuit of Happiness?

Second, all basic health services should be provided in every single health care plan. It is a denial of the state's responsibility to bolster the well-being of all to not commit to this necessary baseline of care. Cutting costs by cutting quality is immoral and lazy.

Third, those who qualify for help in accessing the health care coverage they need should be given that aid, with no wait list or threat of back-billing. People need to know that they have access to the health care they need in order to really be able to heal from whatever is plaguing them. Would you add to someone's stress level, and thus diminish the quality of life and care, but not providing them this most basic need because they cannot afford it?

Please consider the impacts of this legislation on the lives of our most vulnerable people in our state, those who have been historically disenfranchised, our veterans who come home physically and mentally wounded but with no promise of quality care, our young people born with debilitating problems yet who hold the promise of our future, and our aging parents and grandparents who deserve the treatments possible after their many years of hard work, service and love. Would you deny them their most basic right to quality healthcare?

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Cline

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Cline

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

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Comments*

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Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/17/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Coleman

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

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I speak from personal experience on behalf of a family member. Help should be readily available no matter the contents of your wallet. We say "There is Hope". Make this hope affordable and available.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Collins

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

This program will cost \$215 million to cover roughly 80,000 people. This is compared to about \$213 million to fully expand Medicaid coverage to at least 490,000 people. Georgia should fully expand Medicaid coverage.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Conde

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

Since these health care waivers were announced I have not had a single peaceful night of sleep. I've had stress dreams every night because this topic doesn't just affect my career, issues like these consume my heart and soul and have affected and destroyed multiple generations in my family. The lives and the financial and physical health of hundreds of thousands of people are at risk. My entire life has been dedicated to advocacy because my younger brother has hemophilia. You don't know fear, grief, and suffering unless you've spent your life constantly scared of what could happen to someone you love. I grew up going in and out of hospitals with my younger brother, never knowing what was going to happen to him. That should have been my worst fear, the sinking feeling in the pit of my stomach should have been reserved for seeing my baby brother bleeding or bruised and waiting to see what would happen to him. Instead, I was robbed of a peaceful childhood because the most terrifying things were the bills that just kept coming, bills that I knew could cripple my family financially. My family had insurance, my family had good insurance but it wasn't enough to handle any illness and if we're honest, what insurance plan is?

The passage of the Affordable Care Act helped to alleviate some of the fears I had grown up with but it wasn't enough, at least not in Georgia. The full expansion of Medicaid is the answer that my family waited nearly a decade for and still has yet to see. However, I've seen and been a part of the struggles that happened because our state chose not to do the right thing. We could have been covered. We could have had so much more. So much more peace. So many more options. Our lives might be good now but we wouldn't have the same scars and trauma if our state leaders had made choices thinking of us as real people and not just numbers.

My family's story isn't unique in Georgia and it's not even close to being the most tragic. I volunteer with families who struggle through every moment of their day not knowing what to do for their children, not knowing how to protect them and guarantee them a safe and healthy future. The Georgia Pathways waiver only adds to this constant stress and terror. State leaders have made a choice, instead of covering as many Georgians as possible, the state opted to erect barriers to coverage by:

- Expanding coverage to only those making up to the poverty level. Federal law allows states to expand coverage to people who earn slightly more than the poverty line—but not enough to afford private insurance.
 - o Creating burdensome paperwork requirements that are expensive for the state to maintain, difficult to navigate and that keep people from being able to enroll. This means you have to work to get healthy, when it should be the other way around.
 - o Requiring that enrollees pay premiums or else be disenrolled. Traditionally, Medicaid recipients do not pay premiums.
- The plan also created burdensome work reporting requirements. Recent studies show implementing work requirements for adult Medicaid enrollees to maintain their eligibility is not an effective way of getting more people connected to employment or volunteer activities.
 - o Lack of information, low computer literacy and unreliable internet access create obstacles to enrollees reporting on work requirements. Georgia should avoid these costly regulations in order to maximize the positive impacts of Medicaid expansion.
 - o States like Tennessee and Arkansas are required to report work hours in order to receive Medicaid. This requirement costs Tennessee \$34 million per year. In Arkansas, 18,000 people lost coverage in the six months following the work requirement implementation.

Fully expanding Medicaid to the extent permitted under federal law remains best moral and economic option. Legislators have the opportunity to amend the Patients First Act to allow for full expansion to cover as many Georgians as possible and receive more federal funding to fix the state's health crisis.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

Since these health care waivers were announced I have not had a single peaceful night of sleep. I've had stress dreams every night because this topic doesn't just affect my career, issues like these consume my heart and soul and have affected and destroyed multiple generations in my family. The lives and the financial and physical health of hundreds of thousands of people are at risk. My entire life has been dedicated to advocacy because my younger brother has hemophilia. You don't know fear, grief, and suffering unless you've spent your life constantly scared of what could happen to someone you love. I grew up going in and out of hospitals with my younger brother, never knowing what was going to happen to him. That should have been my worst fear, the sinking feeling in the pit of my stomach should have been reserved for seeing my baby brother bleeding or bruised and waiting to see what would happen to him. Instead, I was robbed of a peaceful childhood because the most terrifying things were the bills that just kept coming, bills that I knew could cripple my family financially. My family had insurance, my family had good insurance but it wasn't enough to handle any illness and if we're honest, what insurance plan is?

The passage of the Affordable Care Act helped to alleviate some of the fears I had grown up with but it wasn't enough, at least not in Georgia. I've seen and been a part of the struggles that happened because our state chose not to do the right thing for consumers. My family stands to face the extreme negative implications of these waivers. Last year, my father lost of his job of 28 years and that same day my family lost their health insurance coverage. The ACA marketplace was a lifesaver for my family and allowed them to have choices and a place where they knew they could make a good and safe choice for the coverage they desperately needed. Threats to the marketplace are threats to family's well being and health, state leaders are making choices while forgetting that those being affected are real people and not just arbitrary numbers.

My family's story isn't unique in Georgia and its not even close to being the most tragic. I volunteer with families who struggle through every moment of their day not knowing what to do for their children, not knowing how to protect them and guarantee them a safe and healthy future. The Georgia Access waiver only adds to this constant stress and terror. Through this waiver the state is allowing insurance companies to more easily offer second-rate plans that do not cover all basic health services. Georgia consumers with pre-existing conditions or those who want to start a family may have to pay more for comprehensive care. This waiver also requires consumers to shop for health insurance on websites that are run by insurance companies and e-brokers, instead of healthcare.gov. Consumers would longer have an unbiased source for health insurance information and may need to visit multiple websites to purchase care. State leaders have made a choice that threatens the lives of hundreds of thousands of people and yet stands to greatly benefit e-brokers and insurance companies. To quote Parks and Recreation "A person should not have to have an advanced degree to avoid being taken advantage of by a multi-billion dollar company."

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Conner

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Conrad

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

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Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/24/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Cooley

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

I am against the waivers and support full Medicaid expansion.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

I am against the waivers and for full Medicaid expansion.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

I am against the waivers and support full Medicaid expansion.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/24/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** coppock

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

But as a Georgian, I have come to expect no better than this. As a result, I have urged my daughter (28 years old with Cystic Fibrosis-who is disabled , but has much to contribute)to establish permanent residence in California, where politicians are not encumbered by a Governor or a legislation who serves only their supporters, and who revel in the marginalization of the weak and the vulnerable cloaked under the veil of partisan politics. I can now only pray that hearts are softened and that this proposed waiver is reconsidered.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/24/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** coppock

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** [REDACTED] Couch

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

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People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [Redacted] **Last Name *** Couch

Email * [Redacted]

Address [Redacted]

City [Redacted] **State** [Redacted] **Zip** [Redacted]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

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Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Crook-Hill

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

The proposed waiver doesn't go far enough - Georgia should adopt the full federal Medicaid expansion that is part of the ACA.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Do NOT eliminate access to healthcare.gov. Private insurers are interested in profit not health.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Crosswell

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Cummings

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.

Insurance companies & legislators need to work for & with those who pay them rather than finding ways to drive-up health care costs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Curtis-Davidson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

As a healthcare professional, I highly support the full expansion of Medicaid in Georgia. I have seen first-hand the disparities in healthcare for individuals living without health coverage. Access to affordable healthcare benefits all Georgians. The 1115 Waiver would exclude more Georgians who need healthcare than those who would be covered. Georgia should fully expand Medicaid to all those eligible under federal law.

This waiver discriminates against some of Georgians most vulnerable citizens. Please make Medicaid available to all who would qualify under federal rules.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

The 1332 state innovation waiver undermines the ACA's protections for people with pre-existing conditions and leaves thousands of Georgians at risk. Consumers who need comprehensive coverage may find that they are stuck with higher overall costs because healthier consumers are able to purchase skimpier plans.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

This wavier is a veiled attempt to dismantle the ACA. This waiver threatens the health of Georgians but limits coverage leaving consumers with no central, unbiased platform where they can compare and purchase comprehensive insurance plans.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/26/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** D'Agostino

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

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Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/26/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** D'Agostino

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

On a personal note, as someone who is about to turn 26 and lose coverage on my parent's healthcare plan, it is overwhelming and terrifying to try to find another adequate plan and the thought of the plan options becoming even less suitable for cystic fibrosis care is horrifying.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/22/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Dale

Email *

Address

City

State Georgia

Zip

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

How you expect sick people to work as a condition of getting health care is indefensible.

Instead of a full expansion of Medicaid as other states have done, Georgia has turned down federal money-- OUR money!--that would have helped give people insurance. Instead, we have Georgians dying because we refused to take what was offered.

Now Kemp wants to peddle his inadequate healthcare plan that will leave hundreds of thousands of Georgians out.

Everyone deserves adequate health insurance. Give it to us.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/14/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Davis

Email *

Address

City

State

Zip

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

It is critically important that mental health parity be a mandated component of any of these health insurance plans. We would like to see in any Waiver proposal Georgia move much more decidedly and intentionally toward the enforcement of federal parity legislation. Any loss of federal mandated protections for those with a mental illness or families seeking seeking mental health care make it harder for people to shop for comprehensive coverage, and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity here in the state will ensure that families with mental health care needs have access to care equal to those with physical health care needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Davis

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

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Comment Topic* Program Goals

Comments*

This waiver does not help those who need it most. What's wrong with expanding Medicaid through the PPACA, since you're trying to keep parts of it anyway? Commercial health insurance is expensive no matter how you slice it. ESI costs money from monthly payments to deductions to copays. So you're still paying out of pocket at each level. How does that help those who can't afford to even pay for ESI? Even if it's "affordable," according to your chart, almost \$20 a month is A LOT of money to those struggling to make ends meet. Not to mention if they have a chronic illness that requires lots of visits to the pharmacy for medication or lots of visits to specialists. Whether it's \$10 or \$2, it adds up.

I happen to fall into the crack where I don't make a lot of money, but I don't qualify for Medicaid either, so I pay lots of money each month on ESI for insurance that I can't afford to use. Medicaid doesn't require any of that. It doesn't cover everything, but doctor's visits and medicine costs are HUGE factors in why people don't even bother going to the doctor until it's too late in a lot of cases. This waiver in no way addresses the actual issue of access. We all have access, doesn't mean we can afford to use the services. And you also want to pay employers MORE to encourage people to use their insurance plans?! Yeah, let's make my healthcare contingent upon whether or not my employer agrees with my life choices. Insurance shouldn't be tied to jobs anymore. People shouldn't have to worry about losing their insurance when they leave a terrible job. I do not like this idea at all.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

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Comment Topic* Reinsurance - Other

Comments*

This is ridiculous. You want to eliminate coverage for pre-existing conditions and compensate the CARRIERS for carrying those high-risk individuals rather than the people using the insurance plans?! Also, you want to cap the claims that people can do? How does that help those who need life-saving care that goes into the millions range? Are they supposed to move or just be rich? And you're not cutting the premium by that much at 10%, so it's not even worth it. That won't stabilize the market, it'll crash it.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

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Comment Topic* Georgia Access - Other

Comments*

I just have to ask have any of the people proposing this waiver ever had to actually depend on any state-run services? I hate to assume anything, but I'm going to say no. State run housing assistance has not been open or accessible for over three years. State run DFCS and SNAP services are so convoluted and messy that almost more people are NOT using the services than are and that's AFTER the state invested millions of dollars into the system. Medicaid will drop coverage with no explanation or warning whatsoever for ONE family member and you won't know until you actually have to use the service.

That's all just to say that the consumer experience that you're touting will be horrible. But who will people actually be able to complain to about it? State politicians don't answer calls. None of the state departments in charge of these services have the answers, if you get a person on the phone at all. There is no oversight whatsoever. So how will the consumer get the better deal out of this? The Georgia Gateway website is a mess. Most state department websites send you to non-existent pages. I have no doubt whatsoever that this "Georgia Access Model" will be as egregious as the rest. Probably even more so because there will be thousands more people trying to use the services.

Since part of your plan is attempting to still use parts of the PPACA, again, why not just expand Medicaid instead of making up nonsense? People are dying and none of this addresses the problem.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Davis

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

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Thank you for your consideration of these comments.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

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Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

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Thank you for your consideration of these comments.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

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Thank you for your consideration of these comments.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Day

Email *

Address

City

State Georgia

Zip

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** DeHeck

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

My family was not renewed by our Health provider when the affordable care act (ACA) was enacted. Our provider stated that our plan did not meet the requirements of the ACA. We had a private Health Savings Account plan since neither my wife or I are covered by employer. I work part-time and she is self-employed. Our HSA allowed to have a High deductible and provided us with a tax benefit of saving for our own health expense when the need arises. This encouraged us to save for health expenses. Our premium on a 10000 deductible was \$350/mo for family of 4. My family is very healthy, no previous conditions.

After being cancelled we researched the ACA website and because we did not qualify for subsidies we were offered \$1100/mo for comparable plan and NO HSA. It was very disappointing to talk with other people getting insurance from ACA and paying less than \$100 for an individual.

We decided not to use the ACA and instead used Medishare, and Christian sharing plan that will cover large medical expenses but does not cover routine procedures such as physicals, pat smears, ect. This coverage has forced us to delay some optional medical procedures recommended by our doctor such as colonoscopy because of the non-discounted cost even though we are both over 50.

The option to not have some services covered in order to lower costs just makes sense. We do not need maternity care for instance. We need to incentivize people to exercise and take responsibility for improving their health. I hope this plan is enacted. I think it will help thousands of self-employed families afford quality health of their choosing.

Doug DeHeck
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/1/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Deogracias

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

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Thank you for your consideration of these comments.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

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Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

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(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

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Comment Topic* Georgia Access - Other

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Public Comments

General Information

Comment Date * 11/27/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Dey

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

This is a terrible way to expand coverage to the poor if we place so many restrictions on them (work requirements, coverage loss due to failed payment). Why are you wasting so much money on administering something like this when those millions in admin costs could be redirected elsewhere? How is not fully expanding Medicaid and at the same time receiving 90% of the funding from federal gov not a better deal?

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

These plans will cost the state about \$215 million to cover an estimated 80,000 people vs. about \$213 million to fully expand Medicaid coverage to at least 490,000 Georgians. How do any of the proposed plans make any financial sense?! Those behind these proposal are NOT prioritizing the health and care of the neediest of Georgians.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

I want my fellow Georgians to get all the essential health benefits Obamacare guarantees...if you care so much about our awful maternity care stats in this state then you'd reconsider something like this. I want us to continue to have a centralized place like healthcare.gov to purchase policies instead of brokers and insurance companies who prioritize profits over care.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Dick

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/14/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Dickinson

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

It is critically important that mental health parity be a mandated component of any of these health insurance plans. We would like to see in any Waiver proposal Georgia move much more decidedly and intentionally toward the enforcement of federal parity legislation. Any loss of federal mandated protections for those with a mental illness or families seeking seeking mental health care make it harder for people to shop for comprehensive coverage, and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity here in the state will ensure that families with mental health care needs have access to care equal to those with physical health care needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/14/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Dickinson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

It is critically important that mental health parity be a mandated component of any of these health insurance plans. We would like to see in any Waiver proposal Georgia move much more decidedly and intentionally toward the enforcement of federal parity legislation. Any loss of federal mandated protections for those with a mental illness or families seeking seeking mental health care make it harder for people to shop for comprehensive coverage, and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity here in the state will ensure that families with mental health care needs have access to care equal to those with physical health care needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Dougherty

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

The work requirement of the proposed waiver request is unrealistic. In addition to being an onerous burden for those living in poverty, it does not take into consideration those who care for a family member who is disabled, chronically ill or elderly. Care of that nature is typically a full time endeavor. If less than full-time, it can be sporadic and the caregiver may find it difficult to sustain any employment due to the unexpected nature of the need for their services. This requirement will reduce the number of participants.

Also, the requirement that only those making under 100% of the poverty line can participate will reduce the number of participants as well. If the goal, as the state claims, is to increase insurance coverage under the 1115 waiver, why is their projection of the number of new participants under their waiver plan lower by 330,000+ of their stated goal?

State Program Costs and Budget

If the state's goal really is to increase the number of covered residents under their plan, expanding Medicaid under the ACA is the best option. It raises the poverty line eligibility requirement to 138% and allows the state to receive a 90% match from the federal government. Spending more tax dollars to cover fewer Georgians is not only ridiculous but from a taxpayer's perspective, it is an act of malfeasance.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

Using premium subsidies for non-qualified health plans opens the door to possibly returning to plans that exclude patients with pre-existing conditions, plans that cost more to use, and shift the market and increase costs for qualified comprehensive plans.

Keep healthcare.gov as a centralized enrollment mechanism instead of eliminating it and requiring the public to deal with each individual insurer's website to gather and compare plans. Those days were abysmal and made it much more difficult to choose the best plan for one's needs.

Remove the cap on premium subsidies to continue to make coverage affordable for as many people as possible.

Compare the costs the state will incur and the number of individuals covered for that cost based on the combined waivers, against the cost of simply expanding Medicaid in the state. The vast difference in both the number of people covered and the tax dollars spent should be a red flag for the Governor. The funding for his plan is being used primarily to reimburse insurance companies while doing virtually nothing in comparison for individuals in the state who have no coverage, currently. The significantly higher cost to cover significantly fewer patients borderlines on fraud. There is no other way to characterize such a theft.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

n/a

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[Redacted]

Last Name *

Draves

Email *

[Redacted]

Address

[Redacted]

City

[Redacted]

State Georgia

Zip

[Redacted]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

Medicaid expansion should come quickly to cover thousands of Georgians. The poor or those who just don't have health insurance need medical coverage. There are so many risks in our lives that are not our fault, but we pay the price for being treated for those conditions.

Air pollution kills 9 million worldwide each year. People are thus exposed to many air-borne chemicals including carcinogens and they risk their health with every breath. There needs to be a way to offset expenses due to public health dangers such as that. Asthma is the Number One reason kids miss school, it also causes the Number One reason for children being admitted to hospitals.

Indoor smoking is much less than in the past, but there are exposures to these very strong chemicals. At least 6 million people worldwide die because of tobacco smoke in the air they breathe. Atlanta will be smokefree in restaurants, bars and the airport, which were not covered by the Smokefree Air Act of 2005. In homes, parents smoking around their children. Secondhand smoke is a major trigger for asthma attacks.

Drunk, drugged or distracted drivers cause many accidents everyday and there are thousands of innocent people hurt.

There are many hazards on the road and in the streets. Accidents happen and those not at fault are harmed by even careful drivers.

Our nation is not providing needed coverage of medical bills especially for someone harmed with no fault of his own.

Those that are not covered by Medicaid come to the hospitals at later stages of diseases that could have been treated earlier that would have save lives, and money. It was very stupid not to have the 3 years of funding that Georgia would not have had to pay. Now legislators are worried about picking up the 10% not covered by the federal government--they must prove it will be a horrible amount of charges.

It is time to get on the ball with covering people with good healthcare. Are there any benefits from allowing disease and accidents to keep people from their job, or keep children home from school? Dental problems affect people's health. Scientists have found that heart disease is connected to how well people are with their teeth.

If Georgia can't afford the 10% as our matching fund, then we can't afford all the diseases and other health negatives. Uninsured sick folks will be coming to your hospital to rack up bill and then leave them behind for other to pick up the tab.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

Medicaid expansion should come quickly to cover thousands of Georgians. The poor or those who just don't have health insurance need medical coverage. There are so many risks in our lives that are not our fault, but we pay the price for being treated for those conditions.

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There are many hazards on the road and in the streets. Accidents happen and those not at fault are harmed by even careful drivers.

Our nation is not providing needed coverage of medical bills especially for someone harmed with no fault of his own.

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It is time to get on the ball with covering people with good healthcare. Are there any benefits from allowing disease and accidents to keep people from their job, or keep children home from school? Dental problems affect people's health. Scientists have found that heart disease is connected to how well people are with their teeth.

If Georgia can't afford the 10% as our matching fund, then we can't afford all the diseases and other health negatives. Uninsured sick folks will be coming to your hospital to rack up bill and then leave them behind for other to pick up the tab.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Medicaid expansion should come quickly to cover thousands of Georgians. The poor or those who just don't have health insurance need medical coverage. There are so many risks in our lives that are not our fault, but we pay the price for being treated for those conditions.

Air pollution kills 9 million worldwide each year. People are thus exposed to many air-borne chemicals including carcinogens and they risk their health with every breath. There needs to be a way to offset expenses due to public health dangers such as that. Asthma is the Number One reason kids miss school, it also causes the Number One reason for children being admitted to hospitals.

Indoor smoking is much less than in the past, but there are exposures to these very strong chemicals. At least 6 million people worldwide die because of tobacco smoke in the air they breathe. Atlanta will be smokefree in restaurants, bars and the airport, which were not covered by the Smokefree Air Act of 2005. In homes, parents smoking around their children. Secondhand smoke is a major trigger for asthma attacks.

Drunk, drugged or distracted drivers cause many accidents everyday and there are thousands of innocent people hurt.

There are many hazards on the road and in the streets. Accidents happen and those not at fault are harmed by even careful drivers.

Our nation is not providing needed coverage of medical bills especially for someone harmed with no fault of his own.

Those that are not covered by Medicaid come to the hospitals at later stages of diseases that could have been treated earlier that would have save lives, and money. It was very stupid not to have the 3 years of funding that Georgia would not have had to pay. Now legislators are worried about picking up the 10% not covered by the federal government--they must prove it will be a horrible amount of charges.

It is time to get on the ball with covering people with good healthcare. Are there any benefits from allowing disease and accidents to keep people from their job, or keep children home from school? Dental problems affect people's health. Scientists have found that heart disease is connected to how well people are with their teeth.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Dubbaka

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Premiums, Copayments, Member Rewards Account

Comments*

Making the premiums mandatory could result in coverage being taken off, from hundreds of families. It just defeats the purpose and the struggles of many non profit organizations/medical centers to reduce the gap in healthcare.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

Everybody has a right to health. It is not fair to not place enough importance on mental health as we would on physical health. Many non-ACA compliant plans health plans do not cover basics like prescription drugs or mental health care, but their marketing tactics obscure these shortcomings. That is not healthy for most Georgians, with mental health and substance abuse cases growing in number everyday.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/22/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Dufort

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

Medicaid coverage for the poor isn't a welfare-to-work program. It's a baseline level of preventative care for people without employer-sponsored health insurance, a workforce that includes landscapers, restaurant workers, home caregivers and other low-income workers whose services we all depend upon.

We all benefit when everyone has access to basic healthcare. Adding a work requirement ignores the reality of what many low income Georgians are dealing with: they may be caregivers for children, or for old or infirm relatives. they may not have adequate transportation - a key issue in many rural counties. they may be too ill to work. There is data that shows getting basic health care services to all people helps some be able to become productive members of the workforce.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

Our rural hospitals are threatened because of your refusal to fully expand Medicaid. My insurance premiums are higher because of your refusal to expand Medicaid.

Do the right thing - take advantage of the ACA subsidies and expand Medicaid.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

While reinsurance has been shown to reduce premiums in some markets, I am concerned that this proposal is far too focused on benefitting insurance companies and not sufficiently focused on benefitting Georgians.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I have lived in Georgia and purchased my insurance using the Healthcare.gov site since the very beginning. Sure, I lived through the frustrating website glitches. But that is long past.

What remains is a curated site, that requires insurance companies to offer me comprehensive plans, laid out in a way the makes it easy to understand and compare plans.

I like that, and do not want you to take it away.

I pay my premiums 100% with no subsidy - I am a "hard working Georgian" who happens to be self-employed.

I am furious that you propose to take away the curated, easy to compare site - and force me to deal directly with insurance companies and brokers, motivated more by profit than by making sure its easy for me to make the best choice for my insurance.

What is the purpose? It certainly does not serve Georgians like me.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/26/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Dunnagan

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

The Georgia Pathways program is going to cost the state more than a full Medicaid expansion would, and cover much fewer people. It will do very little to address health care disparities in this state for poor and rural people and people of color. The income threshold of 95% of the FPL is too low and the requirements for work/ education/ community service do a tremendous disservice to people who need Medicaid because of health issues. This program is a shame and a disgrace to Georgia.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Eidson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Elsa

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

I am strongly opposed to Governor Kemp's proposal for Medicaid Waivers.

We need to expand Medicaid to all eligible people, WITHOUT WORK REQUIREMENTS, and

take advantage of the federal dollars which pay 90% and COVER MANY MORE PEOPLE.

This is not only morally correct, but an economically sound practice.

Nancy Elsea

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

Georgia should NOT adopt Gov. Kemp's Medicaid waiver plan.

We need to cover all eligible for Medicaid without work requirements.

The Federal government pays 90% of this cost.

This makes economic sense as well as being a way to create a healthier population.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

ELSEA

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

MEDICAID EXPANSION

Recent analysis indicates the number of deaths projected for states that have not expanded Medicaid in the tens of thousands of increased deaths because of lack of insurance coverage.

Do our elected officials want the hundreds of deaths in Georgia forever on their conscience? I'm afraid so.

Fully expanding Medicaid using about 90% federal money would cost the state \$213 million to cover 490,000 Georgians. If this is not done, the federal money will go to other states. Governor Kemp's two proposals would spend about \$215 million to cover an estimated 80,000 people, about 16% covered for the same amount of state money.

Surely our officials can see fully expanding Medicaid not only will prevent many hundreds of deaths but makes great economic sense utilizing federal money which we would otherwise lose.

William Elsea, MD, MPH
(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

MEDICAID EXPANSION

Recent analysis indicates the number of deaths projected for states that have not expanded Medicaid in the tens of thousands of increased deaths because of lack of insurance coverage.

Do our elected officials want the hundreds of deaths in Georgia forever on their conscience? I'm afraid so.

Fully expanding Medicaid using about 90% federal money would cost the state \$213 million to cover 490,000 Georgians. If this is not done, the federal money will go to other states. Governor Kemp's two proposals would spend about \$215 million to cover an estimated 80,000 people, about 16% covered for the same amount of state money.

Surely our officials can see fully expanding Medicaid not only will prevent many hundreds of deaths but makes great economic sense utilizing federal money which we would otherwise lose.

William Elsea, MD, MPH
(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

MEDICAID EXPANSION

Recent analysis indicates the number of deaths projected for states that have not expanded Medicaid in the tens of thousands of increased deaths because of lack of insurance coverage.

Do our elected officials want the hundreds of deaths in Georgia forever on their conscience? I'm afraid so.

Fully expanding Medicaid using about 90% federal money would cost the state \$213 million to cover 490,000 Georgians. If this is not done, the federal money will go to other states. Governor Kemp's two proposals would spend about \$215 million to cover an estimated 80,000 people, about 16% covered for the same amount of state money.

Surely our officials can see fully expanding Medicaid not only will prevent many hundreds of deaths but makes great economic sense utilizing federal money which we would otherwise lose.

William Elsea, MD, MPH
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/15/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Emberley

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

I oppose this waiver and support full Medicare expansion in Georgia.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

I oppose this waiver and support full Medicare expansion in Georgia.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

I oppose this waiver and support full Medicare expansion in Georgia.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Emrick

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Epstein

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

I was diagnosed with Lymphoma over 10 years ago and I have battled through 2 different types of Lymphoma, first time was Follicular Lymphoma which I had to undergo Chemotherapy for 6 months and I was given a clean bill of health, However a year to the day when I started the first round of Chemo I was diagnosed with Lymphoma again it had resurfaced but it changed forms which put me into less than 5% of the population that this occurs to. It changed into Large B Cell Lymphoma. My doctors told me that my best chance of survival would be 3 months of Chemotherapy followed by Radiation treatments then followed by a stem cell transplant, after I was given all the details it was really my only choice. I had the stem cell transplant performed at Emory Hospital in Atlanta Georgia and then spent 3 weeks at Emory Hospital in an isolated floor so no chance of germs since my immune system was basically at zero. When your body is barely strong enough you then have to endure 10 straight days of the most intense Chemotherapy to make sure it rids your body of any bad cells. After that your body has to recover for a few days then my new stem cells Where injected back into my body so I could have the chance to recover. After being cancer free for over 4 1/2 years, my Cancer returned. I had to keep a positive outlook and pray that the advancement in Cancer research has evolved to give me a better chance of survival. After a few rounds of Chemotherapy we found out a new immunotherapy was approved by FDA and my oncologist told me it is my best chance of survival. The Therapy is CAR-T immunotherapy which involves taking my white blood cells then sending to a lab and having the lab enhance the cells with a "cancer killer" DNA which when injected will kill all cancer cells within my body. I was in Emory Hospital 20 days fighting this disease. I am now in remission and hopeful this will be the last time I have to endure what I have in the past to battle this Disease. The Lymphoma ResearchFoundation's mission is to help find a cure to stop Lymphoma all together.

Need your help to support this worthy cause!!!!

My story is just one of many that is so grateful that there was a pre-existing condition clause in the health care system, I do not know what I would have done if there was not. It still cost me a tremendous amount of money out of pocket but that was a small price to pay for your life.

As I am know getting older I have to hope that our government understands all the issues that cancer patients have to face and we do not need to worry that we will not be covered if there are changes to policy just to cut a budget or move funds to another issue. There is no greater issue than to protect people that need the care and treatment that they are suppose to receive.

Please do the right thing for all Cancer patients!!!!!!

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Esho

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

I support the expansion of Medicaid but believe temporary based on employment criteria for eligible adults.
Opportunities to go back to work or community involvement should also be used as a criteria
(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

This will help stabilize risk and potentially reduce cost to the State.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

We can reduce cost by increase access to medical records. If both the patient and physicians have access to their medical records, it would reduce unnecessary utilization.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Fakharian

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Fakharian

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/13/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Fleek

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

It is important for Georgia to provide as much sourcing as possible for people with mental illness and addiction problems. Otherwise, it hurts Georgia in the long run.

It is critically important that mental health parity be a mandated component of any of these health insurance plans. We would like to see in any Waiver proposal Georgia move much more decidedly and intentionally toward the enforcement of federal parity legislation. Any loss of federal mandated protections for those with a mental illness or families seeking seeking mental health care make it harder for people to shop for comprehensive coverage, and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity here in the state will ensure that families with mental health care needs have access to care equal to those with physical health care needs.

Thank you. All those who deal with people in our lives who have mental illness or addiction problems (which is most of the population) will be eternally grateful.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Flores

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Florio

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am concerned about the Kemp Administration's 1332 waiver proposal. Blood (and all other) cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. A waiver approval means people in our state who need coverage will most certainly unknowingly purchase a health plan that does not provide the treatment or medications needed. Vague and misleading provider information will make it SEEM that there is coverage, but when needed the patient will find out otherwise. Georgians would have no choice but to rely on profit-driven health insurance brokers and agents for information on plan options beforehand. There would be no unbiased platform to compare and shop for comprehensive coverage. Progress has been made in protecting patients and ensuring people who buy individual coverage have high quality options available. This Waiver will be a setback.

It is incumbent upon our state leaders to prioritize the best interests of cancer patients and their families by halting this proposal.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Floyd

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

I think it is repulsive that we are raising the bar for insurance eligibility under this myth that we only need to protect 'hardworking Georgians'. Which is a lie, because it is hard work to take care of a dying relative, but that's not covered. There are more people dying in Georgia due to lack of healthcare than I think Governor Kemp realizes. Stacey Abrams was right in that we should have expanded Medicaid under the ACA and anything less sacrificing human lives for 'fiscal responsibility'. What's the point of a state government that chooses not to take care of it's citizens in need?

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

1332 is ridiculous because it is just another segue for you to benefit your private insurance benefactors in lieu of public insurance. Private insurance is a scam and any direction towards their profit-for-lives business model is sick and should not be tolerated. I urge Governor Kemp to move towards expanding Medicaid under the ACA and allowing more access to healthcare instead of less. Healthcare is a human right and Georgia is leaving our most vulnerable in the dust because Governor Kemp doesn't think that they deserve it.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/15/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Fogle

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

Enforce Federal Parity Legislation in Georgia!

It is critically important that mental health parity be a mandated component of any health insurance plan in Georgia. I would like to see any waiver proposal in Georgia move toward the enforcement of federal parity legislation.

Any loss of federal mandated protections for those with mental illness or families seeking mental health care makes it harder for people to shop for comprehensive coverage. It also limits the amount of financial assistance available to Georgians to help lower medical costs. Implementation of parity in our state will ensure that families with mental health care needs have access to care equal to those with physical healthcare needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/1/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Ford

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

I don't understand why Georgia does not accept full-Medicaid expansion. As I understand it we have over 400,000 residents who would benefit from such an expansion and Georgia would get more Federal dollars to fund it. By covering only a fraction of those who could benefit, the rest of Georgia health care consumers will continue to pay higher costs for care because hospitals and other providers will have to provide care for the uninsured or under-insured. Take the full-expansion and let's move on.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

This is the only good idea in the entire package. With the State subsidizing the most expensive treatments and patients, all Georgians should see their health insurance premiums stabilize if not decline. Please make sure the Legislature funds it adequately.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

I do not have a huge problem with this part of the plan. I have used an independent health care agent for years, buying ACA compliant policies and more recently a one-year short term policy through her. For me it worked because I make too much money for a ACA subsidy and I am experienced and skilled enough to know how to pick and use an agent and not get "taken." My concern is that health care plans are numerous and complicated. Will everyone in Georgia be able to navigate the new system Governor Kemp envisions with a minimum of confusion, fraud, profiteering, and other "undesirable and unintended" consequences?"

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/15/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Ford

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Hello,

I am expressing my desire to see access to whole-food natural supplementation to all patients.

Many times, patients cannot afford to purchase quality whole-food supplements, which have been found to fill in the gaps and provide the body with needed nutrients many times depleted in our food sources. That is assuming patients have the ability to purchase quality food, like fresh fruits and vegetables. Sadly, many do not.

My desire is to see all healthcare providers recognize and allow patients to purchase whole-food supplements as a part of their covered plan. This would allow all patients to have access to proper nutrients to help prevent health issues. Preventative measures are vitality important to proper health.

Thank you!

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Forsythe

Email *

Address

City

State Georgia

Zip

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

I am deeply concerned that the 1115 Waiver - Georgia Pathways greatly restricts access to healthcare for vulnerable Georgians, not improve it. As a mental health professional, I am deeply concerned about the state of healthcare in this country, and urge the state to expand coverage, not reduce the protections of the Affordable Care Act as these bills would.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

I am deeply concerned that the 1332 Waiver - Reinsurance, greatly restrict access to healthcare for vulnerable Georgians, not improve it. As a mental health professional, I am deeply concerned about the state of healthcare in this country, and urge the state to expand coverage, not reduce the protections of the Affordable Care Act as these bills would.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

I am deeply concerned that the 1332 Waiver -GA Access, greatly restrict access to healthcare for vulnerable Georgians, not improve it. As a mental health professional, I am deeply concerned about the state of healthcare in this country, and urge the state to expand coverage, not reduce the protections of the Affordable Care Act as these bills would.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/9/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Foxx

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

This program has less than a 10 percent effective rate with a 100 million State subsidy that will only reach a limited number of citizens who really need insurance help.

The external cost already most likely generates more hidden cost due to the inability of our citizens not having access to affordable health care.

We can do better for our citizens!

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Fraser

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone who knows thousands of people personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Freeman

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

Please stop wasting time and money devising work-around solutions that aim to replicate the successes of the ACA and just sign up for the damn ACA itself. Georgia could cover over 400,000 more people for the same or less cost by fully extending Medicaid eligibility and qualifying for the 90% federal match. I work at Grady Hospital and our patients cannot afford to wait another moment for help while the GA Republican party tries to shuck and jive their way out of admitting that the ACA, while imperfect, offers real benefits to American citizens.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Please do not allow premium subsidies to be used for non-qualified health plans, which could create a market shift and increase costs for comprehensive qualified health plans.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Subsidies

Comments*

Please remove the cap on the premium subsidies to ensure that everyone eligible for subsidies can continue to receive them and afford their health coverage.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

Please use the existing healthcare.gov system and invest in outreach and enrollment assistance to help more people get enrolled. Trying to create a decentralized, patchwork system of system of private entities will be FAR less successful and is generally a stupid idea.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

I agree with the proposed structure of the reinsurance program and the increased funding for areas with higher premiums.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/27/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Fulton

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

test

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Gafford

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

The medicaid waiver work requirements are unnecessarily onerous and require unnecessary when we could just proceed with the full medicaid expansion and avoid all this nonsense. The 1115 waiver also covers fewer people at higher cost and that is not fiscally responsible. Please simply expand medicaid. Thank you

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Gafford

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Why on earth would you remove Georgia from healthcare.gov? This tool is critical for people to compare different health insurance plans and is easy to use. Also waiver 1332 encourages junk insurance plans which do not help when people actually need insurance. People deserve good insurance. Until we can get a public option or medicare for all we need something that actually works (as well as possible) in the interim.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/1/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Gajadharsingh

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/1/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Gajadharsingh

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. One of those people is me, I have been living with cystic fibrosis for 36 years. I spend hours each day doing breathing treatments and taking 50 pills a day...just so I can stay alive. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Garcia

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

Mercy Care has actively supported the state's decision to pursue 1115 and 1332 waivers. We also advocated for the widely supported plan to embed Grady Health System's Healthy Georgia Solution into the waiver proposal.

Imbedding the Georgia Healthy Solution into the waiver program would also open greater access to specialty services such as cancer and heart care as well as access to more mental health services that are severely lacking in Georgia.

Mercy Care works to increase the number of individuals we serve each year, but our clinics are at capacity with 15,000 patients served in 2018 through over 60,000 visits; 12,000 of those visits meeting mental health needs. We see each day the desperate need for this bill.

We appreciate the work that has gone into the 1115 waiver proposal, but the barriers built into the Georgia Pathways plan are great.

Putting work requirements before healthcare needs will negatively impact access to coverage being offered. Patients with significant health, social, housing and life issues are not in a position to work until their health and social issues are addressed.

Therefore, Georgia Pathways will benefit only a small number of relatively healthy individuals who are currently employed or meeting other related criteria.

I appreciate you consideration of this opinion.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/1/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Gargiullo

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a practicing Occupational Therapist, I have concerns about the proposed 1115 waiver, as it may be detrimental to patients with chronic disabilities. Under the proposed 1115 waiver, the state may determine that an employer health care plan is more cost effective than extending eligibility to persons at 100% of the federal poverty level. In such cases, it is not clear that the services under the employer's plan will provide the services needed by such a patient.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

As a practicing Occupational Therapist and member of GOTA, I have concerns about the 1332 waiver as it is currently proposed. The current application would allow the subsidizing of health plans that do not meet the ten essential elements of a "qualified health plan" under the Affordable Care Act.

In particular, these policies might not include rehabilitative and habilitative services and devices.

Such policies would harm persons with chronic disabilities by denying access to needed therapies, as well be detrimental to patients with acute injuries from which they must recover.

Additionally, these less expensive policies are likely to be purchased by younger, healthier persons, removing them from the overall pool of health insurance consumers. This will result in increasing costs for policies providing services to persons with chronic disabilities. Goals of the proposed reinsurance program to increase access to health insurance, lower premiums, and set aside state funds to cover high-cost claims are laudable, but not at the expense of those persons whom the waiver seeks to assist.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Garland

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

Work reporting requirements are a financial burden on the state, largely because administering work reporting requirements often necessitates additional staff and updates to information technology systems. The Government Accountability Office reported that Arkansas spent \$26 million and Indiana spent \$35 million to administer these work reporting requirements in their Medicaid programs.

Work reporting requirements are also a burden to people. Working people may face difficulties in reporting hours due to lack of reliable internet access or having seasonal work schedules. Furthermore, some people are not able to work because they are caregivers, students, have a chronic illness, are in a substance abuse or mental health treatment program, have a disability but do not qualify for disability benefits or other reasons. People who are unable to work or volunteer are often not able to get or maintain health coverage when there are work reporting requirements. Because of the many challenges these reporting requirements present, tens of thousands of people subjected to them in states like Arkansas lost their health coverage.

Requiring premiums and co-payments under this waiver presents another burden to enrollees and could also lead to significant drops in coverage. Cost-sharing requirements can lead to fewer eligible people enrolling in coverage and fewer enrolled people keeping their coverage. In a study of public health insurance programs in multiple states, premiums as low as one percent of the enrollee's income reduced participation by about 15 percent. Even in Wisconsin, where premiums were charged for adults with incomes above the poverty line, there was a 24 percent reduction in enrollment because of nonpayment of premiums.

Also, the cost-sharing requirements will be different for some enrollees in this proposed waiver. Some participants in this waiver plan would be receiving premium and cost-sharing assistance to enroll in their employer's health coverage plan. But these participants would likely face coinsurance and deductibles that could make those plans cost-prohibitive for people making below the poverty line.

There are also likely administrative costs associated with managing the member rewards accounts that some enrollees would have under the proposed waiver. The Georgia Department of Audits and Accounts published a fiscal note in 2016 that estimated a health savings account pilot program for a partial Medicaid expansion population would cost the state \$4.6 to \$5.9 million in the first year and up to \$7.5 to \$9.8 million in the third year. The expense of this proposed waiver is likely to be higher than stated because these additional costs are not included.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Garrett

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

Just expand Medicaid. All of this is nonsense and will cost more than it is worth. Expand Medicaid like every other rational state in the union. Take the federal money. This is not hard.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

Just expand Medicaid like every other rational state government in the nation. This is folly that will cost taxpayers more than it is worth. It is not that hard. Take the federal money and expand medicaid under the ACA.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

Just expand Medicaid like every other rational state government in the nation. This is folly that will cost taxpayers more than it is worth. It is not that hard. Take the federal money and expand medicaid under the ACA.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/14/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Gau

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

As the mother of a 47-year-old son with serious mental health problems, I feel strongly that it is critically important that mental health parity be a mandated component of any of these health insurance plans. We would like to see in any Waiver proposal Georgia move much more decidedly and intentionally toward the enforcement of federal parity legislation. Any loss of federal mandated protections for those with a mental illness or families seeking seeking mental health care make it harder for people to shop for comprehensive coverage, and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity here in the state will ensure that families with mental health care needs have access to care equal to those with physical health care needs. As a state, Georgia is woefully behind many other states in support for those with mental health issues. We need to rectify that situation, not make it worse!

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/4/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

ghosh

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

Waiver 1115

The work requirements would be very burdensome for people with part-time jobs, contract jobs, seasonal jobs, or those who are temporarily disabled. How can anyone making \$15,000 or less per year afford internet access to be compliant with this reporting requirement?

I also want to protest taking people off of insurance just because their construction job was rained out for two weeks. Or because as a cancer patient, they may not have worked for a month. Not only does this cause a massive problem for that worker, but tracking on the state's side will be expensive and likely contracted out to a private company because of course, we need to spend even more money.

Full-on Medicaid expansion is the best solution.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

The proposed changes in this waiver will allow people to use their premium subsidies to purchase non-qualified health plans. These plans do not have to cover all the essential health benefits. Because of this, the plans are expected to have premiums that are about 10 percent lower than the comprehensive qualified health plans. People with fewer health concerns could be steered towards these plans because of the lower cost, which would drive up costs for people who need to have comprehensive plans.

People could also face higher costs as the result of a cap the state plans to put on the premium subsidies. If more people use the premium subsidies than expected, additional enrollees would be able to enroll in plans but would only receive subsidies if more state funding becomes available. This includes people who would have otherwise been eligible for subsidies under the current federal structure. By capping the subsidies, there is a risk that some people could face higher premiums as a result of not receiving the subsidies they are qualified for.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Gold-Hopton

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

If implemented, the 1115 waiver and the 1332 waiver together would only cover about 80,000 more Georgians and would the state \$215 million to implement. Meanwhile, if Georgia fully expanded Medicaid to the extent allowed under federal law, the state would spend \$213 million (a comparative savings of \$2 million!) to cover almost 500,000 more Georgians.

These proposals don't just fall short. They are irresponsible. After watching the state spend years—and millions of taxpayer dollars—investigating Georgia's health care crisis, Georgians deserve a plan that allows all of us get the comprehensive, affordable coverage we all need.

I've been unemployed for 9 years because of severe illnesses and repeated hospitalizations. I was terminated from my most recent employment because of an emergency hospitalization that lasted longer than my allotted sick leave. Working 80 hours a month isn't possible while hospitalized or otherwise debilitated by illness. And applying for disability is a lengthy and difficult process. The 1115 Waiver would leave the sickest Georgians ineligible for Medicaid. (In my case, I have been covered under my wife's employer-provided health insurance, but many Georgians don't have that option.)

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Georgians who have been buying their health insurance through healthcare.gov would have to use private brokers under the Georgia Access Model proposal. These private web brokers would be paid by commissions on their sales, so they will be financially motivated to steer clients towards health insurance plans which pay the highest commissions.

And, "the State will certify Eligible non-QHPs [non-Qualified Health Plans] which offer a more limited set of EHBs [Essential Health Benefits]" to be sold by these brokers and subsidized by the government (quoted from 1332 Waiver Application). What that means is that Georgians would be encouraged to buy junk plans that don't provide adequate coverage. Because these plans would be certified by Georgia, many Georgians might not realize how little coverage they have - until they get sick and their insurance doesn't cover their medical treatment.

Also, if a lot of Georgians do buy these junk plans, the premiums for the good plans (that do cover the full set of Essential Health Benefits) will become even higher and/or won't be offered any longer in Georgia because the Georgians who are the sickest (and most expensive to cover) would be most likely to choose the full set of Essential Health Benefits.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** GONZALEZ

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

I find the "work" requirement quite backwards. One has to be healthy in order to work, not work in order to get healthy. The work requirement makes no sense at all and statistics from other states and countries where one can get healthy in order to work show that the community at large is healthier, people have jobs, and crime goes down. Good leadership on this issue should be honest about how this works with people in other locations because all humans are basically wired the same. Painting the poor as lazy and unmotivated does not serve the public as a whole. It just makes us all poorer.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

1332 Georgia Access. This bill puts health care in the hands of only private insurance which is a mistake. I think most people would agree that insurance companies and their extended network of coders and billers are the biggest hurdle in reforming health care. Non-medical people are making decisions as to what care and what cost should be appropriate. The profit motive is clearly present, and I submit that health care does NOT respond to the free market. Why? Because the free market relies on people deciding whether or not to purchase a product or service. Health care is not a decision. It is a necessity for all of us at some point in our lives. Going broke because a non-network provider somehow gave care to an unconscious patient is totally outrageous, yet insurance companies allow that to happen practically every day. And it's the insurance companies who have invented networks, just to curb their costs so they can make more profit. Hopefully the federal marketplace will soon offer a public option. That should be available to all Georgians. I bet that scares the insurance people. I know they lobby and finance elected officials. But honor is honor and this is wrong because people suffer as a result.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

The lack of access to the protections built in to the federal Affordable Health Care Act is a big problem here. Again, the insurance companies make all of the decisions -- who you can see for care, how much it's going to cost, what can be denied to you. We need less private insurance and more access to a Medicare-type plan which does not discriminate on doctor choice or type of services offered. It's not perfect, of course. But it certainly works better than anything a private company has ever offered, especially to people who aren't eligible for employer-benefit plans. Like it or not, we have a large number of self-employed people in our state, and they should not be discriminated against. We work hard; maybe even harder than those with an employer and we deserve fair access to health care.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Goodson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

I think this is covering for the horrifically short-sighted failure of Georgia to expand Medicare coverage in the first place. Liberals in New York and California essentially wanted to send free money to this state to cover Medicare expansion through the federal program, but because it was popular to smack on anything Obama did, we're Johnny-Come-Latelys now trying to cover for political foolishness with these half-measures.

I guarantee you all of liberal Atlanta would actually consider voting for Governor Kemp if he had the gumption to say: "Republicans screwed this up 8 years ago, and we're fixing it now" (something Governor Deal actually occasionally did) and simply expand Medicare fully under the auspices of the ACA instead of pretending this CYA baby step is some sort of ingenious plan.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Gordon

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

I have so many objections to this plan that I don't know where to begin. First of all, this seems like a poor substitute for a full Medicaid expansion. There are roughly 270,000 uninsured people living at or the federal poverty line in Georgia, and according to the Governor's own estimates this plan will only cover 80,000. We're paying more money to leave hundreds of thousands of the poorest and most vulnerable Georgians without insurance, which does not make any sense.

Perhaps my strongest objection is to the work requirements and they way they ignore the realities of low income Georgians. Most of Georgia is rural and lacks public transportation. This is where the states poverty and health disparities are the most concentrated and where the most people need Medicaid. If someone living in rural Georgia doesn't have a car, there will be no way for them to meet the work/training/volunteer requirements. If they have a car but can't afford gas to drive long distances, which is likely given how poor one has to be to qualify for Medicaid, they won't be able to meet the requirements. If they have transportation but have young children and can't afford childcare (which is very likely considering the crisis of affordable childcare) they won't be able to meet the requirements. If they are caring for a older family member who needs full time care they won't be able to meet the requirements. Is it the policy of the state of Georgia that people who are too poor for both health insurance and transportation shouldn't have health insurance? Is it the policy of the state of Georgia that people who are too poor for both health insurance and childcare shouldn't have health insurance? Is it the policy of the state of Georgia that people who are too poor for both health insurance and home health aids shouldn't have health insurance? If the answer to any of those questions is no, then this waiver proposal fails to meet the state's policy aims and should be rejected.

My other objection is that this proposal would subsidize insurance plans that don't meet the essential benefits listed by the ACA. Those benefits are considered essential for a reason; because insurance plans sold without them are unlikely to meet people's needs. Why would Georgia want to subsidize the selling of health insurance plans that don't meet patient needs, when we are already struggling with access to adequate healthcare in this state? Why would we subsidize plans that don't include maternity care when we have one of the highest rates of maternal and infant mortality in the country? Selling plans like that goes directly against the state's interest of keeping Georgia's pregnant people and newborns safe and healthy.

Finally, by allowing the creation of high risk pools this proposal would make it possible for insurance companies to charge higher rates for people with pre-existing conditions, which is exactly what made the ACA necessary in the first place. My husband had a pediatric brain tumor, and while he has been cancer free for more than 20 years I worry about what could happen if an insurance company decided they didn't like the risk that his cancer could come back. I was diagnosed with depression 2 years ago and I've suffered from chronic migraines for 10 years. I worry that an insurance company would decide I'm too much of a risk and that they want to charge more for my coverage. I work for a nonprofit and my husband works for a small business; we couldn't afford higher health insurance bills.

This proposal spends more money to cover less people than we could with a traditional Medicaid expansion. At a time when our state budget seems to be so tight that the Governor is advocating for cutting it my 10%, it seems absurd to do this rather than finding the most efficient use of the state's money, especially considering how much it would cost to create the infrastructure needed to enforce the work requirement.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/1/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Graham

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

Under the proposed 1115 waiver, the state may determine that an employer health care plan is more cost effective than extending eligibility to persons at 100% of the federal poverty level. In such cases, it is not clear that the services under the employer's plan will provide the services needed by such a patient. (personal statement modified from my professional association comments.)

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

While seeking lower insurance premiums for Georgians is a worthy goal, I am concerned about some of the (perhaps unintended) effects of implementing the 1332 waiver as it is currently proposed. The current application would allow the subsidizing of health plans that do not meet the ten essential elements of a "qualified health plan" under the Affordable Care Act. In particular, these policies might not include rehabilitative and habilitative services and devices. Such policies would harm persons with chronic disabilities by denying access to needed therapies, as well be detrimental to patients with acute injuries from which they must recover. Additionally, these less expensive policies are likely to be purchased by younger, healthier persons, removing them from the overall pool of health insurance consumers. This will result in increasing costs for policies providing services to persons with chronic disabilities. Goals of the proposed reinsurance program to increase access to health insurance, lower premiums, and set aside state funds to cover high-cost claims are laudable, but not at the expense of those persons whom the waiver seeks to assist. (personal statement modified from my professional association comments.)

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/22/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Grant

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

I am writing these comments as a concerned, tax paying Georgian. While I appreciate any attempt to expand coverage, we can do so much better than this current 1115 waiver proposal for our fellow citizens in need of health care and at the same time make significantly better and more cost effective use of tax dollars. As the Georgia Budget and Policy Institute reports, this proposal costs more in state general funds than a full expansion and yet covers only about 10% of those that would otherwise qualify. I have seen first hand, as a former health care executive responsible for a 16 state region, the positive benefits of full expansion and the continuing challenges in those states that have not expanded Medicaid. These benefits have been documented in a recent review of 324 research studies on the impact of Medicaid expansion by the non partisan Kaiser Family Foundation (KFF). Expansion states have seen meaningful decreases in the number of uninsured, increased access to health care services, improved health outcomes and actual savings for the state government and its tax payers. With the significant health challenges for our low income residents, Georgia can not afford to pass on the opportunity for these same positive impacts. My specific concerns with this proposal include:

1. This proposal is predicated on the use of work requirements and a request to receive enhanced FMAP despite a 100% FPL cut off. Neither of these appears feasible, making pursuing this proposal a waste of time, and in the meantime, hundreds of thousands of Georgians are going without healthcare. Work requirements are on hold and the subject of federal law suits in a number of states, and the recent appeal hearing appears to support eliminating from the Medicaid program. The appeal judge panel in October arguments reiterated the findings of the lower court, that while employment is a laudable goal, the central goal of the Medicaid program is to ensure health care coverage for the country's most vulnerable and work requirements do not advance that goal. In addition, no state has gained federal approval of an enhanced match for a Medicaid expansion that does not include all eligibles up to 138% FPL (vs 100% FPL).

2. Work requirements also raise a number of other concerns. A recent Harvard study documented the negative impacts in Arkansas (which have since been eliminated per a court order), in which over 17,000 lost their health coverage, in most cases not because they weren't working, but because of the burden of the reporting requirements. This same study stated that there were no meaningful gains in employment. It is the chronically ill, including those with mental health challenges, that have the greatest need for ongoing continuity of care—and with good care, may be able to gain and maintain employment, not the other way around. In fact, KFF reports that 63% of eligible adults are already working, and those that are not, are suffering from chronic conditions or are caregivers. In addition, the administrative costs of work requirements are significant. In Kentucky, one of the health plans of my former company spent \$9M in preparing for work requirements and premium collection prior to the court order that put a halt on both. This cost multiplied across all the health plans and the state, is not good use of Medicaid dollars that are supposed to be focused on providing health care.

3. A recent study by the Georgetown Center for Families and Children, cited Georgia as the fifth worst state for the rate of uninsured children—at 8.1%—and having the second highest increase at 21.2% from 2016 to 2018. This is an embarrassment and ultimately will make Georgia less competitive. Bipartisan efforts have supported access to coverage for children over the years since the CHIP program was passed, and in fact Georgia covers up to 235% FPL. However, the big driver here is lack of coverage for parents—it is the expansion states that have seen gains in coverage for children and non-expansion states that are falling behind. It is critical to cover the whole family to maximize coverage for children.

I urge a complete reassessment of the expansion plan for Georgia, and for us to take advantage of the full expansion that is available with enhanced FMAP to best serve low income Georgians and our state.

Sincerely,

Janet Grant
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Green

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

As a Georgia resident and health advocate I believe that the current proposed 1115 waiver is not as expansive as it could be and this is why I find it imperative to submit my comment. The proposed waiver will not cover as many low-income Georgians as possible, leaving folks in the coverage gap without a pathway to coverage. Even those who are able to qualify for Medicaid might be forced to pay premiums which most Medicaid participants do not have to do. This creates a financial barrier to care and might result in many individuals losing their coverage. In addition to this, this proposal creates burdensome work requirements that would require enrollees to prove they are working at least 80 hours/month. This is especially harmful and we have seen in states such as Arkansas, that thousands of Medicaid enrollees end up losing their coverage when they are forced to submit proof of "adequate" employment. This is yet another barrier to care included in the proposed waiver which will lead to more and more Georgia residents being stuck in the coverage gap with no tangible options for care. Finally, the federal government pays 90% of the cost of expanding Medicaid but will only pay approximately 67% of the cost associated with partial expansion. Expanding Medicaid to the full extent makes both economic and moral sense for Georgia residents. I encourage you to revise the proposed waivers and take the first step increasing a healthier and more productive state.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Green

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

I think this waiver will be beneficial for a majority of the residents in Georgia.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

I think this waiver will be a detriment to many citizens in Georgia.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Gulaian

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

As a Georgia resident who buys health insurance through the healthcare.gov website, I was originally happy to hear that Governor Kemp was proposing a medicaid expansion via a waiver program.

But then I discovered that Georgia's plan to "improve" access to insurance would in fact cut off access to the healthcare.gov website, and leave me to search for insurance through unspecified private brokers.

This can only make access more difficult, and probably more expensive (since these brokers must be making a profit).

It seems like we are back to business as usual, attempting to undermine access to health care rather than expand it. What other sham "improvements" are lurking in those waivers? I don't want to find out. I oppose them.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/30/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** H

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

Georgia sits at or near the bottom when it comes to healthcare. Shame on us. I request that you do no harm to the ACA. Fix the parts that don't work for some while not ending the parts that help many Georgians. Healthcare.gov is a very helpful website. I know several people who find their health insurance through that site and would hate to see them lose all that assistance. I believe the best way to go is to keep the ACA while offering other new plans that help those who need it.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

Georgia sits at or near the bottom when it comes to healthcare. Shame on us. I request that you do no harm to the ACA. Fix the parts that don't work for some while not ending the parts that help many Georgians. Healthcare.gov is a very helpful website. I know several people who find their health insurance through that site and would hate to see them lose all that assistance. Eliminating a central website with all the information one needs to compare and choose plans would wreak havoc. I believe the best way to go is to keep the ACA while offering other new plans that help those who need it.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Georgia sits at or near the bottom when it comes to healthcare. Shame on us. I request that you do no harm to the ACA. Fix the parts that don't work for some while not ending the parts that help many Georgians. Healthcare.gov is a very helpful website. I know several people who find their health insurance through that site and would hate to see them lose all that assistance. Eliminating a central website with all the information one needs to compare and choose plans would wreak havoc. I believe the best way to go is to keep the ACA while offering other new plans that help those who need it.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Haley

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

The 115 Waiver is not a "conservative" policy. It requires MORE taxpayer money, and creates a whole new regular bureaucracy, in order to cover less people than full Medicare expansion. To cover only 50,000 of the 408,000 people currently without coverage is simply unacceptable. We can and should be better stewards of our tax dollars by simply expanding Medicaid and accepting 90% of the full expansion cost from federal tax dollars, billions of which have already been collected and used in other states. Our federal tax dollars could instead stay in GA to help Georgians.

Please reconsider.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Hampton

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

Our goal should be to get insurance for everyone, fairly marketed.

This would be best achieved by full medicaid expansion and preservation of access to HealthCare.gov.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Our goal should be to provide health care for everyone. A work requirement does not do this.

We should do a full expansion of medicaid and preserve access to the federal healthcare website.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Hanson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

The healthcare proposal waiver 1115 is a financially responsible alternative for our state as opposed to a full Medicaid expansion. I believe Gov. Kemp's waiver 1115 is excellent for our state. Not only does it make healthcare insurance more attainable with lower premium prices, but it is also a better financial option for our hardworking state in the long run. A broader Medicaid expansion would be a very costly alternative over time. If the Supreme Court rules the Affordable Care Act unconstitutional, states will be forced to pay the expenses that the federal government once covered, sending the numerous states who have already expanded Medicaid into a recession. Gov. Kemp has opted for a more fiscally responsible option for the state of Georgia. The only thing I would like to see different in this proposal would be the inclusion of disabled persons who are not able to work. I understand, however, there are different waivers that would serve these people. Overall, these proposals should be sent to Trump for approval!

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Haralson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

As a hospital social worker, I see first hand the tragedy of requiring Georgia residents to be deemed disabled in order to qualify for Medicaid. So many Georgians are working two part-time jobs at minimum wage. They don't get health insurance from their employers, they make TOO LITTLE to qualify for federal subsidies for health insurance, and they can't get Medicaid BECAUSE THEY ARE WORKING, and so aren't considered disabled. We MUST ACT to give health insurance to working people who aren't eligible for insurance from their employers.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

This is redundant. Why not just participate in the federal program that is already set up? The ACA is a good solution. We just need to participate in Medicaid expansion.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

Before the Affordable Care Act, I saw patients who came into the hospital and were surprised to learn that the health insurance they bought only paid a tiny portion of their health care costs. Your plan would return us to the days when consumers could be swindled like this, by removing requirements that plans cover basic services. I'm also horrified that your plan would not require mental health parity. Aren't you supposed to working to increase Georgians' access to mental health services?

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/12/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Harper

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

For the GA Pathway eligibility, the Member, Physician and Facilities so and must be held accountable for any support received from the Plan. The Plan Staff approving eligibility and reimbursement should be dedicated stewards/gatekeepers not to allow the funds to be used Fraudulent or Abused. Every Member/Healthcare Providers accepting this Health Plan must follow Medicare/Medicaid guidelines, especially when another TOP should be primary. I believe there's Georgia citizens which need this healthcare assistance and will comply to the requirements. "My main plea is the Gatekeepers of these Funds must take their job/tasks serious at all times." Thank You.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/22/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Harris

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/22/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Harris

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Harris

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

Make good choices to cover as many Georgians as possible!

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

Do not move forward with a plan that only covers 80,000 people.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Do not approve programs that would only cover 80,000 additional Georgians.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Harvey

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.

I am a two-time Hodgkins Lymphoma survivor and having been through many rounds of chemo, radiation, and a stem cell transplant, I KNOW HOW EXPENSIVE TREATMENT CAN BE IF YOU DO NOT HAVE GOOD INSURANCE... Without good health coverage, most people that undergo something like I did would go bankrupt. If you add up all the expenses of the treatments that I had it was easily a million dollars...

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Hawkins

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Hawkins

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/16/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Hay

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Enforce Federal Parity Legislation in Georgia!

It is critically important that mental health parity be a mandated component of any health insurance plan in Georgia. I would like to see any waiver proposal in Georgia move toward the enforcement of federal parity legislation.

Any loss of federal mandated protections for those with mental illness or families seeking mental health care makes it harder for people to shop for comprehensive coverage. It also limits the amount of financial assistance available to Georgians to help lower medical costs. Implementation of parity in our state will ensure that families with mental health care needs have access to care equal to those with physical healthcare needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/30/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [Redacted] **Last Name *** [Redacted] Head

Email * [Redacted]

Address [Redacted]

City [Redacted] **State** [Redacted] **Zip** [Redacted]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

The Governor's proposals are not the solution we need in Georgia. First of all, we need to find ways to strengthen the ACA-not do away with www.healthcare.gov in our state. Why are we one of the few state's that hasn't expanded Medicaid under the ACA? This should not be a political decision, but one based on what benefits the citizens of our state.

Let's all work together to insure the largest amount of Georgian's we can.

Thank you,

Scott Head

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/24/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Hebert

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/24/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Hebert

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** HEIMAN

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Program Goals

Comments*

While presented as Georgia-focused solutions to improve healthcare access and affordability, the current proposals 1115 and 1332 waiver proposals fail to meaningfully address either problem. As proposed, our state is once again missing an opportunity to expand access to care, stabilize rural and safety net hospitals, and leverage federal funding to not only improve health, but support economic development and new jobs.

By way of background, this perspective is informed by over 20 years of clinical practice experience as a family physician in Marietta Georgia and the past 10-years teaching and engaging in health policy at Morehouse School of Medicine, as a health policy fellow working in the House Energy and Commerce Committee on Capitol Hill, and currently as faculty at the Georgia State University School of Public Health.

Georgia has urgent health and healthcare problems that need to be addressed. 1.4 million Georgians, including 217,000 children, are uninsured, placing us third worst in the country. Georgia also has lagging health outcomes, with high rates of diabetes and cardiovascular disease, high rates and profound disparities in both infant and maternal mortality, and the challenge of an opioid epidemic that in 2017 alone led to over 1000 deaths in our state. While many states have leveraged Medicaid Expansion and the Affordable Care Act (ACA) to expand health insurance coverage and affordability, improve health outcomes, and address their urgent health challenges, our state has failed to act.

Expanding Medicaid would provide access to affordable health coverage to over 500,000 low-income Georgians, paid at least 90% by the federal government. This includes over 400,000 people who currently fall into the coverage gap, with no affordable options because they make too little to qualify for subsidies in the health insurance marketplace. Medicaid expansion has been shown to support health and financial stability in low-income families, improve health outcomes for parents and children, and improve access to both mental health and substance use treatment. In addition, while rural and safety net hospitals have stabilized in Medicaid expansion states, they continue to struggle and close in non-expansion states like Georgia.

The 1115 Waiver proposed by Governor Kemp in place of Medicaid expansion would lead to new coverage for an estimated 25,000 to 50,000 people. It also includes a significant administrative burden for both participants and the state to document work status. While there is a compelling relationship between employment and health, the experience of Arkansas and other states clearly shows that making documentation of work status a prerequisite for health insurance coverage creates a barrier to both. Ironically, the cost for Georgia to increase coverage for a modest 50,000 as proposed in the waiver is higher than the cost of Medicaid expansion covering over 500,000.

Governor Kemp also proposes using a 1332 Waiver to lower health insurance costs by developing a state reinsurance pool to offset the costs of catastrophic claims in the individual insurance marketplace. This, by itself, is a good policy proposal. Yet the Governor undermines this approach by also proposing to use subsidies to pay for policies that lack coverage for critical areas of care, like maternity care and mental health and substance use treatment. That we would propose subsidizing non-ACA compliant policies at a time when Georgia leads the nation in maternal mortality and faces the continuing challenges of untreated mental health and substance use disorders is unfathomable.

A full Medicaid expansion would powerfully support improving Georgia's health outcomes. Leveraging a 1332 Waiver to help control costs in the Individual market through a state reinsurance pool is a great idea. Undermining consumer protections defeat the economic and health benefits of this waiver. Georgia's serious health challenges demand serious, evidence-based policy solutions.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

While presented as Georgia-focused solutions to improve healthcare access and affordability, the current proposals 1115 and 1332 waiver proposals fail to meaningfully address either problem. As proposed, our state is once again missing an opportunity to expand access to care, stabilize rural and safety net hospitals, and leverage federal funding to not only improve health, but support economic development and new jobs.

By way of background, this perspective is informed by over 20 years of clinical practice experience as a family physician in Marietta Georgia and the past 10-years teaching and engaging in health policy at Morehouse School of Medicine, as a health policy fellow working in the House Energy and Commerce Committee on Capitol Hill, and currently as faculty at the Georgia State University School of Public Health.

Georgia has urgent health and healthcare problems that need to be addressed. 1.4 million Georgians, including 217,000 children, are uninsured, placing us third worst in the country. Georgia also has lagging health outcomes, with high rates of diabetes and cardiovascular disease, high rates and profound disparities in both infant and maternal mortality, and the challenge of an opioid epidemic that in 2017 alone led to over 1000 deaths in our state. While many states have leveraged Medicaid Expansion and the Affordable Care Act (ACA) to expand health insurance coverage and affordability, improve health outcomes, and address their urgent health challenges, our state has failed to act.

Expanding Medicaid would provide access to affordable health coverage to over 500,000 low-income Georgians, paid at least 90% by the federal government. This includes over 400,000 people who currently fall into the coverage gap, with no affordable options because they make too little to qualify for subsidies in the health insurance marketplace. Medicaid expansion has been shown to support health and financial stability in low-income families, improve health outcomes for parents and children, and improve access to both mental health and substance use treatment. In addition, while rural and safety net hospitals have stabilized in Medicaid expansion states, they continue to struggle and close in non-expansion states like Georgia.

The 1115 Waiver proposed by Governor Kemp in place of Medicaid expansion would lead to new coverage for an estimated 25,000 to 50,000 people. It also includes a significant administrative burden for both participants and the state to document work status. While there is a compelling relationship between employment and health, the experience of Arkansas and other states clearly shows that making documentation of work status a prerequisite for health insurance coverage creates a barrier to both. Ironically, the cost for Georgia to increase coverage for a modest 50,000 as proposed in the waiver is higher than the cost of Medicaid expansion covering over 500,000.

Governor Kemp also proposes using a 1332 Waiver to lower health insurance costs by developing a state reinsurance pool to offset the costs of catastrophic claims in the individual insurance marketplace. This, by itself, is a good policy proposal. Yet the Governor undermines this approach by also proposing to use subsidies to pay for policies that lack coverage for critical areas of care, like maternity care and mental health and substance use treatment. That we would propose subsidizing non-ACA compliant policies at a time when Georgia leads the nation in maternal mortality and faces the continuing challenges of untreated mental health and substance use disorders is unfathomable.

A full Medicaid expansion would powerfully support improving Georgia's health outcomes. Leveraging a 1332 Waiver to help control costs in the Individual market through a state reinsurance pool is a great idea. Undermining consumer protections defeat the economic and health benefits of this waiver. Georgia's serious health challenges demand serious, evidence-based policy solutions.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

While presented as Georgia-focused solutions to improve healthcare access and affordability, the current proposals 1115 and 1332 waiver proposals fail to meaningfully address either problem. As proposed, our state is once again missing an opportunity to expand access to care, stabilize rural and safety net hospitals, and leverage federal funding to not only improve health, but support economic development and new jobs.

By way of background, this perspective is informed by over 20 years of clinical practice experience as a family physician in Marietta Georgia and the past 10-years teaching and engaging in health policy at Morehouse School of Medicine, as a health policy fellow working in the House Energy and Commerce Committee on Capitol Hill, and currently as faculty at the Georgia State University School of Public Health.

Georgia has urgent health and healthcare problems that need to be addressed. 1.4 million Georgians, including 217,000 children, are uninsured, placing us third worst in the country. Georgia also has lagging health outcomes, with high rates of diabetes and cardiovascular disease, high rates and profound disparities in both infant and maternal mortality, and the challenge of an opioid epidemic that in 2017 alone led to over 1000 deaths in our state. While many states have leveraged Medicaid Expansion and the Affordable Care Act (ACA) to expand health insurance coverage and affordability, improve health outcomes, and address their urgent health challenges, our state has failed to act.

Expanding Medicaid would provide access to affordable health coverage to over 500,000 low-income Georgians, paid at least 90% by the federal government. This includes over 400,000 people who currently fall into the coverage gap, with no affordable options because they make too little to qualify for subsidies in the health insurance marketplace. Medicaid expansion has been shown to support health and financial stability in low-income families, improve health outcomes for parents and children, and improve access to both mental health and substance use treatment. In addition, while rural and safety net hospitals have stabilized in Medicaid expansion states, they continue to struggle and close in non-expansion states like Georgia.

The 1115 Waiver proposed by Governor Kemp in place of Medicaid expansion would lead to new coverage for an estimated 25,000 to 50,000 people. It also includes a significant administrative burden for both participants and the state to document work status. While there is a compelling relationship between employment and health, the experience of Arkansas and other states clearly shows that making documentation of work status a prerequisite for health insurance coverage creates a barrier to both. Ironically, the cost for Georgia to increase coverage for a modest 50,000 as proposed in the waiver is higher than the cost of Medicaid expansion covering over 500,000.

Governor Kemp also proposes using a 1332 Waiver to lower health insurance costs by developing a state reinsurance pool to offset the costs of catastrophic claims in the individual insurance marketplace. This, by itself, is a good policy proposal. Yet the Governor undermines this approach by also proposing to use subsidies to pay for policies that lack coverage for critical areas of care, like maternity care and mental health and substance use treatment. That we would propose subsidizing non-ACA compliant policies at a time when Georgia leads the nation in maternal mortality and faces the continuing challenges of untreated mental health and substance use disorders is unfathomable.

A full Medicaid expansion would powerfully support improving Georgia's health outcomes. Leveraging a 1332 Waiver to help control costs in the Individual market through a state reinsurance pool is a great idea. Undermining consumer protections defeat the economic and health benefits of this waiver. Georgia's serious health challenges demand serious, evidence-based policy solutions.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/1/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Hein

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

I am fiscally conservative. The plan to cover a relatively small number of Georgians under an expanded version of Medicaid that is unlikely to receive any federal funding just does not make financial sense. We could cover almost ten times as many people at a lower cost if we expanded Medicaid as approved under the PPACA.

As a Georgia tax payer and an active voter, I strongly encourage you to act in a more fiscally responsible manner. Our citizens will benefit from Medicaid expansion, yes, but so will we tax payers.

I encourage you to expand Medicaid fully and take advantage of all the benefits full Medicaid coverage would mean to our state.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/23/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Heningburg

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

I don't see the benefit to taxpayers of spending so much per the governor's plan vs a few million more to cover 5x as many people with Medicaid expansion. This is not an efficient use of taxpayer funds.

Georgians should feel disgraced to have one of the largest pools of un and under-insured people in the country - even behind poorer states. This should be what any health plan legislation aims to fix.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

I don't see the benefit to taxpayers of spending so much per the governor's plan vs a few million more to cover 5x as many people with Medicaid expansion. This is not an efficient use of taxpayer funds.

Georgians should feel disgraced to have one of the largest pools of un and under-insured people in the country - even behind poorer states. This should be what any health plan legislation aims to fix.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

I don't see the benefit to taxpayers of spending so much per the governor's plan vs a few million more to cover 5x as many people with Medicaid expansion. This is not an efficient use of taxpayer funds.

Georgians should feel disgraced to have one of the largest pools of un and under-insured people in the country - even behind poorer states. This should be what any health plan legislation aims to fix.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [Redacted] **Last Name *** Henson

Email * [Redacted]

Address [Redacted]

City [Redacted] **State** Georgia **Zip** [Redacted]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

This plan fails to cover many Georgians -- we should do Full Medicaid Expansion up to 138% of poverty. Doing 100% of poverty makes no sense - if it is good to go to 100% it makes even more sense to go to 138% it will bring more money back to our state to help our healthcare system and it will save lives in our state.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

The 1332 Waiver should not allow Premium credits to be used for short term plans and should maintain the premium tax credit structure based on income and geographic areas. We need to Provide enhanced outreach efforts and cost sharing assistance.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

We must make sure plans maintain high standards and broad coverage. We should also look at how the state can assist rural Georgians.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/22/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Hernandez

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/22/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Hernandez

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

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Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Hernandez

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

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Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Hernandez

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

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Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/15/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Hill

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

It is critically important that mental health parity be a mandated component of any of these health insurance plans. We would like to see in any Waiver proposal Georgia move much more decidedly and intentionally toward the enforcement of federal parity legislation. Any loss of federal mandated protections for those with a mental illness or families seeking seeking mental health care make it harder for people to shop for comprehensive coverage, and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity here in the state will ensure that families with mental health care needs have access to care equal to those with physical health care needs.

Georgia ranks at the bottom of all states for mental health care. Let's move forward to improve this dire situation, not take steps backwards.

Morgan and Debra Hill,
Parents of Eric Hill (disabled by serious mental illness)
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Hill

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

Though I do commend Governor Kemp for creating a plan and attempting to cover more people, I don't think this is the best idea. There are some good points though. For example, copay and premiums collectively not exceeding 5% of enrollee's income is a great idea. For individuals who aren't health literate, majority of this proposal may sound great. However, when you dig deeper, the proposed waivers will only cover 80,000 Georgians and spend \$215 million. Yes, 80,000 more people is a lot more than before BUT we can fully expand Medicaid for millions (well 2) less than that. I guess I just don't see why we wouldn't fully expand Medicaid if it helps more people AND saves us money.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/22/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Hinerfeld

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

Hello and thank you for taking comments on this proposed law. My name is Debi Hinerfeld and I am an occupational therapist. I treat children and adults who have disabilities that prevent them from doing meaningful and functional activities that they need and want to do every day. My comment has to do with the use of non-qualified health plans. My fear is that these plans will not offer benefits in the areas of habilitation and rehabilitation. Patients who find themselves with health concerns such as a traumatic brain injury, stroke, heart attack, or even have a child with a significant developmental delay are not going to be able to access services such as occupational therapy that will get them back on the road to being productive members of our communities. The cost to the patients is the inability to pay which will likely lead to not receiving services or bankruptcy trying to pay for whatever services they can afford out of pocket.

I believe that the essential health benefits lay a foundation of a minimal standard for health insurance plans. Promoting the use of non-qualified health plans is not a good solution to our problem of getting more Georgians insured.

Thank you,
Debi Hinerfeld, PhD, OTR/L, FAOTA
(404) 483-8496
(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

Hello and thank you for taking comments on Waiver 1332. My name is Debi Hinerfeld and I am an occupational therapist. I treat children and adults who have disabilities that prevent them from doing meaningful and functional activities that they need and want to do every day. My comment has to do with people who will still not be able to afford their insurance premiums even with this waiver program. Many individuals who lack health insurance do so because they do work but they do not make enough money, even working multiple jobs, to afford a healthcare insurance premium, particularly if they have families. It's enough to get food on the table. Also, having a work requirement puts many individuals who have disabilities in a precarious position if they have health reasons why they can't work.

I do not believe that this waiver is a viable solution to insuring the thousands of Georgians who have no access to healthcare. A better solution is Medicaid expansion and affording the right to health care to everyone regardless of the ability to pay.

Thank you,

Debi Hinerfeld, PhD, OTR/L, FAOTA
(404) 483-8496

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Holland

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]
0738

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

None of these bills are good for Georgians. The will not cover the most needed insurance for those who can't afford to purchase it. The work requirement and the fee to purchase the insurance are slaps in the face to low income people, especially those who have to stay home to take care of sick children, spouses or parents. and the changes to Obama Care will cost the state more including the people who have to pay the premiums! these are bad plans!!

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

This will be costly to the state, make premiums higher and cause insurance to be sold that doesn't cover everything that should be covered!!

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

Not good for Georgians!!

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Holtz

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

You are doing a job!

Regards,

Lena Holtz

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/26/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Hudson

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

While I deeply appreciate Gov. Kemp's desire to provide health insurance to more Georgian's the 1115 wavier does not achieve his goal as it covers only 50,000 of the more than 400,000 people who need it. We need to fully expand Medicaid. Gov. Kemp knows how to support business. By implementing a full-scale expansion of Medicaid jobs will follow as we'll need more medical providers to care for patients with insurance. Plus it covers more people for less money.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Subsidies

Comments*

The 1332 Waiver would allow subsidies for plans that cover less. I don't understand why we are even discussing this. We're supposed to be a fiscally conservative state. Why do we want to pay more for less?
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Huff

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]
1632

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

This is addressed to all of Kemp's attempt to claim he is Expanding Medicaid.
Ga citizens are desperate for healthcare access & this is a sham proposal that covers few of the over 400,000 estimated to be eligible now.
The reinsurance part-- is simply trying to gain Federal dollars & to gain state control of those funds. Just giving more to insurance co's those dollars-- is a ridiculous & sham effort.
Stop the game playing & Expand Medicaid to our needy!
We are in the top states that have terrible health outcomes for our people!

The human cost to Ga. is laid at the feet of the current & past republican party!
Stop the games!!!

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

This is addressed to all of Kemp's attempt to claim he is Expanding Medicaid.
Ga citizens are desperate for healthcare access & this is a sham proposal that covers few of the over 400,000 estimated to be eligible now.
The reinsurance part-- is simply trying to gain Federal dollars & to gain state control of those funds. Just giving more to insurance co's those dollars-- is a ridiculous & sham effort.
Stop the game playing & Expand Medicaid to our needy!
We are in the top states that have terrible health outcomes for our people!

The human cost to Ga. is laid at the feet of the current & past republican party!
Stop the games!!!

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

This is addressed to all of Kemp's attempt to claim he is Expanding Medicaid.

Ga citizens are desperate for healthcare access & this is a sham proposal that covers few of the over 400,000 estimated to be eligible now.

The reinsurance part-- is simply trying to gain Federal dollars & to gain state control of those funds. Just giving more to insurance co's those dollars-- is a ridiculous & sham effort.

Stop the game playing & Expand Medicaid to our needy!

We are in the top states that have terrible health outcomes for our people!

The human cost to Ga. is laid at the feet of the current & past republican party!

Stop the games!!!

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Hughes

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

The Governor's plan is ineffective, and will cost more to cover fewer people than a full Medicaid expansion under the ACA. Georgia's citizens desperately need affordable and accessible healthcare, and Kemp's plan falls woefully short. It favors profits for insurance companies over the health of every day people. The ONLY acceptable choice is full and complete Medicaid expansion under the ACA.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

The Governor's plan is ineffective, and will cost more to cover fewer people than a full Medicaid expansion under the ACA. Georgia's citizens desperately need affordable and accessible healthcare, and Kemp's plan falls woefully short.

Offering skimpy "junk" health insurance plans will benefit no one, except insurance companies. While premiums may be lowered, copays and deductibles will rise, and much care now covered under the ACA (like maternity care, mental health care, and pre-existing conditions) will be lost. It's appalling to think the Governor could offer such plans to Georgians in good conscience.

Additionally, the inability for consumers to use the healthcare.gov website will make enrollment confusing, and again profit insurance companies and private navigators.

The ONLY acceptable choice for Georgia is full and complete Medicaid expansion under the ACA. We do NOT want a waiver -- we want the full federal program that is offered in other states. That is the only way to provide the competition needed to drive down the price of healthcare.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

The Governor's plan is ineffective, and will cost more to cover fewer people than a full Medicaid expansion under the ACA. Georgia's citizens desperately need affordable and accessible healthcare, and Kemp's plan falls woefully short.

Offering skimpy "junk" health insurance plans will benefit no one, except insurance companies. While premiums may be lowered, copays and deductibles will rise, and much care now covered under the ACA (like maternity care, mental health care, and pre-existing conditions) will be lost. It's appalling to think the Governor could offer such plans to Georgians in good conscience.

Additionally, the inability for consumers to use the healthcare.gov website will make enrollment confusing, and again profit insurance companies and private navigators.

The ONLY acceptable choice for Georgia is full and complete Medicaid expansion under the ACA. We do NOT want a waiver -- we want the full federal program that is offered in other states. That is the only way to provide the competition needed to drive down the price of healthcare.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/12/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Huth

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Enforce Federal Parity Legislation in Georgia!

It is critically important that mental health parity be a mandated component of any health insurance plan in Georgia. I would like to see any waiver proposal in Georgia move toward the enforcement of federal parity legislation.

Any loss of federal mandated protections for those with mental illness or families seeking mental health care makes it harder for people to shop for comprehensive coverage. It also limits the amount of financial assistance available to Georgians to help lower medical costs. Implementation of parity in our state will ensure that families with mental health care needs have access to care equal to those with physical healthcare needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Hyde

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

Though I am pleased to see some movement from the Republican majority, covering <20% of the Medicaid eligible Georgians is far too little.

Please do better
(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

I object to two provisions of this proposal:

- 1) wealthy citizens do not need further assistance with premiums - use that money for Medicaid
- 2) Eliminating access to the Federal healthcare website is another act to weaken our current system. Please do not do that.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Ingraham

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

Pursuing waivers instead of expanding Medicaid through the ACA is the wrong path for Georgia. Georgia ranks last in the nation in many access to care and health outcomes measures. Studies show that Medicaid expansion improves those metrics, saves lives, and ultimately saves money. These benefits would resonate in Georgia given the financial pressures that our rural hospitals, physicians, and other care providers face. Relevant studies supporting that statement are helpfully summarized by the Kaiser Family Foundation, a non-partisan organization.

<https://www.kff.org/medicaid/issue-brief/the-effects-of-medicaid-expansion-under-the-aca-updated-findings-from-a-literature-review-august-2019/>

As a specific example, 64 out of Georgia's 159 counties have no pediatrician and 79 counties have no OBGYN. As a result, Georgia ranks number ONE in the nation for maternal mortality. A Georgetown University Health Policy Institute study regarding Medicaid expansion found that states that expanded Medicaid have experienced 1.6 fewer maternal deaths per 100,000 women compared with states that did not expand the program. Additionally, the same study also shows that the infant death rate within states that expanded their Medicaid program fell by more than 50% between 2010 and 2016.

<https://ccf.georgetown.edu/2019/05/09/medicaid-expansion-fills-gaps-in-maternal-health-coverage-leading-to-healthier-mothers-and-babies/>

Many other states with similar demographics and challenges have expanded Medicaid, including Louisiana, Arkansas, and Kentucky. Please put politics aside and choose the option that is most beneficial for Georgians.
EXPAND MEDICAID!

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

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<https://www.kff.org/medicaid/issue-brief/the-effects-of-medicaid-expansion-under-the-aca-updated-findings-from-a-literature-review-august-2019/>

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<https://ccf.georgetown.edu/2019/05/09/medicaid-expansion-fills-gaps-in-maternal-health-coverage-leading-to-healthier-mothers-and-babies/>

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EXPAND MEDICAID!

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

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<https://ccf.georgetown.edu/2019/05/09/medicaid-expansion-fills-gaps-in-maternal-health-coverage-leading-to-healthier-mothers-and-babies/>

Many other states with similar demographics and challenges have expanded Medicaid, including Louisiana, Arkansas, and Kentucky. Please put politics aside and choose the option that is most beneficial for Georgians. EXPAND MEDICAID!

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Inniss

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

From my understanding the waiver will reduce vision and dental services for transitional age youth, which is disheartening. Young people in foster care have a hard time accessing Medicaid in general and to reduce these services will only continue to disadvantage this population from accessing Medicaid. Those in rural south not only need transportation resources but providers that actually accept the insurance outside of the main hospital. Benefits should include (specifically those in rural areas) should promote easy access to benefits and more incentives for providers to accept Medicaid in those areas. I went to college in Valdosta. I was lucky to have access to the extended foster care Medicaid for when I have emergencies but still had to travel to Atlanta for my annual physical, vision, and dental. I would literally spend so much money on a greyhound or providing gas to go straight to an appointment. Or I would have to wait till holiday breaks because the appointments didn't work with my school schedule. I've had hard times in accessing Medicaid and luckily had a support system that helped in gaining that access yet all young people in foster care don't have the support. So in creating this waiver, I hope it takes into consideration access and attainment of Medicaid for vulnerable populations by making adaption to eligibility, incentivizing providers to accept Medicaid, and increasing program benefits like transportation assistance or reimbursement.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Jackson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

The Medicaid expansion limits the number of new enrollees. This program could be better. If the plan under the ACA is followed over 500k Georgia residents would receive health care. The current plan will cover less 100k. What happens to the people who do not have insurance? Many will get sick and die. This should be unacceptable to anyone who is supposed to govern on behalf of the people. Fully expand Medicaid and help the people of Georgia. This will let people live longer, get better and create jobs. It's a win-win. Let's expand Medicaid like it was intended and insure as many Georgians as possible.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Jamison

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

I disapprove of these three waivers. I'd like to see legislation that increases accessibility to healthcare for ALL Georgians, specifically those that are currently underserved and would be even further underserved with these three waivers. Low income individuals should have accessible and affordable access to healthcare, including mental healthcare, and addiction services. Women should have easy affordable access to reproductive rights and healthcare services which includes family planning, birth-control, and safe legal abortion.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

I disapprove of these three waivers. I'd like to see legislation that increases accessibility to healthcare for ALL Georgians, specifically those that are currently underserved and would be even further underserved with these three waivers. Low income individuals should have accessible and affordable access to healthcare, including mental healthcare, and addiction services. Women should have easy affordable access to reproductive rights and healthcare services which includes family planning, birth-control, and safe legal abortion.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

I disapprove of these three waivers. I'd like to see legislation that increases accessibility to healthcare for ALL Georgians, specifically those that are currently underserved and would be even further underserved with these three waivers. Low income individuals should have accessible and affordable access to healthcare, including mental healthcare, and addiction services. Women should have easy affordable access to reproductive rights and healthcare services which includes family planning, birth-control, and safe legal abortion.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/13/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Johnson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

6865

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

It is critically important that mental health parity be a mandated component of any of these health insurance plans. We would like to see in any Waiver proposal Georgia move much more decidedly and intentionally toward the enforcement of federal parity legislation. Any loss of federal mandated protections for those with a mental illness or families seeking mental health care make it harder for people to shop for comprehensive coverage, and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity here in the state will ensure that families with mental health care needs have access to care equal to those with physical health care needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Johnson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Premiums, Copayments, Member Rewards Account

Comments*

What will happen to patients who are unable to work due to their health conditions? i.e. People with Heart Failure with reduced ejection fraction (HFrEF), a weakened heart that only pumps < 40% of the blood out with each heart beat, typically are unable to work or volunteer for 80 hrs/month. They do good to walk to the restroom, kitchen table, etc.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

How do people without income, pay for "Coinsurance"?
(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

I agree that some people are able to work, volunteer and pay coinsurance. There are MANY Georgians with chronic diseases who cannot. How will these be vetted out? There needs to be a plan for this patient population, PRIOR to implementing the proposed plan.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/19/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Joiner

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Any waiver proposal should be written to move Georgia much more decidedly and intentionally toward the enforcement of the 2008 federal mental health parity legislation. It is critically important that mental health parity be a mandated component of any Georgia health insurance plan. The brain is the CPU of the human body; healthcare is necessary for the entire body.

Any loss of federally mandated protections for those with a mental (brain) illness or families seeking mental (brain) health care makes it harder for people to shop for comprehensive coverage and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity here in the state will ensure that families with mental (brain) health care needs have access to care equal to other physical healthcare needs.

Any waiver proposal must also preserve and not undermine critical consumer protections, such as those which protect individuals with pre-existing conditions.

To fully protect Georgia consumers, any waiver must also insulate consumers from rising health insurance costs by building a stable, robust health insurance marketplace and investing in policies that increase marketplace enrollment.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Jones

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Employer Sponsored Insurance

Comments*

I have employee sponsored insurance that doesn't offer Co-pay, specialist, tests, or prescriptions. I'm a working resident of Georgia. GEorgia continues to move behind every state in the nation. Our citizens (we) deserve better than this. People will continue to use hospitals as doctors offices!

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Jones

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis as my 11-year-old has CF, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Jones

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis as my 11-year-old has CF, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Jones

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

The healthcare.gov website provides a reliable portal in which consumers can choose insurance plans, safe in the knowledge that those plans cover certain mandated services and conditions. Preventing Georgia consumers from accessing healthcare.gov and redirecting them instead to private broker and insurance company sites where insurance companies may provide deceptive marketing materials which obfuscate the actual coverage offered and where brokers may steer consumers to plans based on financial incentives to the broker, rather than the health needs of the consumer, is an unconscionably insidious proposal. This proposal is clearly designed to benefit the interests of private insurance companies and brokers, to the detriment of individual healthcare consumers in Georgia. It will result in many Georgians being exposed to unexpected and potentially ruinous costs when they receive healthcare for which they thought they were insured, only to discover that the services provided are not covered by the plan they have selected.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Jones

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Premiums, Copayments, Member Rewards Account

Comments*

This proposal is very concerning because it seems to contradict itself. If someone is enrolling in Medicaid and they are at or below the poverty line how would they be able to pay monthly premiums? That doesn't make a lot of sense to me.

Also why just a small fraction of people when there are hundreds of thousands of people who do NOT have healthcare? Why? What about the rest of the 450,000+ people?

It seems like this waiver makes it even more difficult for people to KEEP Medicaid even after this expansion that was just signed.

I understand that the state does not want to enable their citizens to be dependent on this but some people really can't meet those work requirements and on top of that the additional paperwork that would be needed will overcomplicate the process.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

While a positive step in stabilizing the marketplace, this program is undermined by the other provisions of the proposal.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

There's a big concern with capping the assistance to low and middle income families especially given that there's a large population of that demographic in the state. With them being low and middle class, how are able to afford the excess cost if there's a limit to the amount of assistance they will receive? Healthcare costs are astronomical and so I feel that it would be doing a disservice to the residents of GA that even if they get financial assistance, it still wouldn't be enough to cover medical expenses which ultimately makes them not being able to afford healthcare even with assistance. I do believe it should be case by case and not generalized.

Also what is the issue with mental health services not being covered the same way as physical health services? There are many people out there who are in need of mental health services, myself included. Luckily it was covered under my insurance at the time but there are so many people out there who needs help. Your brain is as important as your heart/body. I just believe that there needs to be

Second-rate plans also seems to be a waste for residents. How can somebody pay a monthly premium and not even get the bare essential health care services covered. This discourages anyone from going to get seen and possibly prevent illnesses that can be detected from a checkup or a regular visit to the doctor. Second rate plans to me and a lot of other people means that it is a bottom tier plan so they get bottom tier healthcare services and that just isn't right. What if someone is trying to get healthcare for the first time because they have a terminal illness but gets denied because it's a pre-existing condition therefore it will cost them more. Is it right for someone to pay more because of an illness that was out of their control? Please revisit this provision. It just does not seem fair.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Jordan

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

Governor Kemp's proposed Medicaid waivers and plan to take over the federal marketplace does very little to provide affordable coverage to the approximately 500,000 people in this state who can't see a doctor when they are sick.

The Kemp Waivers will only cover about 80,000 more Georgians and cost the state \$215 million to implement.

This stands in sharp contrast to full Medicaid expansion which would cost the state \$213 million to cover almost 500,000 Georgians.

Simply, the draft waivers are fiscally irresponsible, are unsustainable from a budgetary perspective, and will not provide the people of this state access to basic, affordable healthcare. Further, it will only further strip away the protections provided by the Affordable Care Act for the most vulnerable Georgians, those who suffer from preexisting conditions.

It is not hyperbole to say that we are in the midst of a rural healthcare catastrophe, with the women of this state bearing the brunt of this burden.

Half of Georgia's counties don't have an obstetrician/gynecologist.

One after another, we have watched our rural hospitals close their doors. At the same time, we have watched our maternal mortality rate rise, becoming the worst in the country. It is safer to give birth in some third world countries than it is in certain parts of our state.

There is no question that the failure to fully expand Medicaid has impacted the ability of women all over this state to access adequate care; has resulted in fewer providers servicing rural communities; has resulted in rural hospital closures; and has taken away our ability to bring over \$2.5 billion dollars more healthcare dollars to the state's economy and healthcare system. The 1552 wavier makes no sense because it requires us to pay more money to cover fewer people.

As for the draft 1332 waiver, the proposal will result in higher premiums for Georgians who get their coverage through qualified health plans (plans that include the ACA protections and include the ten essential health benefits) because healthy individuals who do not suffer from preexisting or chronic conditions (like diabetes or heart disease) will now have the ability to use premium subsidies to purchase cheaper non-qualified plans (non-qualified plans that don't provide essential benefits). This alone will erode the protections of the ACA and will make healthcare, for Georgians that need comprehensive care the most, unaffordable and unobtainable.

We can and should do better.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Subsidies

Comments*

With respect to the draft 1332 waiver, the proposal will result in higher premiums for Georgians who get their coverage through qualified health plans (plans that include the ACA protections and include the ten essential health benefits) because healthy individuals who do not suffer from preexisting or chronic conditions (like diabetes or heart disease) will now have the ability to use premium subsidies to purchase cheaper non-qualified plans (non-qualified plans that don't provide essential benefits). This alone will erode the protections of the ACA and will make healthcare, for Georgians that need comprehensive care the most, unaffordable and unobtainable.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Jordan

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

As a long-time Georgia citizen, I find it baffling that the state would propose to spend \$215 million to insure possibly 80,000 people while refusing to spend \$213 million to insure nearly 400,000 more. Nor have I ever understood why Georgia turned away Federal Medicaid dollars, especially during the years when no match money was required. The fact is that expanding Medicaid under the Affordable Care Act is still the least expensive and most efficient way to improve insurance coverage of Georgians.

And do we ever need coverage for more of us. Georgia ranks high in residents with risk factors for many chronic and expensive diseases, life expectancy has declined in the state, and the infant mortality rate is among the worst in the world. It's beyond time for state policymakers to take a realistic look at the health care conditions in the state, to realize that many of those who lack coverage are already working, and to stop playing politics when lives are at stake.

The current proposal accomplishes only the goal of refusing to accept a plan its opponents have relentlessly vilified but failed to replace. Expand Medicaid and improve the lives of Georgians.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/1/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Jueschke

Email *

Address

City

State Georgia

Zip

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

This Medicaid proposal is too little and too expensive. The work requirements are expensive to maintain and difficult for people to navigate. They don't consider disabilities or caregiver responsibilities. By the state's own estimate at most 50,000 Georgian's will be eligible leaving far too many uncovered.

Do the smart thing, the right thing and fully expand Medicaid. The Federal Government will cover 90% of the cost. 90%! DO THE MATH!! That means for every \$1.00 Georgia puts in the Feds put in \$9.00. Wouldn't YOU take a 90% discount deal????!!

Fully expanding Medicaid will cost about \$213 Million. Putting in place the work requirements and the private insurance portion of the plan will cost \$215 Million. At least. I would bet more. Regardless, do the math - \$213 million is less than \$215 million.

The goal should be to get Georgian's covered by healthcare so that they can be healthy and work, not the other way around.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

The part of the Medicaid expansion plan that involves private insurance is a bad idea. It will drive people away from an existing, unbiased platform, that is centralized, that people know how to use - healthcare.gov.. People will be at risk from being preyed on by insurance companies that want to increase profits. This proposal also does not require insurers to cover essential health benefits, such as maternity care (scary in a state with one of the highest infant mortality rates in the nation!). Those who need comprehensive coverage may be force to pay more.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

This bears repeating:

Do the smart thing, the right thing and fully expand Medicaid. The Federal Government will cover 90% of the cost. 90%! DO THE MATH!! That means for every \$1.00 Georgia puts in the Feds put in \$9.00. Wouldn't YOU take a 90% discount deal????!!!

Fully expanding Medicaid will cost about \$213 Million. Putting in place the work requirements and the private insurance portion of the plan will cost \$215 Million. At least. I would bet more. Regardless, do the math - \$213 million is less than \$215 million.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

Do the smart thing, the right thing and fully expand Medicaid. The Federal Government will cover 90% of the cost. 90%! DO THE MATH!! That means for every \$1.00 Georgia puts in the Feds put in \$9.00. Wouldn't YOU take a 90% discount deal????!!

Fully expanding Medicaid will cost about \$213 Million. Putting in place the work requirements and the private insurance portion of the plan will cost \$215 Million. At least. I would bet more. Regardless, do the math - \$213 million is less than \$215 million.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

Do the smart thing, the right thing and fully expand Medicaid. The Federal Government will cover 90% of the cost. 90%! DO THE MATH!! That means for every \$1.00 Georgia puts in the Feds put in \$9.00. Wouldn't YOU take a 90% discount deal????!!

Fully expanding Medicaid will cost about \$213 Million. Putting in place the work requirements and the private insurance portion of the plan will cost \$215 Million. At least. I would bet more. Regardless, do the math - \$213 million is less than \$215 million.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

The private insurance option should be kicked to the curb. We already have an unbiased, system healthcare.gov. We don't need a system that favors insurance companies and their goal to make money.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/30/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Kahn

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

In my view, Medicaid dollars should benefit patients, not private companies. The current waiver proposals for GA Medicaid strike me as backward for our State. It appears that this trivial expansion of Medicaid will help very few of the many Georgians who lack funding for medical care. The dollars provided will go primarily to private insurers who provide no care but serve only as middle-person agents. A few of these dollars will go also to create re-insurance programs . . . more folks who siphon off the dollars without caring for anyone.

In an Op-Ed written for the Atlanta Journal-Constitution this past February, Governor Kemp wrote that "Monthly premiums have more than doubled over the past five years. . . . Insurance premiums in the Peach State are crushing families, businesses and economic opportunity. . . . Georgians are spending thousands of dollars each month . . . to pay for bare-bones health insurance and overpriced prescription drugs."

At that time Gov Kemp correctly described the waste and inefficiency funneled through commercial insurance companies.

So why is it, then, that the Governor's waiver proposals for Georgia Medicaid direct so much public cash and political power right back to the private insurance companies? These corporations will obstruct any role for good government to improve health care for our sickest folks. The so-called "market forces" that have already closed many rural hospitals will continue robbing our poorest, least healthy neighbors. Insurance companies and Big Pharma will continue hauling in profits while boasting about Georgia's "great economy". Great for whom?

Henry S Kahn, MD, FACP

947 Blue Ridge Ave NE
Atlanta, Georgia 30306
Professor Emeritus, Emory University School of Medicine
(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

Please see my umbrella comments submitted with regard to the 1115 Waiver proposal.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

Please see my umbrella comments submitted with regard to the 1115 Waiver proposal.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Kausche

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

The terminal goal of expanding Medicaid is to simply increase access to healthcare with the most cost-effective solution, which should be beneficial to Georgians who need this coverage while responsibly allocating taxpayer dollars.

The current 1115 waiver proposals, even when paired with the 1332 waiver falls short of achieving this goal in an effective manner. The Georgia Pathway to Coverage 1115 Waiver plan is an unsound plan that only covers a fraction of eligible Georgians and adds significant administrative fees - ultimately increasing the net cost of healthcare. It also fails to adequately address the needs of rural Georgians and healthcare providers in our state.

Concerns re: Eligibility Requirement

The proposed waivers would cover eligible Georgians with an income below 100 percent of the federal poverty line. A qualifying individual must meet an hours and activities threshold of 80 hours per month of engagement through select qualifying activities: e.g. full or part-time employment, community service, or full-time student status, etc.; enrollees must also report proof of activities to certify their monthly hours in order to continue receiving coverage. Enrollees who do not meet the reporting requirements are dropped from the healthcare plan after 3 months.

Eligibility restrictions will subject Georgia's most needy populations to unreliable regulations and opens the door for potentially erroneous and discriminatory reporting practices. Since the purpose of Medicaid healthcare expansion is to increase healthcare access for the neediest groups in Georgia, it is contrarian to the mission of Medicaid expansion to implement additional barriers to access. Work reporting requirements are also an additional financial burden on the state because they further increase the size of bureaucracy in monitoring those requirements.

Shortsighted Eligibility Requirements: Some enrollees are unable to work because they are caregivers, suffer from chronic illness, are in a substance abuse or mental health treatment program, have a disability but do not qualify for disability benefits, or other reasons. Some enrollees may work in a seasonal industry (agriculture). People who are unable to work or volunteer are often not able to get or maintain health coverage when there are work reporting requirements.

Logistically, enrollees may not be able to accurately report their hours due to a lack of appropriate infrastructure, transportation, and/or internet access, especially in rural areas of the state lacking broadband access. Further, these requirements add additional administrative costs to the state, which would be tasked with monitoring those requirements. States like Arkansas and Indiana reported a significant increase in the Medicaid administration fees after introducing these burdensome regulations.

Some enrollees simply may not be able to meet these requirements due to health or family issues, they may have seasonal work schedules, or they may be faced with a language barrier to reporting. These reporting penalties also implicitly suggest that Medicaid recipients "do not want to work" - which has been proven false many times. These qualifying requirements do not increase long-term employment nor long term wages and are not based in sound reasoning, thus decreasing the effectiveness of the waiver. In states with reporting requirements like Arkansas, tens of thousands of enrollees lost their health coverage. It is of the utmost importance to remove these unnecessary and inefficient eligibility restrictions.

e.g. The Government Accountability Office reported that Arkansas spent \$26 million and Indiana spent \$35 million to administer these work reporting requirements in their Medicaid programs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Kausche

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Premiums, Copayments, Member Rewards Account

Comments*

Requiring premiums and copayments under this waiver presents another burden to enrollees and could also lead to significant drops in coverage. Cost-sharing requirements can lead to fewer eligible people enrolling in coverage and fewer enrolled people keeping their coverage.

In a study of public health insurance programs in multiple states, premiums as low as one percent of the enrollee's income reduced participation by about 15 percent. Even in Wisconsin, where premiums were charged for adults with incomes above the poverty line, there was a 24 percent reduction in enrollment because of nonpayment of premiums.

Also, the cost-sharing requirements will be different for some enrollees in this proposed waiver. Some participants in this waiver plan would be receiving premium and cost-sharing assistance to enroll in their employer's health coverage plan. But these participants would likely face coinsurance and deductibles that could make those plans cost-prohibitive for people making below the poverty line.

Additional Fees: There are also likely administrative costs associated with managing the member rewards accounts that some enrollees would have under the proposed waiver. The Georgia Department of Audits and Accounts published a fiscal note in 2016 that estimated a health savings account pilot program for a partial Medicaid expansion population would cost the state \$4.6 to \$5.9 million in the first year and up to \$7.5 to \$9.8 million in the third year. The expense of this proposed waiver is likely to be higher than stated because these additional costs are not included.

In addition, the current waiver proposals fails to account for alternative cost savings for the state if Medicaid would be fully expanded, like cost saving that would occur because people would have access to preventative care, could actually get the healthcare they need to become healthy and get a better job or a job at.

Estimated Annual Enrollment compared to Full Medicaid Expansion and Financial Concerns

Coverage: Full Medicaid Expansion would cover about 400,000 Georgians and would reduce the state's uninsured rate from 13.7% to 9%, whereas the 1115 waiver plan covers roughly 50,000 Georgians (only 13% of those with eligible incomes).

Financially smarter option: Full Medicaid Expansion covers approximately 8x as many Georgians and is the more financially responsible and cost-effective option.

The proposed waiver only offers coverage to about 50,000 of the more than 408,000 eligible Georgians statewide who currently live at or below 100% of the federal poverty level and have no health insurance. This is not only very disappointing, but it is willfully negligent and will continue to negatively affect rural hospitals and physicians which carry the burden of care for hundreds of thousands of Georgia's most medically underserved and uninsured areas. These institutions already struggle to keep up with the growing medical needs of a population that increasingly has no health insurance.

In comparison, full Medicaid expansion could cover up to 490,000 eligible people in Georgia, reducing the financial burden on rural hospitals. Expansion of Medicaid in 2019 would cost the state roughly \$213 million in the fiscal year of 2022 while providing a pathway to healthcare for many Georgians. Offering a downsized Medicaid waiver that only

covers 50,000 uninsured Georgians is a drop in the bucket and is an shortsighted, financially irresponsible program.

Uncertainty with benefit package offering: We are also concerned that the proposed waiver seeks to waive some parts of the benefit package for newly eligible enrollees. The traditional Medicaid benefits are designed to improve health outcomes among vulnerable residents in low-income and rural areas. The state's application seeks a waiver for both non-emergency medical transportation and certain vision and dental services for 19- and 20-year-old enrollees. Reducing vision and dental services would reduce access to care for transitional age youth.

Two other aspects of the 1115 waiver would reduce payments to Georgia health care providers by waiving two key policies—retroactive coverage and hospital presumptive eligibility. The three months of required retroactive coverage in Medicaid helps hospitals get paid for more of the services they already provided and gives them an opportunity to get eligible people enrolled. Presumptive eligibility gives those hospitals an expedited way of enrolling eligible patients.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/26/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Keegan

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

I would like to state that the 1115 Waiver - Georgia Pathways that is being proposed is inadequate to serve the needs of our most vulnerable Georgians. As a taxpaying Georgia citizen, this proposal is not a good use of my tax dollars. I believe this proposal will require approximately \$213 million to implement and cover approximately 80,000 people. It comes with all kinds of work requirements and premium requirements, which I frankly cannot believe is necessary, difficult to monitored and will cause implementation problems. Medicaid expansion (using government dollars that Georgia taxpayers are already paying for) would make much more sense. I believe that under Medicaid Expansion Georgia would have to kick in \$218 million, and with government assistance be able to cover approximately 400,000 people. In my humble opinion, this is no-brainer! We want to cover the largest number of people possible in order to help our most vulnerable citizens. People should not have to choose between healthcare and rent, or healthcare and warm clothes for their children.

My suggestion would be that politicians in the state of Georgia put a face on every person who is living without healthcare, and do the right thing. Expand Medicaid using our federal and state tax dollars. This is not a political issue - it is a human issue!

Thank you for listening.

Kind regards,

Gloria Keegan

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Kim

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

I feel like this will go terribly wrong. There is no set action plan on how to handle the finances. Also, I'm worried that redistributing the AHA money more "loosely" will take funds away from people at more need. Also, even if you do put in subsidies, insurance plans can hike their prices, so there needs to be a price cap on these companies.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

Moreover, things like emergency care and mental health services NEED to be included. Many people suffer from mental health disorders, and many people end up in the ER that wasn't planned. Taking these benefits out would screw thousands of Georgians.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Kimball

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

Regarding Section 1115 Medicaid Waiver:

It is not too late for Georgia to fully extend Medicaid eligibility and qualify for the 90 percent federal match so more people would be covered for a lower cost, not put at risk the federal funding by proposing a partial plan that the federal government may not accept.

I have read that the state is expecting only about 13 percent of the 408,000 uninsured Georgians under the poverty line to meet the work eligibility requirement. This is unacceptable. We should be helping people get jobs or job training so they can meet the requirement and get insurance. We should be trying to get as many people as possible covered.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Regarding 1332 Waiver - Georgia Access:

There should be a centralized enrollment website, such as healthcare.gov, instead of a more confusing decentralized system of private entities. With one enrollment site, outreach to the public will be streamlined and more people will know how to sign up.

Premium subsidies should not be used for non-qualified health plans. Healthier people with fewer health problems might use these plans because of their lower cost, thus driving up costs for less healthy people or people with preexisting conditions who need to have comprehensive plans. This is particularly concerning to me, the mother of a type 1 diabetic.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/22/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Kincer

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/22/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Kincer

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/13/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Kinnaman

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

It is critically important that mental health parity be a mandated component of any of these health insurance plans. We would like to see in any Waiver proposal Georgia move much more decidedly and intentionally toward the enforcement of federal parity legislation. Any loss of federal mandated protections for those with a mental illness or families seeking seeking mental health care make it harder for people to shop for comprehensive coverage, and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity here in the state will ensure that families with mental health care needs have access to care equal to those with physical health care needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Kirkland

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

My dad was just diagnosed with leukemia and the care he has received in the last 37 days has literally saved his life!!!!

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Kirlin

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

As someone who has pre-existing conditions I know personally how crucial it is to have access to healthcare. I am upset by many of the proposed changes to Georgia's Medicaid program. The changes actually seek to limit healthcare by requiring people to work and the cost of verifying and administering that program could be spent on actual medical services.

Another way it seems to limit access is that it would detour citizens from healthcare.gov to a Georgia run site. This would create confusion and eliminate the cost comparison that healthcare.gov allows. After years of using that website it finally got user friendly and now Georgia wants to change it. It makes no sense.

The biggest nonsensical plan is the one in which Georgians would pay more money to cover fewer people. Why? Why? Why? What a waste of taxpayer dollars!!!

Please do not approve the three plans proposed by Gov Kemp. Georgians deserve better than this.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

As someone who has pre-existing conditions I know personally how crucial it is to have access to healthcare. I am upset by many of the proposed changes to Georgia's Medicaid program. The changes actually seek to limit healthcare by requiring people to work and the cost of verifying and administering that program could be spent on actual medical services.

Another way it seems to limit access is that it would detour citizens from healthcare.gov to a Georgia run site. This would create confusion and eliminate the cost comparison that healthcare.gov allows. After years of using that website it finally got user friendly and now Georgia wants to change it. It makes no sense.

The biggest nonsensical plan is the one in which Georgians would pay more money to cover fewer people. Why? Why? Why? What a waste of taxpayer dollars!!!!

Please do not approve the three plans proposed by Gov Kemp. Georgians deserve better than this.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

As someone who has pre-existing conditions I know personally how crucial it is to have access to healthcare. I am upset by many of the proposed changes to Georgia's Medicaid program. The changes actually seek to limit healthcare by requiring people to work and the cost of verifying and administering that program could be spent on actual medical services.

Another way it seems to limit access is that it would detour citizens from healthcare.gov to a Georgia run site. This would create confusion and eliminate the cost comparison that healthcare.gov allows. After years of using that website it finally got user friendly and now Georgia wants to change it. It makes no sense.

The biggest nonsensical plan is the one in which Georgians would pay more money to cover fewer people. Why? Why? Why? What a waste of taxpayer dollars!!!

Please do not approve the three plans proposed by Gov Kemp. Georgians deserve better than this.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Kneeland

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

I don't understand why anyone would support this proof of work requirement. It is not reality based. What about construction workers who lose days to the weather. What about childcare workers whose employers take an extended vacation. How is someone who undergoing cancer treatments supposed to work at the same time ? Monitoring someone's work requires that they have a computer and internet access and time to input every detail. it would also cost the state so much to run this program that the new program would cost more than simply expanding Medicaid and using the federal dollars due our state. Why would anyone vote to spend more money to insure fewer people ? And why would anyone want to leave people out ? The goal should be to insure everyone.Please don't use the welfare of the people of Georgia to enable political revenge by a misinformed and misdirected party of Trump.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

Removing access to healthcare.gov makes no sense , morally or financially. It would cause even more people to lose healthcare coverage to charlatan companies who will offer little to no coverage for increased costs. it would take away preventive measures like flu shots , mammograms and basic coverage that encourages people to be proactive in guarding their health. it would shut down even more hospitals and clinics in rural areas and push those who struggle financially already off a cliff. Why would anyone turn down this state's fair share of federal tax money that supports the ACA ? The only motivation the governor has is to make points with Trump. No one is thinking about the reality of denying people healthcare and in so doing actually increasing end costs to the state.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/14/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Kohl

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

It is critically important that mental health parity be a mandated component of any of these health insurance plans. We would like to see in any Waiver proposal Georgia move much more decidedly and intentionally toward the enforcement of federal parity legislation. Any loss of federal mandated protections for those with a mental illness or families seeking seeking mental health care make it harder for people to shop for comprehensive coverage, and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity here in the state will ensure that families with mental health care needs have access to care equal to those with physical health care needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Koritz

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Koritz

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Premiums, Copayments, Member Rewards Account

Comments*

I am writing to express concerns about the Kemp Administration's 1115 waiver proposal. Blood cancer patients and their families understand first-hand that their survival depends on access to affordable treatment and medication.

Governor Kemp's proposed changes to the state's Medicaid program would cover only a fraction of uninsured, low-income Georgians and leaves billions of federal health care dollars on the table. Georgia is turning down \$8 million a day (\$3 billion per year) that could be used to give access to health care coverage to hardworking Georgians.

As cancer patients and survivors know all too well, just one medical bill can send a person into bankruptcy if they are uninsured. Georgians need the security of quality health care coverage when they need it most, without facing huge medical bills or going into bankruptcy.

This proposal does little to help those in the most need and makes little economic sense for the state – it must be stopped.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Kraimer

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage. Being a survivor of Leukemia, I would not have been able to afford the over \$1,000,000 medical bills per year.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Kramer

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Colorado

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

Expand Medicaid

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

Expand Medicaid

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Expand Medicaid

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/15/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Kramer

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

I have issues with the work requirements portion of your proposal. I don't know how a person with multiple health issues is supposed to find work before getting help. In order to get better they have to work, but in order to work they need to be healthy. It seems to be a bit of backwards logic. We need to be addressing the barriers that keep people from staying healthy. Everyone deserves a fighting chance.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

LaBarbera

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/12/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** LaBranche

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Enforce Federal Parity Legislation in Georgia!

It is critically important that mental health parity be a mandated component of any health insurance plan in Georgia.

I would like to see any waiver proposal in Georgia move toward the enforcement of federal parity legislation. Any loss of federal mandated protections for those with mental illness or families seeking mental health care makes it harder for people to shop for comprehensive coverage. It also limits the amount of financial assistance available to Georgians to help lower medical costs.

Implementation of parity in our state will ensure that families with mental health care needs have access to care equal to those with physical healthcare needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Laird

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access To individual coverage have high quality options available.

My daughter fought a long fight to win her battle and beating all odds. Without the availability to healthcare she would have undeniably lost her battle. She is cancer free today and due to good health care is able to remain that way!

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Lake

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

This waiver proposal does not help enough people who need medical coverage. There are over 400,000 adult Georgians without insurance. This proposal covers only 50,000.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

Work requirements are costly to administrate. Dollars would be better spent to provide Medicaid coverage to more uninsured Georgians.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

Reinsurance may be a good idea. Too bad Trump got rid of it at federal level.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

Purchasers' use of private broker websites, instead of the federal healthcare.gov website, leaves them vulnerable to buying inadequate insurance products.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Lamanno

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available. We already have one of the stingiest states when it comes to Medicaid. We don't need to remove any protections for those lucky folks that can afford insurance.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Lane

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Lane

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Lanford

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

To the Office of the Governor,

This is a public comment regarding Georgia's 1332 waiver proposal, the State Relief and Empowerment Waiver, submitted for public comment on Nov. 4, 2019. The stated aim of the proposal is to reduce premiums, increase coverage, and promote a more competitive private insurance marketplace.

The current 1332 waiver proposal suggests eliminating the federal health insurance Marketplace for Georgia, where lower-income consumers currently compare and buy federally subsidized health insurance. The waiver proposal instead suggests a practice called the Georgia Access Model. The Georgia Access Model leaves private insurers and brokers to offer subsidized health insurance to the same segment of consumers currently targeted by the Marketplace. Private insurers and brokers are expected to offer their plans through their various internet locations using their own methods. These insurers and brokers will be required to obtain state certification. The processes and requirements for certification are not yet specified.

Below, I offer three suggestions for strengthening the proposal. I believe these amendments to the proposal may reduce risk for Georgians and increase the likelihood of reduced premiums, increased coverage, and competitive private insurance.

(1) In the Georgia Access Model, the distributed system of letting various private insurers and brokers lead the way in offering subsidized health insurance plans through diverse websites and methods will add new complexity to Georgia's healthcare system. This complexity will create new administrative burdens for consumers trying to compare plans. While private insurers and brokers may compensate for this added complexity by engaging in creative marketing and user-friendly systems, incentivized by the desire to sell larger volumes of insurance, it is unclear whether private insurers or private brokers will be able to make their plans more visible, accessible, or comparable than plans currently are on the existing Marketplace. I therefore suggest:

The state should amend the proposal in one of three ways: (1) retain the Marketplace as-is, (2) follow the lead of other states by creating a state-run exchange with clear comparisons between plans, or (3) include detailed plans and costs-to-the-state for defining and enforcing clear standards for health insurance plans offered through the Georgia Access Model. Certification should clearly indicate Qualified Health Plan items that are not covered. The standards should allow simple comparisons of plans across insurer and broker websites. The state costs for administering this process should be presented in the waiver proposal, with comprehensive cost accounting.

(2) The federal government currently guarantees subsidies for Qualified Health Plans for all individuals who qualify. The proposed new plan states that those subsidies will no longer be guaranteed. If the new plan does not work as hoped, the burden of rising costs will not fall to the federal government as it currently does, but instead it will fall to low-income people who need health insurance. This is because, under the new plan, they may not be able to obtain subsidies even if they qualify. I therefore suggest:

The state should amend the proposal to guarantee premiums for Marketplace-quality plans at or below forecasted Marketplace levels for all who qualify by Marketplace standards. The state of Georgia can do this with subsidies just as the federal government did with the Marketplace, but in order to do so, the state must remove the currently-proposed cap on subsidies for qualifying individuals. This allows for innovation among private insurers without placing Georgia consumers at additional risk.

Guaranteed rates for consumers might otherwise be guaranteed by amending the proposal to include a circuit-breaker clause that switches subsidized health insurance for low-income people back to the standard and

breaker clause that switches subsidized health insurance for low-income people back to the standard and currently-existing Marketplace format if costs to consumers for Marketplace-quality plans increase beyond forecasted Marketplace rates. This would incentivize low prices in the private insurance market, since private insurers would have to offer Marketplace-comparable prices (or lower) or lose their market for alternative policies due to a circuit-breaker switch back to the standard Marketplace.

(3) The process outlined by Georgia officials for submitting the proposal to the United States Department of Health and Human Services states that the proposal will be submitted by the end of year 2019. This may not leave enough time to respond to public comment and rewrite the proposal or add details necessary for protecting Georgians from undue risk. I therefore suggest:

The state should extend the deadline for submitting the application to the Department of Health and Human Services, allowing for changes and additional details on administration of the Georgia Access Model, per public comment. This will give the state adequate time to respond to the current public comment process and fill out details that are currently unspecified but that will have a significant impact on health insurance access and costs for consumers and the state of Georgia.

The amended waiver proposal should include detailed plans for certification and regulation of new health insurance policies, detailed plans for certification and regulation of health insurance brokers, detailed plans for effectively and satisfactorily resolving consumer complaints and appeals, detailed plans for guaranteeing consumers can get the same or better plans at the same or better costs than they would with the current Marketplace, detailed plans for subsidizing health insurance plans without Qualified Health Plan items, and detailed plans for implementing safeguards in case health insurance costs, quality, and access do not improve.

Thank you for considering these comments.

Daniel Lanford, PhD.

Longtime Georgia citizen, health policy scholar, and friend and family to uninsured Georgians.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Larson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

I have a couple of concerns: Coverage is only extended to those at the poverty level. It is my understanding that Federal law allows states to extend coverage to people who earn a little more than the poverty line, but not enough to afford private insurance.

My other concern is that a payment of a premium is required, which goes against the grain of the Medicaid system, and should not be a requirement. The true circumstances of a disability or health crisis and ability to work or pay must be considered. The true cost, both economic and in human lives, would be a far greater toll without access to care.

Thank you.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

I am concerned about the elimination of the requirement that insurers cover mental health services such as for physical health services. I know far too many families with teenagers and young adults who are in need of these services to help their children out of despair and/or substance abuse. It seems almost epidemic now and requires more support, not less.

Also, like so many other Georgians, I have a pre-existing condition that requires costly daily prescription medicines to stay alive. I'm concerned about being offered second-rate plans that don't give us the coverage we need. Too many "junk insurance" plans are being allowed to enter the market. We also need to maintain an unbiased resource for information, which makes it less of a burden on the consumer in choosing a plan.

Thank you.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Lau

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

Governor Kemp's Medicaid Waiver Proposal is bad for Georgia. Even the Governor's office estimates that in the best-case scenario, only 10% of the half-million Georgians who are eligible would be able to enroll. The federal government would cover 90% of the cost of full Medicaid expansion but only 67% of a limited expansion. It makes sense to reject Governor Kemp's half-hearted Medicaid Waiver Proposal that costs more and covers fewer people. Full Medicaid expansion is the option that would provide the greatest coverage and receive the most federal funding.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

Governor Kemp's Medicaid Waiver Proposal is bad for Georgia. Even the Governor's office estimates that in the best-case scenario, only 10% of the half-million Georgians who are eligible would be able to enroll. The federal government would cover 90% of the cost of full Medicaid expansion but only 67% of a limited expansion. It makes sense to reject Governor Kemp's half-hearted Medicaid Waiver Proposal that costs more and covers fewer people. Full Medicaid expansion is the option that would provide the greatest coverage and receive the most federal funding.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

Governor Kemp's Medicaid Waiver Proposal is bad for Georgia. Even the Governor's office estimates that in the best-case scenario, only 10% of the half-million Georgians who are eligible would be able to enroll. The federal government would cover 90% of the cost of full Medicaid expansion but only 67% of a limited expansion. It makes sense to reject Governor Kemp's half-hearted Medicaid Waiver Proposal that costs more and covers fewer people. Full Medicaid expansion is the option that would provide the greatest coverage and receive the most federal funding.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Lawrence

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Lawrence

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** LeCraw

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

Only 50,000 people are estimated to qualify. Therefore, 360,000 will still have no access to healthcare. One of my many concerns is fertile women who have no access to reversible long term birth control. Other birth control methods have been shown to be ineffective at preventing unwanted pregnancies. In our state abortions are only VERY rarely an option. Studies show that if women have unplanned pregnancy, they and their babies have a higher risk of morbidity and mortality. Georgia has the highest maternal mortality rate in the U.S. We are 45th in neonatal death. The incidence of injury and negative health consequences is much higher than death. These babies can have cognitive and physical impairment that will result in the inability to work, but needing financial assistance, i.e. medicaid, etc that our state is required to pay. The cost to our state is enormous. If women of reproductive health health have EASIER access to long term reversible birth control, there will be less tragedy to our Georgia women, babies, and the Georgia public.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

I support this

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

If there is an option to select a "skinny policy" I am opposed to it. This will pull the healthy people out of the standard policies that can not exclude people with preexisting conditions. This will result in higher premiums to the later group. This will result in serious financial consequences to the people remaining in the nonexclusive policy. In effect, we will go back to the days where people are charged higher premiums if they have preexisting conditions.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Lee

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage. I was diagnosed with Non Hodgins Lymphoma in 2009 and was treated with chemotherapy. It reoccurred in 2012 and again was treated with chemotherapy. Without good health insurance we could not have afforded the treatment for this blood cancer.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Leftridge

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

"These proposals are absolutely absurd and politically motivated. More people could be covered, at a lower rate, if the Medicaid expansion was just accepted as originally intended. One need look no further than states where these waivers have been shut down and in states where the expansion has been accepted like KY. The proposed "skinny plans" are useless and they don't even portend to cover the minimum requirements of pre-existing conditions requirements. The waivers are simply kickbacks to insurance companies that become enriched while serving a bare minimum of constituents at a greater cost than what true Medicaid expansion would require. Georgians deserve better - especially the elderly, children and those living with lifelong medical conditions such as HIV.

Stop playing political games with Georgians health care."

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

"These proposals are absolutely absurd and politically motivated. More people could be covered, at a lower rate, if the Medicaid expansion was just accepted as originally intended. One need look no further than states where these waivers have been shut down and in states where the expansion has been accepted like KY. The proposed "skinny plans" are useless and they don't even portend to cover the minimum requirements of pre-existing conditions requirements. The waivers are simply kickbacks to insurance companies that become enriched while serving a bare minimum of constituents at a greater cost than what true Medicaid expansion would require. Georgians deserve better - especially the elderly, children and those living with lifelong medical conditions such as HIV.

Stop playing political games with Georgians health care."

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

"These proposals are absolutely absurd and politically motivated. More people could be covered, at a lower rate, if the Medicaid expansion was just accepted as originally intended. One need look no further than states where these waivers have been shut down and in states where the expansion has been accepted like KY. The proposed "skinny plans" are useless and they don't even portend to cover the minimum requirements of pre-existing conditions requirements. The waivers are simply kickbacks to insurance companies that become enriched while serving a bare minimum of constituents at a greater cost than what true Medicaid expansion would require. Georgians deserve better - especially the elderly, children and those living with lifelong medical conditions such as HIV.

Stop playing political games with Georgians health care."

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/1/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Lehan

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

Please expand Medicaid. It is estimated to cost \$213 million to fully cover 450,000 Georgians. Georgia's plans leave federal money on the table and many still without care.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

Please expand Medicaid. Georgia's plans leave money on the table and many still without care.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

Please expand Medicaid. Georgia's plans leave federal money on the table and many still without care
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/1/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Leitheiser

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

There should be no eligibility criteria or other test for health insurance or health care in Georgia.

Health care is a right. People should not have to go through some type of test to get something that is a right, that people of the state have already funded through taxes. Everyone should get health care in America, with no restrictions.

Georgia should have full Medicaid expansion with no restrictions.

People in Georgia deserve the health care that people in California, Minnesota, New York and other states receive. People that live here in Georgia should not have to move to a different state to get good health care.

It seems like it is the goal of Republicans in power in our state and other "Red" states to kill people with lack of health insurance. If you are poor or middle class and can't afford insurance copays and other costs of health care, is that a death sentence? For many people it is. That is just wrong. Health care is a RIGHT. Everyone should have it, like people do in the UK in Mexico, in Canada, in Costa Rica. America and Georgia should not be third-world places where people are dying because they can't afford to see health care professionals.

Republicans need to stop being so ridiculous and selfish about health care. Take the federal money for the Medicaid expansion and stop playing games with peoples' lives. Stop treating Georgia citizens as unworthy of health care.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

Georgia doesn't need its own reinsurance program as though we aren't even a part of the United States. Just use the ACA, use the available Medicaid expansion money and act like Americans. We don't need a totally new (Selfish, Republican) system that benefits the wealthy. Stop treating Georgia citizens like we are separate from the rest of the country.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

This is from Gov. Kemp's website announcement:

""Georgia Access creates a state reinsurance program to incentivize the private sector, empower consumers, and lower insurance premiums for families. This plan shakes up the status quo as we work to enhance access to affordable, quality healthcare in Georgia.

"When combined with Georgia Pathway, our Section 1115 demonstration waiver, we will have healthcare reform in the Peach State that actually puts patients first."

We don't need a separate health care system in Georgia. Just join the system already in place through the ACA and Medicaid expansion. Why does Gov. Kemp think we need to be "other" than the rest of the country? Stop treating Georgia citizens as though we are not worthy of what people in other states receive as far as health care.

Health care is a RIGHT. It should not be part of a for-profit insurance system designed to increase capitalism. No one would do that with other rights like freedom of speech or freedom of religion. We don't expect a profit model of incentives in our rights, period. Everyone needs health care and everyone should have it. We don't need the middle men - insurance companies - to profit off our illnesses, and we don't need them involved at all. Just do the right thing by increasing and expanding Medicaid and Medicare in Georgia so citizens of Georgia can have the good health care that people in other states have. Don't make us move to another state because Republicans didn't like a Democrat's health care system. Don't make us move for our health care because Republicans are selfish and need to find a profit in every single thing that America offers to people.

I and my family are against Gov. Kemp's waivers and we want and demand and deserve the full amount of federal money provided under the ACA and Medicaid and Medicare expansions.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/17/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Lezaj

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

I reside in Fayette County with only a few insurers (Kaiser, Ambetter, CareSource, BCBS Pathway, etc) for my self-employed husband and our family. Our insurance premiums are \$2,000/month (\$24,000 a year!) and yet we cannot see the doctors in our Piedmont Hospital Network. There is no PPO program and the doctor network for individual plans are restrictive. We should have equal access to doctors for the price we are paying. We are not receiving subsidies because my husband makes too much. What is a crime is that if we won the lottery, there is STILL no individual plan available we could purchase that allows access to our doctors and to our local Fayette Piedmont Hospital (our local hospital is not in-network!)

I believe insurance carriers should not be able to offer employer plans in this state unless they also offer an individual plan with a PPO option or expanded doctor network. How are they allowed to so blatantly discriminate? This is the U.S. We should have freedom and equal access to healthcare.

#1: How does 1332 address our situation of no doctor choice?

I also worry that combining the risk pool will only raise my premiums and make me pay for sicker insured individuals, and restrict the doctor network even more.

#2: How will 1332 address the number of individuals who don't qualify for subsidies who have left the insurance market to participate in Christian Cost-Share plans like Medi-share? They use PHCS doctor network which is extensive and have lower monthly costs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Lindbeck

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

(1) the work requirement is onerous for anyone working multiple part-time jobs, contract jobs of uncertain length, etc.; (2) internet access is unreasonable for the poor; (3) expand Medicaid--it does not have this hornet's nest of bureaucratic hurdles; (4) fewer are covered at a higher cost: covering a mere 50k individuals instead of the 450k individuals who are in desperate need of coverage??? (5) this is an outrage! bring our tax dollars HOME; help Georgians regain and maintain their health; protect RURAL HEALTHCARE; address the OPIOID EPIDEMIC; address MATERNAL HEALTHCARE!! This is a WASTE of tax dollars. Period.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

(1) pulling out of healthcare.gov is UNACCEPTABLE!! Georgians would no longer have access to tools that compare one plan to another to avoid the junk plans that are clogging the market that give no protection to consumers (and are padding the pockets of the 1%); (2) paltry subsidies would be given to Georgia--and when those subsidies run out, that's it! If you lose your job 2/3 of the way through the fiscal year and the subsidies have been exhausted, Georgians have no healthcare!! What sort of government is this? This is something out of a Dicken's novel! (3) protections for those with pre-existing conditions would disappear, so those with cancer, chronic conditions--those desperately in need of healthcare are simply abandoned! (4) power is once again in the hands of the industry to manipulate coverage availability without oversight of ACA. This is shocking.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

(1) pulling out of healthcare.gov is UNACCEPTABLE!! Georgians would no longer have access to tools that compare one plan to another to avoid the junk plans that are clogging the market that give no protection to consumers (and are padding the pockets of the 1%); (2) paltry subsidies would be given to Georgia--and when those subsidies run out, that's it! If you lose your job 2/3 of the way through the fiscal year and the subsidies have been exhausted, Georgians have no healthcare!! What sort of government is this? This is something out of a Dicken's novel! (3) protections for those with pre-existing conditions would disappear, so those with cancer, chronic conditions--those desperately in need of healthcare are simply abandoned! (4) power is once again in the hands of the industry to manipulate coverage availability without oversight of ACA. This is shocking.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Lloyd

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

As a citizen of GA I believe that Medicaid should be fully accessible to the public. Without the restrictions specifically placed on it in GA, you could help so many people that need it. It's important to so many peoples well being that they have access to Medicaid. Please do better for your citizens and help as many people as possible by extending Medicaid to its fullest allowance under federal law.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/15/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Lohr

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

It is critically important that mental health parity be a mandated component of any of these health insurance plans. We would like to see in any Waiver proposal Georgia move much more decidedly and intentionally toward the enforcement of federal parity legislation. Any loss of federal mandated protections for those with a mental illness or families seeking seeking mental health care make it harder for people to shop for comprehensive coverage, and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity here in the state will ensure that families with mental health care needs have access to care equal to those with physical health care needs.

As a mother of a mentally ill child who also has medical issues, I feel parity of the mental health programs to be critical in receiving appropriate care both medically and mentally as they often go hand in hand .Mental health care including addiction treatment is already hard to obtain so having more restrictions on insurance offerings will make it almost impossible to obtain critical treatment.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Loner

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

I am disappointed in the fact that the Governor's plan is to spend more money to cover fewer recipients than estimates indicate when it is cheaper to open it to all. Wouldn't helping as many people as possible be the right thing to do?

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

The unreasonable workload, paperwork, and premiums required to participate in this program are designed to sabotage the very people that need it most. With all the work that I do, I barely have the time to fill out needed paperwork once a year, much less having to keep with the demands proposed in the waiver.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

Changing the marketplace from Healthcare.gov, a government regulated website designed to offer impartial healthcare options to a private marketplace run by a for-profit industry is a calculated move to remove the protections current consumers have access to. Sponsored plans, a la carte options and unregulated coverage options benefit only the private insurance companies over the citizens of Georgia.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Bad idea of removing requirements for minimal essential coverage.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

The two waivers are clearly designed to lead the most vulnerable into commercial entrapment.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Lough

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

I have been involved for some time in issues of mental health, including caring for a son who has a severe mental illness. I am adamantly opposed to the requirement that the proposed Medicaid "expansion" imposes a work requirement. There are many persons who have a mental illness who desperately need medical insurance and yet they cannot work. Perhaps if they could afford medical insurance then maybe they could work, but how can they get stabilized and maintain their stability without good medical care and the medical insurance that allows them to have access to that good medical care? And even if able to work once treated and stabilized, some persons with mental illness will never be able to work the required 80 hours per month. The people who are making this proposal certainly must never have had a loved one who has a severe mental illness who cannot afford insurance. Otherwise, they would never have considered making such a proposal!

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

I am against requiring people to go through private brokers to obtain health insurance. I think that this option leads the brokers to steer clients to those plans that are not necessarily in the client's best interest but rather bring the highest commission to the broker. Also, as I understand this proposal, the available insurance options would include ones that do not provide for comprehensive insurance, which would likely cost less but would increase the costs for people choosing the more comprehensive insurance. And also, the plan can leave people without adequate coverage. Some people may choose, or have to take, a less expensive plan, thinking they have the coverage they need, only to find out when a medical crisis arises that they do not

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Lunney

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

The work requirement is a bogus requirement. Most of the folks who qualify are already working. Just puts another hurdle for those who already lack services and even mobility

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

This protects insurance companies and dumps the risk onto the Georgia Tax Payer. What good is coverage if they can back out. The companies get the profits and We the People take the risks.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Why are we not expanding Medicaid for the full funds availability? It would actually cost Georgia less and cover hundreds of thousands more citizens. This is an ELITIST Plan serving the few rather than the many. The bottom line is none of these Waivers improve the outcomes for everyday Georgians who presently are not covered by any access or insurance.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/1/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Mack

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/1/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Mack

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/25/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Mackesey

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

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Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/25/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Mackesey

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

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Comment Topic* Georgia Access - Other

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Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** mackesey

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

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Comments*

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Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** mackesey

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

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Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Maddox

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

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Comment Topic* Other

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Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Maddox

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

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Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/13/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Malfitano

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

It is critically important that mental health parity be a mandated component of any of these health insurance plans. We would like to see in any Waiver proposal Georgia move much more decidedly and intentionally toward the enforcement of federal parity legislation. Any loss of federal mandated protections for those with a mental illness or families seeking seeking mental health care make it harder for people to shop for comprehensive coverage, and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity here in the state will ensure that families with mental health care needs have access to care equal to those with physical health care needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/23/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Maloney

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]
1872

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

The new Medicaid proposal will cost approximately \$215 million to cover roughly 80,000 people. This is compared to about \$213 million to fully expand Medicaid coverage to at least 490,000 people. It makes no economic sense to not take the Medicaid expansion.

In addition, the Medicaid expansion saves lives. According to the Center on Budget and Policy Priorities, the Medicaid expansion saved the lives of at least 19,200 from 2014 to 2017 in states that adopted it. In GA 1336 lives were lost because of the decision not to expand Medicaid. Cardiovascular disease and diabetes are the most consequential in terms of being responsive to medical care.

If GA accepted the Medicaid expansion, this would create new economic activity, increase employment and tax revenue and prevent the loss of more rural hospitals. Federal government funds would be used to pay for GA health coverage and rural hospitals. For every dollar the state spends, it could receive \$9 from federal spending, 56,000 jobs could be created and the state's economic output could be expanded by \$6.5B annually.

Medicaid expansion is shown to improve lives in other ways as well: preventing evictions, improving quality of care, and expanding access to treatment for opioid use disorders.

Another troubling aspect of the new Medicaid proposal is work requirements for recipients. These work requirements for Medicaid could be a real burden for those in need: there are unpaid family caregivers, students, elderly or disabled, those with severe illness. It might be difficult to prove employment due to mental illness, intellectual disabilities, and physical limitations. It might be difficult to not only find work but to obtain work records, testimony from doctors, etc. Paperwork and red tape can be quite onerous, and schedules could make filing difficult. Work is a privilege that not everyone can achieve. To attach it to Medicaid benefits is unrealistic and cruel.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/23/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Maloney

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

1872

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

The affordable care act was finally passed in order to combat a critical problem with our health care system: the cost. The expense of health insurance had become more and more unaffordable for many of the citizens of our country and for even those lucky enough to have health insurance, the out of pocket expenses were skyrocketing, making illness a major cause of bankruptcy. The system that we had was not working. Private insurance was costly because it was a business designed to make a profit. Health insurance options were not adequate to cover most people and the out of pocket expenses were exorbitant.

The ACA was designed to be affordable for all of us as the federal government would subsidize those in need and the health insurance options were designed to make them cover the kinds of health challenges that most people have. Government run health care is designed to be a service not for profit. Health care is a right that all citizens should have, not just the privileged few. If we watch Governor Kemp enact his plan and withdraw from the ACA, it would radically overhaul the state's health insurance market. Under it, Georgia would establish a reinsurance program, as other states have done, but it would also exit the HealthCare.gov platform without creating its own marketplace. Instead, consumers could enroll in coverage only through private web brokers and insurers. Consequently, we will go right back where we were where only those who can afford it will be able to be insured. The health insurance industry will be a business making huge profits, and bankruptcy will be the way to manage exorbitant health costs.

The state estimates that about 30,000 people will gain coverage through this change. But in reality, it's more likely to reduce coverage overall. That's because letting people use subsidies to buy substandard plans would create adverse selection, as healthy people enroll in lesser coverage and leave sicker people in ACA plans, causing premiums for those plans to rise. Because subsidies would continue to be based on ACA plan premiums, rising premiums would drive higher per-person subsidy costs as well. That means providing subsidies to all eligible people would almost certainly cost more than Georgia is budgeting, triggering the waiver provision that would cap enrollment in subsidies. Without subsidies, many low- and moderate-income people would be unable to afford coverage, causing them to become uninsured.

In addition, these wavers will allow insurers to sell cheaper plans that would not cover the benefits required by the ACA such as drugs, mental health care, or maternity. There is something wrong with that.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

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(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Mangiafico

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

Please expand Medicaid under the ACA. Our state would get funds and many many more of our citizens will have coverage and assistance they so desperately need. I'm not sure how Georgia's officials can say they serve all Georgians when such a simple act could mean so much to so many.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

See previous

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

See previous

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/27/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Manke

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Enforce Federal Parity Legislation in Georgia!

It is critically important that mental health parity be a mandated component of any health insurance plan in Georgia. I would like to see any waiver proposal in Georgia move toward the enforcement of federal parity legislation.

Any loss of federal mandated protections for those with mental illness or families seeking mental health care makes it harder for people to shop for comprehensive coverage. It also limits the amount of financial assistance available to Georgians to help lower medical costs. Implementation of parity in our state will ensure that families with mental health care needs have access to care equal to those with physical healthcare needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Mantay

Email *

Address

City

State Georgia

Zip

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.

Cancer affects all of us and loved ones, who help out the most vulnerable that are afflicted with it, do not need further stress of worry over high quality options. They have enough on their plates.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Marchner

Email *

Address

City

State Georgia

Zip

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

The proposal is too restrictive, does not address the homeless population, and many disenfranchised people of our city/state.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Same comments and too many limitations.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Marin

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

I am very concerned that this program will not cover a sufficient number of those needing health insurance. I am also concerned about the complicated requirements to maintain eligibility including work requirements. 60 Minutes covered this topic recently and indicated that work requirements can be very confusing and unfair to those who need insurance coverage the most. When people don't have coverage, they lose access to vital medications and care, which will ultimately cost the state more money. Simplify the process or expand Medicaid. Thanks for your attention.

Dr. Barbara Marin

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

I am very concerned about the lack of mental health coverage in this program, especially coverage for addiction. With the current addiction crisis, I have watched friends bury their children and others worry daily about a child overdosing. Addiction treatment can save lives and costs.

Thanks for your attention,

Dr. Barbara Marin

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

I am deeply concerned about the number of Georgians who have inadequate access to health care insurance. I don't believe this program will solve that problem and I believe expanding Medicaid will begin to solve many of these problems. We have a responsibility to our neighbors and to the health of all to provide adequate care for those in need.

Thanks for your attention, Dr. Barbara Marin

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/13/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Marinelli

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

Enforce Federal Parity Legislation in Georgia!

It is critically important that mental health parity be a mandated component of any health insurance plan in Georgia. I would like to see any waiver proposal in Georgia move toward the enforcement of federal parity legislation.

Any loss of federal mandated protections for those with mental illness or families seeking mental health care makes it harder for people to shop for comprehensive coverage. It also limits the amount of financial assistance available to Georgians to help lower medical costs. Implementation of parity in our state will ensure that families with mental health care needs have access to care equal to those with physical healthcare needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/13/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Marinelli

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

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(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Marquardt

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

I understand the rationale of encouraging people to work in order to afford insurance. Unfortunately, there are many people who either cannot work, or are unable to meet the criteria for work that are set in the Georgia Pathways proposal.

I believe that improving the health of all individuals is the the first step in getting them to be functioning members of society. The 1115 Waiver would only help a fraction of fully functioning Georgians to receive healthcare coverage, leaving a majority of those in need without coverage.

With the goal of improving the health of more Georgians and improving the quality of life and work for the Georgians most in need of that, I support Medicaid expansion over the 1115 Waiver. We don't need more state bureaucracy to cover something that the Federal Government is already offering.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Premiums, Copayments, Member Rewards Account

Comments*

As a self-employed man, I don't like the amount I have to pay for medical insurance each month. At the same time, I look at it as something like public education. Public schools are there to give people the opportunity for an education. I did not send my children to public schools (which, in East Lake, seem poorly managed and supported), but I do not complain about paying taxes to support these schools. I also don't complain about paying my insurance premiums because they are supporting all of us.

I pay premiums hoping I never have to use the truly expensive services that some may need, but I'll have that option. For example, I've benefited from maternity and child healthcare help when I was younger and less able to afford it out of pocket. Now, if my premiums help a young couple afford the same in order to have a stable foundation for their family, that's a good thing for Georgia in general.

The people that need insurance the most will not be helped by a sliding scale of coverage when they're trying to remain financially stable as medical issues come into play.

And a maximum 10% savings on premiums is petty when other states seem to be implementing the ACA with greater success than Georgia.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

I understand the need to reduce premiums in rural areas in Georgia. Oddly, it seems that this waiver tries to achieve what the ACA was already trying to achieve with Medicaid expansion and other ways to equalize the insurance burden across the nation.

Rather than wasting time attacking and fighting a program (the ACA) that can benefit Georgians, and then wasting more time and taxpayer dollars coming up with a competing program, it would seem to make more sense to work to improve on a good foundation.

The program is already there. It does not need to be re-invented.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I have used the healthcare.gov web site and had no problems. It seems to work well.
(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

I don't see the need to waste taxpayer dollars to re-create something that already exists. Our money would be better spent on seeing how more insurance companies might be incentivized to cover Georgians in need.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Martin

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

tock
Dr

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Marx

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Ohio **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

Thhanaks

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Marx

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

You are doing a job!

Regards,

Bernie Marx

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Marx

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

You are doing a job!

Regards,
Bernie Marx

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Marx

Email *

Address

City

State

Zip

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

You are doing a job!

Regards,

Bernie Marx

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Marx

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

You are doing a job!

Regards,

Bernie Marx

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Master

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

I am a doctor.

Georgians need access to healthcare.

Spending more money to cover fewer Georgians is irresponsible.

Healthcare leads to a more productive and thriving society.

This is not a good plan.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Mattis

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

I would like to voice my concerns about all of the proposed changes being discussed at the State level. I am concerned that these proposed changes make it harder rather than easier for people to get what they need to survive.

I work for Emory as a Medical Social Worker with a background in public health. I graduated from Emory's School of Public Health in 2013 with a focus on Behavioral Sciences and Health Education. I went back to school in my late thirties after working in a number of Atlanta's Ryan White funded HIV clinics and working for a behavioral health insurance carrier. I have worked in GA's health care sector (for an insurance call center on the behavioral health side as well as nonprofit and academic health centers) since 1997. Over that time I have helped people access the physical and mental health services they need. I have often joked that we need to include education in high school about health insurance and health care systems. Navigating health systems, insurance systems and federal/state programs is challenging for everyone, but even more so for people who are also compromised in some way-- by the burden of managing and affording a chronic disease, of paying for health care costs and insurance, of family and caregiving demands, of trying to work at the same time, and so on.

I understand that we may want people to contribute to the costs of health care or participate by performing work or re-enrollments but in some cases that isn't feasible. Those low income Georgians who will be most affected often work hourly wage jobs and can't miss work. When people fall out of programs, they will still get the health services they need but in a more costly way through the ER and at a more advanced stage of condition. Taxpayers will still pay for this, and will pay more than they would otherwise. Further, the State as a system must be equipped with infrastructure to support any changes which are made so that citizens are successful in their efforts to comply.

I am also quite concerned about changes to the health insurance products that could be offered. One reason involves the country's opioid crisis which is also here in GA; without behavioral health benefits, access to treatment will be even more challenging. The State's community service board system has already been taxed beyond its limits before this new wave of demand for public treatment. It seems to me that we would be shooting ourselves in the foot by allowing insurers to offer stripped down plans here. Another reason for concern is that benefits not provided by a policy are still needed and drain on the health care system will remain. For example, if prescription benefits are not offered by plans, the consumer still has to figure out how to get it elsewhere (or not in some cases which can have work effects)- it still drains the health system somehow.

Finally, I am entirely against getting rid of an unbiased consumer focused entity like the Marketplace to educate and advocate for patients/ taxpayers/consumers. Expecting businesses to behave ethically, consistently, and transparently is lofty-- I dream that would happen, but know that it will not- there are far too many unreported conflicts of interest. And when it comes down to it, health insurance is a money-making business. Expecting individuals to navigate that without policy is unjust. I might be losing my reader with strong language here, but I am really bothered by this.

My 20+ years in health care and training in public health gives me a plethora of education and direct system experience to shape my perspectives on the proposed policies. I appreciate your willingness to consider public comment. I welcome any reply or requests for further discussion.

Thank you,
Shanna Mattis, MPH
(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Premiums, Copayments, Member Rewards Account

Comments *

I would like to voice my concerns about all of the proposed changes being discussed at the State level. I am concerned that these proposed changes make it harder rather than easier for people to get what they need to survive.

I work for Emory as a Medical Social Worker with a background in public health. I graduated from Emory's School of Public Health in 2013 with a focus on Behavioral Sciences and Health Education. I went back to school in my late thirties after working in a number of Atlanta's Ryan White funded HIV clinics and working for a behavioral health insurance carrier. I have worked in GA's health care sector (for an insurance call center on the behavioral health side as well as nonprofit and academic health centers) since 1997. Over that time I have helped people access the physical and mental health services they need. I have often joked that we need to include education in high school about health insurance and health care systems. Navigating health systems, insurance systems and federal/state programs is challenging for everyone, but even more so for people who are also compromised in some way-- by the burden of managing and affording a chronic disease, of paying for health care costs and insurance, of family and caregiving demands, of trying to work at the same time, and so on.

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Thank you,
Shanna Mattis, MPH
(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Employer Sponsored Insurance

Comments*

I would like to voice my concerns about all of the proposed changes being discussed at the State level. I am concerned that these proposed changes make it harder rather than easier for people to get what they need to survive.

I work for Emory as a Medical Social Worker with a background in public health. I graduated from Emory's School of Public Health in 2013 with a focus on Behavioral Sciences and Health Education. I went back to school in my late thirties after working in a number of Atlanta's Ryan White funded HIV clinics and working for a behavioral health insurance carrier. I have worked in GA's health care sector (for an insurance call center on the behavioral health side as well as nonprofit and academic health centers) since 1997. Over that time I have helped people access the physical and mental health services they need. I have often joked that we need to include education in high school about health insurance and health care systems. Navigating health systems, insurance systems and federal/state programs is challenging for everyone, but even more so for people who are also compromised in some way-- by the burden of managing and affording a chronic disease, of paying for health care costs and insurance, of family and caregiving demands, of trying to work at the same time, and so on.

I understand that we may want people to contribute to the costs of health care or participate by performing work or re-enrollments but in some cases that isn't feasible. Those low income Georgians who will be most affected often work hourly wage jobs and can't miss work. When people fall out of programs, they will still get the health services they need but in a more costly way through the ER and at a more advanced stage of condition. Taxpayers will still pay for this, and will pay more than they would otherwise. Further, the State as a system must be equipped with infrastructure to support any changes which are made so that citizens are successful in their efforts to comply.

I am also quite concerned about changes to the health insurance products that could be offered. One reason involves the country's opioid crisis which is also here in GA; without behavioral health benefits, access to treatment will be even more challenging. The State's community service board system has already been taxed beyond its limits before this new wave of demand for public treatment. It seems to me that we would be shooting ourselves in the foot by allowing insurers to offer stripped down plans here. Another reason for concern is that benefits not provided by a policy are still needed and drain on the health care system will remain. For example, if prescription benefits are not offered by plans, the consumer still has to figure out how to get it elsewhere (or not in some cases which can have work effects)- it still drains the health system somehow.

Finally, I am entirely against getting rid of an unbiased consumer focused entity like the Marketplace to educate and advocate for patients/ taxpayers/consumers. Expecting businesses to behave ethically, consistently, and transparently is lofty-- I dream that would happen, but know that it will not- there are far too many unreported conflicts of interest. And when it comes down to it, health insurance is a money-making business. Expecting individuals to navigate that without policy is unjust. I might be losing my reader with strong language here, but I am really bothered by this.

My 20+ years in health care and training in public health gives me a plethora of education and direct system experience to shape my perspectives on the proposed policies. I appreciate your willingness to consider public comment. I welcome any reply or requests for further discussion.

Thank you,
Shanna Mattis, MPH
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/23/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

McCallister

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

Expand Medicaid as outlined by the Affordable Care Act. Period.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Subsidies

Comments*

Expand Medicaid as outlined in the Affordable Care Act.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** McClure

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Eligibility Criteria

Comments *

Set the threshold at 138% FPL.

Cover more people.

Decreased regulation and complexity for both the public to understand the laws and programs, and the compliance by providers who are looking to keep their Uncompensated Care down.

Would not need to seek a waiver for this.

Would allow for the maximum dollars to be brought down from the Fed level.

Work Requirement

Expand to include child / family care providers, for those who need to spend lots of time providing for their family.

Expand to include working out / exercising as eligible activities.

Reduce down to 10 hours / week, and simplify the verification and compliance of this rule. It should be easier and less cumbersome than certifying for unemployment.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Premiums, Copayments, Member Rewards Account

Comments *

Add in a BMI surcharge, since many chronic diseases are co-morbid with obesity & can be managed by lifestyle changes. Tie to expanding work requirement Eligibility to include exercising as eligible activities.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Program Goals

Comments *

Address Uncompensated Care to bring parity between ESI and Medicaid payments.

Reduce Medicaid underpayments.

This will assist the operations of the hospitals, allow for the expansion of services, and ultimately be a boon for rural Georgia.

\$1.87B in 2017 uncompensated Care.

With 2 Million Medicaid participants & \$10B in costs, we spend \$5,000 per person. ESI is \$5,849 per person.

That would be an additional \$935 / person in compensated care, which would then drive premiums down, since the hospitals no longer have to cost shift reimbursement to ESI plans.

Over time, these should be in parity, as the quality and efficiency of care should be the measure.

This would also put higher pressure on private insurers to cut premiums, since their reimbursement would go down.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

Decrease Medicaid underpayment to address the \$1.87B in 2017 uncompensated Care.
With 2 Million Medicaid participants & \$10B in costs, we spend \$5,000 per person. ESI is \$5,849 per person.
That would be an additional \$935 / person in compensated care, which would then drive premiums down, since the hospitals no longer have to cost shift reimbursement to ESI plans.
Over time, these should be in parity, as the quality and efficiency of care should be the measure.
This would also put higher pressure on private insurers to cut premiums, since their reimbursement would go down.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

Will there be any re-insurance for specialist, and high cost drug claims?
Will Georgia force insurance companies to expand covered meds and procedures, with the intent to re-insure?
Ensure patients are not liable for disastrous medical bills, which will be sent to Re-insurance market.
(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

Is there any plan to pass this cost to hospitals or providers for Plan Years 2021 through 2025?
If there is, how close are they to the current 6% tax and fee cap?
(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Georgia Access - Consumer Experience

Comments *

Offer a State "Public Option", which would allow someone to buy into any plan that the state negotiates with carriers.

Define a HSA as a HDHP for state income tax purposes.

The focus should be on primary care, not hospitals.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Georgia Access - Plan Options

Comments *

Maximize the # of plans in the State Exchange

o Offer State "Public Option", which would allow someone to buy into any plan that the state negotiates with carriers.

o Define a HSA as a HDHP for state income tax purposes.

o Increase ESI participation

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Georgia Access - Subsidies

Comments *

o Establish opportunity zones where there are no primary care providers, and provide a block grant similar to FQHC.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Georgia Access - Consumer Experience

Comments *

Consumers should be able to compare a self-pay / payment plan option for providers.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/27/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** McCoy

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Enforce Federal Parity Legislation in Georgia!

It is critically important that mental health parity be a mandated component of any health insurance plan in Georgia. I would like to see any waiver proposal in Georgia move toward the enforcement of federal parity legislation.

Any loss of federal mandated protections for those with mental illness or families seeking mental health care makes it harder for people to shop for comprehensive coverage. It also limits the amount of financial assistance available to Georgians to help lower medical costs. Implementation of parity in our state will ensure that families with mental health care needs have access to care equal to those with physical healthcare needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/8/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** McDowell

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

I am in complete support of this proposal and I see a GREAT need in Barrow, Gwinnett, and Clarke counties. I currently work at a Mental Health facility that has ten stations across the state of Georgia and believe if this were passed we would be able to get many off of the waiting list and they be seen by clinicians that are licensed professional counselors (LPC). This has been passed by the senate and house of representative however, not simultaneously it is time to make this happen.

Best Regards,

Melissa McDowell
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Mcguinness

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** McMichael

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

The plan as it stands seems like it's not fiscally responsible. GBPI's analysis of the proposal shows the state could pay about \$215 million per year to cover only about 80,000 people (using conservative estimates to maximize savings). The optimal solution is fully expanding Medicaid, which costs \$2 million LESS but fully ensures that it covers at least 490,000 people (410,000 more).

This is a substantially lower cost per person and easier to implement. One could argue that Georgia could receive a waiver from the federal government, but the court case in Minnesota regarding their waiver denial makes this seem highly unlikely. Based on these facts, the proposal as it stands is unacceptable.

Please change the proposal to fully fund the Medicaid expansion or work across the aisle to come to a better solution.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

The plan as it stands seems like it's not fiscally responsible. GBPI's analysis of the proposal shows the state could pay about \$215 million per year to cover only about 80,000 people (using conservative estimates to maximize savings). The optimal solution is fully expanding Medicaid, which costs \$2 million LESS but fully ensures that it covers at least 490,000 people (410,000 more). This is a substantially lower cost per person and easier to implement. One could argue that Georgia could receive a waiver from the federal government, but the court case in Minnesota regarding their waiver denial makes this seem highly unlikely. Based on these facts, the proposal as it stands is unacceptable. Please change the proposal to fully fund the Medicaid expansion.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

The plan as it stands seems like it's not fiscally responsible. GBPI's analysis of the proposal shows the state could pay about \$215 million per year to cover only about 80,000 people (using conservative estimates to maximize savings). The optimal solution is fully expanding Medicaid, which costs \$2 million LESS but fully ensures that it covers at least 490,000 people (410,000 more). This is a substantially lower cost per person and easier to implement. One could argue that Georgia could receive a waiver from the federal government, but the court case in Minnesota regarding their waiver denial makes this seem highly unlikely. Based on these facts, the proposal as it stands is unacceptable. Please change the proposal to fully fund the Medicaid expansion.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Mcneilly

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Mcneilly

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Miller

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Miller

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

If this is a first step towards expanding Medicaid to ALL eligible GA citizens, I'm willing to see it tried out. I'd rather Georgia just go ahead and accept all the Federal money and work with ACA as it was designed to work.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/18/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Miller

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Please keep the proposed structure of the reinsurance program, including directing more funding to areas with higher premiums. Remove the cap on the premium subsidies to ensure that everyone eligible for subsidies can continue to receive them and afford their health coverage. Please maintain the centralized system for "shopping" for health care plans.

Do NOT allow premium subsidies to be used for non-qualified health plans. Doing so would create a shift in the market and increase costs to comprehensive plans, making them even more out of reach that before. Non-qualified health plans are absolutely the worst type of plans and are a pure junk product.

I know, because I purchased insurance from the Exchange for four years, before becoming desperate because prices were too high. I purchased a "junk plan" from a vendor, and it was a terrible mistake. They lied to me about coverage, refused to send a written contract until AFTER receiving my premium payment, and then when they refused to cover anything, I had to file with the Insurance Commissioner. The company dropped my policy RIGHT AWAY. They didn't even tell me, I had to find out while trying to file a pharmacy claim. My family was left without insurance for three months. (I did get my premiums refunded for that time.)

Taking away the protection of the ACA would be devastating to my family. My daughter was diagnosed with an auto-immune disease at the age of three, and she needs the protections of the pre-existing condition laws.

Also, I have three daughters, and all of them need the ACA protections FOR WOMEN, including that prenatal care and deliveries are covered by insurance, and women aren't charged more for insurance simply for being female.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Mills

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

In the best interest of most Georgians, full Medicaid expansion provides the most coverage for the most people.

Waivers do not meet the needs of Georgians as a whole.

The Governor is wise to see the need to help more Georgians, but short sighted in creating other plans than full expansion.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Mills

Email *

Address

City

State

Zip

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

Full Medicaid expansion is what is needed in Georgia. Governor Kemp is wise to realize Georgians need health care, but creating new programs when Medicaid exists is a waste of time and money.

I support full expansion of Medicaid in Georgia.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [Redacted] **Last Name *** Mills

Email * [Redacted]

Address [Redacted]

City [Redacted] **State** Georgia **Zip** [Redacted]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

Please find a way to eliminate the health insurance companies and/or governments restrictions on a small businesses ability to join an trade association group policy.

Currently a small business must have 2 or more employees to obtain group health insurance rates through a trade association. A lot of small business' are owner operated, single employee business' that use subcontractors or contract labor, and therefore cannot obtain group health insurance rates.

In example, I have owned a printing business in metro Atlanta for over 22 years. In years past, I offered employees group health insurance through the Printing Industry Association of Georgia. After the Great Recession, I have had to, unfortunately, replace employees, with technology or contract labor, to meet the changing needs of my customers and the industry. But with only 1 employee, I cannot purchase group health insurance through the PIAG due to the restrictions currently in place by the health insurance companies. The only alternative then is to purchase extremely expensive, non-subsidized, individual health insurance through the marketplace or else buy a substandard policy.

It seems logical that the 'group' in group health insurance rates should not be restricted by the number of employees in a single business, but rather should be inclusive of the 'group' of citizens in this state that can affiliate through an industry trade association.

The more citizens that can qualify for group insurance the better, for the individual, the state, and the nation.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/15/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Milton

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

It is critically important that mental health parity be a mandated component of any of these health insurance plans. We would like to see in any Waiver proposal Georgia move much more decidedly and intentionally toward the enforcement of federal parity legislation. Any loss of federally mandated protections for those with a mental illness or families seeking mental health care makes it harder for people to shop for comprehensive coverage and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity here in the state will ensure that families with mental health care needs have access to care equal to those with physical healthcare needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * **Last Name *** Mink

Email *

Address

City **State** Georgia **Zip**

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Minton

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Minton

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Misset

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

I am opposed to the waivers. They are cruel. They will make Georgia's health care crisis worse, and they are just bad business.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

I am opposed to the waivers. They are cruel. They will make Georgia's health care crisis worse, and they are just bad business.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

I am opposed to the waivers. They are cruel. They will make Georgia's health care crisis worse, and they are just bad business.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Mitchell

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

What are we doing here? Why would we want to have less coverage at a higher price than Medicaid expansion. This does not serve the people of Georgia.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

Again we should not be restricting how many people have the right to use healthcare in Georgia. Everyone has the right to healthcare, there shouldn't be a cap on eligibility.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

It is irresponsible to not require Georgia plans to be ACA compliant. Ignoring the impact of accessible, affordable mental healthcare on Georgia families and is fundamentally wrong. Ignoring the impact of restricted mental healthcare services on businesses, schools and communities also decreases success of the Georgia economy.

Healthcare is a human right. We should do better for Georgians.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Moffitt

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

Please know and understand the harm the 1332 waiver proposal can do to individuals and families. I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Montgomery

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Moore

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

These proposals are absolutely absurd and politically motivated. More people could be covered, at a lower rate, if the Medicaid expansion was just accepted as originally intended. One need look no further than states where these waivers have been shut down and in states where the expansion has been accepted like KY. The proposed "skinny plans" are useless and they don't even cover the minimum requirements of pre-existing conditions requirements. The waivers are simply kick backs to insurance companies that become enriched while serving a bare minimum of constituents at a greater cost than what expansion would require. Georgians deserve better - especially the elderly, children and those living with life long medical conditions such as HIV. Stop playing political games with Georgians health care.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

These proposals are absolutely absurd and politically motivated. More people could be covered, at a lower rate, if the Medicaid expansion was just accepted as originally intended. One need look no further than states where these waivers have been shut down and in states where the expansion has been accepted like KY. The proposed "skinny plans" are useless and they don't even cover the minimum requirements of pre-existing conditions requirements. The waivers are simply kick backs to insurance companies that become enriched while serving a bare minimum of constituents at a greater cost than what expansion would require. Georgians deserve better - especially the elderly, children and those living with life long medical conditions such as HIV. Stop playing political games with Georgians health care.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

These proposals are absolutely absurd and politically motivated. More people could be covered, at a lower rate, if the Medicaid expansion was just accepted as originally intended. One need look no further than states where these waivers have been shut down and in states where the expansion has been accepted like KY. The proposed "skinny plans" are useless and they don't even cover the minimum requirements of pre-existing conditions requirements. The waivers are simply kick backs to insurance companies that become enriched while serving a bare minimum of constituents at a greater cost than what expansion would require. Georgians deserve better - especially the elderly, children and those living with life long medical conditions such as HIV. Stop playing political games with Georgians health care.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/13/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Moore

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

It is critically important that mental health parity be a mandated component of any of these health insurance plans. We would like to see in any Waiver proposal Georgia move much more decidedly and intentionally toward the enforcement of federal parity legislation. Any loss of federal mandated protections for those with a mental illness or families seeking seeking mental health care make it harder for people to shop for comprehensive coverage, and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity here in the state will ensure that families with mental health care needs have access to care equal to those with physical health care needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Moriarty

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

Working as a nurse for 35 years I witnessed how bad health could lead to economic disaster for people with good skills and an ability to contribute to their community. Since retirement volunteering at the Decatur- area Emergency Assistance Ministry allows me to hear client's stories of loss of economic security due to bad health. The cost of medications and medical care can quickly pull someone a person and their family into financial ruin. So Gov. Kemp's plan to expand Medicaid sounded like a wonderful plan to me. Now that I have learned from the AJC articles about how of the 408,000 Georgians who live below the poverty level and do not qualify for Medicaid, only about 50,000 will qualify for "Georgia Pathways" waivers. The cost of "Georgia Pathways" is considerable more expensive for Georgia tax payers then just expanding Medicaid under the "Affordable Care Act". Why make healthcare coverage a political act and allow people and their communities to continue to suffer with bad health. Please just expand Medicaid and allow more Georgians living in poverty to have adequate healthcare. Bad health leads to financial hardship so give folks a chance to get treatment for illness. Having healthcare will benefit that person, their family, and their community.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Morris

Email *

Address

City

State Georgia

Zip

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

To whom it may concern,

As a nurse practitioner working in primary care at Mercy Care, Decatur Street location, I serve patients daily who are homeless, many of whom are unable to work due to physical and mental disabilities. This is in part due to a lack of healthcare, and in part due to a lack of housing, both of which are incredibly difficult to access in Georgia for those who are uninsured. As such, I will reiterate and support the official statement from Mercy Care:

As part of Atlanta's safety net for the homeless and uninsured, Mercy Care serves a population that is 75% uninsured and living below 100% of the federal poverty level (annual earnings of about \$12,000 for an individual and \$25,000 for a family of four). Sixty-seven percent of our patients are homeless. Our primary care and behavioral health teams are dedicated to helping people thrive by managing chronic illnesses, such as diabetes and hypertension, as well as anxiety and depression. The complex needs of our patients and lack of access to insurance makes their work both difficult and essential to the health of metro Atlanta.

Mercy Care has actively supported the state's decision to pursue 1115 and 1332 waivers. We also advocated for the widely supported plan to embed Grady Health System's Healthy Georgia Solution into the waiver proposal. It offers a comprehensive and transformational approach to providing access to care for the uninsured across metro Atlanta and in rural areas. The current plan to implement Georgia Pathways, which looks like traditional Medicaid, does not address the barriers that keep people from staying healthy—lack of transportation, healthy food, health education, etc. The innovative Healthy Georgia Solution could make Georgia a leader in healthcare.

Imbedding the Georgia Healthy Solution into the waiver program would also open greater access to specialty services such as cancer and heart care as well as access to more mental health services severely lacking in Georgia. Mercy Care works to increase the number of individuals we serve each year, but our clinics are at capacity with 15,000 patients served in 2018 through over 60,000 visits; 12,000 of those visits meeting mental health needs.

We appreciate the work that has gone into the 1115 waiver proposal, but the barriers built into the Georgia Pathways plan are significant. Putting work requirements before healthcare needs will negatively impact access to coverage being offered. Patients with significant health, social, housing and life issues are not in a position to work until their health and social issues are addressed. As a result, Georgia Pathways will benefit only a small number of relatively healthy individuals who are currently employed or meeting other related criteria. The state's own estimates prove it -- 400,000 uninsured in Georgia live at or below of 100% of the federal poverty level, yet only 50,000 individuals across the state will be covered after five years.

We strongly encourage Governor Kemp and the state to reconsider including the Healthy Georgia Solution as part of Georgia Pathways. It is the cost-effective, efficient solution to create a healthier Georgia.

Sincerely,
Sara Morris, FNP-C
(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

To whom it may concern,

As a nurse practitioner working in primary care at Mercy Care, Decatur Street location, I serve patients daily who are homeless, many of whom are unable to work due to physical and mental disabilities. This is in part due to a lack of healthcare, and in part due to a lack of housing, both of which are incredibly difficult to access in Georgia for those who are uninsured. As such, I will reiterate and support the official statement from Mercy Care:

As part of Atlanta's safety net for the homeless and uninsured, Mercy Care serves a population that is 75% uninsured and living below 100% of the federal poverty level (annual earnings of about \$12,000 for an individual and \$25,000 for a family of four). Sixty-seven percent of our patients are homeless. Our primary care and behavioral health teams are dedicated to helping people thrive by managing chronic illnesses, such as diabetes and hypertension, as well as anxiety and depression. The complex needs of our patients and lack of access to insurance makes their work both difficult and essential to the health of metro Atlanta.

Mercy Care has actively supported the state's decision to pursue 1115 and 1332 waivers. We also advocated for the widely supported plan to embed Grady Health System's Healthy Georgia Solution into the waiver proposal. It offers a comprehensive and transformational approach to providing access to care for the uninsured across metro Atlanta and in rural areas. The current plan to implement Georgia Pathways, which looks like traditional Medicaid, does not address the barriers that keep people from staying healthy—lack of transportation, healthy food, health education, etc. The innovative Healthy Georgia Solution could make Georgia a leader in healthcare.

Imbedding the Georgia Healthy Solution into the waiver program would also open greater access to specialty services such as cancer and heart care as well as access to more mental health services severely lacking in Georgia. Mercy Care works to increase the number of individuals we serve each year, but our clinics are at capacity with 15,000 patients served in 2018 through over 60,000 visits; 12,000 of those visits meeting mental health needs.

We appreciate the work that has gone into the 1115 waiver proposal, but the barriers built into the Georgia Pathways plan are significant. Putting work requirements before healthcare needs will negatively impact access to coverage being offered. Patients with significant health, social, housing and life issues are not in a position to work until their health and social issues are addressed. As a result, Georgia Pathways will benefit only a small number of relatively healthy individuals who are currently employed or meeting other related criteria. The state's own estimates prove it -- 400,000 uninsured in Georgia live at or below of 100% of the federal poverty level, yet only 50,000 individuals across the state will be covered after five years.

We strongly encourage Governor Kemp and the state to reconsider including the Healthy Georgia Solution as part of Georgia Pathways. It is the cost-effective, efficient solution to create a healthier Georgia.

Sincerely,
Sara Morris, FNP-C
(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Subsidies

Comments*

To whom it may concern,

As a nurse practitioner working in primary care at Mercy Care, Decatur Street location, I serve patients daily who are homeless, many of whom are unable to work due to physical and mental disabilities. This is in part due to a lack of healthcare, and in part due to a lack of housing, both of which are incredibly difficult to access in Georgia for those who are uninsured. As such, I will reiterate and support the official statement from Mercy Care:

As part of Atlanta's safety net for the homeless and uninsured, Mercy Care serves a population that is 75% uninsured and living below 100% of the federal poverty level (annual earnings of about \$12,000 for an individual and \$25,000 for a family of four). Sixty-seven percent of our patients are homeless. Our primary care and behavioral health teams are dedicated to helping people thrive by managing chronic illnesses, such as diabetes and hypertension, as well as anxiety and depression. The complex needs of our patients and lack of access to insurance makes their work both difficult and essential to the health of metro Atlanta.

Mercy Care has actively supported the state's decision to pursue 1115 and 1332 waivers. We also advocated for the widely supported plan to embed Grady Health System's Healthy Georgia Solution into the waiver proposal. It offers a comprehensive and transformational approach to providing access to care for the uninsured across metro Atlanta and in rural areas. The current plan to implement Georgia Pathways, which looks like traditional Medicaid, does not address the barriers that keep people from staying healthy—lack of transportation, healthy food, health education, etc. The innovative Healthy Georgia Solution could make Georgia a leader in healthcare.

Imbedding the Georgia Healthy Solution into the waiver program would also open greater access to specialty services such as cancer and heart care as well as access to more mental health services severely lacking in Georgia. Mercy Care works to increase the number of individuals we serve each year, but our clinics are at capacity with 15,000 patients served in 2018 through over 60,000 visits; 12,000 of those visits meeting mental health needs.

We appreciate the work that has gone into the 1115 waiver proposal, but the barriers built into the Georgia Pathways plan are significant. Putting work requirements before healthcare needs will negatively impact access to coverage being offered. Patients with significant health, social, housing and life issues are not in a position to work until their health and social issues are addressed. As a result, Georgia Pathways will benefit only a small number of relatively healthy individuals who are currently employed or meeting other related criteria. The state's own estimates prove it -- 400,000 uninsured in Georgia live at or below of 100% of the federal poverty level, yet only 50,000 individuals across the state will be covered after five years.

We strongly encourage Governor Kemp and the state to reconsider including the Healthy Georgia Solution as part of Georgia Pathways. It is the cost-effective, efficient solution to create a healthier Georgia.

Sincerely,
Sara Morris, FNP-C
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/4/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Morse

Email *

Address

City

State

Zip

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

Contracts with insurers need to guarantee that savings due to reinsurance translate into capped premium costs for the people insured. It's not fair to allow insurers to 'double dip' - reduce risk through the reinsurance program while being able to charge participants for the entire risk. Either the risk is accounted for in the premiums or it is accounted for in the reinsurance. You can split the difference but you cant — or shouldn't— chargeboth parties for 100% of the risk.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Murphy

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Murphy

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Murphy

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

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Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Murphy

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

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The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/8/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Napier

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

I don't think that the state should be subsidizing the cost of providing insurance coverage by the insurers. The insurers are in the business of evaluating risk and setting prices accordingly. They should set the premiums at a sustainable rate and the state should subsidize the premium payments for Georgia Residents. This is much more transparent than the State of Georgia paying insurers after the fact to reimburse them for engaging in their business.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

Currently Georgia residents who do not have other credible coverage are able to access health insurance options at Helathcare.gov. We do not have to pay an insurance agent or broker. Under the new plan Georgia residents will have to have the time and knowledge to contact multiple insurance carriers to find plans in their area. Insurance brokers and agents charge fees for helping consumers find plans. I used Helathcare.gov for 4 years to find my own coverage. Even with an insurance license, I could not have easily evaluated the plans against each other had I been looking at each insurer's collateral directly.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Subsidies

Comments*

The Cap on subsidies scares me. I am an elder law attorney and see Georgia Residents dying or becoming homeless while awaiting funds to become available in our Medicaid Waiver programs. I hate to think about more Georgians forgoing needed Medical care, because the state has capped the amount it will pay out in subsidies. If people cannot afford their premiums, then enrollment will not increase and more vulnerable Georgians will go without insurance, and thus without health care services.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Choice

Comments*

QHPs guarantee that all insurance coverage provides basic protections for the insured. Eliminating an essential health benefit, like maternity care would reduce premiums, however, it would increase the health risks of lower income Georgians who already have some of the worst maternal mortality rates in the country. There is also sex discrimination inherent in a plan that does not cover maternity care and charges a lower premium. Men can safely choose this plan and a lower premium without worrying about putting their health at risk. Women who care all the risk of pregnancy will need to purchase a plan that includes maternity care and will likely carry a higher premium.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Natkin

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

This plan only covers about 10% of those who would be eligible if we fully expanded Medicaid, for nearly the same cost. We are leaving \$s on the table and failing our citizens who need access to healthcare.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Premiums, Copayments, Member Rewards Account

Comments*

We shouldn't be requiring that those who qualify for Medicaid have to pay premiums. That's the whole point of Medicaid - they can't afford premiums!

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

Why are we spending nearly as much to cover only 10% of the population that would be eligibly with Medicaid expansion? That's a waste of our taxpayer dollars - we should expand Medicaid and get the most bang for our \$!

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** NETTLES

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

FULLY EXPAND MEDICAID TO BRING MORE HEALTH TO GEORGIANS FOR ***LOWER COST** THAN HALF-WAY MEASURES. MEDICAID EXPANSION NOT ONLY BRINGS BETTER HEALTH TO CITIZENS; EXPANSION ALSO PROVIDES AND KEEPS *JOBS* HERE, AND HELPS KEEP HOSPITALS AND CLINICS OPEN.

REDUCE THE WORK REQUIREMENT REPORTING. FOLKS AT POVERTY LINE CAN'T AFFORD THE INTERNET CONNECTION REQUIRED FOR THIS.

BRING OUR TAX DOLLARS HOME TO GEORGIA TO BENEFIT AS MANY AS POSSIBLE.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

MANY GEORGIANS RELY ON WWW.HEALTHCARE.GOV TO SEARCH FOR HEALTH INSURANCE, AND TO LEARN WHETHER OR NOT THEY QUALIFY FOR A SUBSIDY TO MAKE PREMIUMS AFFORDABLE. HEALTHCARE.GOV HAS EXCELLENT ON-LINE HELP, AND THEIR LIVE ASSISTANTS ARE QUALIFIED TO ASSIST US. GEORGIANS NEED AND DESERVE THE BENEFITS OF THE AFFORDABLE CARE ACT. I FULLY SUPPORT THE ACA!

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

Re the ACA assistance: By pulling Georgians out of healthcare.gov:

- we would no longer have access to tools that compare one plan to another
- subsidies would be given to Georgia to manage (that should stop your heart right there) which means that when the money we receive runs out, it's gone. If you lose your job 2/3 of the way into the fiscal year, you better hope and pray that there's money left in the pot to help you buy your insurance. Otherwise, you are placed on a waiting list.
- plans will not be subject to ACA certification which could encourage the proliferation of "junk" insurance plans with little or no protection for consumers
- costs for mental healthcare will go up
- protections for those with pre existing conditions could disappear
- power is returned to insurance companies brokered not by an ACA compliant broker, but very likely an industry salesperson.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** nicholson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone someone involved in the battle to eliminate cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Nix

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

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Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Nix

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/23/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Nowing

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

We need full Medicaid expansion which would cost roughly \$213 million to cover 490,000 Georgians. The proposed waivers would cost roughly \$215 million (higher costs) and only cover about 80,000 people (definitely not as much bang for the buck). The state innovation waiver could also leave people paying higher premiums for health coverage by shifting people to skimpier plans and capping the availability of premium subsidies many Georgians need to afford their private health coverage. Georgia is already at or near the bottom of the barrel in regards to the health of its people--witness our maternal and infant mortality levels--lower than some third world countries. As an FNP who provided healthcare to our lower income level patients and families, it is intolerable that we would allow this situation to continue. At the center of his plan, Governor Kemp aims to decentralize how consumers currently enroll in individual market coverage in favor of private web brokers and insurers. This means that consumers would no longer have an unbiased place to compare plan options and instead would be forced to rely on private entities who would have the incentive to enroll consumers in plans that offered the highest commission and not necessarily the plan that best fits their health needs. The most likely result is that Georgia consumers will struggle to navigate numerous websites, translate the sales lingo of insurers, and disentangle conflicting information. While work requirements have an appeal--most of these individuals would be working or volunteering if there was a reasonable way to do so. Of the 408,000 uninsured Georgians under the poverty line, the state is expecting only about 13 percent of them to meet the work eligibility requirement of 80 hours a month. However, the state acknowledges in the 1115 application that 60 percent of uninsured Georgians over age 16 are employed at least part-time. Given these low enrollment estimates, it is very likely that the costs will be much higher than proposed, although it is unclear how many people who are employed would struggle to adequately report their work.

The cons of this waiver far outweigh any of the pros it might have. Reject this and help our state move from it's dismal lowest healthcare ranking by enacting full Medicaid expansion.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

We need full Medicaid expansion which would cost roughly \$213 million to cover 490,000 Georgians. The proposed waivers would cost roughly \$215 million (higher costs) and only cover about 80,000 people (definitely not as much bang for the buck). The state innovation waiver could also leave people paying higher premiums for health coverage by shifting people to skimpier plans and capping the availability of premium subsidies many Georgians need to afford their private health coverage. This 1332 waiver weakens consumer protection (like mental health parity) and assumes without any supporting evidence that skimpy new plans will cover about 90% of the benefits that comprehensive coverage under the ACA provides. Show me the proof please. Skimpy plans that do not offer basic health services like prescription drugs, maternity care, or mental health services will become commonplace. As a result, Georgians will have a harder time accessing needed care and will pay more out-of-pocket.

Georgia is currently one of only 14 states that has not expanded Medicaid. To pursue this, Georgia lawmakers would need to amend the Patients First Act to change the Medicaid income eligibility from 100 percent to 138 percent of the federal poverty line. With the additional federal money, Georgia could extend coverage to hundreds of thousands more people than under the current proposed waiver. This would also make a greater dent in the state's high uninsured rate and bring significantly more revenue to hospitals and health care providers across the state. The state has spent years—and millions of dollars—talking about and looking into Georgia's health care problems, but these proposals do not come close to fully addressing the state's health care crisis. These proposals will not stem the closure of rural hospitals, while full Medicaid expansion would positively impact both the care that rural Georgians receive and the continued viability of keeping rural hospitals open(which is much needed for both employment opportunities and the FISCAL health of rural communities).

The cons of this waiver far outweigh any of the pros it might have. Reject this and help our state move from it's dismal lowest healthcare ranking by enacting full Medicaid expansion.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

We need full Medicaid expansion which would cost roughly \$213 million to cover 490,000 Georgians. The proposed waivers would cost roughly \$215 million (higher costs) and only cover about 80,000 people (definitely not as much bang for the buck). The state innovation waiver could also leave people paying higher premiums for health coverage by shifting people to skimpier plans and capping the availability of premium subsidies many Georgians need to afford their private health coverage. This 1332 waiver weakens consumer protection (like mental health parity) and assumes without any supporting evidence that skimpy new plans will cover about 90% of the benefits that comprehensive coverage under the ACA provides. Show me the proof please. Skimpy plans that do not offer basic health services like prescription drugs, maternity care, or mental health services will become commonplace. As a result, Georgians will have a harder time accessing needed care and will pay more out-of-pocket.

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The cons of this waiver far outweigh any of the pros it might have. Reject this and help our state move from it's dismal lowest healthcare ranking by enacting full Medicaid expansion

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** O'Connor

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

As a volunteer Medicaid biller for Community Advanced Practice Nurses, Inc., I am concerned about the ability of many of our adult patients to document their compliance with the "work" requirement. Conversely, I am concerned that the 328,000 students currently in the university system of Georgia and the 137,000 students in the technical college system could meet the documentation requirements but could overwhelm the system, even if they are only allowed 12 months of eligibility in a lifetime. I'm not sure how to solve the latter problem, but I think it needs to be addressed so that students with very low income but from families with adequate resources don't take advantage of taxpayers dollars to get free/cheap health insurance, even if only for a year. Perhaps exclude students who are eligible to be on their parents' health insurance policy.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

I think the Evaluation plan is a good start. I would caution that using claims data to measure percent of members who have had an ambulatory or preventive (thanks for spelling it correctly) visit will be an under count. Not all of the providers at our clinics are enrolled as Medicaid providers and not all those that are enrolled are contracted (yet) with CMOs. There also are a number of Free and Charitable Clinics (NAFC) member in Georgia who don't bill Medicaid but I bet they would not turn away patients who have Medicaid. Your evaluators could probably do some simple surveys to come up with an adjustment factor.

It would be useful to have an evaluation measure to determine the effectiveness of the work requirement. E. g. contact a subsample of members who are dropped from Medicaid after a year to find out their health insurance status: Marketplace, employer, none etc.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

What happens if HHS doesn't approve a 90% federal share?

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

O'Keeffe

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

It is despicable that Kemp's plan is based on denying medical care to as many poor people as possible. It uses the common Republican tenet that people are poor because they just want to live off of government benefits. Most are poor due to health problems, mental problems and a lack of decent jobs. The concept that you can starve people out of poverty has been repeatedly disproved. The waiver would also deny care to people who have to care for their family. The Kemp plan would ask a person to give up taking care of a sick, elderly parent in order to get health care. I would like to think we were better than this, but again the Kemp plan is designed to make sure not too many people can actually use it.

Please deny this waiver and send a message to Governor Kemp that he needs to sign up for a real Medicaid plan that covers all 400,000 poor Georgians.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

No comment

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** O'Keeffe

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

To force Georgians off of the ACA website and on to third party websites to obtain medical insurances is a travesty. Suggesting that they will be able to navigate the various sites and the questionable plans that will be offered is disingenuous.

I am a senior on Medicare and I am well educated. Having to navigate through the various options for Medicare is a challenge for even me. To think that the average and less than average educated Georgian will be able to navigate the raft of sites that will pop up to offer less than good plans is a tragedy just waiting to happen. If this waiver is allowed we will be looking back a couple of years from now asking how could we have allowed this happen.

Please in all decency deny the 1332 waiver and make Governor Kemp provide real access to the ACA
(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Governor Kemp's proposal to use bait and switch coverage to supposedly keep costs down is just wrong. Tricking people into accepting poor coverage is a dishonest end run around the real issue which is the Republicans do not want to offer health care to the working poor. By exempting coverage to certain areas you are baiting the customer into believing he will not need the coverage, but when he/she does they are out of luck. For example - mental health coverage. Offering a lower rate to eliminate mental health coverage sounds like a good idea. No one dies from mental illness. Not until they pull out a gun and shot someone.

The 1332 waiver is bad for the citizens and bad for Georgis. Please deny the waiver!
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/14/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Oldham

Email *

Address

City

State Georgia

Zip

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

I am the legal guardian and conservator of an adult on Medicaid because of disability. If you don't fix the problem of increasing funding where more doctors will take Medicaid the problem will worsen of people going to the ER for things that if they could see a private doctor they could avoid. To show an example of this problem, it took me literally 5 hours and calling numerous hospital and orthopedic groups around Atlanta to find a surgeon to repair a badly fractured leg because every one of them would not take Medicaid for an outpatient surgery. Grady had a 3 week wait to find out if they would see her in the clinic with another 3-4 weeks wait for surgery - for a badly broken knee! I finally found a surgeon in Canton that was gracious enough to help us. We were living in Marietta at the time. I gave up attempts to find her a primary care doctor while living there as not a single non-OB/GYN doctor would take Medicaid. None. I spent days trying to find one. Every one of them cited low reimbursements as they reason they don't accept it. I happen to work in the medical field and understand the problem of overhead costs and many doctors want to see these patients but cannot afford to. I'd be happy to volunteer my services to help you all work on this problem.

I totally support the idea of having able bodied people on Medicaid who are able to work have to work to get it - use the same guidelines used for Foodstamps.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

I am the legal guardian and conservator of an adult on Medicaid because of disability. If you don't fix the problem of increasing funding where more doctors will take Medicaid the problem will worsen of people going to the ER for things that if they could see a private doctor they could avoid. To show an example of this problem, it took me literally 5 hours and calling numerous hospital and orthopedic groups around Atlanta to find a surgeon to repair a badly fractured leg because every one of them would not take Medicaid for an outpatient surgery. Grady had a 3 week wait to find out if they would see her in the clinic with another 3-4 weeks wait for surgery - for a badly broken knee! I finally found a surgeon in Canton that was gracious enough to help us. We were living in Marietta at the time. I gave up attempts to find her a primary care doctor while living there as not a single non-OB/GYN doctor would take Medicaid. None. I spent days trying to find one. Every one of them cited low reimbursements as they reason they don't accept it. I happen to work in the medical field and understand the problem of overhead costs and many doctors want to see these patients but cannot afford to. I'd be happy to volunteer my services to help you all work on this problem.

I totally support the idea of having able bodied people on Medicaid who are able to work have to work to get it - use the same guidelines used for Foodstamps.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Olenczak

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

These waivers are going to cost the state \$215 Million dollars and will only cover about 50k individuals by your own estimates. It would cost only \$213 Million to fully expand medicaid coverage and cover at least 490k people. Why would we, as a state, pay \$2 million more to cover only 10% of the people who could be covered if we spent less? It is wrong to make Georgia taxpayers spend more money to do less. It is not only fiscally irresponsible, it is incomprehensible why our state government wants to pay more money to PREVENT Georgian Citizens from having healthcare.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

The eligibility and reporting criteria will exclude people from having Health Insurance. It will be very hard to get it to begin with, and if they make one mistake they loose coverage.

What happens to people who are out of work for several weeks due to an illness or recurring episodes which forces them to miss work or school due to the severity. They will lose their coverage?

This also does not seem to care for care-givers taking care of other people. These care-givers are giving their time, energy, and lives to take care of others - and will not be eligible for healthcare coverage?

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

There is no benefit to Georgians to dismantle the single source to compare and purchase healthcare plans, and force them to shop around and purchase from private brokers.

This makes the process to shop for comprehensive healthcare coverage more difficult for Georgians and will create a roadblock for them to sign up for healthcare.

Georgia should be making it easier for our Citizens to access affordable healthcare, not more difficult as a means to PREVENT them from having healthcare coverage.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

These changes are going to negatively impact Georgians. This opens the doors to junk policies and plans that do not provide the protections to Georgians they are guaranteed under the Affordable Care Act... including those with pre-existing conditions and mental health disorders. Many Georgians will not realize this until it is too late.

Georgia should be ensuring that our Citizens have the best healthcare coverage possible for the money we spend. Spending more money to take away protections from our Citizens, and making them pay more for less coverage is not fiscally or morally responsible.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Oliver

Email *

Address

City

State

Zip

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Oliver

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** O'Neal

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

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Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** O'Neal

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Osborn

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage. My little sister has been treated for CCL for the last 8 years and the burden this has placed on her and the family is immense. Please don't take away the support she and others need.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Owens

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

This proposal only covers a small fraction of those who would otherwise be eligible for coverage via what the federal government offers for Medicaid expansion. The 90 percent of those potentially eligible deserve coverage too. Expand Medicaid fully and don't leave money on the table just because of politics.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/1/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Pasackow

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

The work requirements make it very onerous for people who have part-time jobs, contract jobs, seasonal jobs, or are temporarily disabled. How can anyone making \$15,000 or less per year afford internet access to be compliant with this reporting requirement? I have a decent retirement income and struggle to pay the high internet rates in Atlanta. How can we penalize a person who has to take off for cancer treatment? Why should a childcare worker be penalized if the owner of a daycare center takes 3 weeks vacation? Why should a construction worker suffer if his work site is shutdown due to rain?

All this tracking will be very burdensome on the State, which will probably contract this work out- leading to corruption, mismanagement and a waste of my tax dollars.

Fewer people will be covered at a higher cost. This is fiscally irresponsible.

Rural Georgia needs access to decent healthcare that will help grow good jobs and rebuild communities. A growing economy requires strong and healthy workers.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

If Georgia pulls out of healthcare.gov we would no longer have access to tools that compare one plan to another. Our plans will not be subject to ACA certification which could encourage the proliferation of "junk" insurance plans with little or no protection for consumers. Young, healthy individuals will be fooled into buying catastrophic insurance only - not sharing the pie with everyone else. Our costs for mental healthcare will go up, protections for individuals with pre existing conditions could disappear and worst of all, the power is returned to insurance companies brokered not by an ACA compliant broker, but very likely an industry salesperson - who only cares about the bottom line, not the health of the patient.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

The waiver could result in coverage disruption for the more than 450,000 individuals who are already enrolled in ACA coverage through HealthCare.gov. If only an additional 30,000 enroll, this pales in comparison to the 1.4 million people who are uninsured in Georgia, more than half of whom are already eligible for ACA subsidies but not enrolled. The state innovation waiver could also leave people paying higher premiums for health coverage by shifting people to skimpier plans and capping the availability of premium subsidies many Georgians need to afford their private health coverage.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/29/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Patrick

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

I'm opposed. These program changes will cost more, cover less, and benefit only insurance companies and brokers.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

This program is intriguing.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

Cost more covers less. I'm opposed

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/13/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Patterson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

It is critically important that mental health parity be a mandated component of any of these health insurance plans. We would like to see in any Waiver proposal Georgia move much more decidedly and intentionally toward the enforcement of federal parity legislation. Any loss of federally mandated protections for those with a mental illness or families seeking mental health care makes it harder for people to shop for comprehensive coverage and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity here in the state will ensure that families with mental health care needs have access to care equal to those with health care needs.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

PLEASE IN THE WAY YOU FEEL MOST COMFORTABLE, AND SHARE THIS MESSAGE:

It is critically important that mental health parity be a mandated component of any of these health insurance plans. We would like to see in any Waiver proposal Georgia move much more decidedly and intentionally toward the enforcement of federal parity legislation. Any loss of federally mandated protections for those with a mental illness or families seeking mental health care makes it harder for people to shop for comprehensive coverage and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity here in the state will ensure that families with mental health care needs have access to care equal to those with health care needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Payne

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

If the goal of the waivers is to increase the number of insured citizens of Georgia, full Medicaid expansion would be a much better option. See statistics in the AJC. In addition - and related to the number of insured citizens - is the problem with the closing of rural hospitals. These hospitals need insured patients to survive! More insured rural citizens means more income of these hospitals when they need medical care.

PLEASE stop the partisanship and do what is best for Georgia! I am a retired Public Health Nurse Practitioner and have seen too many problems with the lack of health care in our state.

Thank you.

Nancy Payne

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

See previous comments.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

See previous comments.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Peltz

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Please do NOT try to implement a state plan that relies on private insurance only and eliminates the healthcare.gov option. We've already been down that path for the last 30 years of my adult life. It has failed.

I have no issue with adding a new option; however, that should not be the only option to GA residents. They should have the option to continue with plans on the federal plan.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/28/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Petersohn

Email *

Address

City

State Georgia

Zip

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

I am for Full Medicaid Expansion in Georgia.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

I am for Full Medicaid Expansion in Georgia
(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

I am for Full Medicaid Expansion in Georgia.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Petkas

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

I am against having work requirements/community service for people to obtain access to healthcare. I think the state should expand Medicaid to cover these individuals.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

I do not want to eliminate Georgian's access to healthcare.gov for purchasing health insurance.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

I do not want to eliminate Georgian's access to healthcare.gov in order to obtain health insurance.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/26/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Phillips

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

4 reasons why Medicaid should be expanded FULLY, with NO work requirement:

(1) Economics. The federal government will pay 90% of the long term costs. The Georgia economy would get \$9 extra for every \$1 we spend. And that's BEFORE the multiplier effect.

(2) Rural hospital closures. Full Medicaid expansion would bail out rural hospitals, preserving the largest employer in many small communities, and giving people a reason not to move away to an area with a larger, denser population.

(3) Administrative hassles. Over and over, poor people I have known have told me the following story about food stamps (SNAP): they submitted ALL their required eligibility paperwork. Then they find out in the grocery store checkout line, there's no money on their EBT card. They call the statewide 800 line, and are on hold for HOURS--6 to 8 hours--they finally give up. They walk into their local DFACS office to find out what paperwork is still needed, and are told, "We can't talk with you about that. You have to call the 800 line." The Medicaid work requirement will be the same kind of administrative disaster, but with life-shortening consequences.

(4) I'm a lawyer. For 20 years I have concentrated on representing applicants for Social Security and SSI disability. These appeals take YEARS. The case I'm working on today, which is typical, was filed in 2014 and has no real hope of being resolved till mid-to-late 2020 at the earliest. Many of my clients are uninsured. It is ROUTINE for me to read in medical records that my clients cannot get care they need, because they are uninsured--they cannot get medication, a device, a scan, surgery, physical therapy, on and on.

Every year, one or a few of my clients die. Most of them would probably still be alive if they could have gotten care.

Today's client has an IQ of 65 and lupus, which she writes as "looper." Since graduating from high school with a special education diploma, she has spent most of the last 20 years working in factories, never making even as much as \$20,000 a year. Now she writes:

"I can't even pay my medicine bills because no help help no money I can't even go to the doctors if I need to so I half to suffer because I can't take anything without been check I can't even get medicaid so I half to do with out stuff which is Medicine, checkup, pay my doctor when it time for me to go to the doctor and even when I need medicine I can't get."

This woman has busted her butt her entire life and our system treats her like human trash. Thankfully she has an adult daughter that she has moved in with, or else she'd be homeless.

I remember another lupus client from about 10 or 12 years ago. After years of litigation, we finally won her appeal. I tried to call and give her the good news, but her phone had been disconnected. Turned out she was dead. She had a 9 year old son.

Nobody is trash. FULL expansion of Medicaid is the decent thing to do, and it's the economically smart thing to do. Just expand Medicaid FULLY.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Pierce-Perryman

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Pierce-Perryman

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** [REDACTED] **Price**

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

As a physical therapist in the state of Georgia, I could comment on the hundreds of patients I see every year without health insurance. They have injuries or illness that can be physically and emotionally difficult but also financially catastrophic. For them as well as the hospital I work for. The state could fully expand Medicaid and reach so many Georgians who desperately need it. They would stop being a burden on our system since healthy Georgians are able to return to work vs becoming chronically ill and/or disabled having never got the care they needed. The cost to expand Medicaid is much more financially sound (like a lot of other states have already discovered) than the ridiculous plan Governor Kemp has put forth.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** [REDACTED] **Pride**

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

Instead of expanding Medicaid to cover all low-income Georgians, this is leaving money on the table and pursuing a complicated plan that makes it hard for low-income Georgians to get covered and stay covered. We will all end up paying in the end with patients seeking care in Emergency rooms settings resulting in poor health outcomes long term. Please expand medicaid with full expansion and support low income and working families.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*
People must first be able to access health insurance and if they do not have health insurance we are back to square one.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

A state ran program by private insurance corporations will only benefit the insurance corporations and not low income and working families.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Purdie

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

From what I've read this past year, this waiver will cost more to cover less than if Georgia had just accepted the original medicaid expansion of the Affordable Care Act. Especially since the first 3 years would have been 90% paid by the Federal government. Instead, Georgia cut itself off from that help that would have covered many more people who could have received health care. In addition, a law was passed so that a government alone could not approve medicaid expansion but that the legislature would vote on it. So now it takes more people to convince that this is needed! I worked almost 30 years with the Department of Family & Children Services as a caseworker in eligibility programs such as medicaid, food stamps, & Nursing Home medicaid. The need is tremendous for health insurance, food assistance, etc. This is true for more & more of our citizens of both low income & middle class incomes. We need more health resources especially in rural areas. People shouldn't have to choose between food & their prescriptions. People shouldn't have to go bankrupt to get health care. Health care should be a right not a privelege!

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Quintero

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/24/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Raiman

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Hawaii **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

The plan will not help all poor people in Georgia. Thousands of citizens will get their healthcare at emergency rooms that have to take them, they won't be able to pay those bills and it will drive up those hospitals' deficits, leading to more hospital shutdowns. That situation has rural residents in crisis now because they can't get to hospitals in an emergency in a timely manner. People who pay for care other than at an emergency room may not be able to afford food or shelter, straining those services that are already past capacity. We need full Medicaid expansion and we needed it years ago, but our tax money went to other states that expanded Medicaid. Georgia will continue to have bad outcomes, including the worst maternal death rate in the country.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/15/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Reisert

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

As a mother with a child diagnosed with Bipolar disorder II, I strongly support the move to Enforce Federal Parity Legislation in Georgia!

It is critically important that mental health parity be a mandatory component of any health insurance plan in Georgia. I would like to see any waiver proposal in Georgia moved toward the enforcement of federal parity legislation.

Any loss of federal mandated protections for those with mental illness or families seeking mental health care makes it harder for people to shop for comprehensive coverage. It also limits the amount of financial assistance available to Georgians to help lower medical costs. Implementation of parity in our state will ensure that families with mental health care needs have access to care equal to those with physical health needs.

Sincerely concerned,
Latricia Reisert
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/22/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Robinson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/22/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Robinson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Robinson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

Please rescind the waiver and accept FULL Medicaid expansion for Georgia.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

Please continue our relationship with Healthcare.gov and accept full Medicaid expansion for Georgia so that the premium prices will come down on Healthcare.gov.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

Please accept FULL Medicaid expansion and continue using Healthcare.gov for Georgia so that healthcare insurance becomes more affordable.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Rogers

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

I have been reading the articles in the AJC regarding the waivers being requested by the State of Georgia for health care coverage and wanted to comment on the cost-effectiveness of these waivers. According to the information I have read, the State of Georgia is going to be paying the same amount of money for coverage under these waivers as it would pay for FULL MEDICAID EXPANSION. However, under the waivers, health coverage is only estimated to cover 50,000 people. Under the Full Medicaid Expansion, almost all of the roughly 480,000 Georgians in need of health coverage would be covered.

I do not see how this is good use of our taxpayer dollars. Clearly, it would be much more fiscally responsible to cover more Georgia residents who need health care under the Medicaid Expansion, than to only cover less than 1/9th of those needing health care for the same cost? In addition, the Full Medicaid Expansion would greatly help out the rural hospitals and community health centers throughout our state that are in dire need of monetary assistance now. This decision makes no sense especially from a government that claims to be fiscally conservative.

I would like to know the rationalization for making such a fiscally inefficient choice -- other than what appears to be some sort of stubborn, partisan opposition to Medicaid Expansion. Full Medicaid Expansion seems to be a win-win in comparison to the waiver plans. It uses our tax dollars much more effectively and is also the most humane and compassionate use of this money.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

I have been reading the articles in the AJC regarding the waivers being requested by the State of Georgia for health care coverage and wanted to comment on the cost-effectiveness of these waivers. According to the information I have read, the State of Georgia is going to be paying the same amount of money for coverage under these waivers as it would pay for FULL MEDICAID EXPANSION. However, under the waivers, health coverage is only estimated to cover 50,000 people. Under the Full Medicaid Expansion, almost all of the roughly 480,000 Georgians in need of health coverage would be covered.

I do not see how this is good use of our taxpayer dollars. Clearly, it would be much more fiscally responsible to cover more Georgia residents who need health care under the Medicaid Expansion, than to only cover less than 1/9th of those needing health care for the same cost? In addition, the Full Medicaid Expansion would greatly help out the rural hospitals and community health centers throughout our state that are in dire need of monetary assistance now. This decision makes no sense especially from a government that claims to be fiscally conservative.

I would like to know the rationalization for making such a fiscally inefficient choice -- other than what appears to be some sort of stubborn, partisan opposition to Medicaid Expansion. Full Medicaid Expansion seems to be a win-win in comparison to the waiver plans. It uses our tax dollars much more effectively and is also the most humane and compassionate use of this money.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I have been reading the articles in the AJC regarding the waivers being requested by the State of Georgia for health care coverage and wanted to comment on the cost-effectiveness of these waivers. According to the information I have read, the State of Georgia is going to be paying the same amount of money for coverage under these waivers as it would pay for FULL MEDICAID EXPANSION. However, under the waivers, health coverage is only estimated to cover 50,000 people. Under the Full Medicaid Expansion, almost all of the roughly 480,000 Georgians in need of health coverage would be covered.

I do not see how this is good use of our taxpayer dollars. Clearly, it would be much more fiscally responsible to cover more Georgia residents who need health care under the Medicaid Expansion, than to only cover less than 1/9th of those needing health care for the same cost? In addition, the Full Medicaid Expansion would greatly help out the rural hospitals and community health centers throughout our state that are in dire need of monetary assistance now. This decision makes no sense especially from a government that claims to be fiscally conservative.

I would like to know the rationalization for making such a fiscally inefficient choice -- other than what appears to be some sort of stubborn, partisan opposition to Medicaid Expansion. Full Medicaid Expansion seems to be a win-win in comparison to the waiver plans. It uses our tax dollars much more effectively and is also the most humane and compassionate use of this money.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/20/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Rogers

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/25/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Rose

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

We should forget about waivers and go for full Medicaid expansion. It's more cost efficient, would save thousands of lives, and give health insurance to the neediest Georgians.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

We should forget about waivers and go for full Medicaid expansion. It's more cost efficient, would save thousands of lives, and give health insurance to the neediest Georgians.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

We should forget about waivers and go for full Medicaid expansion. It's more cost efficient, would save thousands of lives, and give health insurance to the neediest Georgians.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Sachs

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. I am a blood cancer survivor. While I could afford a robust insurance plan, I watched three others die during treatment because of their limited coverage and inability to personally fund insurance shortfalls. I do not believe healthcare should only be for the wealthy and do not want to be part of a state nor country that thinks otherwise.

Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Salzman

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

Unfortunately the intent behind 1115 will be lost in the actual outcomes. Not enough people will be served and have insurance for the cost. Why not look at full expansion which would decrease the amount of those uninsured significantly more and have similar costs? This is not going to have long term impact on employment or our economy. Disappointing.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Samuel

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

Mercy Care on the proposed 1115 waiver

As part of Atlanta's safety net for the homeless and uninsured, Mercy Care serves a population that is 75% uninsured and living below 100% of the federal poverty level (annual earnings of about \$12,000 for an individual and \$25,000 for a family of four). Sixty-seven percent of our patients are homeless. Our primary care and behavioral health teams are dedicated to helping people thrive by managing chronic illnesses, such as diabetes and hypertension, as well as anxiety and depression. The complex needs of our patients and lack of access to insurance makes their work both difficult and essential to the health of metro Atlanta.

Mercy Care has actively supported the state's decision to pursue 1115 and 1332 waivers. We also advocated for the widely supported plan to embed Grady Health System's Healthy Georgia Solution into the waiver proposal. It offers a comprehensive and transformational approach to providing access to care for the uninsured across metro Atlanta and in rural areas. The current plan to implement Georgia Pathways, which looks like traditional Medicaid, does not address the barriers that keep people from staying healthy—lack of transportation, healthy food, health education, etc. The innovative Healthy Georgia Solution could make Georgia a leader in healthcare.

Imbedding the Georgia Healthy Solution into the waiver program would also open greater access to specialty services such as cancer and heart care as well as access to more mental health services severely lacking in Georgia. Mercy Care works to increase the number of individuals we serve each year, but our clinics are at capacity with 15,000 patients served in 2018 through over 60,000 visits; 12,000 of those visits meeting mental health needs.

We appreciate the work that has gone into the 1115 waiver proposal, but the barriers built into the Georgia Pathways plan are significant. Putting work requirements before healthcare needs will negatively impact access to coverage being offered. Patients with significant health, social, housing and life issues are not in a position to work until their health and social issues are addressed. As a result, Georgia Pathways will benefit only a small number of relatively healthy individuals who are currently employed or meeting other related criteria. The state's own estimates prove it -- 400,000 uninsured in Georgia live at or below of 100% of the federal poverty level, yet only 50,000 individuals across the state will be covered after five years.

We strongly encourage Governor Kemp and the state to reconsider including the Healthy Georgia Solution as part of Georgia Pathways. It is the cost-effective, efficient solution to create a healthier Georgia.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Sanchez

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

Your goals should be that everyone deserves healthcare and Georgia needs to get on board. It's not an entitlement, its a right. We are in last place in healthcare and our government needs to get on board. We have Emery and the CDC in Georgia yet our healthcare falls short. Get on board. People do not have to take out loans for medical treatment.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

Your goals should be that everyone deserves healthcare and Georgia needs to get on board. It's not an entitlement, its a right. We are in last place in healthcare and our government needs to get on board. We have Emery and the CDC in Georgia yet our healthcare falls short. Get on board. People do not have to take out loans for medical treatment.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Subsidies

Comments*

Your goals should be that everyone deserves healthcare and Georgia needs to get on board. It's not an entitlement, its a right. We are in last place in healthcare and our government needs to get on board. We have Emery and the CDC in Georgia yet our healthcare falls short. Get on board. People do not have to take out loans for medical treatment.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/15/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Sandefur

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

I would like to see subsidies/incentive reimbursements built in for WHOLE FOOD, natural multivitamins and enzyme/digestion supplements, organic vegetable purchases, and other whole food based naturopathic options included in your offerings. Georgia is a particularly poor state in terms of healthy food availability and affordability. I know of many neighborhoods and communities in middle Georgia that qualify as food deserts, and I know you know of them, too. There is not a single grocery store in Crawford County at all. Rural & even urban access (in neighborhoods of Macon) to healthy, affordable diet options is substantially limited and directly correlates to the high levels of chronic disease among our local populace.

If you would like additional consultation, I am willing and able to connect you with several professionals who can provide input and speak constructively into your planning process from this angle.

Thank you for your efforts toward bettering health for ALL Georgians, Medicare eligible and not.

Respectfully,

Jen Sandefur
478.714.6298
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Sanders

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Sanders

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Santander

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Santander

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Satisfy

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/26/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Scardasis

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/26/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Scardasis

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Schrag

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

The plan should NOT go forward and has many problems leaving the poorest with nothing and the slightly less poor with copays, expenses and a requirement to work or volunteer they may not be able to fulfill

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

The program should NOT go forward and hurts the poor
(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

The plan should NOT go forward and hurts the poor and primarily benefits the insurance companies
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/8/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Schwartz

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

This plan fails to provide adequate affordable medical care for hundreds of thousands of Georgians who could be covered with a straightforward Medicaid expansion without waivers. Expanding Medicaid would save lives and take advantage of federal taxes we are already paying. It would save the most lives and rescue failing rural hospitals and the states 10% contribution to the total cost would be more than repaid with the benefits to public health and the direct and indirect money that would flow into the state. Failing to take full advantage of Medicaid expansion reveals Governor Kemp to be a partisan hack more driven by adherence to mindless GOP opposition to the Affordable Care Act than the public interest and the health of Georgians. This flimsy partial expansion makes no sense economically and will result in lives being lost that could be saved.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

Just expand Medicaid fully and you won't need to implement these partial and less effective measures
(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

Just expand Medicaid fully and make Georgia a decent place to live for everyone
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Scovil

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

Medicaid should be expanded to cover more people than just folks below the poverty line , the working poor need help and Ga hospitals suffer financial losses since many of these people are unable to pay their hospital bills; this affects retirees like me who could be faced with hospitals being closed down for financial constraints like this

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

The cost is affordable an I am happy to see my tax dollars going to help my fellow Georgians have access to adequate health care, it saves us all money in the long run

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

expand Medicare

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

expand medicare to extend coverage to more Georgians

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Scovill

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Seitz

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/13/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Shaffer

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

3469

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

Mental health parity must be a mandated component of any health insurance plan in Georgia.

As an active member of NAMI organization in Georgia I have witnessed too many uninsured mental illness victims in unhealthy prison environments, which costs taxpayers unnecessarily. Families wish to help their own mentally ill receive treatment and to avoid this misplaced burden on law enforcement and hard-working legal and correctional staff.

I would like to see any waiver proposal in Georgia move toward the enforcement of federal parity legislation. Any loss of federal mandated protections for those with mental illness or families seeking mental health care makes it harder for people to shop for comprehensive coverage. It also limits the amount of financial assistance available to Georgians to help lower medical costs. Implementation of parity in our state will ensure that families with mental health care needs have access to care equal to those with physical healthcare needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Shaw

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Shaw

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/1/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Shockey

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

I am fundamentally opposed to the idea that we should spend more money to cover fewer people. Not only does the math not work, but it is bad fiscal management. Over the last few months Georgia has spent millions of dollars trying to figure out how to NOT fully expand Medicaid to then turn around and leave millions on the table for other states to use. We do not have the option of bringing home our tax dollars. This is a waste of taxpayers dollars.

Then there are the issues of those who are not covered. It's a moral outrage and fiscal malfeasance. Why are we simply allowing Georgians to not only get sick and stay sick, but potentially causing them to become disabled and die. This alters the path of their families, does not stabilize communities, and costs us work force. This makes NO sense whatsoever.

Those who have potential to be covered, are then required to report in on their work, attempts to work, etc. This draconian and expensive mandate, is a pathway to failure not a pathway to health. Where in a \$15,000 a year budget could one find the money to pay for internet service? Could one afford transportation to get to a library? Are there allowances for transportation? What about those who work seasonally? What about those who do contract work? What about day laborers? What about the housekeeper who's employer goes on a long vacation and doesn't pay her? What about someone who is temporarily disabled by an illness? Cancer may require travel and being off work. What about people with seizure disorders in rural areas? How do they get to work? How can they even find online work with no broadband?

There is absolutely no reality built into these proposals.

Let's also talk about the cost to implement work requirements. Is this a business opportunity on the backs of Georgians? It sure looks like it to me.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

Why Georgia wants to pull out of healthcare.gov is beyond me. My daughter and her husband get decent health coverage and enjoy the protections of the ACA by purchasing her health insurance through the exchange. I understand that this year, the market for Georgia has stabilized and there are even more options. That particular piece is not broken, let's not fix it.

Secondly, it would eliminate the ability of Georgia consumers to compare plans and choose what best fits their circumstances. Why wouldn't we want people to buy the best product for their family?

Pulling a limited number of funds from the ACA subsidy fund is a disaster looking for a place to happen. Let's say I lose my job in the middle of the cycle, do not have the option to purchase Cobra insurance, and then apply through the "Georgia marketplace" - how would I be assured that there would be enough money to help me purchase my insurance? I'd have to be placed on a waiting list that would likely not help me until the beginning of the next fiscal year. Again, just as we would with the Medicaid experiment, Georgia would lose money set aside from OUR tax dollars because of this attempt to circumvent the ACA marketplace. Fiscal malfeasance.

Putting consumers in the predicament of trying to sort through plans is a risky thing. Most of us do not have the expertise to read through the fine print and figure out what will and will not work for us. Too many with weak plans have found themselves in a serious financial predicament after an unexpected medical event. It is a rare person who never has the opportunity to run into hidden insurance company rules. We should not be weakening the rules, but instead strengthening consumer protections. Is this not what we elect our officials to do?

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Siegel

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

This program should be available to any and all who want to participate.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Silva

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

These proposals are absolutely absurd and politically motivated. More people could be covered, at a lower rate, if the Medicaid expansion was just accepted as originally intended. One need look no further than states where these waivers have been shut down and in states where the expansion has been accepted like KY. The proposed "skinny plans" are useless and they don't even portend to cover the minimum requirements of pre-existing conditions requirements. The waivers are simply kickbacks to insurance companies that become enriched while serving a bare minimum of constituents at a greater cost than what true Medicaid expansion would require. Georgians deserve better - especially the elderly, children and those living with lifelong medical conditions such as HIV. There is no data or studies to suggest these waivers are effective.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

These proposals are absolutely absurd and politically motivated. More people could be covered, at a lower rate, if the Medicaid expansion was just accepted as originally intended. One need look no further than states where these waivers have been shut down and in states where the expansion has been accepted like KY. The proposed "skinny plans" are useless and they don't even portend to cover the minimum requirements of pre-existing conditions requirements. The waivers are simply kickbacks to insurance companies that become enriched while serving a bare minimum of constituents at a greater cost than what true Medicaid expansion would require. Georgians deserve better - especially the elderly, children and those living with lifelong medical conditions such as HIV. There is no data or studies to suggest these waivers are effective.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

These proposals are absolutely absurd and politically motivated. More people could be covered, at a lower rate, if the Medicaid expansion was just accepted as originally intended. One need look no further than states where these waivers have been shut down and in states where the expansion has been accepted like KY. The proposed "skinny plans" are useless and they don't even portend to cover the minimum requirements of pre-existing conditions requirements. The waivers are simply kickbacks to insurance companies that become enriched while serving a bare minimum of constituents at a greater cost than what true Medicaid expansion would require. Georgians deserve better - especially the elderly, children and those living with lifelong medical conditions such as HIV. There is no data or studies to suggest these waivers are effective.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Skoog

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.

I am a survivor of Non-Hodgkin's Lymphoma and I do not support this legislation.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Smith

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Smith

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/27/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Smith

Email *

Address

City

State Georgia

Zip

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

This leaves out too many Georgians ! All those 100 -133% PP L. Those who are disabled and awaiting adduction of SSID claim 24-36 mos in Ga. Then if approved eligibility for Medicare/Medicaid is 24 mos after SSID approval ! The work requirements are unrealistic. My daughter works in a Restaurant and attends Gwinnett Tech. She works 8 hrs wk 32 month and has 7 hrs of course work. Most of her co workers are similar or maybe 12 hrs of work (3 nights) and 6 hrs of class. Resturants have two busy shifts per week and then split up the remaining with each employee getting another shift maybe two. No one gets 20 hrs a week consistently. They can not afford to take a full course load and are taking one or two classes at a time.

The co pays will be an administrative nightmare, they are too low to pay the administrative burden.

The BMI's are a joke 25 ?? Start with 30.

The biggest problem is this leaves 450,000 Georgian uninsured vs expanding Medicaid as per the ACA. Only a 10th. How stupid, just for ignorant partisan politics.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

This is the only part of the proposals that has any redeeming value. But, you have made it a confusing mess. I am not an ignorant reader either, but a retired federal HHS employee who knows how to read, write and evaluate policy.

I would suggest something much simpler, such as the State reinsurance would pay all claims over \$1M per year. There few and it would still ensure the purpose of reinsurance a backstop. That no one insurer got caught with all the high risk cases.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

This is redundant on the Federal Government system existing. If this would have been done like California from the beginning ok, but you snooze you loose. Now it is just a consultant give away, aka a give away to political donors.

We need Medicaid expansion and a real reinsurance. This is crap!

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/22/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Snellings

Email *

Address

City

State

Zip

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/22/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Snellings

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Sparkman

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

I'm 38 and have been living with MS since I was 21 years old. My first child just turned two and it has been difficult for me to take care of my son because Multiple Sclerosis has attacked me in all of the areas that the definition describes for this condition. On my first Father's Day I was unable to pick up my son due to paralysis from a flare up. I went uninsured 14 out of those 17 years because I lived in a state that wasn't fully expanded however the topic of my comment I'd like to focus on access to quality care and the importance of it for a person like myself.

If you were to look at my employment record you would see one great career run reaching a high point followed by an abrupt end four times over a 17 year period because an MS attack would end each career. It wasn't until my later years when I had access to insurance and medication that I found out some of those relapses could have been avoided if I would've just had access to the right specialists who could've told me how to better manage my MS with my careers and life.

What I'd like you to know and other people living with MS is how serious this condition really is. MS is mostly an invisible illness so it breaks down its victims from the inside a little bit at a time. Not even the patient that it's happening to can feel the effects for the most part. You need specialist. Quality specialist to follow these types of things and keep track. As long as the MS patient can avoid relapses and stay in the first stage of MS then the span of life may be longer.

However those little parts that MS attacks in the first stage will be the the parts that completely fail I the next stage. For example if one of the systems were breathing that MS affected in the first stage, when the next stage of MS is reached it's possible that the person will get pneumonia and to take it a step further die from the complications of that. My MS is an aggressive MS that has attacked a lot of systems so I need to stay proactive with specialists and get quality healthcare to avoid the next stage. I need to be there for my family.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Spera

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

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Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Spera

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

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Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

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Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/16/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Spetnagel

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

It is critically important that mental health parity be a mandated component of any of these health insurance plans. We would like to see in any Waiver proposal Georgia move much more decidedly and intentionally toward the enforcement of federal parity legislation. Any loss of federal mandated protections for those with a mental illness or families seeking seeking mental health care make it harder for people to shop for comprehensive coverage, and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity here in the state will ensure that families with mental health care needs have access to care equal to those with physical health care needs.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

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(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

It is critically important that mental health parity be a mandated component of any of these health insurance plans. We would like to see in any Waiver proposal Georgia move much more decidedly and intentionally toward the enforcement of federal parity legislation. Any loss of federal mandated protections for those with a mental illness or families seeking seeking mental health care make it harder for people to shop for comprehensive coverage, and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity here in the state will ensure that families with mental health care needs have access to care equal to those with physical health care needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Spieldenner

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

My daughter has cystic fibrosis and we were told she might not live past the age of 16. Because she had excellent health insurance through my employer and now, through her husbands employer, she has received important treatments and medications that have allowed her to live a full, happy and productive life. Now, at age 39, she is a mother of 2 beautiful children. and she is pursuing a Master of Divinity degree. Without adequate health insurance, this would not be possible and, in fact, she would probably not be alive.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Spieldenner

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

My daughter has cystic fibrosis and we were told she might not live past the age of 16. Because she had excellent health insurance through my employer and now, through her husbands employer, she has received important treatments and medications that have allowed her to live a full, happy and productive life. Now, at age 39, she is a mother of 2 beautiful children. and she is pursuing a Master of Divinity degree. Without adequate health insurance, this would not be possible and, in fact, she would probably not be alive.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Staggs

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage. I have had to deal with the expenses of Cancer. I'm still paying my hospital bills six years later. We do not need this 1332 Waiver!! Thank you.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * **Last Name *** **Staker**

Email *

Address

City

State Georgia

Zip

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I know, from personal experience, as I'm a cancer survivor - Acute Lymphoblastic Leukemia. No family should have to worry about insurance coverage or money during a cancer diagnosis. The medicine has gotten better, but ones mentality and outlook on life, and the focusing on the silver lining or positive outcome is just as important!

Do it for Kylie Shiell! She lost her battle with childhood leukemia on November 13, 2019, just one day after we attended the Savannah Light the Night event!

<https://www.wsav.com/news/local-news/rincon-teen-smiling-through-her-battle-with-cancer/>

<https://fox28media.com/news/local/a-rincon-teen-is-continuing-her-fight-against-leukemia>

<https://www.legacy.com/obituaries/savannah/obituary.aspx?n=kylie-nicole-shiell&pid=194454768&fhid=6808>

Check out my story with the link below.

<https://pages.ils.org/ltn/ga/savannah19/CStaker>

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal!
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Stephens

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Eligibility Criteria

Comments *

I would like to see this proposal offer Medicaid eligibility to individuals up to 138% of the Federal Poverty Level (FPL), rather than 100% FPL. This would enable more working Georgians to gain access to affordable coverage.

My Concerns Regarding the Employment, Community Service or Education Requirements in the Georgia Pathways to Coverage proposal:

People who are struggling to make ends meet and who live near the Federal Poverty Level have many challenges. They are often juggling the duties of caring for loved ones with attempting to earn income to support their families. I am concerned that the employment-related activity and reporting requirements in this proposal will be extremely burdensome for these individuals. These parents and caregivers need access to healthcare because other family members, young and elderly, are often dependent upon them. I am concerned that these requirements will create unnecessary barriers to their access to affordable care. Additionally, access to a computer or the Internet may not be readily available in their homes or communities, which would make it very difficult to fulfill these reporting requirements.

I am also concerned that this proposal does not offer coverage for those in our state who cannot work. Many people who desperately need Medicaid coverage are suffering with chronic health conditions that prevent them from working. The individuals may have lost their jobs due to their illness, and without any income, they are unable to afford commercial health insurance. In some cases, these chronic health conditions are not permanently disabling, and if treated, some of these people would be able to return to the workforce. However, these individuals are too sick to engage in the employment, education, and volunteer activities required in this proposal. Some of these people could also be waiting for approval of their Social Security or other disability benefits, and I don't see any opportunity for coverage in this proposal for people who are in these situations and need access to healthcare. I also do not see any opportunity for coverage for individuals who are full-time caregivers of a disabled person.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Premiums, Copayments, Member Rewards Account

Comments *

I believe that mandating premiums above those that are required in a traditional Medicaid program creates barriers to access to affordable healthcare for low-income Georgians. I am concerned that the premiums proposed in Georgia Pathways to Coverage put individuals who struggle to pay for other basic necessities for their families at risk of disenrollment.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Stewart

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

I provide eyecare at Mercy Care and I completely support the Mercy Care position. My personal view is more simple. We are a compassionate and merciful country and state. We never have and never will allow anyone to die on the street for lack of caring. Having said that, it is then simply an issue of economics. Anything we do to keep people from obtaining simple, early and inexpensive office medical care will only force them to our already crowded and extremely expensive emergency rooms. That leaves the citizens of Georgia paying a highly trained emergency room physician \$1500 to treat a sore throat. We can be compassionate and smart at the same time.

Jim Stewart O.D.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Stewart

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

I am a veteran. <https://www.cbpp.org/research/health/taking-away-medicaid-for-not-meeting-work-requirements-harms-veterans>

My girlfriend is self employed and does not have insurance currently. She is relying on the individual market and Healthcare.gov to get insurance coverage.

If there is a work requirement, will she be able to continue being an entrepreneur? Does she have to stop what she is doing and forced to find an employer in order to qualify for this non-ACA state plan Kemp is cooking up?

What if someone gets sick and cannot work? will you take their insurance away from them too?

Do housewives and caretakers and people who cannot work for whatever reason not deserve health insurance?

<https://www.cbpp.org/medicaid-briefs-who-is-harmed-by-work-requirements>

taking away people's Medicaid is what the Republican Party is all about these days. But it will hurt hospitals and we cannot have any more rural hospitals close.

<https://www.commonwealthfund.org/publications/issue-briefs/2019/sep/how-will-medicaid-work-requirements-affect-hospital-finances-update>

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

I am a veteran. <https://www.cbpp.org/research/health/taking-away-medicaid-for-not-meeting-work-requirements-harms-veterans>

My girlfriend is self employed and does not have insurance currently. She is relying on the individual market and Healthcare.gov to get insurance coverage.

If there is a work requirement, will she be able to continue being an entrepreneur? Does she have to stop what she is doing and forced to find an employer in order to qualify for this non-ACA state plan Kemp is cooking up?

What if someone gets sick and cannot work? will you take their insurance away from them too?

Do housewives and caretakers and people who cannot work for whatever reason not deserve health insurance?

<https://www.cbpp.org/medicaid-briefs-who-is-harmed-by-work-requirements>

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<https://www.commonwealthfund.org/publications/issue-briefs/2019/sep/how-will-medicaid-work-requirements-affect-hospital-finances-update>

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

I am a veteran. <https://www.cbpp.org/research/health/taking-away-medicaid-for-not-meeting-work-requirements-harms-veterans>

My girlfriend is self employed and does not have insurance currently. She is relying on the individual market and Healthcare.gov to get insurance coverage.

If there is a work requirement, will she be able to continue being an entrepreneur? Does she have to stop what she is doing and forced to find an employer in order to qualify for this non-ACA state plan Kemp is cooking up?

What if someone gets sick and cannot work? will you take their insurance away from them too?

Do housewives and caretakers and people who cannot work for whatever reason not deserve health insurance?

<https://www.cbpp.org/medicaid-briefs-who-is-harmed-by-work-requirements>

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<https://www.commonwealthfund.org/publications/issue-briefs/2019/sep/how-will-medicaid-work-requirements-affect-hospital-finances-update>

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Stoltz

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

Medicaid expansion is the best option. Georgia's newest proposal extends coverage to only 50,000 of the nearly 500,000 residents who would qualify if Georgia fully expanded Medicaid to the extent allowed under federal law. Not only is this plan detrimental to Georgia residents who cannot afford private insurance but are slightly above the poverty line but also foregoes key funding opportunities. The federal government pays 90% of the full cost of Medicaid expansion but only 67% of the limited expansion.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/24/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [Redacted] **Last Name *** Stone

Email * [Redacted]

Address [Redacted]

City [Redacted]

State

Zip [Redacted]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

This is so backwards - requiring sick people to 'work' for healthcare. The 'requirements' need to be reversed.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/24/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Stone

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State

Zip

[REDACTED]

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

US health insurers make nearly a trillion dollars, and pay little taxes - but we're going to give them MORE money?

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

This sounds like another version of ACA. In that case, we should just stick with ACA.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Strickland

Email *

Address

City

State Georgia

Zip

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

Fully expand Medicaid because it will cover more people, cost less, and help to solve our growing rural healthcare crisis.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

Fully expand Medicaid because it will cover more people, cost less, and help to solve our growing rural healthcare crisis.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

Fully expand Medicaid because it will cover more people, cost less, and help to solve our growing rural healthcare crisis.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Sussman

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

It sounds like a good idea.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

it should not get rid of federal mental health parity protections to QHPs.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

There should not be a cap. There should not be a waiting list. They should have federal mental health parity protections to QHPs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/12/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Taylor

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Please enforce Federal Parity Legislation in Georgia!

It is critically important that mental health parity be a mandated component of any Georgia health insurance plan. I would like to see any Waiver proposal in Georgia move toward the enforcement of federal parity legislation.

Any loss of federal mandated protections for those with a mental illness or families seeking mental health care make it harder for individuals to shop for comprehensive coverage. It also limits the amount of financial assistance available to Georgians to help lower medical costs. Implementation of parity in our state will ensure that families with mental health care needs have access to care equal to those with physical healthcare needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/23/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Taylor

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

Our state should open Medicaid for all those who are below the poverty line. We should absolutely follow the ACA instead of cherry picking the issue on health care.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

There should be no waivers what so ever on insurance. Follow the ACA & stop cherry picking this issue.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Teplin

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.

I have non-Hodgkins lymphoma and would be personally affected.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Terrell

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

This is stupid. Why would you spend more money on coverage for fewer Georgians? That's a waste of my tax dollars. Take the free money the federal government is offering and quit being a baby.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

Again, all of this is a waste of money. Why compel Georgians to spend money on a substandard product?
(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

Limiting Georgians' ability to choose their healthcare plan is some fascist shit.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Terrio

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

I am writing to urge Georgia legislators to expand health care coverage to provide Medicaid for low income residents. Georgia is one of only 14 states who have not expanded medicare coverage and has a dismal record on health care. We know that Georgia ranks first in maternal morality and 5th in infant mortality. Moreover, the state had an equally dismal record regarding the access and affordability of health care as well as the treatment and prevention of medical conditions. The most startling statistic is that the state could cover 480,000 people for the cost of \$218,000,000 if they accepted federal funds. In contrast that state legislators are proposing to cover only 80,000 people for \$215,000,000. A difference of just a few thousand dollars. This is a no brainer. Accept the federally matching funds and do the right thing.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

I urge Georgia legislators to expand medicaid coverage for low income residents. This would help to address the dismal state of health care in this state. It could redress the fact that Georgia ranks first in the rate of maternal mortality and 5th in infant mortality. We know that the state ranks 46 out of 50 state in the access and affordability and 40th in treatment and prevention. We also know that life expectancy is lower in the red states of the south. Let's move to change this and in the process do the right thing for all the citizens of this state.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Terry

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage. My husband was just diagnosed with prostate cancer, so this issue has become very important to us. It's stressful enough to worry about survival and the future without adding losing healthcare benefits or coverage as well.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/4/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Thompson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

Go ahead

Continue to work against the ACA and this will only give even worse care to Georgians and eventually cost them even more.

Deplorable Republicans are so short sided because they think this will never affect them.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

Go ahead

Continue to work against the ACA and this will only give even worse care to Georgians and eventually cost them even more.

Deplorable Republicans are so short sided because they think this will never affect them.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

Go ahead

Continue to work against the ACA and this will only give even worse care to Georgians and eventually cost them even more.

Deplorable Republicans are so short sided because they think this will never affect them.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Timm

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/25/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** TIMMS

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

Expand Medicare and Medicaid. It is cheaper than the governor's plan and would reach more Georgians.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/13/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Tinkham

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

It is critically important that mental health parity be a mandated component of any health insurance plan in Georgia I would like to see any waiver proposal in Georgia move toward the enforcement of federal parity legislation.

Any loss of federal mandated protections for those with mental illness or families seeking mental health care makes it harder for people to shop for comprehensive coverage. It also limits the amount of financial assistance available to Georgians to help lower medical costs. Implementation of parity in our state will ensure that families with mental health care needs have access to care equal to those with physical healthcare needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Tinsley

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

As a young college graduate, I found myself without health insurance. My mother had lost her job and no longer had health insurance which meant I was unable to be on a plan with her. I was working two part time jobs, neither of which provided health insurance in my benefits. I hoped that under ACA I would be able to qualify for health insurance. However, while working with a navigator I discovered that I was in what was called "the coverage gap."

I made too much to qualify for Medicaid, however I was not financially able to afford the costs of purchasing a plan through the marketplace. I was without coverage until I went to grad school and was able to get coverage through my university. No one should be forced to go to higher education to afford basic access to healthcare. I want the state of Georgia to fully expand Medicaid so that all Georgians are able to access the healthcare that they need and want.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Troxell

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

Please just expand Medicaid as numerous other states have done. Do the right thing for Georgia families and expand the program. Also, the federal exchange works just fine and we do not need to spend the time/money to build a new exchange.

People who need quality health insurance often cannot afford to pay for healthcare. A sliding scale doesn't always cut it and the state should just expand the program overall.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

Please just expand Medicaid as numerous other states have done. Do the right thing for Georgia families and expand the program. Also, the federal exchange works just fine and we do not need to spend the time/money to build a new exchange.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

Please just expand Medicaid as numerous other states have done. Do the right thing for Georgia families and expand the program. Also, the federal exchange works just fine and we do not need to spend the time/money to build a new exchange.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Tryonoviech

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal. Since I lost my Mother to leukemia I have vowed to assist in the fight against anything that would hinder every person from getting help in their battle for life. Please do what's right for those who suffer from this disease.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Tucker

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [Redacted] **Last Name *** Tucker

Email * [Redacted]

Address [Redacted]

City [Redacted] **State** [Redacted] **Zip** [Redacted]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

Thank you

Regards,
Drayton Tucker
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Tucker

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

You are doing a job!

Regards,

Drayton Tucker

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Tucker

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

You are doing a job!

Regards,

Drayton Tucker

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Tucker

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

You are doing a job!

Regards,

Drayton Tucker

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/22/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Ulken

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

2790

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

Please reconsider Medicare Waivers for full endorsement of Medicare Expansion so that all of the possible financial benefits can be accessed to help the poor and disadvantaged.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Uttenhove

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

I support full Medicaid expansion. It has been available to Georgia since the ACA was passed. This waiver covers too few Georgians at a cost that makes no sense. Furthermore the work requirement will restrict access for people who need to get healthy first.

Pass full Medicaid expansion
(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Subsidies

Comments*

Again this waiver is a program that seeks to reinvent the wheel instead of building on existing programs. Furthermore it is inadequate in terms of the coverage of those who are without insurance. Tthe estimate of 30,000 additional people covered out of the million people who need help with insurance makes no sense. Replacing the access to federalhealthcare.gov with a "dumbed down offering by private insurance companies is the wrong approach.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** valenti

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a registered nurse of 30 years, I have seen the painful results of being uninsured. It would seem logical to expand Medicaid without 1115 waiver that would result in less coverage at a higher cost, economically, politically and morally. Let's be smart and cover more people, about 500,000 more people and receive the full benefit of federal funds. Georgia gladly takes federal dollars for port expansion, highways, and farmers , why not to improve the health of our people and the stature of our State? What possible reason is there to continue needless suffering, deplorable health statistics, rural hospital closures, personal health related bankruptcies and a free pass for insurance companies to sell deceitful junk insurance when we could make a choice to fully expand Medicaid to 138% of poverty. The cost not to fully expand Medicaid is far higher than the cost of improved health security for a half million Georgians that full Medicaid expansion without these punitive waivers would provide.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/12/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Van Epps

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

First, I am opposed to any 1332 waiver because the state of GA is not trying to better serve its people through this waiver.

Second, if the state decides to move forward with its poor decision to seek a 1332 waiver, I completely agree with GA NAMI's position that it is critically important that mental health parity be a mandated component of any of these health insurance plans. I would like to see in any waiver proposal Georgia move much more decidedly and intentionally toward the enforcement of federal parity legislation. Any loss of federal mandated protections for those with a mental illness or families seeking seeking mental health care make it harder for people to shop for comprehensive coverage, and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity here in the state will ensure that families with mental health care needs have access to care equal to those with physical health care needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/1/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

VENTURA

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

I have a son who recently turned 26, so is no longer part of my health insurance coverage. He suffers from Crohn's and needs a weekly injection of Humira. He also suffers from ADHD and has had difficulty getting and keeping a job.

He is currently in Chicago, where Medicaid covers his medications, but he is not able to care for himself, so we need to bring him back home to Georgia. He is not ready to be by himself, and we would like to help him get his life together.

I understand that the current cost of Humira, without insurance, is several thousands of dollars per month.

There are many 26 year olds in his situation, who need expensive medications that they can't afford in order to stay alive.

Please see that Medicaid covers life-saving medications for young people who can't afford them.

I am, always been and will always be a republican. i don't believe in single-payer health insurance, and do believe people who wait until they get sick to get health insurance should be penalized. That is not the case here. My son has been covered since birth till now, without gaps in his coverage. He got sick when he was 18. There should be an affordable way to continue getting his medications here in Georgia

Thanks,
David Ventura
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/22/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Vinson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

My husband and I have own a small design/build company and purchase our insurance on the ACA exchange. For our first year on the exchange, coming out of the recession, we qualified for subsidies that helped a lot. Since that first year, we our business has been growing and we have not qualified for subsidies. While the premiums are much too high, I genuinely appreciate the easy-to-use HealthCare.Gov portal because we've been able to compare insurance plans in an apples-to-apples manner.

I appreciate Georgia's efforts to reduce premium costs through the proposed waiver plan. However, I do not look forward to having to sift through a variety of private insurance options. I do not have confidence in the private insurance market and would much prefer to have the level playing field offered through the ACA.

I urge Governor Kemp to rethink his plan and take advantage of the reliable and trusted information services available through the ACA exchange. Buying health insurance as private individuals is a stressful process. Please don't make it worse.

Sincerely,

Sara Vinson

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/23/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Wagner

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

We need full Medicaid expansion in this state. Reject these waivers and do the right thing by insuring more of our fellow citizens!

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

We need full Medicaid expansion in this state. Reject these waivers and do the right thing by insuring more of our fellow citizens!

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

We need full Medicaid expansion in this state. Reject these waivers and do the right thing by insuring more of our fellow citizens!

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Walker

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Walker

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Wallace

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

The eligibility requirements lack courage to address the gap that exists in healthcare coverage for those below the ACA subsidy line but above the federal poverty line. This will leave hundreds of thousands of Georgians without access to affordable healthcare. Should they have any access via the emergency room, the care will only be for expensive acute care and those costs will be passed along via the most expensive route possible.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

This will cost the state more and cover less.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Employer Sponsored Insurance

Comments*

Eliminating mental health coverage requirements is a step backwards in addressing one of the most bipartisan concerns.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

This program, while not a bad idea, is undermined by aspects of the other proposals.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

Recreating the wheel with another government program seems the height of foolishness.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/23/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Wallace

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Stop trying to destroy the ACA. It was working, until the republicans started trying to destroy Georgian's access to quality affordable health care by undermining the insurance markets. So, instead, you all have passed massive tax cuts for the very rich and the middle class is left with paying for that burden. And NOW, you want to put Georgia politicians in charge of my health care? NO.WAY. You do know we have an election next year, RIGHT?

In January 2017, my monthly insurance premium for \$580/month under the ACA. My teenage daughter's plan was \$180. Just one year later, after the trump admin and the GOP got its hands all over the ACA, my insurance premium went up to \$1,300/month and my college-age daughter's plan went up to \$400/month. You want to see proof? Just contact me and I'll show you how the GOP and trump have destroyed the ACA by showing you copies of my insurance premium paper trail.

I want the ACA fixed - not destroyed. I WAS EXTREMELY HAPPY WITH IT, having had to purchase my own insurance on the corrupt insurance markets the previous 20 years. I KNOW HOW THIS CRAP WORKED: insurance companies called it "churning." They'd raise our rates 20% every year until we had to drop it and go somewhere else. By the time the ACA became available, the ONLY plan I could afford was one with a \$12,500 annual family deductible that cover NO PREVENTATIVE care. The ACA was a GODSEND for me and my family.

I know there were problems that needed to be fixed. But you are actively DESTROYING our access to health care, especially when it comes to women's health care. You have eliminated our ability to save for college or retirement, not to mention trying to take the occasional family vacation. Insurance premiums gobble up every single extra dollar!

You people are SHAMELESS. I will do everything in my power to vote you all out of office. And there's a whole army of us who know what you are up to. We won't tolerate your abuse any longer. STOP GASLIGHTING. We know what you are up to, and we won't put up with this any longer.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** [REDACTED] **Ward** [REDACTED]

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

Revise this waiver to provide coverage to all Georgians eligible for Medicaid. A fiscal note prepared by the Georgia Department of Audits suggests that expansion would cost less than the combined total for both proposed waivers.

Or, revise this waiver to reflect that proposed by Grady Health System to more effectively manage patients with chronic health conditions who repeatedly present in emergency rooms across the state.

Alternatively, convene TANF and SNAP employment and training professionals along with state and local Workforce Innovation and Opportunity Act (WIOA) boards and Continuums of Care for the homeless to refine this waiver by:

Aligning participation and reporting requirements across programs requiring work activities.

Aligning exemptions and exceptions to work requirements across programs.

Leveraging work supports available through other programs given that Medicaid dollars cannot be used for this purpose.

Determining strategies to enroll and retain participants in coverage.

Identifying whether a dedicated Medicaid Managed Care Organization with knowledge of the needs of very low-income working Georgians is warranted.

Protecting organizations, including IRS 501 (c)(3) charities, from liability for loss of coverage when they are unable to provide a volunteer community service slot or enough hours to satisfy work activity requirements.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** [REDACTED] **Ward** [REDACTED]

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

Help Georgia consumers make wise choices in selecting a health insurance plan for themselves and their families by providing guidance in evaluating coverage against essential health benefits, provider networks, premiums, deductibles, co-pays, plan limits, and maximum out-of-pocket spending.

Restrict the use of premium subsidies to qualified health plans offering all essential health benefits.

Alternatively, revise the waiver to specify the characteristics of non-qualified plans that will be eligible for subsidies and how consumers would be protected.

Remove the cap on the premium subsidies to ensure that everyone eligible can receive them and afford their health coverage.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Warren

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.

Please protect my baby girl!
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Warren

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

Please protect my baby girl!

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Warrington-Read

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

It doesn't make sense to do this halfway. Georgians deserve the full Medicare Expansion that the ACA offered us. Anything less is a waste of our money. As it stands right now, we are leaving money on the table and Georgians are losing their lives due to lack of access to healthcare. Stop toeing the GOP party line and start looking at the FACTS - there is Federal money on the table, ours for the taking, and we have wasted enough time already.

As a local business owner, our bottom line is affected by the current lack of affordable health insurance options available to us and our employees.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

We waste GA taxpayers money and threaten GA citizens' lives if we do not move forward on a full Medicare Expansion. Stop hiding from the truth and parroting the GOP's talking points and start collecting the Federal Money that we have been offered to move into full Medicare Expansion. GA's healthcare statistics are an embarrassment and will not improve if we take baby steps towards this. The time has passed for full Medicare Expansion.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

Time to move forward with a full Medicare Expansion plan, not a half-assed attempt that will cover a fraction of the Georgians who need coverage.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Washell

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

What Georgia needs is to accept the Medicaid expansion. This current plan is not as cost effective and will not be able to provide insurance for as many Georgians as the Medicaid expansion deal. More insured Georgians mean a healthier Georgia, one in which health problems are less likely to escalate to life threatening and costly proportions. It means more people being healthy enough to be productive at work and in their communities.

Please reconsider accepting the Medicaid expansion instead!

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

What Georgia needs is to accept the Medicaid expansion. This current plan is not as cost effective and will not be able to provide insurance for as many Georgians as the Medicaid expansion deal. More insured Georgians mean a healthier Georgia, one in which health problems are less likely to escalate to life threatening and costly proportions. It means more people being healthy enough to be productive at work and in their communities.

Please reconsider accepting the Medicaid expansion instead!

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

What Georgia needs is to accept the Medicaid expansion. This current plan is not as cost effective and will not be able to provide insurance for as many Georgians as the Medicaid expansion deal. More insured Georgians mean a healthier Georgia, one in which health problems are less likely to escalate to life threatening and costly proportions. It means more people being healthy enough to be productive at work and in their communities.

Please reconsider accepting the Medicaid expansion instead!

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** washington

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

I am one of the many who fall between the cracks of the healthcare criteria in Georgia. I do work but do not make enough money to afford Marketplace health care nor do I fit the eligibility criteria for medicare through the state. Each year I'd apply, hoping I'd be eligible for some insurance and each year I'm denied and I find it hard to believe that there is nothing available for the many people in my shoes. The only question I ask is why not? Expanding this coverage to include people like me would be a weight lifted and greatly appreciated.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Wasson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

The work requirements are a big impediment to helping people who truly need help, including those who are temporarily disabled or who are caring full time for disabled loved ones. Low income people would surely struggle with monthly reporting with documentation— either taking time and traveling to do this in person or to afford internet access and equipment to do it online. This is also really onerous on the state to track all that. Jobs are not what they used to be in this age of temporary and gig economy. If someone lost a job through no fault of their own, then they'd get thrown off insurance? And of course full Medicaid expansion just makes more sense all around. Cover more Georgians for less money! The life expectancy of Americans of working age — in the prime of their lives—is decreasing. We need to cover more people so they can have access to healthcare to protect their health & livelihoods. This will be so much better for Georgia's economy to have a healthy workforce and population.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

Healthcare.gov has been a great tool. I've helped family members use it to find a plan. If Georgians lose this, we will be going backwards. Our residents will be subject to worse plans that don't have the same consumer protections. Our citizens won't have the same access to mental health options. We could lose protection for pre-existing conditions. This waiver is not good for us — we need access to better coverage, not worse.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Watson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government. My two grandchildren, Karter and Kade, would be affected if this waiver for Medicaid is adopted.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease. So much of the help for my grandchildren is found in preventative treatments and medicines.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health. Thankfully, they do not currently require Medicaid services, but I am reminded daily as they do breathing treatments and chest physiotherapy treatments (CPT) with a vest that there could come a time when the need for Medicaid who be undeniably important.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government. The lives of my grandchildren and others with CF would be adversely affected.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Watson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government. I have two grandsons, Karter and Kade, who deal with Cystic fibrosis every day!

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt my two grandchildren and others with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF. My grandchildren rely on their insurance to be able to afford treatments and medicines that prevent more serious health issues.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. So much of sustaining a healthy lifestyle is preventive medicines and treatments which cannot allow time for insurance provider to wait to see if their family meets the criteria for financial assistance with medicine or treatment they must have. My two boys, Karter and Kade, need to be able to get help as deemed necessary by their medical team. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. I am thankful that they have been able to receive the medical care they need because of the insurance they have. The changes proposed in this waiver could hurt my grandsons and other people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Weathers

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I have Chronic Lymphocytic Leukemia. Chronic, non-curable at the present time... I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Whitehead

Email *

Address

City

State Georgia

Zip

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

I strongly oppose Governor Kemp's plan to prevent Georgians from accessing the federal website at healthcare.gov to enroll in ACA programs.

During 11 months of unemployment (June 2015 to May 2016), I was a Georgia resident who received health insurance coverage through the ACA, and the experience was a very positive one.

When selecting my health insurance coverage in 2015 and 2016, I consulted with a healthcare navigator. Their help was essential in choosing the best and most affordable plan for my needs. It is my understanding that under Governor Kemp's Georgia Access/Reinsurance plan, Georgians would be required to navigate on their own and deal directly with private insurance companies. I can tell you that the average Georgia citizen is unqualified to perform this very important task.

It's also my understanding that many of the health insurance programs offered by private insurers would not match the standard of care required by the ACA. This is not progress!

Choosing a health insurance plan is one of the most important things a person can do. Preventing people from receiving informed advice and limiting their choices is no solution to capping health insurance premiums or caring for an increasingly sick population. I

f Governor Kemp is so confident about the efficacy of this proposal, why not continue to allow Georgians to purchase their health insurance through the ACA and also offer a Georgia state website that directs Georgians to private insurers? Governor Kemp talks about limited government, but his proposal is government intervention at its worst.

Governor Kemp's plan to force Georgia residents to act entirely on their own in seeking health insurance is reckless. He claims he is proposing this change as a way to reduce health insurance premiums for Georgians. Really? How can he guarantee such a thing? Instead, this plan sounds like a big gift for insurance companies and a big slap in the face to the citizens of Georgia.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

Please see my comments regarding Reinsurance.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Whitley

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/15/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Wilbon

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

I think that the work requirement is a mistake. Many people cannot work due to physical health and mental health issues. These same people are oftentimes not eligible for SSI or SSDI due to their age, employment history, or many other factors. It leave so many people to fall through the cracks and will barely effect ER and other hospital spending, if at all. In order to make a difference in healthcare spending and overall community health in Georgia, we must make policy changes that effect our system's highest utilizers. This includes people who are currently uninsured and will not change if there is still a work requirement under the 1115 waiver.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Wilkinson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

Health coverage should be available to all Georgians. Bottom line, 480,000 Georgians can be covered for \$213 million vs 80,000 for \$215 million. That is a no brainer.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

Health coverage should be available to all Georgians. Bottom line, 480,000 Georgians can be covered for \$213 million vs 80,000 for \$215 million. That is a no brainer.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

Health coverage should be available to all Georgians. Bottom line, 480,000 Georgians can be covered for \$213 million vs 80,000 for \$215 million. That is a no brainer.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Williams

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Williams

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/22/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Williams

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

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Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

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Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/22/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Williams

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Williams

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1332 Georgia Access waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

The changes proposed in this waiver could hurt people with cystic fibrosis. Allowing the state to subsidize non-qualified health insurance plans could destabilize the market as healthier people buy these cheaper, skimpier plans and drive up the cost of comprehensive coverage for people with more serious health care needs like CF.

Adding a budget cap to limit subsidies for marketplace plans would also be harmful. If more people who qualify for subsidies apply for coverage than the state predicts, people who need this financial assistance to afford their coverage would be put on a waiting list to receive it. People with cystic fibrosis cant afford to be on a waiting list both financially, and for the sake of their health and wellbeing. Any loss or gaps in health coverage puts the health of people with CF at risk.

People with cystic fibrosis already face enormous costs to manage their disease. While 98% of people with CF have some type of health insurance coverage, almost 60% have skipped or delayed care due to cost concerns. The changes proposed in this waiver could hurt people with CF in Georgia by increasing the cost of their coverage and making it harder for them to access the treatments and care they need to live longer, healthier lives.

Respectfully, I urge you not to submit this waiver to the federal government.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Williams

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As a Georgian and someone personally affected by cystic fibrosis, I oppose the states 1115 Georgia Pathways waiver and urge the state not to submit this waiver to the federal government.

Cystic fibrosis is a life-threatening genetic disease that causes persistent lung infections and progressively limits the ability to breathe, often leading to respiratory failure. There is no known cure. As a complex, multi-system condition, cystic fibrosis requires affordable and adequate health coverage for the targeted, highly specialized treatment and medications necessary to fight the effects of the disease.

Medicaid plays an important role in helping people with CF access the specialized care and treatments they need to stay healthy, and there are people with cystic fibrosis in Georgia who could benefit from the state expanding Medicaid to the full federal poverty level. However, while many people with CF work, some are unable to due to their health status or the amount of time they must spend on treatments to maintain or improve their health.

Denying someone coverage because they are unable to satisfy a work requirement is dangerous for people with life-threatening conditions like CF.

Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Williams

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

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(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/21/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** Williams

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

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Respectfully, I urge you not to submit this waiver to the federal government.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

Last Name *

Wilson

Email *

Address

City

State Georgia

Zip

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

As a survivor of leukemia, I am writing to express concerns about the Kemp Administration's 1332 waiver proposal. Blood cancer patients and their families know all too well that their survival depends on access to comprehensive health coverage.

This proposal eliminates critical patient protections. If the waiver is approved, people in our state who need coverage may unknowingly purchase a health plan that does not provide the treatment or medications needed. This means Georgians would have to rely on profit-driven health insurance brokers and agents for information on plan options, rather than have an unbiased platform to compare and shop for comprehensive coverage. This proposal rolls back progress that has been made in protecting patients and ensuring people who buy individual coverage have high quality options available.

Our state leaders must prioritize the best interests of cancer patients and their families by halting this proposal.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/25/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes No

First Name * [REDACTED] **Last Name *** Woddail

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State Georgia

Zip [REDACTED]

5022

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

The State of Georgia needs to stop leaving millions of our taxpayer dollars on the table. We could get a much bigger benefit and have more people covered if we opened medicaid up to all those who qualify. To do otherwise is just going to make all Georgians pay more in taxes without the potential for a better return on our investment. Stop being cruel and stupid.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

We need to open up Medicaid to all those who qualify. To do otherwise is to leave millions of our taxpayer dollars on the table and with no opportunity to them to be returned to our state to help people who desperately need healthcare coverage. Please stop being needlessly cruel and stupid. Accepting full Medicaid will help rural hospitals survive. It is the responsible thing to do if you care about the citizens of Georgia.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

We need to open up Medicaid to all those who qualify. To do otherwise is to leave millions of our taxpayer dollars on the table and with no opportunity to them to be returned to our state to help people who desperately need healthcare coverage. Please stop being needlessly cruel and stupid. Accepting full Medicaid will help rural hospitals survive. It is the responsible thing to do if you care about the citizens of Georgia.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/12/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes

No

First Name *

[REDACTED]

Last Name *

Wolf

Email *

[REDACTED]

Address

[REDACTED]

City

[REDACTED]

State Georgia

Zip

[REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

It is critically important that mental health parity be a mandated component of any of these health insurance plans. We would like to see in any Waiver proposal Georgia move much more decidedly and intentionally toward the enforcement of federal parity legislation. Any loss of federal mandated protections for those with a mental illness or families seeking seeking mental health care make it harder for people to shop for comprehensive coverage, and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity here in the state will ensure that families with mental health care needs have access to care equal to those with physical health care needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [REDACTED] **Last Name *** Wood

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

I am not in favor of the Georgia Access waiver proposal for the following reasons.

SHOPPING

I have had no problems with the Healthcare.gov website, even in the first year. I SO appreciate having all of the plans that are available for me on display in a single location, presented without bias, having the comfort of knowing that they will all cover the essential services, and being able to toggle through the effects of the different metal quality ratings to see likely total costs for different levels of insurance usage.

The plan that is being presented will take Georgians back to the Wild West of insurance shopping during the pre PPACA days. We will have to navigate multiple biased channels, avoid the pitfalls of inadvertently selecting sub-par plans, and resist profit minded sales pitches. Insurance shopping will be vastly more confusing and I feel that it will provide an unnecessary barrier that many Georgians will not be able to overcome.

If Georgia truly wants to put Patients First and wants to be able to subsidize non-compliant ACA health insurance offerings, and cannot continue to use the federal site, then they should make the commitment go all in and run their own central shopping portal, modeled on the federal site, that allows direct, easy, unbiased comparison between offerings and usage scenarios. It should return support to the navigator outreach program that was removed in the prior administration. The ramifications of placing the medical and financial fate of its citizens in the hands of a multitude of profit minded actors are just too severe. We need transparency and trust.

SUBSIDY FUNDING CAP

The plan presents the possibility that all citizens that are legally eligible for subsidies will not be able to access them. Each Nov 01, all of us are supposed to duke it out for the available funds? How much time will be required to notify you as to whether you qualify? Guess that you might have to be prepared to quickly cough up another \$1000 per month (if you are old and poor) or move out of state?

Gladiator Games and medical emigration??

If Georgia truly wants to put Patients First, they would commit to providing all of the funds necessary to see that their citizens can continue to access coverage that is as affordable as it would be absent the proposed waiver.

Instead of the first come first served process, when the funding cap is reached, subsidies to ALL persons should be reduced to whatever level is needed to stay below allocated resources. The net cost of the insurance can be estimated at the time of purchase, but a final determination would be made at the end of the enrollment period. ALL citizens should share equally in the anxiety of waiting to see what their insurance costs will be. ALL should share the lesser pain of insufficient funding rather than only SOME face the possibility of a catastrophic last minute loss of assistance. If as many as possible were to see the potential negative effects, they would be also be able to influence their state representatives to make different budget choices. The 450,000 now covered and the 30,000 anticipated new enrollees would have a significant voice. Otherwise, those that do not survive the subsidy lottery may be few enough that their plight will be invisible and dismissed by fellow citizens. Again, we need transparency and trust.

PUBLIC HEARINGS

There were five public hearings to present the proposed waivers. It seems to me that the locations chosen were not logical if the intent was truly to solicit the most public involvement. While there were events in Macon and in Savannah, the four others were in small towns. Why were there were no hearings at all in the large cities of Columbus, Athens, Augusta or Atlanta? The closest location to me (Albany, the major and centrally located city in SOWEGA, MSA population 157,000) was an hour away in Bainbridge (population 13,000), which is located in the most extreme SW county in the state.

If Georgia truly wanted to put Patients First, they would have held more public hearings and/or hosted them in the locations that would have provided the best potential to reach the maximum number of citizens, in order to educate, persuade, answer questions and solicit comments from the people that they are elected to serve. Again, we need transparency and trust.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/16/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

- Yes
- No

First Name * [REDACTED] **Last Name *** WOOD

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

It is critically important that mental health parity be a mandated component of any health insurance plan. I would like to see in any waiver proposal that Georgia move much more decidedly and intentionally toward the enforcement of federal parity legislation. Any loss of federal mandated protections for those with a mental illness or families seeking seeking mental health care make it harder for people to shop for comprehensive coverage and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity here in the state will ensure that families with mental health care needs have access to care equal to those with physical health care needs.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Georgia Resident * Are you a Georgia Resident? (choose one)

Yes No

First Name * [Redacted] **Last Name *** Yoder

Email * [Redacted]

Address [Redacted]

City [Redacted] **State** Georgia **Zip** [Redacted]

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

If I understand correctly, Governor Brian Kemp is applying for a waiver of certain Medicare and Medicaid requirements.

I think it is a BAD idea and, in simple terms, a waste of taxpayers money.

Specifically, his proposal is going to cost \$245,000 and cover only 80,000 people. If he would accept the standard "Medicaid Expansion" option, it would cost \$247,000 and cover 500,000 people.

It doesn't take a "rocket scientist" to see which option provides more benefits for our money!
(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

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(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/25/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * Advance for Kids

Stakeholder Type * Business Owner

First Name * [REDACTED] **Last Name *** Payne

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

Hi,

I own 2 out-patient pediatric clinics in North Georgia. We serve children ages 0-21 through OT, PT, & ST services. I was interested in the 1115 Waiver as I was hoping that it would help our children receive the services they so desperately need. We are seeing that while insurance companies are changing and stating that they are attempting to "better serve their membership", we are seeing less coverage for therapy services for children with special needs. In particular not covering certain diagnoses like Developmental Delay. Not all children have a diagnoses or can be put into a category. But not covering services is certainly not helping them "get better". We see denials for "that is a school/ educational problem so you can not work on that in out-patient". There seems to be a lack of understanding that the school system can ONLY work on what is educationally based so that children can merely access their educational environment. In out-patient we work on the medical based reason for these educational delays. So things like handwriting SHOULD be worked on in both environments to best support the child. It seems that insurance companies have TOO MUCH say in what type of service and what goals the child can work on. Our therapists are Master and Doctorate level with specific training to help these children. We also follow a practice act in Georgia. We are fortunate if we get to see the child just one hour a week. However, ABA seems to be receiving Prior Approvals for up to 40 HOURS A WEEK! They don't even have a practice act in Georgia and are encroaching onto OT, PT, ST goals and areas of practice. Many of the "therapists" that work in ABA are solely RBTs which have maybe 90 days of training. They have one BCBA level therapist supervising the RBTs. The children CAN NOT BENEFIT from this. I highly suggest that the 1115 waiver not support more ABA services but help the child with true skilled therapy.

Therapists should be paid Fee for Service versus a case rate. The Case Rate that TNGA utilizes, encourages fraudulent behaviors as the often state "if the child doesn't show up, you will still get paid". It will also cause the therapist to see the child for less than an hour of service since they are not paid enough to cover the cost of the therapist and overhead. We prefer for our patients to show up to therapy and just get paid for what we do without having to jump through a bunch of hoops or laborious documentation. This waiver will be served through the 4 existing CMOs, please consider utilizing FFS so that therapists can be paid fairly.

I appreciate the efforts to help cover the uninsured in Georgia while making them have some level of employment if possible to elevate them from their current status. As a clinician in pediatrics, we strive to support the family unit as a whole and financial burdens certainly top their list of concerns.

Please help my team of therapists better serve Georgia's children but not restricting us. We are happy to (and strictly) do follow the CMS manual for CIS. Please help the CMOs to be in better alignment with the CIS manual so that we can have continuity in care and consistency in protocol. The CMOs seem to be exercising cutting services as their means to save money. It's leaving children without services which will cost the state more in the long run.

Thank you so much,
Mai Lee Payne, MS, OTR/L
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/27/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Business/Organization * Alliant Health Plans

Stakeholder Type * Health Plan

First Name * [REDACTED] **Last Name *** Mixer

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

Alliant Health Plans is highly supportive of Governor Kemp's goal of lowering health insurance costs while expanding access to quality services. In review of the proposed 1332 Waiver, Alliant has three comments on how the proposed waiver might be improved.

Comment #1:

Regarding how Subsidy-Eligible Non-QHPs will function within a single risk pool where QHPs exist. Alliant recommends a modification of the Risk Adjustment formula.

Significant adverse selection in the QHP Individual Market will likely occur if particular care is not paid toward Risk Adjustment. In its current structure, Risk Adjustment creates equilibrium between issuers that have lower risk versus issuers with higher risk. This enables issuers to offer products which attract both ends of the risk spectrum. The current structure further enables a lower priced product that might offer narrow networks or only required services to thrive and compete alongside products that might offer broader networks or expanded services. This can happen only because issuers which attract higher risk members are compensated through the Risk Adjustment transfers program.

Adding issuers who provide products which are able to waive various EHBs adds a layer of complexity to Risk Adjustment which may lead to QHPs being under-compensated for risk if large numbers of lower risk individuals shift to this new Subsidy-Eligible Non-QHP product offering, thus lowering statewide premium against which Risk Adjustment transfers are determined as well as lowering aggregate transfers as a percentage of premium for higher risk issuers.

Alliant recommends a modification to the Risk Adjustment formula that would change one component of the Risk Adjustment formula. Although an actuarial analysis has not been performed, Alliant's experience with the Risk Adjustment formula shows a three-pronged approach to modifying the formula for Subsidy-Eligible Non-QHPs would ameliorate concerns of harming the QHP market.

1. The induced demand factor should be set to 1 as a base factor, even if the product has a cost-sharing structure that would qualify it for a higher induced demand factor in a QHP setting. This is because it is expected that the individuals who enroll in this plan are less likely to be induced to use health care services due to the fewer expected EHBs.
2. A reduction to the induced demand factor by ten (10) basis points for each EHB the product waives.
 - a. This will have the effect of reducing the left side of the formula, increasing the expected Risk Adjustment transfers for these plans, while still enabling such plans to be appropriately compensated for the care that is delivered to members with higher risks – but recognizing that the costs of those risks is lower when fewer benefits are covered.
 - b. A more detailed actuarial analysis may need to be performed to determine if some EHBs waivers might be weighted more heavily in the reduction to the induced demand factor, given that some EHBs have higher costs than others.
3. Do not include Subsidy-Eligible Non-QHPs in the calculation of the statewide average premium to ensure risk transfers remain sufficient to compensate QHPs taking on higher risk members.
4. Regarding the State Access Model, Alliant recommends a state subsidy approach include a netting provision for Risk Adjustment payments. This method allows plans owing money to the Risk Adjustment pool to have payables remitted directly to the federal government netted from state subsidy payments and ensures issuers do not default on obligations to the common risk pool.

These steps ensure both new Non-QHP and existing QHP markets can remain competitive and issuers offering QHPs can continue to offer a variety of products to consumers in areas where the reinsurance program creates opportunities for expansion.

Comment #2:

Regarding the reinsurance program Alliant recommends a mid-year sweep of payments.

DCH's proposed approach to reinsurance has been tested in many states and shows it lowers premiums, especially in areas with some of the highest health care costs. Given the large, cash flow demands this puts on issuers, Alliant recommends the state further consider a mid-year sweep of expected payments due participating issuers.

Given the federal portion of the subsidy is available to the state in April of 2021, Alliant believes by making mid-year payments after receipt of federal pass-through dollars (of an actuarially reasonable portion of the expected payable to insurers) the state will achieve a higher participation of issuers. This is because large cash flow demands may strangle a small or newer entrants' ability to take advantage of the tremendous opportunity this waiver offers. Assuming the state relies upon the EDGE server infrastructure already in place, this sweep could be done without a large administrative burden on the state or issuers. Issuers currently report "baseline" data collection of eligibility and claims data to the federal government's EDGE server. Aligning sweep payments with baseline deadlines would ensure issuers are submitting accurate data that would also allow the state to more accurately project any projected shortfalls or surpluses.

Alliant believes even lower premiums can be realized by implementing this approach; as it makes mid and high-tier regions of the state attractive to issuers of all sizes. This could become a true differentiator in DCH's innovative approach and would further allow for market competition which will push premiums lower. Rather than simply provide an ability for 'existing' issuers to lower premiums, this cash-sensitive approach would attract new issuers, and the benefits of competition, to be available to consumers across the state.

Comment #3:

It appears the state portion of the funding is from general appropriations. Alliant recommends devising a stable funding source.

A stable funding source, such as insurer or provider taxes (or other designated funded sources), not subject to the vagaries of an annual appropriation process would provide stability and calm to an already volatile market. Issuers make decisions regarding market participation with long-term views in mind and having the assurance of a stable state funding source, alongside federal waiver funds would make Georgia an attractive market for many issuers. For example, North Dakota's reinsurance program is funded through an assessment on all health insurers writing coverage in the state of North Dakota, with the assessment deductible from their premium taxes. Similar approaches may be considered in Georgia so that the funding mechanism is defined and can naturally increase with health care costs.

Alliant believes these recommendations allow the proposed 1332 Waiver proposal to achieve its greatest potential in creating an innovative marketplace that allows competition and a robust free market to drive lower costs for consumers while continuing to protect individuals with pre-existing conditions.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * American Cancer Society Cancer Action Network

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Freeman

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Other

Comments*

December 2, 2019

Blake T. Fulenwider
Chief Health Policy Officer
Georgia Department of Community Health
2 Peachtree St. NW
Atlanta, GA 30303

Re: Georgia Section 1115 Demonstration Waiver Application

Dear Chief Health Policy Officer Fulenwider:

The American Cancer Society Cancer Action Network (ACS CAN) appreciates the opportunity to comment on Georgia's Section 1115 Demonstration Waiver Application. ACS CAN is making cancer a top priority for public officials and candidates at the federal, state, and local levels. ACS CAN empowers advocates across the country to make their voices heard and influence evidence-based public policy change, as well as legislative and regulatory solutions that will reduce the cancer burden. As the American Cancer Society's nonprofit, nonpartisan advocacy affiliate, ACS CAN is critical to the fight for a world without cancer.

ACS CAN commends Georgia for expanding Medicaid coverage for many of its low-income residents earning under 100 percent of the federal poverty level (FPL) through the Georgia Pathways to Coverage ("Georgia Pathways"). However, we strongly urge the state to consider expanding coverage to 138 percent of FPL for all Georgians, regardless of whether they are working or not, to ensure that Georgia residents have access to critical health insurance coverage. Over 50,450 people in Georgia are expected to be diagnosed with cancer this year and there are nearly 446,900 cancer survivors in the state – many of whom rely on Medicaid or would greatly benefit from receiving their health care through a full expansion of the program. Research has demonstrated that individuals who lack health insurance coverage are more likely to be diagnosed with advanced-stage cancer, which is costly and often leads to worse outcomes. , Research has also shown that individuals in expansion states are more frequently diagnosed with cancer at earlier stages than those in non-expansion states. , Additionally, individuals enrolled in Medicaid prior to their diagnosis have better survival rates than those who enroll after their diagnosis.

ACS CAN wants to ensure that cancer patients, survivors, and those who will be diagnosed have adequate access and coverage and that any requirements included in the waiver do not create unintentional barriers to care for low-income cancer patients and survivors. While we appreciate that the Georgia Department of Community Health ("the Department") may expand access to coverage to thousands of low-income Georgians in the coverage gap, we have serious concerns with how Georgia has decided who is eligible for the expansion and the requirements that those eligible individuals will need to complete to receive coverage. Our letter details some of these issues. We strongly urge the Department to reconsider moving forward with the proposed waivers until stakeholder concerns are addressed.

Following are our specific comments:

Georgia Pathways to Coverage Eligibility

ACS CAN opposes Georgia's proposed eligibility pathway that would only allow those Georgians ages 19 to 64 with incomes under 100 percent of the Federal Poverty Level (FPL) who are working or participating in employment-related activities for 80 hours per month be eligible for Medicaid coverage through Georgia Pathways. This leaves hundreds of thousands of low-income uninsured and underinsured Georgians who do

not have employment or educational opportunities without coverage, including countless cancer patients and survivors who may be unable to comply with the employment related activity requirements.

ACS CAN opposes tying access to affordable health care for lower income persons to work or participate in community engagement requirements because cancer patients, survivors, and those who will be diagnosed with the disease - as well as those with other complex chronic conditions - would likely find that they are ineligible for coverage through the state's Medicaid program. Cancer patients and recent survivors may not be eligible for Georgia Pathways if they are told by their doctors not to work or to limit their work hours during their treatment protocol. Research suggests that between 40 and 85 percent of cancer patients stop working while receiving cancer treatment, with absences from work ranging from 45 days to six months depending on the treatment. If work and community engagement is required as a condition of eligibility, many cancer patients, recent survivors, and those with other chronic illnesses could find that they are ineligible for the lifesaving care and treatment services provided through the state's Medicaid program. Additionally, the increase in administrative requirements for enrollees to attest to their working status on a monthly basis, as well as provide supporting documentation, would likely prevent or decrease the number of individuals with Medicaid coverage, regardless of whether they are given exceptions or not, as seen in the first year of implementation of Arkansas' work requirement.

Given the recent experience with Arkansas' work requirement, where state uninsured rates were driven up and employment actually declined since the work requirement went into effect, we urge the Department to consider the number of Georgians whose health could be negatively impacted, and coverage lost due to this proposal.

Suspension and Disenrollment for Non-compliance

We are also concerned about the proposed suspension period and eventual disenrollment from the program for non-compliance with the work and other eligibility requirements (discussed in more detail below). Non-compliance with the work requirement would result in a suspension of benefits after one month and disenrollment after three months. The Department offers exceptions for "certain life events," but the waiver does not go far enough to protect vulnerable individuals, including recent cancer survivors, and those with other serious chronic diseases linked to cancer treatments.

It is also unclear if an appeals process is provided for individuals the state may assume are not meeting the requirements but who, in fact, are in compliance. We urge the Department to provide additional information regarding the appeals process (if it exists), including information regarding whether the individual will retain the right to coverage pending the outcome of the appeal. If individuals are suspended from coverage during the appeals process, they will likely have no access to health care coverage, making it difficult or impossible to continue treatment or pay for their maintenance medication until it is determined that they have "certain life events" to meet the exception. For those cancer patients who are mid-treatment, a loss of health care coverage could seriously jeopardize their chance of survival. Being denied access to one's cancer care team could be a matter of life or death for a cancer patient or survivor, and the financial toll that the lock-out would have on individuals and their families could be devastating.

Finally, we note the Department failed to provide disenrollment estimates for failure to comply with the work requirement and other eligibility requirements, as required by the Centers for Medicare and Medicaid Services (CMS). We urge the Department to provide these numbers to stakeholders before moving forward with the waiver application so as to allow stakeholders and the state to better evaluate the effects this proposal may have on low-income Georgians, particularly since one of the state's stated goals is to "reduce the number of uninsured Georgians."

Request for Enhanced Federal Funding for Partial Expansion

We note that the state is requesting the enhanced federal funding from CMS for expanding the Medicaid program for working individuals up to 100 percent of FPL. The state should be focused on the core goal of improving health outcomes for Georgia's low-income residents rather than using federal and/or state funds to pay for the administrative costs of a complex work and community engagement requirement and other burdensome eligibility requirements. Additionally, in a January 2018 State Medicaid Director letter, CMS clearly states that workforce training activities are not eligible for federal Medicaid match. Therefore, we strongly urge the Department to expand to all adults with incomes up to 138 percent of FPL, as the law clearly requires, to receive the enhanced federal match.

Employer Sponsored Insurance and Cost Sharing

We commend the Department for offering individuals in the demonstration group premium reimbursement for their employer-sponsored insurance (ESI), but are disappointed Georgia is mandating the use of ESI and not

offering wrap-around services to enrollees in the premium assistance program. We are concerned that even with the premium assistance, low-income Medicaid adults could still be unable to pay their share of ESI cost sharing. The enrollee would be subject to the cost sharing terms and conditions of the plan into which they are enrolled, such as coinsurance or deductibles.

Individuals who are shifted from the Medicaid program to ESI could experience higher out-of-pocket costs and may be more likely to forgo needed care. Imposing cost sharing on low-income populations has been shown to decrease the likelihood that they will seek health care services, including preventive screenings. , , Cancers that are found at an early stage through screening are less expensive to treat and lead to greater survival. Uninsured and underinsured individuals already have lower screening rates resulting in a greater risk of being diagnosed at a later, more advanced stage of disease. Proposals that place greater financial burden on the lowest income residents create barriers to care and could negatively impact Medicaid enrollees – particularly those individuals who are high service utilizers with complex medical conditions.

Moving cancer patients and survivors out of the more robust Medicaid program and into ESI if it is “cost-effective for the State” could result in reduced benefits and a significant increase in out-of-pocket cost sharing – even with premium and copayment assistance – making coverage less comprehensive and unaffordable. We are concerned that the proposal would leave individuals exposed to significant cost-sharing, beyond what is permitted under current federal requirements.

Premiums and cost sharing above the five percent of family income maximum for Medicaid enrollees would be particularly burdensome for a high-utilizer of health care services, such as an individual in active cancer treatment or a recent survivor. Cancer patients in active treatment require many services shortly after diagnosis and thus incur a significant portion of cost sharing over a relatively short period of time. It can be challenging for an individual – particularly an individual with limited means – to be able to afford their cost sharing requirements. Likewise, a recent survivor may require frequent follow-up visits to prevent cancer recurrence. Having to pay the full cost up front would likely result in many cancer patients and survivors delaying their treatment and could result in them forgoing their treatment or follow-up visits altogether. We strongly urge the Department to reconsider mandating low-income individuals to enroll in their ESI and waiving critical wrap-around coverage for these individuals.

Questions Regarding Mandated Employer-Sponsored Insurance

We have several clarifying questions about the requirement that individuals enroll in their ESI or be ineligible for Medicaid/the Georgia Pathways Program. Specifically, how would the state verify ESI coverage and the individual's premium? If an individual fails to report their ESI coverage status for a period of time, would that individual be denied Medicaid coverage? Or would there be a grace period given to individuals to report their status? What safeguards will the state have in place to ensure that someone is not inadvertently denied Medicaid coverage due to an individual or state error?

It is unclear how an individual could be disenrolled from coverage for noncompliance and how the disenrollment would work with ESI open enrollment periods. We are concerned that the disenrollment period could occur after the individual has missed the opportunity to enroll in ESI, thus leaving the individual with a gap in affordable coverage for as much as a year until their next ESI open enrollment period.

What if the individual accidentally misses an enrollment period? Would they and their dependents lose coverage and be denied access to Medicaid coverage? As mentioned previously, a loss of health care coverage for a cancer patient who is mid-treatment could seriously jeopardize their chance of survival. Being denied access to one's cancer care team could be a matter of life or death for a cancer patient or survivor and the financial toll that the lock-out would have on individuals and their families could be devastating.

Prospective Eligibility and Continuity of Care

The state also proposes that eligibility will be prospective, where individuals must first meet the 80 hours per month and pay a proposed premium before they can gain access to Medicaid benefits under Georgia Pathways. Enrollment will then begin the start of the month following the initial premium payment. We are concerned this proposal could cause a gap in coverage for beneficiaries. Cancer patients undergoing an active course of treatment for a life-threatening health condition need uninterrupted access to the providers and facilities from whom they receive treatment. Disruptions in primary cancer treatment care, as well as longer-term adjuvant therapy, such as hormone therapy, can result in negative health outcomes. Additionally, recent cancer survivors often require frequent follow-up visits and maintenance medications as part of their survivorship care plan to prevent recurrence, and suffer from multiple comorbidities linked to their cancer treatments. Ensuring both cancer patients and recent survivors receive the care they need is critical to positive

health outcomes.

We also note that the 1115 waiver fails to provide specific provisions to ensure that individuals transitioning on or off the Georgia Pathway program, the Health Insurance Premium Payment (HIPP) program, or between managed care organizations (MCO) can continue to see their health care provider, if medically necessary. Failure to consider the care delivery and/or treatment regimen of patients, especially those managing a complex, chronic condition like cancer, could have devastating effects on patients, their families, and providers. We ask the Department to ensure any transition periods allow cancer patients and recent survivors to maintain their cancer care treatment regimen and continue to see their providers in the same health care systems through the end of their treatment.

Waiving Presumptive Eligibility

Patients rely on presumptive eligibility to receive affordable health care, particularly if they did not realize they were eligible for affordable coverage through Medicaid. Safety net hospitals and providers also rely on presumptive eligibility for reimbursement of provided services, allowing these facilities to keep the doors open. , Waiving presumptive eligibility for the adult population could result in either an individual facing significant out-of-pocket expenses for care that they believed would be covered by their presumed eligibility or a provider being responsible for the cost of the provided services should the patient be unable to pay for them. Therefore, we urge the Department to reconsider this request and how it could negatively impact patients, hospitals, and providers in the state.

Waiving Retroactive Eligibility

Medicaid currently allows retroactive coverage if: 1) an individual was unaware of his or her eligibility for coverage at the time a service was delivered; or 2) during the period prospective enrollees were preparing the required documentation and Medicaid enrollment application. Policies that would reduce or eliminate retroactive eligibility could place a substantial financial burden on enrollees and cause significant disruptions in care, particularly for individuals battling cancer.

Many uninsured or underinsured individuals who are newly diagnosed with a chronic condition already do not receive recommended services and follow-up care because of cost. , In 2017, one in five uninsured adults went without care because of cost. Waiving retroactive eligibility could mean even more people are unable to afford care and forgo necessary care due to cost.

Safety net hospitals and providers also rely on retroactive eligibility, similar to presumptive eligibility, for reimbursement of provided services, allowing these facilities to keep the doors open. For example, the Emergency Medical Treatment and Labor Act (EMTALA) requires hospitals to stabilize and treat individuals in their emergency room, regardless of their insurance status or ability to pay. Retroactive eligibility allows hospitals to be reimbursed if the individual treated is eligible for Medicaid coverage. Likewise, Federally Qualified Health Centers (FQHCs) offer services to all persons, regardless of that person's ability to pay or insurance status. Community health centers also play a large role in ensuring low-income individuals receive cancer screenings, helping to save the state of Georgia from the high costs of later stage cancer diagnosis and treatment. Therefore, we urge the Department to consider these providers and their contribution to Georgia's safety net, as well as the patients who rely on Medicaid for health care coverage, before waiving retroactive eligibility for the adult expansion group.

Premiums and Copayments for Adult Expansion and Transitional Medicaid Assistance Beneficiaries

ACS CAN opposes the proposed mandated monthly premiums and copayments for individuals with incomes above 50 percent of FPL (\$880 for a family of three) in the Georgia Pathways program, including those in the Transitional Medicaid Assistance (TMA) program. We are concerned the cost sharing and related penalties for non-payment for the adult populations could create administrative burdens for enrollees, deter enrollment or result in a high number of disenrollment, and potentially cause significant disruptions in care, especially for cancer survivors and those newly diagnosed. Studies have shown that imposing even modest premiums on low-income individuals is likely to deter enrollment in the Medicaid program. , , Imposing cost sharing on low-income populations has been shown to decrease the likelihood that they will seek health care services, including preventive screenings. , , Cancers that are found at an early stage through screening are less expensive to treat and lead to greater survival. Uninsured and underinsured individuals already have lower screening rates resulting in a greater risk of being diagnosed at a later, more advanced stage of disease. Proposals that place greater financial burden on low-income residents create barriers to care and could negatively impact enrollees – particularly those individuals who are high service utilizers with complex medical conditions.

Loss of Eligibility for Non-Payment

We are deeply concerned about the loss of eligibility for adults with incomes over 50 percent of FPL for non-payment of premiums after three months. Denying individuals health coverage for non-payment of a premium could place a substantial financial burden on enrollees and cause significant disruptions in care, particularly for cancer survivors (who require frequent follow-up visits) and individuals in active cancer treatment. Low-income cancer patients or survivors will likely have no access to health care coverage if their eligibility is suspended after two months for non-payment (until they can pay the outstanding premiums) or disenrolled after three months, making it difficult or impossible to continue treatment or pay for their maintenance medication.

While we appreciate that the individual may regain eligibility at any point after being disenrolled if he/she meets the hours and activities threshold, income eligibility requirement, and any premium obligations in a single month, it is unclear whether the individual will be responsible for paying any outstanding premiums from the previous months. For those cancer patients who are mid-treatment, a loss of health care coverage could seriously jeopardize their chance of survival. Being denied access to one's cancer care team for three months could have a significant impact on an individual's cancer prognosis and the financial toll that the disenrollment would have on individuals and their families could be devastating.

ACS CAN urges the Department to implement a medical or hardship exemption that would exclude individuals managing complex medical conditions, like cancer, from any suspension or disenrollment penalties.

Additionally, we encourage the Department to allow enrollees and/or their health care providers to proactively attest to any change in their health status that could qualify them for the medical or hardship exemption, preventing any unnecessary gaps in coverage.

Copayment for Non-emergent Use of the Emergency Department

The Department's request to impose a \$30 copayment for each "non-emergent" emergency department (ED) use for those with incomes above 50 percent of FPL could increase costs for cancer patients. Imposing copayments may dissuade an individual from seeking care from an ED setting – even if the case is medically warranted. Cancer patients undergoing chemotherapy and/or radiation often have adverse drug reactions or other related health problems that require immediate care during evenings or weekends. If primary care settings and other facilities are not available, these patients are often directed to the ED. Penalizing enrollees, such as cancer patients, by requiring copayments for non-emergent use of the ED could become a significant financial hardship for these low-income patients.

We urge the Department to define the term "non-emergent" use of the ED, as a definition is not included in the waiver. Additionally, when evaluating ED cost sharing requirements, we request that the Department evaluate the impact it has on patients with complex chronic conditions, such as cancer, not just evaluate the financial impact of this type of requirement.

Tobacco Surcharge

ACS CAN urges the Department not to impose a tobacco surcharge on adult enrollees. A tobacco premium surcharge of \$3 to \$5, on top of the sliding scale premium requirements and copayments, will create more barriers to low-income Georgians to quit smoking. Requiring adult enrollees who are known tobacco users to pay a monthly tobacco use surcharge is not an evidence-based approach to discourage tobacco use or encourage participation in tobacco cessation. Research demonstrates that penalizing smokers with higher insurance costs would result in a reduced likelihood of being able to afford coverage with no significant benefits for smoking cessation. Preserving access to affordable health care for individuals receiving care through Medicaid is particularly important, as tobacco users are disproportionately low-income and at higher risk for chronic diseases associated with tobacco addiction, including lung cancer. Cost is a major barrier to individuals obtaining health insurance coverage and prevention services; therefore, the surcharge will likely have the opposite effect on Georgia's Medicaid beneficiaries.

We urge the Department not to impose a monthly tobacco use surcharge on low-income Georgia Pathway and TMA enrollees. There is not strong evidence that a surcharge discourages people from smoking. Further, imposing a surcharge could price enrollees – who are by definition low-income – out of the very coverage they need to help them quit. We believe the more cost-effective approach is for the Department to broadly promote the tobacco cessation benefits and services available to enrollees – using evidence-based interventions included in The Community Guide – and to ensure Medicaid enrollees have access to these services without any barriers to access such as copayments, step therapy, or prior authorization. Additionally, the Department should be encouraged to continuously evaluate the benefits and services of their tobacco cessation program to ensure its effectiveness.

Member Rewards Account

ACS CAN supports Georgia's goal of encouraging beneficiaries to adopt healthy behaviors through the Member Rewards Account. A substantial proportion of cancers can be prevented or caught at an earlier, more treatable stage through preventive care and screening. ACS CAN commends the Department for proposing an incentive-based program rather than using a mandatory, outcome-based program.

Research indicates that penalizing enrollees for non-compliance or failing to meet outcomes dictated by the state will not likely generate cost savings or improve the health of low-income Medicaid enrollees. We believe state residents would be best served by a comprehensive, evidence-based participatory wellness program based on incentives, like the one proposed in the waiver, as long as it also provides adequate and comprehensive coverage of preventive services (including tobacco cessation, weight loss, and cancer screenings) and emphasizes evidence-based interventions to educate, promote, and encourage patients to participate in prevention, early detection, and wellness. Evidence shows that unhealthy behaviors can be changed or modified by modest incentives, rather than penalties, as long as they are combined with adequate medical services and health promotion programs. Providing enrollees incentives could lead to a change in behavior whereas penalties do little to improve health, and could reduce access to necessary health care services, including preventive care. We do, however, have some concerns and seek clarification from the Department regarding the Member Rewards Account.

According to the waiver, the state will set a series of criteria for awarding points for the account and mention a couple of examples, such as "being a non-smoker or quitting smoking" or "completing annual well care visits." Again, we urge the Department to ensure beneficiaries be offered the full range of tobacco cessation benefits and services, including all FDA-approved tobacco cessation medications, and that individuals be incentivized to quit smoking rather than penalized for doing so. We also urge the Department to include recommended cancer screenings to the criteria list, as screening for cancer can help prevent and detect cancers at earlier, more treatable stages.

We are concerned the monthly invoice members will receive regarding their required copayment amounts and the deduction of those copayments from their Member Rewards Account could be confusing to beneficiaries, particularly if they have a negative balance in their rewards account. For example, the beneficiary may think that he/she must pay these copayments to the state if they see a negative balance in the rewards account. We urge the Department to clearly indicate in the monthly invoice to members that future premiums and healthy incentive points will be used to pay any negative balances, as not to deter beneficiaries from receiving necessary care over concerns with paying their copayments.

Non-Emergency Medical Transportation

Non-emergency medical transportation (NEMT) is a critical service for many low-income Medicaid beneficiaries who do not have the financial means or the access to needed transportation services. Without transportation benefits, chronically ill Medicaid beneficiaries may go without the lifesaving health services they need, leading to delayed care, an increase in avoidable hospitalizations, and poorer health outcomes. The American Community Survey estimates that nearly 9 percent of occupied housing units in Georgia report having no access to a vehicle.

We appreciate that NEMT will remain a covered service for children, pregnant women, and the blind/disabled, but the Department neglected to consider the need for NEMT for preventive services for their adult populations. NEMT is used by individuals to access preventive services and cancer screenings – especially colon cancer screenings and mammograms. As mentioned earlier, early detection of cancer results in less expensive treatments and better health outcomes, which could help offset some short-term Medicaid program costs. In addition, some cancer screenings can prevent cancers from developing (such as colonoscopies and Pap tests) by detecting and removing pre-cancerous polyps or lesions. However, lack of transportation to screening services hinders an individual's ability to obtain the necessary screening and, for some individuals, could result in detection of tumors at a later stage. Furthermore, the lack of NEMT services could cause more people to cancel appointments last minute, which could result in an enrollee facing the \$30 "non-emergency use of the emergency department" penalty each time an individual is unable to make it to an appointment due to lack of transportation. ACS CAN strongly urges the Department to reconsider the request to waive NEMT for non-disabled adults in the Medicaid program.

Other Concerns

Georgia's 1115 waiver proposal is incredibly complicated. The combination of a work requirement, monthly income-based premiums, copayments, the Member Rewards Account, a healthy behavior incentive program, and employer premium assistance program will likely result in a great amount of confusion for enrollees.

managed care organizations, and providers and in huge administrative costs to the states. We strongly urge the Department to invest significant time and resources in a public education campaign that is comprehensive and far-reaching for the public, the MCOs, and providers. We also recognize the Department will need to provide a great deal of oversight to ensure the MCOs and providers are ensuring beneficiaries are held harmless from any issues in the administration of these proposals. In particular, it is critical that before any beneficiaries lose coverage for not meeting any of the above requirements that the Department ensure a swift and efficient appeals process be provided to the beneficiary before any coverage is lost or penalty is received.

Conclusion

We appreciate the opportunity to provide comments on Georgia's 1115 waiver amendment. Expanding eligibility and coverage through the Medicaid program is critically important for many low-income Georgians who could greatly benefit from the program for cancer prevention, early detection, diagnostic, and treatment services. However, the proposed eligibility pathway and proposed requirements in this 1115 waiver denies countless low-income Georgians who are in cancer treatment and recent survivors, who are unable to complete the community engagement requirements, access to comprehensive, affordable health care coverage. We ask the Department to weigh the potential impact of this 1115 waiver proposal on low-income Georgians' access to lifesaving health care coverage, particularly those individuals with cancer, cancer survivors, and those who will be diagnosed with cancer during their lifetime.

Maintaining access to quality, affordable, accessible, and comprehensive health care coverage and services are a matter of life and survivorship for thousands of low-income cancer patients and survivors, and we look forward to working with the Department to ensure that all Georgians, no matter their working status, are positioned to win the fight against cancer. If you have any questions, please feel free to contact me at 404.582.6122 or andy.freeman@cancer.org.

Sincerely,

Andrew J. Freeman
Georgia Government Relations Director
American Cancer Society Cancer Action Network
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * American Cancer Society Cancer Action Network

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Freeman

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

via electronic submission
December 3, 2019

Ryan Loke
c/o The Office of the Governor
206 Washington Street
Suite 115
State Capitol
Atlanta, GA 30334
Re: Georgia Draft 1332 Waiver Application

Dear Mr. Loke:

The American Cancer Society Cancer Action Network (ACS CAN) appreciates the opportunity to comment on Georgia's Draft Section 1332 waiver proposal. ACS CAN is making cancer a top priority for public officials and candidates at the federal, state and local levels. ACS CAN empowers advocates across the country to make their voices heard and influence evidence-based public policy change as well as legislative and regulatory solutions that will reduce the cancer burden. As the American Cancer Society's nonprofit, nonpartisan advocacy affiliate, ACS CAN is critical to the fight for a world without cancer.

ACS CAN supports a robust marketplace from which consumers can choose a health plan that best meets their needs. Access to health care coverage is paramount for persons with cancer and survivors. Research from the American Cancer Society has shown that uninsured Americans are less likely to get screened for cancer and thus are more likely to have their cancer diagnosed at an advanced stage when survival is less likely and the cost of care more expensive. In the United States, more than 1.7 million Americans will be diagnosed with cancer this year – an estimated 50,450 in Georgia. An additional 15.5 million Americans are living with a history of cancer – 446,900 in Georgia. For these Americans access to affordable health insurance is a matter of life or death.

We offer the following comments on Georgia's proposed two-phase section 1332 waiver.:

Phase I: Reinsurance Program

ACS CAN supports Georgia's proposed reinsurance program. A well-designed reinsurance program can help to lower premiums and mitigate the plan risk associated with high-cost enrollees. We note that the draft waiver anticipates the reinsurance program will reduce premiums by 10 percent in plan year 2021. These savings could reduce federal government subsidy payments, and lower premiums for consumers who enroll in coverage through the exchange but are not eligible for subsidies.

Georgia's proposed reinsurance waiver is similar to that adopted in Colorado, which has been shown to reduce premiums. A reinsurance program may encourage insurance carriers to enter the market. A reinsurance program may also encourage plans already in the market to continue offering plans through the exchange. Further, the expected maintenance or increase in plan competition due to the reinsurance program may help to keep premiums from rising. These premium savings could help cancer patients and survivors afford health insurance coverage and may enable some individuals to enroll who previously could not afford coverage – the draft waiver anticipates increased enrollment of 0.4 percent.

We are pleased that the proposal states that Phase I of the waiver will not impact the comprehensiveness of coverage in Georgia. ACS CAN believes that patient protections in current law – like the prohibition on pre-existing condition exclusions, prohibition on lifetime and annual limits, and Essential Health Benefits requirements – are crucial to making the healthcare system work for cancer patients and survivors. We strongly urge Georgia to proceed with its Phase I proposed 1332 waiver request for the creation of a reinsurance program.

Phase II: Georgia Access Model

In the second phase of its draft 1332 waiver, Georgia proposes to eliminate healthcare.gov as an enrollment platform for residents of Georgia and transition to an entirely new model, the Georgia Access Model, under

which the private sector would provide front-end consumer shopping experiences and operations with the State validating whether an individual is eligible for subsidies and providing those subsidies to plans. Unfortunately, the proposed Georgia Access Model raises a number of concerns, as outlined in more detail below.

Program Design -- Access

Under the Georgia Access Model private sector entities will deliver front-end functions of outreach, customer service, plan shopping, selection and enrollment. Georgia would be responsible for ongoing program management and compliance of participating entities. The State believes this will help to promote competition and improve customer service.

Concern about potential for plan steering: We are concerned that under this proposal, consumers would be steered toward specific plan options and may not be provided with information regarding the totality of options available to them. Even if brokers don't outright omit plan choices in their systems, there is still the potential for them to display certain plans differently – or provide more clear and detailed information about certain plans they have an incentive to sell – and in other ways alter the plan shopping experience so that the consumer is not truly presented with all the relevant choices. Web-brokers are typically paid on commission and that commission may vary depending on the plan in which the individual enrolls, thus creating a financial incentive for web-brokers to steer individuals to specific plan options rather than provide individuals with plan choices that best meet their needs.

Cancer patients have unique coverage needs: For patients with cancer and cancer survivors, it is crucial to choose a health insurance plan that provides coverage for their unique needs. Cancer patients and survivors must pay particular attention to whether a plan covers the medications they need, whether their (often multiple) physicians are in-network, whether their treatment center is in-network, and the cost-sharing that will be required of them. Weighing all these factors with premium prices, tax credits and subsidies can be daunting for even the most educated consumer, while we know that many individuals enrolling in the exchanges may have health literacy challenges or be inexperienced with health insurance and are almost guaranteed to have trouble. We are concerned that the proposal will inhibit an individual from finding a plan that best meets his/her needs.

Program Design – Plan Certification

We are pleased that under the Georgia Access Model the state will continue to make available to consumers metal level qualified health plans (QHPs) and catastrophic plans to look exactly the same as they do today. These plans allow individuals the choice of coverage options with key patient protections, including the prohibition against pre-existing condition exclusions and life-time and annual limits as well as the mandatory coverage of essential health benefits (EHBs).

Unfortunately, the state also intends to certify Eligible non-QHPs that “will offer a more limited set of EHBs in order to provide residents with expanded access to affordable health care coverage options.” The waiver notes these non-QHPs must maintain protections for those with pre-existing conditions and may not medically underwrite in order to be eligible for state subsidies. We have a number of concerns with this proposal. EHBs are needed to protect people with pre-existing conditions: While we appreciate Georgia's stated intention of maintaining protections for people with pre-existing conditions, allowing the availability of plans with limited EHBs actually harms people with pre-existing conditions by causing premiums to rise for plans that cover the full EHB – plans that patients with pre-existing conditions must enroll in to receive treatment (discussed further below). Furthermore, comprehensive coverage is especially important for consumers who are diagnosed with serious diseases like cancer during the middle of the plan year. Most cancer diagnoses are unexpected, and cancer patients likely did not know they would need cancer care when they initially enrolled in their plan. Consumers who enroll in health coverage expect their plan to provide coverage for these necessary products and services. If cancer patients do not have access to cancer treatment services through their health insurance coverage, they face astronomical costs and disruptions and delays to their treatments or may be forced to forgo treatment entirely because of costs. Providing coverage of EHBs, like preventive services (including cancer screenings), helps to prevent some forms of cancer and can help detect other cancers at an earlier stage when the individual has a higher likelihood of more treatment options and a better overall health outcome. Including preventive services as standard benefits in health insurance has benefits to overall public health, saves lives, and can reduce healthcare spending.

EHBs tied to life-time and annual limits: We also note that prohibitions of annual and life-time limits are a key protection for individuals with pre-existing conditions. These protections exist only for EHBs. Thus, if a service is no longer considered to be an EHB service, the plan can choose to no longer cover the service or it can impose life-time and annual limits on coverage. Cancer patients and survivors often have high treatment costs and require spending that reaches the amount of annual and/or lifetime cap on health services that was typical prior to 2010. According to one study, prior to the enactment of the current protections one in ten cancer patients responding to the survey reached the limit of what their insurance plan would pay for their cancer treatment.

Potential for Non-QHPs to Discriminate: While the waiver suggests that Eligible non-QHPs would be prohibited

from medically underwriting, Eligible non-QHPs could choose to exclude coverage of services that are necessary for individuals with pre-existing conditions (for example, robust coverage of prescription drugs). It is not clear whether these plans would be permitted to vary premiums based on non-health factors beyond what is currently permitted (e.g., age and tobacco usage) or impose other non-health status-related factors (such as gender and work history). Expanding the ability to impose more premium variations for non-health factors can be a backdoor way of discriminating against individuals with pre-existing conditions. For example, increasing the age rating beyond the current 3:1 ratio would make health insurance more expensive for older adults, which is important from a cancer perspective because the incidence of cancer increases with age. According to the American Cancer Society, 85 percent of all cancers in the United States are diagnosed in people 50 years of age and older. Thus, increased age rating bands would mean that older individuals (those more at risk of developing cancer) would face significantly higher health care premiums. Prior to the enactment of the current age rating band restrictions, older adults faced significant problems accessing health insurance coverage, in large part because of age rating bands.

In addition, Eligible non-QHPs would not have to meet network adequacy requirements, which provides another way for these plans to discriminate against individuals with pre-existing conditions like cancer. Access to a full range of health care providers is critical for cancer patients – those newly diagnosed or in active treatment as well as survivors. Each cancer diagnosis is as unique as is the team of providers and specialists needed to help a patient identify and receive the most appropriate and effective treatment. That is why it is so critical that issuers offer robust networks of providers, including specialists.

Eligible Non-QHP Premiums' Impact on QHP Premiums: One of the waiver's stated goals is to provide residents with access to Eligible non-QHPs in order to provide more affordable health care coverage options. We are concerned that not only will Eligible non-QHPs provide less comprehensive coverage, but they are more likely to attract younger and healthier individuals, who are more likely to be attracted to the lower premiums. Conversely, older and sicker individuals who need comprehensive coverage are more likely to enroll in the higher cost QHPs.

Variation will make it harder to shop for coverage: We also note that allowing non-QHPs to be marketed alongside QHP coverage options will make it harder for consumers to choose a plan that best meets their needs. This confusion will be compounded by the fact that education and outreach will be conducted by private entities, who, as discussed in detail above, have a financial interest to steer consumers to particular plan options (particularly those options from which the broker may receive a larger commission) and may not provide consumers with all available choices.

Program Design – State Subsidies

Beginning in plan year 2022 the state proposes to implement a state subsidy structure for both QHPs and Eligible Non-QHPs that is the same as the existing federal subsidy structure for individuals between 100 percent to 400 percent of the federal poverty level (FPL). The State will manage eligibility determinations for individual market subsidies. However, the waiver notes that it will institute a budget caps on subsidies, which could limit their availability:

If a larger number of subsidy eligible residents enroll than projected, the State will grant subsidies on a first in, first out basis until the funding cap is reached. Additional enrollees will still be able to enroll in plans and will be placed on a wait list, should additional State funding become available.

ACS CAN has a number of concerns with this proposal.

Subsidies should not be block granted: ACS CAN strongly opposes the proposal to essentially block-grant federal subsidies to the state. Under current federal law, individuals are eligible for subsidies if they meet certain income and eligibility requirements. These subsidies are provided to ensure that individuals have access to affordable health insurance coverage.

We are gravely concerned that Georgia would consider placing individuals who otherwise qualify for federal subsidies on a wait list. Cancer patients need access to comprehensive, affordable health insurance coverage. Individuals may need to enter the individual market for a variety of reasons, for example, when an individual loses a job due to a cancer diagnosis and treatment. Research suggests that between 40 and 85 percent of cancer patients stop working while receiving cancer treatment, with absences from work ranging from 45 days to six months depending on the treatment.

Under the proposed waiver, an individual who loses employment during her cancer treatment could presumably qualify for a special enrollment period into the individual market but may not be able to afford her plan because she is unable to obtain subsidies if the funding cap is reached. For those cancer patients who are mid-treatment, a loss of health care coverage could seriously jeopardize their chance of survival. Similarly, a gap in coverage for a cancer survivor could jeopardize their health, as cancer survivors often require frequent follow-up visits and maintenance medications as part of their survivorship care plan to prevent recurrence. Being denied access to one's cancer care team could be a matter of life or death for a cancer patient or survivor, and the financial toll that the lock-out would have on individuals and their families could be devastating. A patient's ability to survive cancer should not depend on the time of year they are seeking treatment, or whether too many other patients before them enrolled in coverage.

Subsidies should not be given to non-QHPs: As discussed in detail previously, we have significant concerns with the availability of non-QHPs. We are concerned that subsidizing Eligible non-QHPs will result in premiums for QHPs to increase. If the amount of the state subsidies is limited, then individuals would be more likely to enroll in an Eligible non-QHP, which as discussed above, could provide inadequate coverage for an individual in active cancer treatment or cancer survivor.

Conclusion

On behalf of the American Cancer Society Cancer Action Network, we thank you for the opportunity to comment on the proposed section 1332 waiver. We strongly support Georgia's proposed reinsurance waiver, which we believe will provide long-term viability of the individual market while not eroding important consumer protections. We have serious concerns with the proposed Georgia Access Model and would discourage Georgia from proceeding with the second phase of its 1332 waiver. If you have any questions, please feel free to contact me at 404.582.6122 or andy.freeman@cancer.org.

Sincerely,

Andy Freeman
Georgia Government Relations Director
American Cancer Society Cancer Action Network

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

via electronic submission

December 3, 2019

Ryan Loke
c/o The Office of the Governor
206 Washington Street
Suite 115
State Capitol
Atlanta, GA 30334
Re: Georgia Draft 1332 Waiver Application

Dear Mr. Loke:

The American Cancer Society Cancer Action Network (ACS CAN) appreciates the opportunity to comment on Georgia's Draft Section 1332 waiver proposal. ACS CAN is making cancer a top priority for public officials and candidates at the federal, state and local levels. ACS CAN empowers advocates across the country to make their voices heard and influence evidence-based public policy change as well as legislative and regulatory solutions that will reduce the cancer burden. As the American Cancer Society's nonprofit, nonpartisan advocacy affiliate, ACS CAN is critical to the fight for a world without cancer.

ACS CAN supports a robust marketplace from which consumers can choose a health plan that best meets their needs. Access to health care coverage is paramount for persons with cancer and survivors. Research from the American Cancer Society has shown that uninsured Americans are less likely to get screened for cancer and thus are more likely to have their cancer diagnosed at an advanced stage when survival is less likely and the cost of care more expensive. In the United States, more than 1.7 million Americans will be diagnosed with cancer this year – an estimated 50,450 in Georgia. An additional 15.5 million Americans are living with a history of cancer – 446,900 in Georgia. For these Americans access to affordable health insurance is a matter of life or death.

We offer the following comments on Georgia's proposed two-phase section 1332 waiver.:

Phase I: Reinsurance Program

ACS CAN supports Georgia's proposed reinsurance program. A well-designed reinsurance program can help to lower premiums and mitigate the plan risk associated with high-cost enrollees. We note that the draft waiver anticipates the reinsurance program will reduce premiums by 10 percent in plan year 2021. These savings could reduce federal government subsidy payments, and lower premiums for consumers who enroll in coverage through the exchange but are not eligible for subsidies.

Georgia's proposed reinsurance waiver is similar to that adopted in Colorado, which has been shown to reduce premiums. A reinsurance program may encourage insurance carriers to enter the market. A reinsurance program may also encourage plans already in the market to continue offering plans through the exchange. Further, the expected maintenance or increase in plan competition due to the reinsurance program may help to keep premiums from rising. These premium savings could help cancer patients and survivors afford health insurance coverage and may enable some individuals to enroll who previously could not afford coverage – the draft waiver anticipates increased enrollment of 0.4 percent.

We are pleased that the proposal states that Phase I of the waiver will not impact the comprehensiveness of coverage in Georgia. ACS CAN believes that patient protections in current law – like the prohibition on pre-existing condition exclusions, prohibition on lifetime and annual limits, and Essential Health Benefits requirements – are crucial to making the healthcare system work for cancer patients and survivors. We strongly urge Georgia to proceed with its Phase I proposed 1332 waiver request for the creation of a reinsurance program.

Phase II: Georgia Access Model

In the second phase of its draft 1332 waiver, Georgia proposes to eliminate healthcare.gov as an enrollment platform for residents of Georgia and transition to an entirely new model, the Georgia Access Model, under which the private sector would provide front end consumer shopping experiences and operations with the

which the private sector would provide front-end consumer shopping experiences and operations with the State validating whether an individual is eligible for subsidies and providing those subsidies to plans. Unfortunately, the proposed Georgia Access Model raises a number of concerns, as outlined in more detail below.

Program Design -- Access

Under the Georgia Access Model private sector entities will deliver front-end functions of outreach, customer service, plan shopping, selection and enrollment. Georgia would be responsible for ongoing program management and compliance of participating entities. The State believes this will help to promote competition and improve customer service.

Concern about potential for plan steering: We are concerned that under this proposal, consumers would be steered toward specific plan options and may not be provided with information regarding the totality of options available to them. Even if brokers don't outright omit plan choices in their systems, there is still the potential for them to display certain plans differently – or provide more clear and detailed information about certain plans they have an incentive to sell – and in other ways alter the plan shopping experience so that the consumer is not truly presented with all the relevant choices. Web-brokers are typically paid on commission and that commission may vary depending on the plan in which the individual enrolls, thus creating a financial incentive for web-brokers to steer individuals to specific plan options rather than provide individuals with plan choices that best meet their needs.

Cancer patients have unique coverage needs: For patients with cancer and cancer survivors, it is crucial to choose a health insurance plan that provides coverage for their unique needs. Cancer patients and survivors must pay particular attention to whether a plan covers the medications they need, whether their (often multiple) physicians are in-network, whether their treatment center is in-network, and the cost-sharing that will be required of them. Weighing all these factors with premium prices, tax credits and subsidies can be daunting for even the most educated consumer, while we know that many individuals enrolling in the exchanges may have health literacy challenges or be inexperienced with health insurance and are almost guaranteed to have trouble. We are concerned that the proposal will inhibit an individual from finding a plan that best meets his/her needs.

Program Design – Plan Certification

We are pleased that under the Georgia Access Model the state will continue to make available to consumers metal level qualified health plans (QHPs) and catastrophic plans to look exactly the same as they do today. These plans allow individuals the choice of coverage options with key patient protections, including the prohibition against pre-existing condition exclusions and life-time and annual limits as well as the mandatory coverage of essential health benefits (EHBs).

Unfortunately, the state also intends to certify Eligible non-QHPs that “will offer a more limited set of EHBs in order to provide residents with expanded access to affordable health care coverage options.” The waiver notes these non-QHPs must maintain protections for those with pre-existing conditions and may not medically underwrite in order to be eligible for state subsidies. We have a number of concerns with this proposal.

EHBs are needed to protect people with pre-existing conditions: While we appreciate Georgia's stated intention of maintaining protections for people with pre-existing conditions, allowing the availability of plans with limited EHBs actually harms people with pre-existing conditions by causing premiums to rise for plans that cover the full EHB – plans that patients with pre-existing conditions must enroll in to receive treatment (discussed further below). Furthermore, comprehensive coverage is especially important for consumers who are diagnosed with serious diseases like cancer during the middle of the plan year. Most cancer diagnoses are unexpected, and cancer patients likely did not know they would need cancer care when they initially enrolled in their plan.

Consumers who enroll in health coverage expect their plan to provide coverage for these necessary products and services. If cancer patients do not have access to cancer treatment services through their health insurance coverage, they face astronomical costs and disruptions and delays to their treatments or may be forced to forgo treatment entirely because of costs. Providing coverage of EHBs, like preventive services (including cancer screenings), helps to prevent some forms of cancer and can help detect other cancers at an earlier stage when the individual has a higher likelihood of more treatment options and a better overall health outcome. Including preventive services as standard benefits in health insurance has benefits to overall public health, saves lives, and can reduce healthcare spending.

EHBs tied to life-time and annual limits: We also note that prohibitions of annual and life-time limits are a key protection for individuals with pre-existing conditions. These protections exist only for EHBs. Thus, if a service is no longer considered to be an EHB service, the plan can choose to no longer cover the service or it can impose life-time and annual limits on coverage. Cancer patients and survivors often have high treatment costs and require spending that reaches the amount of annual and/or lifetime cap on health services that was typical prior to 2010. According to one study, prior to the enactment of the current protections one in ten cancer patients responding to the survey reached the limit of what their insurance plan would pay for their cancer treatment.

Potential for Non-QHPs to Discriminate: While the waiver suggests that Eligible non-QHPs would be prohibited from medically underwriting, Eligible non-QHPs could choose to exclude coverage of services that are

necessary for individuals with pre-existing conditions (for example, robust coverage of prescription drugs). It is not clear whether these plans would be permitted to vary premiums based on non-health factors beyond what is currently permitted (e.g., age and tobacco usage) or impose other non-health status-related factors (such as gender and work history). Expanding the ability to impose more premium variations for non-health factors can be a backdoor way of discriminating against individuals with pre-existing conditions. For example, increasing the age rating beyond the current 3:1 ratio would make health insurance more expensive for older adults, which is important from a cancer perspective because the incidence of cancer increases with age. According to the American Cancer Society, 85 percent of all cancers in the United States are diagnosed in people 50 years of age and older. Thus, increased age rating bands would mean that older individuals (those more at risk of developing cancer) would face significantly higher health care premiums. Prior to the enactment of the current age rating band restrictions, older adults faced significant problems accessing health insurance coverage, in large part because of age rating bands.

In addition, Eligible non-QHPs would not have to meet network adequacy requirements, which provides another way for these plans to discriminate against individuals with pre-existing conditions like cancer. Access to a full range of health care providers is critical for cancer patients – those newly diagnosed or in active treatment as well as survivors. Each cancer diagnosis is as unique as is the team of providers and specialists needed to help a patient identify and receive the most appropriate and effective treatment. That is why it is so critical that issuers offer robust networks of providers, including specialists.

Eligible Non-QHP Premiums' Impact on QHP Premiums: One of the waiver's stated goals is to provide residents with access to Eligible non-QHPs in order to provide more affordable health care coverage options. We are concerned that not only will Eligible non-QHPs provide less comprehensive coverage, but they are more likely to attract younger and healthier individuals, who are more likely to be attracted to the lower premiums. Conversely, older and sicker individuals who need comprehensive coverage are more likely to enroll in the higher cost QHPs.

Variation will make it harder to shop for coverage: We also note that allowing non-QHPs to be marketed alongside QHP coverage options will make it harder for consumers to choose a plan that best meets their needs. This confusion will be compounded by the fact that education and outreach will be conducted by private entities, who, as discussed in detail above, have a financial interest to steer consumers to particular plan options (particularly those options from which the broker may receive a larger commission) and may not provide consumers with all available choices.

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ACS CAN has a number of concerns with this proposal.

Subsidies should not be block granted: ACS CAN strongly opposes the proposal to essentially block-grant federal subsidies to the state. Under current federal law, individuals are eligible for subsidies if they meet certain income and eligibility requirements. These subsidies are provided to ensure that individuals have access to affordable health insurance coverage.

We are gravely concerned that Georgia would consider placing individuals who otherwise qualify for federal subsidies on a wait list. Cancer patients need access to comprehensive, affordable health insurance coverage. Individuals may need to enter the individual market for a variety of reasons, for example, when an individual loses a job due to a cancer diagnosis and treatment. Research suggests that between 40 and 85 percent of cancer patients stop working while receiving cancer treatment, with absences from work ranging from 45 days to six months depending on the treatment.

Under the proposed waiver, an individual who loses employment during her cancer treatment could presumably qualify for a special enrollment period into the individual market but may not be able to afford her plan because she is unable to obtain subsidies if the funding cap is reached. For those cancer patients who are mid-treatment, a loss of health care coverage could seriously jeopardize their chance of survival. Similarly, a gap in coverage for a cancer survivor could jeopardize their health, as cancer survivors often require frequent follow-up visits and maintenance medications as part of their survivorship care plan to prevent recurrence. Being denied access to one's cancer care team could be a matter of life or death for a cancer patient or survivor, and the financial toll that the lock-out would have on individuals and their families could be devastating. A patient's ability to survive cancer should not depend on the time of year they are seeking treatment, or whether too many other patients before them enrolled in coverage.

Subsidies should not be given to non-QHPs: As discussed in detail previously, we have significant concerns

with the availability of non-QHPs. We are concerned that subsidizing Eligible non-QHPs will result in premiums for QHPs to increase. If the amount of the state subsidies is limited, then individuals would be more likely to enroll in an Eligible non-QHP, which as discussed above, could provide inadequate coverage for an individual in active cancer treatment or cancer survivor.

Conclusion

On behalf of the American Cancer Society Cancer Action Network, we thank you for the opportunity to comment on the proposed section 1332 waiver. We strongly support Georgia's proposed reinsurance waiver, which we believe will provide long-term viability of the individual market while not eroding important consumer protections. We have serious concerns with the proposed Georgia Access Model and would discourage Georgia from proceeding with the second phase of its 1332 waiver. If you have any questions, please feel free to contact me at 404.582.6122 or andy.freeman@cancer.org.

Sincerely,

Andy Freeman
Georgia Government Relations Director
American Cancer Society Cancer Action Network
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Business/Organization * American College of Physicians Georgia Chapter

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Daniels

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

The Honorable Brian Kemp
Governor, State of Georgia
203 Capitol Place SW
Atlanta, GA 30334

Re: Public Comments Proposed Waivers 1115 & 1332

Dear Governor Kemp,

The American College of Physicians Georgia Chapter (ACP GA) is pleased to provide the following comments on the waivers recently submitted by your office to the Centers for Medicare and Medicaid Services to expand health coverage in Georgia. We look forward to a collaborative working relationship with you and your staff going forward as we collectively address the barriers to access health care that face many of our fellow Georgians.

As you know, the Georgia Chapter of the American College of Physicians is a diverse community of internal medicine primary care specialists and subspecialists united by a commitment to excellence. With 159,000 members internationally and 3800 in Georgia, ACP is the largest medical-specialty society in the world.

Our Chapter wants to thank you for assembling a talented and hard-working team and taking an in-depth approach into evaluating the healthcare landscape in Georgia. We are very sensitive to the political, financial and human dimensions that you and your staff must contemplate in producing a balanced approach to healthcare. We are also very mindful of the fact that your team has had limited time to assemble an extensive application submission to CMS in the form of 1115 and 1332 State Innovation waiver. We appreciate the efforts of the administration on these very important waiver applications.

Our leadership has carefully reviewed the 1115 and 1332 waivers that your administration has proposed to address Georgia's unique healthcare challenges. We want to share with you some of the concerns and opportunities for improvement that have emerged in discussions with our members. Importantly, as a patient centered organization, this feedback is rendered primarily through the lens of the patients we serve, although the impact it may have on physician practices and members is important.

We hope that this feedback will be received as constructive, candid and apolitical. Additionally, we would welcome an opportunity to meet with you or your staff to discuss our position.

Below are areas of improvement that we have identified:

1) Number of Georgians Covered: Given Georgia's poor ranking in the category of uninsured population, we are concerned that the proposed 1115/1332 waivers fall well short in covering more Georgians; Especially relative to existing alternatives available to Georgia. The total projected number of Georgians likely to gain insurance coverage (80-90,000) as a result of the 1115/1332 is not only unlikely to dislodge our state from its woeful third from last uninsured ranking nationally (a ranking that we have long regarded as unacceptable) but it may actually cement our status in such rankings for years to come.

As physicians actively engaged in providing care to our patients, we know firsthand that the uninsured are far less likely to seek medical care, which often leads to substantially poorer health outcomes, and cost shifting, as

less likely to seek medical care, which often leads to substantially poorer health outcomes, and cost shifting, as such patients often seek care in higher cost environments, such as emergency rooms. Additionally, the high rate of uninsured Georgians often conspires with our low Medicaid provider rates (also languishing in the bottom quartile nationally), to produce a patient mix that makes medical practice unsustainable in many areas of Georgia, specifically, rural areas. In the end, insuring another 80-90,000 Georgians is a positive step, but unfortunately, this waiver may be more accurately characterized by the 1.3 million Georgians who are still left uncovered. As such, when compared to other options available to Georgia, we regard this proposal as a significant missed opportunity to meaningfully improve the healthcare coverage across urban, suburban and rural communities in our state. We urge you to consider investing in a plan that can in a meaningful way support and incentivize coverage for many more Georgians, even if such a plan must be implemented incrementally over the course of your first and second terms.

2) Federal/State Funding Ratio: While we remain hopeful that your team can secure the 9/1 match previously limited to full expansion states, we are concerned that the rejection of a similar partial expansion plan in Utah may bode poorly for Georgia's prospects. If the more robust match is in fact denied, we seem poised to spend similar amounts of state revenue for dramatically reduced coverage rates, and covered services. Though we understand that SB 106 capped eligibility at 100% of FPL, we ask that your administration consider earning Georgia a better return on our dollars with a higher match rate, greater opportunities for more Georgians to gain insurance, and creating a broader, more stable market.

3) Covered Services: In addition to our concerns that fewer Georgians will be eligible for coverage, and at a higher cost, we are also concerned that the covered "essential" benefits may be rolled back as well. Exempting plans from federal mental health parity requirements, diminishing pregnancy and maternal coverage, and reduced prescription drug coverage, to name a few, are of great concern to us. And while moving towards or incentivizing more "bare bones" plans may appear to be more cost effective early on, such gains are routinely eliminated as cost shifting, diminished access and reduced medical efficacy set in. Notably, the "essential health benefits" that were implemented as part of the ACA were heavily evidence-based cost savers---a pre-condition of being included. And while we are sensitive to the political nature of the ACA, the data that supported the 10 essential health benefits pre-dated the ACA. The data is not partisan, and it is indisputable. We regard a rollback of such critical coverage as a setback to many Georgians and urge you to consider reinstating these benefits.

4) Primary Care; Any health policy should not place limits on the longitudinal physician- patient relationship in primary care. The chapter's request is that Georgia health policies serve to strengthen primary care across Georgia which is paramount to supporting the state's vision of creating "A Healthy Georgia". Health Policies that serve to strengthen and sustain primary care practice in Georgia are critical to improving health of Georgians.

Collectively, the concerns enumerated above would underscore Georgia's status as a highly uninsured state, with diminished services for those that are newly covered, and at a price point that exceeds existing alternatives that offer more robust coverage for literally hundreds of thousands more Georgians. From a business perspective, the proposed waivers are also unlikely to move the needle enough to solve the problem of medical workforce shortages and hospital closures that have plagued rural communities. As such, we anticipate a disproportionately adverse, but avoidable impact on rural communities.

Lastly, we want to underscore our sensitivity to the task that you and your administration has embraced in tackling the very complex healthcare issues that face our state and country. We appreciate your efforts and sensitivity to the balancing act that these complex issues require. We stand ready to work with you and your administration in any way that you deem useful. We all share the overarching concern of making Georgia a healthier state and offer this feedback as we look forward to working together with you and your administration to achieve that common and critically important goal.

G. Waldon Garriss, III, MD, MS, FAAP, MACP
Program Director, Internal Medicine
WellStar Kennestone Regional Medical Center
Governor, Georgia Chapter of the American College of Physicians
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * American Diabetes Association

Stakeholder Type * Advocacy Group

First Name * [REDACTED] **Last Name *** De La Garza

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Virginia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Other

Comments*

Dear Commissioner Berry:

On behalf of the more than 30 million Americans living with diabetes and the 84 million more with prediabetes, the American Diabetes Association (ADA) provides the following comments on Georgia's Department of Community Health (Department) 1115 Medicaid Waiver Application (1115 Waiver).

As the global authority on diabetes, the ADA funds research to better understand, prevent and manage diabetes and its complications; publishes the world's two most respected scientific journals in the field, Diabetes and Diabetes Care; sets the standards for diabetes care; holds the world's most respected diabetes scientific and educational conferences; advocates to increase research funding, improve health care, enact public policies to stop diabetes, and end discrimination against those denied their rights because of the disease; and supports individuals and communities by connecting them with the resources they need to prevent diabetes and better manage the disease and its devastating complications.

According to the Centers for Disease Control and Prevention, over 11.4% of adults in Georgia have diagnosed diabetes (footnote 1). Access to affordable, adequate health coverage is critically important for all people with, and at risk for, diabetes. Adults with diabetes are disproportionately covered by Medicaid (footnote 2). For low-income individuals, access to Medicaid coverage is essential to managing their health. As a result of inconsistent access to Medicaid across the nation, these low-income populations experience great disparities in access to care and health status, which is reflected in geographic, race and ethnic differences in morbidity and mortality from preventable and treatable conditions.

Expanding Medicaid Eligibility

Medicaid expansion made available through the Affordable Care Act (ACA) offers promise of significantly reducing disparities in access to care and health status. Specifically, in Medicaid expansion states, more individuals are being screened for and diagnosed with diabetes than states that haven't expanded (footnote 3). Additionally, a new study found expansion states have a higher rate of prescription fills for diabetes medications than non-expansion states (footnote 4). Regular medication use with no gap in health insurance coverage leads to fewer hospitalizations and less use of acute care facilities (footnotes 5,6). The ADA applauds the state of Georgia for taking the steps to expand access under Medicaid, but recommends the state take advantage of full expansion, ensuring all low-income Georgians have access to adequate, affordable health care coverage.

Work Requirements

The ADA is deeply concerned by Georgia's waiver to limit or revoke certain Medicaid beneficiaries' enrollment if they do not meet proposed community engagement standards. This type of coverage limit is in direct conflict with the Medicaid program's objective to offer health coverage to those without access to care. Most people with Medicaid who can work, do so. Nearly 8 in 10 non-disabled adults with Medicaid coverage live in working families, and nearly 60% are working themselves. Of those not working, more than one-third reported that illness or disability was the primary reason; 28% reported they were taking care of home or family; and 18% were in school (footnote 7). For people who face major obstacles to employment, harsh Medicaid requirements will not help to overcome them. In addition, research shows work requirements are not likely to have a positive impact on long-term employment (footnote 8). In a recent study of the Arkansas Medicaid work requirements, researchers found that 95% of the target population appeared to meet the requirements or qualified for an exemption, and yet there was still significant loss in coverage due to lack of awareness and confusion about the reporting requirements (footnote 9). Instituting a work requirement could lead to higher uninsured rates and higher emergency room visits by uninsured individuals who would have been

eligible for Medicaid coverage, and increase the administrative burden for the state and its Medicaid managed care plans (footnotes 10,11).

A study by the National Bureau of Economic Research concluded Medicaid coverage increases utilization of primary and preventive services, lowers out-of-pocket medical spending and medical debt, and results in better self-reported physical and mental health (footnote 12). The CDC data show prevention programs and early detection can prevent the onset of type 2 diabetes and reduce state spending (footnote 13). Georgia's waiver to limit access to Medicaid services through the implementation of work requirements will decrease access to care for low-income Georgia residents with diabetes and increase state health care costs. The Department should retract its request to tie Medicaid eligibility to documentation of community engagement.

Administrative Burden

Under this proposed waiver, individuals will need to either prove they meet certain exemptions or provide evidence of the number of hours they have worked which significantly increases the administrative burden of health care. It is highly likely that increasing the administrative requirements to maintain eligibility will result in fewer individuals with Medicaid coverage, even for those who meet the requirements or qualify for an exemption. An analysis of expected Medicaid disenrollment rates after implementation of work requirements shows most disenrollment would be due to administrative burdens or red tape (footnotes 14,15). Medicaid enrollees who are working may experience difficulty obtaining the required documentation from their employer on a timely basis.

Diabetes is a complex, chronic illness that requires continuous medical care (footnote 16) so Medicaid enrollees with diabetes cannot afford a sudden gap in health insurance coverage. A recent study found that patients with type 1 diabetes who experience a gap or interruption in coverage, are five times more likely than those with continuous coverage to use acute care services (i.e. urgent care facilities or emergency departments)(footnote 17). Adding administrative barriers and burdens will impede access to health services that Georgia residents with diabetes need.

Cost-Sharing

The ADA has great concern with Georgia's proposal to impose premiums for its Medicaid population. Imposing premiums on individuals with incomes below 100% of the federal poverty line (FPL) is incompatible with the objectives of the Medicaid program. A Kaiser Family Foundation review of research related to cost-sharing and premiums in state Medicaid and CHIP programs found that "[f]or individuals with low income and significant health care needs, cost sharing can act as a barrier to accessing care, including effectiveness and essential services, which can lead to adverse health outcomes (foonote 18)." In addition, premiums can prevent individuals from enrolling in and maintaining coverage (foonote 19). Disenrolling individuals with diabetes from Medicaid coverage due to their inability to pay could have a negative impact on their ability to manage the disease, which could result in significantly increased health care costs for the state in the long term. The ADA strongly urges the Department to retract its request to impose a premium as a condition of Medicaid eligibility.

Previous Recommendations

A core objective of the Medicaid program is to serve the health and wellness of our nation's vulnerable and low-income individuals and families. Under these 1115 Waivers, states have the opportunity to "focus on evidence-based interventions that drive better health outcomes and quality of life improvements"(footnote 20). As the State of Georgia continues to develop its Section 1115 waiver application, the ADA continues to recommend the state focus on expanding access to evidence-based programs that can improve the health of Georgia residents and decrease state health care costs.

Covering the Diabetes Prevention Program in Medicaid

Almost 2.6 million Georgians, or 36.1%, have prediabetes, a condition with blood glucose levels higher than normal but not yet high enough for diabetes (footnote 21). The Diabetes Prevention Program (DPP), a structured lifestyle intervention consisting of intensive education, guidance and support for healthier eating and improved physical activity, has been shown to delay or prevent progression to type 2 diabetes in 58% of participants (footnote 22).

At least twelve state Medicaid programs have taken steps to provide Medicaid coverage for the DPP, utilizing a variety of authorities. In March 2019, the Centers for Medicare and Medicaid Services (CMS) approved an

amendment to Maryland's Health Choices 1115 Waiver, to provide CDC-recognized DPP services to Medicaid enrollees. In that approval, CMS concluded that Maryland's Health Choices DPP would improve outcomes (footnote 23). The ADA believes that providing DPP coverage for Medicaid beneficiaries would strengthen Georgia's 1115 Waiver application and Georgia Medicaid as a whole. In fact, if just 35% of Georgia residents with prediabetes participated in the DPP, more than 73,000 years of life with diabetes could be averted over 10 years (footnote 24).

Medicaid coverage of DPP would complement and reinforce the efforts of other payers to promote access to DPP. Medicare Part B began covering DPP for its enrollees in 2018 nationally, through both in-person and online delivery methods. Employers and commercial plans are investing in DPP coverage as well (footnote 25). By joining these efforts, Georgia Medicaid can help scale and expand delivery of this evidence-based intervention to communities throughout the state- and begin to beat back the growing economic and human costs associated with type 2 diabetes.

Conclusion

The ADA appreciates the opportunity to provide our comments on the 1115 Waiver, however, we are concerned that by portions of this Waiver Application. We request the Department retract this 1115 Waiver as it creates barriers to affordable, adequate healthcare for low-income Georgians with diabetes who rely on the program.

Our comments include numerous citations to supporting research, including direct links to the research for the benefit of the Department in reviewing our comments. We direct the Department to each of the studies cited – made available through active hyperlinks – and we request that the full text of each of the studies cited, along with the full text of our comments, be considered part of the administrative record in this matter for purposes of the Administrative Procedure Act. If you have any questions, please contact: Veronica De La Garza at vdelagarza@diabetes.org or 1-800-676-4065, ext. 6017.

Sincerely,

Veronica De La Garza
Director, State Government Affairs
American Diabetes Association
2451 Crystal Drive, Suite 900
Arlington, VA 22202

Footnotes:

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(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * American Diabetes Association

Stakeholder Type * Advocacy Group

First Name * [REDACTED] **Last Name *** De La Garza

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Virginia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

Ryan Loke
c/o The Office of the Governor
206 Washington Street, Suite 115
State Capitol
Atlanta, GA 30334

Re: Georgia Section 1332 Waiver Application

Dear Mr. Loke:

On behalf of the more than 30 million Americans living with diabetes and the 84 million more with prediabetes, the American Diabetes Association (ADA) provides the following comments on the State of Georgia's draft Section 1332 Waiver Application.

As the global authority on diabetes, the ADA funds research to better understand, prevent and manage diabetes and its complications; publishes the world's two most respected scientific journals in the field, Diabetes and Diabetes Care; sets the standards for diabetes care; holds the world's most respected diabetes scientific and educational conferences; advocates to increase research funding, improve health care, enact public policies to stop diabetes, and end discrimination against those denied their rights because of the disease; and supports individuals and communities by connecting them with the resources they need to prevent diabetes and better manage the disease and its devastating complications.

We support state innovation that increases access to comprehensive and affordable health coverage and applaud the State's plan to establish a waiver-funded reinsurance program to improve the affordability of Affordable Care Act (ACA) compliant individual market health insurance.

We are deeply troubled by, and strongly oppose, the State's proposal to eliminate the option for consumers to enroll in coverage through the federal marketplace website and to use federal coverage subsidies to promote enrollment in insurance products that are exempt from critical consumer protections. These proposals will undermine access to and the affordability of comprehensive health coverage for Georgians with preexisting conditions. Not only are these policies harmful to the individuals we represent and to thousands of other Georgians who rely on comprehensive coverage to meet their care needs, they violate the statutory requirements of the waiver program and cannot be lawfully approved or implemented. We strongly urge the State to reconsider its approach and we stand ready to assist policymakers in the development of lawful policy reforms that will reduce the uninsurance rate and make comprehensive coverage more affordable for more Georgians.

Reinsurance

We support the State's proposal to establish an individual market reinsurance program beginning in plan year 2021. Reinsurance programs are proven tools for providing market stability and moderating premiums, to the direct benefit of consumers. Medicare Part D includes a reinsurance program, and the temporary program established by ACA lowered individual market premiums by 10 to 14 percent in 2014. Since that program lapsed, 12 states have received federal approval to use a Section 1332 waiver to fund state-operated reinsurance programs.

These efforts have made a real difference for consumers. All 12 states with waiver-funded reinsurance have experienced, or are set to experience in 2020, substantial decreases in premium rates — average statewide reductions have ranged from 6 to 30 percent — as a result of these programs. It appears likely that Georgia's

reductions have ranged from 6 to 30 percent — as a result of these programs. It appears likely that Georgia’s proposed reinsurance program would produce similar benefits in 2021. If not otherwise undermined by the counterproductive policies described in the “Georgia Access Model,” reinsurance could be expected to promote stability and competition in the State’s private insurance market in the years that follow.

Georgia Access Model

Unfortunately, the Georgia Access Model would impose substantial and highly disruptive changes on the State’s individual market that would offset the benefits of the proposed reinsurance program and harm the many thousands of Georgians who rely on the existing market for comprehensive coverage.

The State would terminate residents’ access to federal premium and cost-sharing assistance. It would establish, instead, a less generous program that caps the total amount of assistance money Georgians can receive and promotes enrollment in deficient insurance products, making comprehensive coverage more expensive.

The State would also prohibit residents from using the federal enrollment platform. Though the application claims this limitation will improve the enrollment experience for consumers, it would, instead, eliminate a widely used option for obtaining comprehensive health coverage and rely exclusively on industry-run and third-party enrollment options that consumers have access to already.

The State would undertake these changes “to spur innovation” (footnote 1). Yet many Georgians who now rely on federal subsidies to afford coverage will almost certainly be cut off from financial help due to the “innovative” program rules described in the application, while others who depend on comprehensive coverage are likely to have fewer plan choices and higher premiums. Meanwhile, state promotion of third-party websites that sell deficient insurance products alongside comprehensive coverage is likely to deepen consumer confusion and increase the risk that individuals will be steered to plans that do not meet their needs or expectations.

In sweeping aside these serious and foreseeable harms, the State relies not so much on actuarial analysis as it does on conclusory assertions. The State’s application omits several key analyses necessary for evaluating the probable effects of the waiver and bases its claimed compliance with the federal guardrails on assumptions unsupported by analysis.

In so doing, Georgia may hope to avail itself of the new flexibilities in waiver design that have been offered to states in recent federal guidance. We believe the policy changes announced in the October 2018 waiver guidance are clearly inconsistent with federal law and that the guidance itself — which was issued in the absence of notice and comment rulemaking and has been determined by the Government Accountability Office to constitute a rule — is procedurally invalid (footnote 2). Yet, the Georgia Access Model fails to satisfy even the lax standards of that document, which requires more from states than unsupported assertions of adherence to federal law.

The Waiver Program Would Segment the State’s Insurance Market, Harming Georgians with Preexisting Conditions

The State’s proposal would divert federal financial assistance used by Georgians to enroll in comprehensive health coverage for use in promoting the sale of what would be, in effect, a new class of insurance product not subject to the same consumer protection standards as the current individual market. These “Eligible non-QHPs” are designed to market coverage that provides skimpier benefits and fewer cost-sharing protections than permissible under current law. Though the application states that these plans must “maintain protections for those with preexisting conditions” and may not medically underwrite, it declines to go beyond these generalities, making it impossible for the public to understand specifically what these new and less regulated plans can, and cannot do. Can Eligible non-QHPs charge consumers a higher premium based on gender or age? May they impose annual or lifetime limits on the benefits they choose to cover? Though the State asserts that Eligible non-QHPs will remain in the single risk pool, how will risk adjustment function, given that the plans will operate under different rules than the rest of the market?(footnote 3). The application is silent on these critical questions.

The proposal is clear, however, in its intention to exempt Eligible non-QHPs from otherwise applicable benefit and cost-sharing requirements. In markets where insurers can avoid covering critical benefits and services used by people with preexisting conditions, experience shows that insurers take advantage. It is well documented that in the years before passage of the ACA, individual health insurance routinely excluded

coverage for mental health services and substance use disorders, maternity care, and prescription drugs (footnote 4). Similarly today, short-term plans, which are exempt from the essential health benefits (EHB) requirement, commonly exclude coverage for these same essential benefits as a way of reducing exposure to unhealthy risks and increasing profits (footnote 5). Because they have critical gaps in coverage, these products are far less attractive to people who expect to use medical care, such as individuals with diabetes. Instead, they draw healthy consumers away from the wider market, cherry picking low-cost enrollees while individuals with preexisting conditions seek out comprehensive coverage options. This dynamic causes the market for comprehensive coverage to become smaller, sicker, and more expensive, with serious consequences. Those who rely on comprehensive plans to address their care needs — the people we represent and many others with preexisting conditions — face higher costs, fewer plan choices, and an increased risk that the insurers who offer such coverage will cease to do so altogether.

The October 2018 waiver guidance articulated five new principles that the federal administration expects states to consider and advance when developing a waiver program. The State's application claims that the Georgia Access Model "aligns with and advances" four of these principles (footnote 6). The fifth principle asks states to "[s]upport and empower those in need. Americans should have access to affordable, high value health insurance" (footnote 7). Tellingly, the State does not even attempt to argue that its program aligns with and advances this goal.

We strongly urge the State to withdraw the Georgia Access Model and to consider only those reforms that do not harm people with preexisting conditions by dividing the market between healthy and sick.

The Waiver Program Would Promote Enrollment in Limited Benefit Products and Jeopardize Georgians' Access to Comprehensive Health Insurance

To receive approval, a Section 1332 waiver application must demonstrate that "it will provide coverage that is at least as comprehensive as the coverage defined in section 1302(b)" of the ACA and offered by Qualified Health Plans (QHPs) on the marketplace. The Georgia Access Model seeks to take federal dollars used by Georgians to enroll in coverage that offers EHB protections and use some of those funds to subsidize enrollment in a new coverage product that is entirely exempt from the EHB protections of section 1302(b). The proposal, in other words, is designed to funnel federal dollars toward providing and promoting coverage that fails the federal statutory requirement.

The application appears to try to obscure the logical implications of this approach by grounding its guardrail analysis on the assumption that the new "Eligible non-QHPs" will cover 90% of the benefits that real QHPs do (footnote 8). This assumption is without basis. The application provides no explanation or analysis to suggest how it reached this conclusion. Experience shows the opposite. As described above, insurance products sold in markets operating under similar tax rules typically offer far fewer benefits than QHPs. The State's assumption to the contrary is implausible and does not accurately assess the degree to which Eligible non-QHPs are likely to diverge from comprehensive coverage.

In addition, the application repeatedly assures readers that the Georgia Access Model will not eliminate QHPs or otherwise affect the availability of these comprehensive plans. Yet, reading further into the document reveals these promises, too, stem from a baseless assumption. The State's guardrail analysis "assume[s] insurers will continue to offer QHPs that cover all ten EHBs. Under this assumption, the waiver does not change the availability of QHPs". (footnote 9). This assumption is made without justification or analysis and runs counter to what we expect from a market structured in the manner that the State proposes (footnote 10). Required to demonstrate how its proposal complies with the federal law guardrails, the State instead offers "analysis" that takes as a given the very condition it is supposed to be testing for: the guardrails are met, it says, because we assume for the purpose of analysis that they are met. There is no doubt that "analysis" in this application fails federal requirements.

The Waiver Program Would Increase the Cost of Comprehensive Coverage, While the Funding Cap Would Cause Georgians to Lose the Premium and Cost-Sharing Assistance They Now Receive

The State must also demonstrate that its waiver program "will provide coverage and cost sharing protections against excessive out-of-pocket spending that are at least as affordable" as those provided under the ACA.

The State acknowledges that, by promoting enrollment in limited benefit products, it will trigger adverse selection against the market for comprehensive health plans and, in so doing, will cause comprehensive coverage to become more expensive (footnote 11). Relying on the same assumptions identified above — that

non-Eligible QHPs will voluntarily offer 90% of QHP benefits and that QHP availability will be unaffected by the State's upending of the market rules — the state projects the cost of comprehensive plans will rise only 1.1% (footnote 12). As explained above, the assumptions underlying this estimate are without basis and are at odds with analysis of markets similar to the one Georgia seeks. Accordingly, the State's projection that its proposal will only modestly increase premiums does not meet the federal Section 1332 application requirements. Though the application asserts Eligible non-QHPs will choose to offer similar benefits to QHPs, it expressly declines to make any claims about how generous these new products will be with respect to cost-sharing. In other words, an Eligible non-QHP that, improbably, were to offer 90% of a QHP's benefits could be expected to impose severe cost-sharing limitations that would make the actuarial value of the product far lower than its QHP counterpart.

For these reasons, it is likely that the waiver program will cause greater adverse selection than the State acknowledges and increase the cost of comprehensive coverage by far more than its estimates allow. This would hurt Georgians in at least two ways.

First, unsubsidized enrollees who require comprehensive coverage — for example, to manage a chronic condition, such as diabetes, or to receive mental health or substance use disorder services — will be forced to pay substantially higher premiums to maintain access to the care they need. Of course, those who are now healthy but unexpectedly develop a need for expensive care will face a similar hardship when choosing a new plan.

Second, the State will reach its self-imposed subsidy funding cap far earlier than it anticipates (footnote 13). Because the State's coverage subsidies will be tied to the price of a QHP, program choices that have the effect of inflating the cost of comprehensive coverage will also inflate the per-person cost of the subsidy. But while, as the application admits, these higher costs should be "entirely born[e] by the State," the program's funding cap would in fact limit the State's commitment (footnote 14). Instead, and by design, the State would shift the cost burden to its lower- and middle-income residents. When the State hits its funding cap, Georgians who otherwise would receive federal premium and cost-sharing assistance will, instead, receive nothing. These individuals will be forced to choose whether to pay the full cost of coverage — in the case of comprehensive plans, the waiver-inflated cost — or go uninsured. Residents who become eligible for coverage and subsidies mid-year —because, for example, they lose coverage through their employer, or age off of a parent's plan— would be at particular risk for being left behind by the State's reforms. A subsidy cap such as the one Georgia proposes cannot be squared with the plain language of the affordability guardrail.

Finally, it appears the waiver program may deprive Georgians of affordable coverage by eliminating, without replacement, the federal cost-sharing assistance relied on by nearly 300,000 residents (footnote 15). The State proposes to waive in its entirety Section 1402 of the ACA, which establishes the law's cost-sharing reduction (CSR) subsidy. Though federal funding for CSRs was cut off in 2017, eligible consumers continue to receive this valuable assistance because insurers are required by federal law — specifically, Section 1402 — to provide it. Were this section rendered inoperative in Georgia, insurers in the State would no longer be obligated to enroll eligible consumers in reduced cost-sharing plans. Without this assistance, these low-income consumers would be exposed to thousands of dollars in increased cost-sharing (footnote 16). The application suggests the State will utilize the "same . . . federal subsidy structure" as is currently in place. However, there is no explicit mention in the application of a cost-sharing component to the state subsidy program. Were the Georgia Access Model not to provide cost-sharing assistance as protective to consumers as the CSR subsidy, it would be an enormous omission that on its own would cause the application to fail.

The Waiver Program Would Reduce the Number of Georgians with Comprehensive Health Insurance

Federal law requires the State to show that its waiver program "will provide coverage to at least a comparable number of its residents as the provisions of [Title I of the ACA] would provide." The Georgia Access Model, by design, would promote enrollment in coverage products that do not comply with Title I of the ACA. According to the application, this approach will cause the number of Georgians insured by comprehensive coverage to decrease by at least 10 percent. We understand the October 2018 waiver guidance purports to allow for the approval of a program that lowers enrollment in comprehensive coverage, so long as it offsets these losses with gains in non-ACA-compliant products. As noted above, it appears this guidance is procedurally invalid.

The State's waiver program would require consumers to purchase coverage directly from a private insurer, or via web and traditional brokers, many of whom receive substantially higher commissions for enrolling individuals in non-ACA-compliant coverage than in comprehensive coverage. Given the substantial risk of consumer confusion regarding the features and limitations of the various disparate insurance products the

State expects will be marketed by these entities (which include not just QHPs and Eligible non-QHPs, but also “accident supplemental plans, critical illness plans, limited-benefit plans, short-term limited duration plans” and more), it is likely that at least some consumers will land in non-comprehensive products that do not align with their needs and expectations (footnote 17).

The Application Fails to Account Fully for the Waiver Program's Effects on the Federal Budget

The application contains estimates of the approximate amount of federal pass-through dollars that will be available to the State to help fund the waiver program. However, the State's analysis significantly underestimates the amount by which the program is likely to reduce federal revenues. In particular, because the waiver program would eliminate federal premium tax credits in Georgia, employers of Georgia residents would no longer be liable for employer shared responsibility payments with respect to their Georgia employees (footnote 18). Once properly accounted for, these lost revenues will materially reduce the federal funding available for what is already an insufficiently funded subsidy program.

The Application Provides Insufficient Information to Assess the State's Ability to Implement the Waiver Program on Time and Without Disruption for the More than 450,000 Georgians Who Depend on the Current Enrollment and Subsidy Framework

The State's plan to cease enrollment through HealthCare.gov, direct the more than 450,000 Georgians who use that platform to alternate enrollment pathways, and at the same time implement a new state subsidy program (and communicate those critical details to enrollees) is a substantial undertaking, posing a significant risk of disruption to consumers' coverage and finances. The State recognizes, correctly, that these proposals will require a “detailed transition strategy, including thoughtful and clear communication for consumers and the public”(footnote 19). Yet while we do not expect a fully articulated transition strategy to be contained in the application, the State has provided scant information about how it will address the various significant technical, operational, and administrative challenges it hopes to undertake. As but one example, the State says it will use the same subsidy eligibility and program parameters for its subsidy program as are currently in place. This suggests the State will authorize and administer an advanceable premium tax credit and a cost-sharing reduction subsidy, the former of which will require annual reconciliation at tax time. Reconciliation is a complicated process to administer, and to communicate to the public. Not only is there no information in the application about how this would occur, it is not even fully clear that this is, in fact, the State's plan. In the application's current form, it is impossible to assess the State's claims about the timing and implementation of its ambitious reforms.

Conclusion

Thank you for the opportunity to provide these comments. Our comments include numerous citations to supporting research, including direct links to the research for the benefit of the Department in reviewing our comments. We direct the Department to each of the studies cited – made available through active hyperlinks – and we request that the full text of each of the studies cited, along with the full text of our comments, be considered part of the administrative record in this matter for purposes of the Administrative Procedure Act. If you have any questions, please contact: Veronica De La Garza at vdelagarza@diabetes.org or 1-800-676-4065, ext. 6017.

Sincerely,

Veronica De La Garza
Director, State Government Affairs
American Diabetes Association
2451 Crystal Drive, Suite 900
Arlington, VA 22202

Footnotes:

1. “Georgia Section 1332 Waiver Application,” Nov. 4, 2019, at 7.
2. U.S. Government Accountability Office, “Department of Health and Human Services and Department of the Treasury—Applicability of the Congressional Review Act to State Relief and Empowerment Waivers,” GAO, July 15, 2019; Christen Linke Young, “The Trump Administration Side-Stepped Rulemaking Processes on the ACA's State Innovation Waivers—and It Could Make Their New Section 1332 Guidance Invalid,” The Brookings Institution, Nov. 28, 2018.

3. American Academy of Actuaries, "How Changes to Health Insurance Market Rules Would Affect Risk Adjustment," May 2017
4. Office of the Assistant Secretary for Planning and Evaluation, "Essential Health Benefits: Individual Market Coverage," U.S. Department of Health & Human Services (HHS), Dec. 16, 2011; Michelle M. Doty, Sara R. Collins, Jennifer L. Kriss et al., "Failure to Protect: Why the Individual Insurance Market Is Not a Viable Option for Most U.S. Families," The Commonwealth Fund, July 21, 2009; see also Dania Palanker, JoAnn Volk, and Justin Giovannelli, "Eliminating Essential Health Benefits Will Shift Financial Risk Back to Consumers," The Commonwealth Fund, March 24, 2017.
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6. Georgia Section 1332 Waiver Application at 24.
7. <https://www.federalregister.gov/documents/2018/10/24/2018-23182/state-relief-and-empowerment-waivers>
8. Georgia Section 1332 Waiver Application at 53.
9. Id. at 42. See also id. at 53 ("The actuarial modeling also assumes that currently available QHPs will continue to be available in all rating areas").
10. Gary Claxton, Karen Pollitz, Ashley Semanskee, and Larry Levitt, "Would States Eliminate Key Benefits if AHCA Waivers are Enacted?" Kaiser Family Foundation, Jun. 14, 2017. Congressional Budget Office, Cost Estimate: H.R. 1628, American Health Care Act of 2017, May 24, 2017. PricewaterhouseCoopers, LLP, "Challenges of partial reform – Lessons from State Efforts to Reform the Individual and Small Group Market Before the Affordable Care Act," California Health Care Foundation, Feb. 2017. Adele Kirk, "Riding the Bull: Experience with Individual Market Reform in Washington, Kentucky, and Massachusetts," Journal of Health Politics, Policy and Law 25(1), 2000.
11. Georgia Section 1332 Waiver Application at 53.
12. Id. at 54.
13. Id. at 20 (anticipating hitting the cap but downplaying its impact on existing consumers).
14. Id. at 54.
15. Centers for Medicare & Medicaid Services (CMS), 2019 Marketplace Open Enrollment Period Public Use Files, Nov. 2019.
16. Kaiser Family Foundation, Explaining Health Care Reform: Questions About Health Insurance Subsidies, Nov. 20, 2018.
17. Georgia Section 1332 Waiver Application at 23.
18. Centers for Medicare and Medicaid Services, Letter to Commissioner Doug Ommen from Randy Pate, Director of the Center for Consumer Information & Insurance Oversight, Oct. 19, 2017.
19. Georgia Section 1332 Waiver Application at 18.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * American Heart Association

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Cortes

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

December 3, 2019

Lynette Rhodes
Medicaid Director
State of Georgia, Department of Community Health
2 Peachtree Street, NW
Atlanta, GA 30303

Re: Georgia – 1115 Georgia Pathways Waiver

Dear Ms. Rhodes,

The American Heart Association (AHA) appreciates the opportunity to submit comments on Georgia's 1115 Demonstration Waiver Application for its Georgia Pathways to Coverage initiative.

The AHA believes everyone, including Medicaid enrollees, should have access to quality and affordable health coverage. As the nation's oldest and largest organization dedicated to fighting heart disease and stroke, the AHA represents over 100 million patients with cardiovascular disease (CVD) including many who rely on Medicaid as their primary source of care.

Nationally, twenty-eight percent of adults with Medicaid coverage have a history of cardiovascular disease. Medicaid provides critical access to prevention, treatment, disease management, and care coordination services for these individuals. Because low-income populations are disproportionately affected by CVD – with these adults reporting higher rates of heart disease, hypertension, and stroke – Medicaid serves as the coverage backbone for the healthcare services these individuals need.

The Georgia Pathways plan is not a sufficient solution to improve access to quality and affordable healthcare for low-income Georgians. The state estimates that approximately 50,000 individuals would gain coverage under the plan, whereas over 500,000 Georgians could access coverage if the state fully expanded its Medicaid program.

The American Heart Association is concerned with the Georgia Pathways program and offers the following comments on the draft waiver application.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

Under the Georgia Pathways plan, only individuals with incomes below 100 percent of the federal poverty level (\$1,778 per month for a family of three) who can prove that they work at least 80 hours per month would be eligible for Medicaid. This will drastically limit the number of patients with cardiovascular disease and other serious and chronic health conditions who will receive access to the quality and affordable healthcare coverage that they need.

No exemption criteria can prevent the potential coverage losses associated with work reporting requirements; however, Georgia has not proposed any exemption criteria that would allow individuals who are unable to meet the work reporting requirements to apply for coverage. This means that patients who have serious health conditions that prevent them from working 80 hours per month would have no pathway to coverage that could help them to treat these conditions.

Once enrolled, individuals may be able to qualify for short-term exemptions in certain situations. Still, exemption criteria risk not capture all individuals with serious and chronic health conditions that prevent them from working. Regardless, even exempt enrollees may have to report their exemption, creating opportunities for administrative error to jeopardize coverage.

For the first six months, enrollees will have the significant administrative burden of reporting their hours and work activities monthly, which will likely decrease the number of individuals with Medicaid coverage. For example, Arkansas also implemented a work reporting requirement where Medicaid enrollees had to report their hours worked or their exemption. During the first six months of implementation, the state terminated coverage for over 18,000 individuals. Georgia has not provided an estimate of the coverage losses associated with this proposal in its waiver application.

Failing to navigate these burdensome administrative requirements could have serious, life or death, consequences for people with cardiovascular disease. If the state finds that individuals have failed to comply for one month, their coverage will be suspended, and if the state finds that individuals have failed to comply for three months, they will be disenrolled. To treat and prevent heart disease and stroke, it is critically important to ensure that everyone in Georgia – regardless of employment status – has access to affordable, quality healthcare.

If individuals can meet the reporting requirements for six consecutive months, they will be exempt from further reporting and re-evaluated for eligibility during their annual redetermination. However, if individuals do not report a change in their employment status, they will be responsible for any capitation and cost-sharing expenses. This exposes already low-income individuals to enormous financial risk. Research suggests that premiums and cost sharing may not result in the intended cost-savings for programs. What research does show, is that low-income individuals served by Medicaid are more sensitive to costs compared to others, more likely to go without needed care, and more likely to experience longer-term adverse outcomes. A study of enrollees in Oregon's Medicaid program demonstrated that implementation of a co-pay on emergency services resulted in decreased utilization of such services, but did not result in the intended cost savings because of subsequent use of more intensive and expensive services. The results of the study suggest this policy may cause inappropriate delays in needed care. Therefore this proposal will likely fail to meet its intended goal while harming patients at the same time.

If Georgia truly cares about incentivizing and promoting employment, full Medicaid expansion would be the best way to achieve this goal. In a report looking at the impact of Medicaid expansion in Ohio, the majority of enrollees reported that being enrolled in Medicaid made it easier to work or look for work (83.5 percent and 60 percent, respectively). That report also found that many enrollees were able to get treatment for previously untreated health conditions, which made finding work easier. Preventing individuals from enrolling in Medicaid coverage until they comply with these requirements will therefore hurt rather than help people search for and obtain employment.

Finally, Georgia would be the first state to require enrollees to comply with the work reporting requirement prior to enrolling in the Medicaid program with no opportunity to demonstrate a medical or other exemption. Changing the eligibility for Medicaid is the sole purview of Congress and cannot be waived. The American Heart Association opposes this policy.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comments *

Financial Barriers

For the few individuals who meet the limited eligibility criteria, this proposal still creates numerous financial barriers that jeopardize their coverage. Individuals with incomes above 50 percent of the federal poverty level will pay monthly premiums and lose coverage if they fail to pay premiums for three months. This will likely both increase the number of enrollees who lose Medicaid coverage and also discourage eligible people from enrolling in the program. Research has shown that even relatively low levels of cost-sharing for low-income populations limit the use of necessary healthcare services. When Oregon implemented a maximum premium in its Medicaid program of \$20 per month, almost half of enrollees lost coverage. Beneficiaries who fail to meet this requirement would lose their coverage, which places a substantial and life-threatening barrier to care for patients with cardiovascular disease.

This policy will not only apply to – and jeopardize coverage for – new enrollees, but for individuals who are currently enrolled in Medicaid through the Transitional Medical Assistance (TMA) program. The American Heart Association believes that these premiums will create significant financial barriers for patients that jeopardize their access to needed care and therefore opposes this policy.

Georgia's premium proposal also includes a surcharge for tobacco users. Surcharges have not been proven effective in helping smokers quit and reducing tobacco use. Recent studies from Health Affairs and the Center for Health and Economics Policy at the Institute for Public Health at Washington University have suggested that tobacco surcharges lead individuals to forgo health insurance rather than paying the surcharge. The American Heart Association opposes this surcharge.

Finally, Georgia's proposal also includes several copayments for individuals with incomes above 50 percent of the federal poverty level that could be a significant financial burden for patients. The most egregious of these is a \$30 copay for non-emergency use of the emergency department (ED). This policy could deter people from seeking necessary care during an emergency. Even a small delay seeking treatment for a heart attack or stroke could be the difference between life and death and should not be a concern that patients are forced to navigate.

People should not be financially penalized for seeking lifesaving care for a heart attack or any other critical health problem that requires immediate care. When people do experience severe symptoms, they should not try to self-diagnose their condition or worry that they cannot afford to seek care. The American Heart Association opposes this punitive proposal for a \$30 copayment for non-emergent use of the ED.

Reduced Benefits

Under the plan, individuals would be required to enroll in employer sponsored insurance (ESI) if it is available and determined to be cost effective for the state. However, Georgia would not provide any wraparound services for individuals regardless of the benefit package in their ESI. The American Heart Association is also concerned that these criteria may not effectively support all individuals with, or at risk of, serious and chronic health conditions that prevent them from working, including those with CVD. Individuals with chronic disease, women, African Americans and those living in rural communities will be disproportionately impacted by the new requirements. The outlined exemptions are not sufficient to protect patients. In Arkansas, many individuals were unaware of the new requirements and therefore unaware that they needed to apply for specific exceptions. Additionally, Georgia will not help individuals with the costs of coinsurance or deductibles required in their ESI. This poses a serious risk to the health of the people we represent. The American Heart Association opposes the requirement to enroll in ESI without wraparound services and full financial protection for patients.

The state has also requested to waive non-emergency transportation (NEMT) for the entire demonstration population. NEMT helps low-income patients overcome barriers to care due to transportation and allows patients to keep appointments with doctors and other healthcare providers. For example, one study found patients with asthma, hypertension or heart disease who needed multiple visits to a medical professional to maintain their health were more likely to keep their appointments if they had NEMT. NEMT is an important benefit for patients with cardiovascular needs who need to get to and from medical services but have no means of transportation. The American Heart Association opposes a waiver of NEMT.

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Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

Administering all of these requirements will be expensive for the state of Georgia. States such as Kentucky, Tennessee and Virginia have estimated that setting up the administrative systems to track and work activities alone will cost tens of millions of dollars. This would divert federal resources from Medicaid's core goal – providing health coverage to those without access to care – and compromise the fiscal health of Georgia's Medicaid program.

The American Heart Association opposes this waiver proposal, and instead we urge focus on solutions that promote adequate, affordable and accessible coverage, including a full expansion of the state's Medicaid program. Thank you for the opportunity to share our thoughts with you as you work to address this issue. If you have any questions or would like to discuss these comments further, please contact Michael Cortes, Georgia Government Relations Director for the American Heart Association at Michael.Cortes@heart.org or 678.224.2085.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

December 3, 2019

Lynette Rhodes
Medicaid Director
State of Georgia, Department of Community Health
2 Peachtree Street, NW
Atlanta, GA 30303

Re: Georgia – 1332 Waiver Application for a Reinsurance Program

Dear Ms. Rhodes,

The American Heart Association (AHA) appreciates the opportunity to submit comments on Georgia's Section 1332 Waiver Application for a reinsurance program.

The AHA believes everyone, including Medicaid enrollees, should have access to quality and affordable health coverage. As the nation's oldest and largest organization dedicated to fighting heart disease and stroke, the AHA represents over 100 million patients with cardiovascular disease (CVD) including many who rely on Medicaid as their primary source of care.

Nationally, twenty-eight percent of adults with Medicaid coverage have a history of cardiovascular disease. Medicaid provides critical access to prevention, treatment, disease management, and care coordination services for these individuals. Because low-income populations are disproportionately affected by CVD – with these adults reporting higher rates of heart disease, hypertension, and stroke – Medicaid serves as the coverage backbone for the healthcare services these individuals need.

The American Heart Association supports the use of reinsurance programs to strengthen state marketplaces.

Reinsurance is an important tool to help stabilize health insurance markets. Reinsurance programs have been used to stabilize premiums in a number of healthcare programs, such as Medicare Part D. A temporary reinsurance fund for the individual market was also established under the Affordable Care Act and reduced premiums by an estimated 10 to 14 percent in its first year. Analysis by Avalere of seven states that have already created their own reinsurance programs through Section 1332 waivers found that these states reduced individual market premiums by an average of 19.9 percent in their first year.

Georgia's proposal will create a reinsurance program starting for the 2021 plan year. This program is projected to reduce premiums by 10 percent and increase the number of individuals obtaining health insurance through the individual market by about 1,400. This would help patients with pre-existing conditions, including patients with cardiovascular disease, obtain affordable, comprehensive coverage.

While the American Heart Association supports reinsurance as a tool to stabilize premiums in the individual marketplace, we are deeply concerned that the remainder of the state's 1332 Waiver Application will jeopardize access to quality and affordable healthcare coverage for patients with cardiovascular disease and other pre-existing conditions, as we have outlined in our related comments on the Georgia Access Model. Thank you for the opportunity to share our thoughts with you as you work to address this issue. If you have any questions or would like to discuss these comments further, please contact Michael Cortes, Georgia Government Relations Director for the American Heart Association at Michael.Cortes@heart.org or 678.224.2085.

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Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

December 3, 2019

Lynette Rhodes
Medicaid Director
State of Georgia, Department of Community Health
2 Peachtree Street, NW
Atlanta, GA 30303

Re: Georgia – 1332 Waiver Application for the Georgia Access Model

Dear Ms. Rhodes,

The American Heart Association (AHA) appreciates the opportunity to submit comments on Georgia's Section 1332 Waiver Application to implement the Georgia Access Model.

The AHA believes everyone, including Medicaid enrollees, should have access to quality and affordable health coverage. As the nation's oldest and largest organization dedicated to fighting heart disease and stroke, the AHA represents over 100 million patients with cardiovascular disease (CVD) including many who rely on Medicaid as their primary source of care.

Nationally, twenty-eight percent of adults with Medicaid coverage have a history of cardiovascular disease. Medicaid provides critical access to prevention, treatment, disease management, and care coordination services for these individuals. Because low-income populations are disproportionately affected by CVD – with these adults reporting higher rates of heart disease, hypertension, and stroke – Medicaid serves as the coverage backbone for the healthcare services these individuals need.

The American Heart Association is deeply concerned that the Georgia Access Model will jeopardize access to quality and affordable healthcare coverage for patients with cardiovascular disease or stroke. The state's 1332 waiver fails to satisfy the guardrails in the statutory language of the Affordable Care Act (ACA) requiring that coverage must be as affordable as it would be without the waiver; coverage must be as comprehensive as it would be without the waiver; a comparable number of people must be covered under the waiver as would be without it; and the waiver must not add to the federal deficit.

The waiver also risks the healthcare coverage of the 450,000 Georgians who currently get their insurance through the state's marketplace, while only attempting to expand coverage for a small fraction (30,000 individuals) of the more than 1.4 million uninsured in Georgia. The American Heart Association urges Georgia to withdraw its application for the Georgia Access Model.

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Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Subsidies

Comments*

The proposal creates a new state-administered subsidy system to replace the Advanced Premium Tax Credits (APTC) created by the ACA. These subsidies are not satisfactory to meet the affordability needs of patients and will be allowed to be used toward the purchase of "eligible non-QHPs," driving individuals towards enrolling in substandard coverage. Access to affordable healthcare coverage for patients with cardiovascular disease will be reduced and the American Heart Association opposes this change.

The draft application requests to waive the cost-sharing reduction (CSR) program that helps patients with incomes below 250 percent of the federal poverty level (FPL) to pay deductibles, coinsurance and other cost-sharing required by their health plan. It is unclear whether individuals who currently qualify for CSRs under the ACA will still get this financial assistance under the state-administered subsidy system.

Additionally, the state has likely underestimated the impact of the Georgia Access Model on premiums in Georgia. Eligible non-QHPs will attract healthier consumers, segmenting the market and increasing the cost of comprehensive coverage. The loss of Healthcare.gov and the incentives for insurers and brokers selling products outside of an exchange will likely boost enrollment in short-term and other skimpy plans, further undermining the risk pool and destabilizing the market. A substantially greater premium increase would both make QHPs more expensive for individuals who do not qualify for subsidies and increase the cost of QHP subsidies for the state, meaning that the state's pool of financial assistance funds would not be able to help as many individuals. Higher premiums will impact the ability of cardiovascular or stroke patients to obtain and access healthcare.

The state subsidy system is significantly under-resourced, which would have serious implications for patients with cardiovascular disease or stroke. The state has budgeted \$13.5 million in the first three years and \$5 million thereafter for implementation costs, which is low given the significant investments in new technical and administrative systems needed to operate the Georgia Access Model. Additionally, the state's contribution to the subsidy fund is just \$144 million in 2022, which is particularly dangerous for patients given the Georgia Access Model's cap on subsidy funding. Currently, any individual who meets the eligibility criteria for financial assistance for coverage under the ACA receives that financial assistance. However, patients could be placed on a wait list if the state exceeds its capped contribution under the Georgia Access Model. Waitlists could result in delays in accessing critical, lifesaving care for patients with cardiovascular disease and stroke.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Georgia Access - Plan Options

Comments *

The proposal also allows subsidies to be used for QHPs currently offered in the state as well as for “eligible non-QHPs.” This will result in more individuals enrolling in less comprehensive coverage and the American Heart Association opposes this change.

The draft waiver application does not contain sufficient information about the standards for eligible non-QHPs, particularly what the state means when it says that the plans will maintain protections for people with pre-existing conditions. Protecting patients with cardiovascular disease and other pre-existing conditions involves much more than guarantee issue; patients need community rating, bans on exclusion periods and condition exclusions, cost-sharing protections, bans on annual and lifetime limits and many other protections currently required for plans sold on the individual market to truly access comprehensive, affordable healthcare coverage.

Other problems include the draft application requesting to waive network adequacy requirements. Additionally, it is unclear how eligible non-QHPs could be part of the single risk pool with current QHPs given how dissimilar these products could be. This would make risk adjustment – a process that discourages plans from cherry-picking healthier individuals by transferring funds from plans with lower risk enrollees to higher risk ones – difficult to implement.

Eligible non-QHPs would not have to cover all ten essential health benefits (EHBs), which are currently required by QHPs. The state claims that eligible non-QHPs will provide 90 percent of the benefits that current QHPs cover, but the state provides no explanation or analysis to support this assumption. The protections and coverages provided by EHBs are critical for cardiovascular disease or stroke patients. By offering plans that do not cover all EHBs but are still eligible for subsidies, issuers will be able to segment the market and charge lower premiums to healthier individuals for eligible non-QHPs while charging high premiums for patients with pre-existing conditions who need comprehensive coverage. This is a backdoor to discrimination against patients with pre-existing conditions.

Finally, given the destabilizing impact of the state subsidy program on the individual marketplace, it is possible that some issuers may rethink their decisions to offer QHPs in Georgia. Yet the state assumes that issuers will still offer QHPs in all ratings areas after the implementation of the new state subsidy program with no explanation to support that assumption. If this assumption fails, patients would no longer have access to comprehensive care and be forced to choose between eligible non-QHPs, other skimpy plans or foregoing coverage.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the [“Click Here to Add Additional Comments”](#) at the bottom of the page.

Comment Topic * Georgia Access - Consumer Experience

Comments *

Georgia's application proposes to no longer use Healthcare.gov for enrollment and instead have people enroll directly through insurers or brokers. This policy will make it harder for patients to enroll in comprehensive, affordable healthcare coverage and the American Heart Association opposes this change.

While the state acknowledges that leaving Healthcare.gov would require a detailed transition strategy, the American Heart Association fears that some of the 450,000 Georgians who currently purchase coverage through Healthcare.gov would inevitably lose coverage during the transition. The state assumes that there will be no coverage losses without any analysis to support that assumption, calling into question whether the Georgia Access Model will truly lead the same or more people to obtain coverage than would without the waiver.

Patients with cardiovascular disease or stroke who shop on Healthcare.gov can trust that they are purchasing a health insurance plan that will allow them to manage their health conditions. However, under the Georgia Access Model, issuers and brokers could sell QHPs alongside other types of plans that discriminate against people with pre-existing conditions and will not cover enrollees' medical expenses if they get sick. This could create confusion for patients and lead them to purchase coverage that does not meet their needs. There is already evidence of misleading marketing leading individuals to unwillingly enroll in coverage that lacks key patient protections, which would likely worsen in Georgia under this proposal.

Healthcare.gov shows consumers all QHPs available in their area and does not favor certain plans over others. However, brokers who would be helping individuals through the enrollment process under the Georgia Access Model would not have to show individuals all their plan options and may receive larger commissions for certain plans over others that influence their recommendations to patients. Increasing the reliance on insurers and brokers will limit the ability of patients with cardiovascular disease or stroke to compare plan price and benefit design in an unbiased manner. This failure to appropriately shield patients from risk is unacceptable.

The American Heart Association is deeply concerned that this waiver proposal will jeopardize access to quality and affordable healthcare coverage for patients with cardiovascular disease, stroke, and other pre-existing conditions. Thank you for the opportunity to share our thoughts with you as you work to address this issue. If you have any questions or would like to discuss these comments further, please contact Michael Cortes, Georgia Government Relations Director for the American Heart Association at Michael.Cortes@heart.org or 678.224.2085.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * American Lung Association

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Deen

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Program Goals

Comments*

The American Lung Association in Georgia appreciates the opportunity to submit comments on the state's 1115 Demonstration Waiver Application for the Georgia Pathways to Coverage initiative.

The American Lung Association is the oldest voluntary public health organization in the United States, representing 35 million Americans with lung disease, including more than 1.2 million individuals in Georgia. For patients with lung disease – including asthma, COPD and lung cancer – having quality and affordable healthcare is essential.

Unfortunately, the Georgia Pathways plan is not a sufficient solution to improve access to quality and affordable healthcare for low-income Georgians. The state estimates that approximately 50,000 individuals would gain coverage under the plan, whereas over 500,000 Georgians could access coverage if the state fully expanded its Medicaid program. Medicaid expansion is critical for the health of low-income patients with lung disease and other serious and chronic conditions. Research shows an association between Medicaid expansion and early stage cancer diagnosis, when cancer is often more treatable. Additionally, Medicaid expansion is associated with improvements in quality measures, including for asthma management, at federally qualified health centers, which are critical healthcare providers for low-income patients. Medicaid expansion is also playing an important role in addressing health disparities—one recent study found that states that expanded Medicaid under the ACA eliminated racial disparities in timely treatment for cancer patients. The Lung Association is disappointed that the state has continued to reject this Medicaid expansion in its current waiver application.

The Lung Association opposes the Georgia Pathways program and offers the following comments on the draft waiver application.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

Under the Georgia Pathways plan, only individuals with incomes below 100 percent of the federal poverty level (\$1,778 per month for a family of three) who can prove that they work at least 80 hours per month would be eligible for Medicaid. This drastically limits the number of patients with lung disease and other serious and chronic health conditions who will receive access to the quality and affordable healthcare coverage that they need.

While no exemption criteria can prevent the potential coverage losses associated with work reporting requirements, Georgia has not proposed any exemption criteria that would allow individuals who are unable to meet the work reporting requirements to apply for coverage. This means that patients who have serious health conditions that prevent them from working 80 hours per month would have no pathway to coverage that could help them to treat these conditions. This discrimination against patients with health conditions that prevent them from working is unacceptable.

Once enrolled, individuals may be able to qualify for short-term exemptions in certain situations. Still, the Lung Association is concerned that these exemption criteria may not capture all individuals with serious and chronic health conditions that prevent them from working. Regardless, even exempt enrollees may have to report their

exemption, creating opportunities for administrative error that could jeopardize their coverage. Again, no exemption criteria can circumvent these problems and the serious risk to the health of the people we represent.

For the first six months, members will have to report their hours and work activities monthly. This will put a significant administrative burden on enrollees, which will likely decrease the number of individuals with Medicaid coverage. For example, Arkansas also implemented a work reporting requirement where Medicaid enrollees had to report their hours worked or their exemption. During the first six months of implementation, the state terminated coverage for over 18,000 individuals. Georgia has not provided an estimate of the coverage losses associated with this proposal in its waiver application.

Failing to navigate these burdensome administrative requirements could have serious – even life or death – consequences for people with lung disease. If the state finds that individuals have failed to comply for one month, their coverage will be suspended, and if the state finds that individuals have failed to comply for three months, they will be disenrolled. People who are in the middle of treatment for lung cancer, rely on regular visits with healthcare providers or must take daily medications to manage their COPD or asthma cannot afford a sudden gap in their care.

If individuals are able to meet the reporting requirements for six consecutive months, they will be exempt from further reporting and re-evaluated for eligibility during their annual redetermination. However, if individuals do not report a change in their employment status, they will be responsible for any capitation and cost-sharing expenses. This exposes already low-income individuals to enormous financial risk.

If Georgia truly cares about incentivizing and promoting employment, full Medicaid expansion would be the best way to achieve this goal. In a report looking at the impact of Medicaid expansion in Ohio, the majority of enrollees reported that being enrolled in Medicaid made it easier to work or look for work (83.5 percent and 60 percent, respectively). That report also found that many enrollees were able to get treatment for previously untreated health conditions, which made finding work easier. Preventing individuals from enrolling in Medicaid coverage until they comply with these requirements will therefore hurt rather than help people search for and obtain employment.

For this new eligibility category based on compliance with work reporting requirements, Georgia has requested to waive both retroactive coverage and presumptive eligibility. Retroactive coverage prevents gaps in coverage by covering individuals for up to 90 days prior to the month of application, assuming the individual is eligible for Medicaid coverage during that timeframe. This allows patients who have been diagnosed with a serious illness, such as lung cancer, to begin treatment without being burdened by medical debt prior to their official eligibility determination. Similarly, presumptive eligibility allows hospitals to provide temporary Medicaid coverage to individuals likely to qualify for Medicaid. This is an important entry point for individuals who qualify for Medicaid but are not yet enrolled to receive access to coverage promptly and helps to protect patients from large medical bills. The Lung Association opposes both of these requests.

Finally, Georgia would be the first state to require enrollees to comply with the work reporting requirement prior to enrolling in the Medicaid program with no opportunity to demonstrate a medical or other exemption. Changing the eligibility for Medicaid is the sole purview of Congress and cannot be waived. The Lung Association opposes this policy.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic * Premiums, Copayments, Member Rewards Account

Comments *

For the few individuals who are able to meet this limited eligibility criteria, the proposal still creates numerous financial barriers that will jeopardize their coverage. Individuals with incomes above 50 percent of the federal poverty level will have to pay monthly premiums and will lose coverage if they fail to pay premiums for three months. This policy would likely both increase the number of enrollees who lose Medicaid coverage and also discourage eligible people from enrolling in the program. Research has shown that even relatively low levels of cost-sharing for low-income populations limit the use of necessary healthcare services. For example, when Oregon implemented a premium in its Medicaid program, with a maximum premium of \$20 per month, almost half of enrollees lost coverage. For individuals with lung disease, maintaining access to comprehensive coverage is vital to access physicians, medications and other treatments and services needed to manage their health.

This policy will not only apply to – and jeopardize coverage for – new enrollees, but for individuals who are currently enrolled in Medicaid through the Transitional Medical Assistance (TMA) program. Again, the state provides no estimate of the loss of coverage due to the inability to pay premiums for this population. Additionally, it unclear how the state may try to recoup capitation and other payments for any months that individuals do not pay their premiums and if, as with the work reporting requirement policy above, patients may be put at significant financial risk. The Lung Association believes that these premiums will create significant financial barriers for patients that jeopardize their access to needed care and therefore opposes this policy.

Georgia's premium proposal also includes an additional surcharge for tobacco users. Research is clear that these surcharges have not been proven effective in helping smokers quit and reducing tobacco use. Recent studies from Health Affairs and the Center for Health and Economics Policy at the Institute for Public Health at Washington University have suggested that tobacco surcharges do not increase tobacco cessation but do lead individuals to forgo health insurance rather than paying the surcharge. Tobacco users often have expensive comorbidities. Charging a tobacco surcharge could cause those enrollees to go without coverage and access to preventive care (including tobacco cessation), allowing comorbid health conditions to worsen and ultimately resulting in more expensive healthcare. The Lung Association opposes this surcharge.

Georgia's proposal also includes a number of copayments for individuals with incomes above 50 percent of the federal poverty level that could be a significant financial burden for patients. The most egregious of these is a \$30 copay for non-emergency use of the emergency department (ED). This policy could deter people from seeking necessary care during an emergency.

People should not be financially penalized for seeking lifesaving care for a breathing problem, complications from a cancer treatment or any other critical health problem that requires immediate care. When people do experience severe symptoms, they should not try to self-diagnose their condition or worry that they cannot afford to seek care. Instead, they must have access to quick diagnosis and treatment in the ED.

Evidence suggests this type of cost sharing may not result in the intended cost savings. Research demonstrates that low-income individuals served by Medicaid are more price sensitive compared to others, more likely to go without needed care, and more likely to experience long-term adverse outcomes. A study of enrollees in Oregon's Medicaid program demonstrated that implementation of a copay on emergency services resulted in decreased utilization of such services but did not result in cost savings because of subsequent use of more intensive and expensive services. This provides further evidence that copays may lead to inappropriate delays in needed care. The Lung Association opposes this punitive proposal for a \$30 copayment for non-emergent use of the ED.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Employer Sponsored Insurance

Comments*

Individuals would be required to enroll in employer sponsored insurance (ESI) if it is available and determined to be cost effective for the state. However, the state would not provide any wraparound services for individuals regardless of the benefit package in their ESI. This means that if a lung disease patient's ESI does not cover important treatments and services like pulmonary rehabilitation or equipment for supplemental oxygen, he or she will have no options to receive more comprehensive coverage. Additionally, the state would not help individuals with the costs of coinsurance or deductibles required in their ESI. Without this assistance, patients may be unable to afford maintenance medications for asthma or COPD, visits to see pulmonologists or oncologists, surgeries or other procedures related to lung cancer and many other treatment and services related to their conditions. The Lung Association opposes the requirement to enroll in ESI without wraparound services and full financial protection for patients.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

The state has also requested to waive non-emergency transportation (NEMT) for the waiver demonstration population. NEMT helps low-income patients overcome barriers to care due to transportation and allows patients to keep appointments with doctors and other healthcare providers. For example, one study found patients with asthma, hypertension or heart disease who needed multiple visits to a medical professional to maintain their health were more likely to keep their appointments if they had NEMT. The Lung Association opposes a waiver of NEMT.

(character limit of 32,500)

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Comment Topic* State Program Cost and Budget

Comments*

Administering all of these requirements will be expensive for the state of Georgia. States such as Kentucky, Tennessee and Virginia have estimated that setting up the administrative systems to track and work activities alone will cost tens of millions of dollars. This would divert federal resources from Medicaid's core goal – providing health coverage to those without access to care – and compromise the fiscal health of Georgia's Medicaid program.

The Lung Association opposes this waiver proposal. Instead, we urge Georgia to focus on solutions that promote adequate, affordable and accessible coverage, including a full expansion of the state's Medicaid program.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

The American Lung Association in Georgia appreciates the opportunity to submit comments on Georgia's 1332 Waiver Application.

The American Lung Association is the oldest voluntary public health organization in the United States, representing 35 million Americans with lung disease, including more than 1.2 million individuals in Georgia. For patients with lung disease – including asthma, COPD and lung cancer – having quality and affordable healthcare is essential.

A strong, robust marketplace is essential for people with lung disease to access the coverage that they need. Reinsurance is an important tool to help stabilize health insurance markets. Reinsurance programs help insurance companies cover the claims of very high cost enrollees, which in turn keeps premiums affordable for other individuals buying insurance on the individual market. A recent analysis by Avalere of seven states that have already created their own reinsurance programs through Section 1332 waivers found that these states reduced individual market premiums by an average of 19.9 percent in their first year.

Georgia's proposal will create a reinsurance program starting for the 2021 plan year. This program is projected to reduce premiums by 10 percent and increase the number of individuals obtaining health insurance through the individual market by about 1,400. This would help patients with pre-existing conditions, including patients with lung disease obtain affordable, comprehensive coverage.

While the Lung Association supports reinsurance as a tool to stabilize premiums in the individual marketplace, we are deeply concerned that the remainder of the state's 1332 Waiver Application will jeopardize access to quality and affordable healthcare coverage for patients with lung disease and other pre-existing conditions. The American Lung Association urges Georgia to withdraw its application for the Georgia Access Model and instead focus on solutions that promote adequate, affordable and accessible coverage without jeopardizing access to care for patients with lung disease and other pre-existing conditions.

Thank you for your consideration.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

The American Lung Association in Georgia appreciates the opportunity to submit comments on Georgia's 1332 Waiver Application.

The American Lung Association is the oldest voluntary public health organization in the United States, representing 35 million Americans with lung disease, including more than 1.2 million individuals in Georgia. For patients with lung disease – including asthma, COPD and lung cancer – having quality and affordable healthcare is essential.

While the Lung Association supports reinsurance as a tool to stabilize premiums in the individual marketplace, we are deeply concerned that the Georgia Access Model will jeopardize access to quality and affordable healthcare coverage for patients with lung disease and other pre-existing conditions. Under the Georgia Access Model, the state would leave Healthcare.gov and instead shift to a state-administered subsidy program that has inadequate funding, drives people to enroll in less comprehensive coverage, and relies on private entities for enrollment that may not help patients choose the best plan for their health needs. The waiver fails to satisfy the guardrails in the statutory language of the Affordable Care Act (ACA) requiring that coverage must be as affordable as it would be without the waiver; coverage must be as comprehensive as it would be without the waiver; a comparable number of people must be covered under the waiver as would be without it; and the waiver must not add to the federal deficit. The waiver would also put the healthcare coverage of the 450,000 Georgians who currently get their insurance through the state's marketplace at risk while only attempting to expand coverage for a small fraction (30,000 individuals) of the more than 1.4 million uninsured individuals in Georgia. The Lung Association urges Georgia to withdraw its application for the Georgia Access Model.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Subsidies

Comments*

Georgia has proposed to create a new state-administered subsidy system to replace the Advanced Premium Tax Credits (APTC) created by the ACA. These subsidies are not satisfactory to meet the affordability needs of patients with lung disease and will be allowed to be used toward the purchase of both qualified health plans (QHPs) and "eligible non-QHPs," driving individuals towards enrolling in substandard coverage. The proposal will reduce access to quality and affordable healthcare coverage for patients with lung disease and the Lung Association opposes this change.

First, the draft application requests to waive the cost-sharing reduction (CSR) program that helps patients with incomes below 250 percent of the federal poverty level (FPL) to pay deductibles, coinsurance and other cost-sharing required by their health plan. It is unclear whether individuals who currently qualify for CSRs under the ACA will still get this financial assistance under the state-administered subsidy system. This financial assistance is essential to making coverage affordable for low-income patients with lung disease. Without this assistance, patients may be unable to afford maintenance medications for asthma or COPD, visits to see pulmonologists or oncologists, surgeries or other procedures related to lung cancer and many other treatments and services related to their conditions. This would also be a violation of the affordability guardrail for Section 1332 waivers.

The Lung Association is deeply concerned about the impact of the subsidy program on premiums for patients with lung disease as well. Eligible non-QHPs will attract healthier consumers, segmenting the market and increasing the cost of comprehensive coverage. The state has therefore likely underestimated the impact of the Georgia Access Model on premiums in Georgia's individual market. Additionally, as discussed later in our comments, the loss of Healthcare.gov and the incentives for insurers and brokers selling products outside of an exchange will likely boost enrollment in short-term and other skimpy plans, further undermining the risk pool and destabilizing the market. A substantially greater premium increase would both make QHPs more expensive for individuals who do not qualify for subsidies and also increase the cost of QHP subsidies for the state, meaning that the state's pool of financial assistance funds would not be able to help as many individuals. This clearly jeopardizes access to affordable coverage for patients in Georgia.

The state subsidy system is significantly under-resourced, which would have serious implications for patients with lung disease and other individuals in Georgia. The state has budgeted \$13.5 million in the first three years and \$5 million thereafter for implementation costs, which seems quite low given the significant investments in new technical and administrative systems needed to operate the Georgia Access Model. Additionally, the state's contribution to the subsidy fund is just \$144 million in 2022, which will not go far if the Georgia Access Model increases premiums as predicted above. This lack of funding is particularly dangerous for patients given the Georgia Access Model's cap on subsidy funding. Currently, any individual who meets the eligibility criteria for financial assistance for coverage under the ACA receives that financial assistance. However, patients could be placed on a wait list if the state exceeds its capped contribution under the Georgia Access Model. Without financial assistance, these patients may choose to go without coverage entirely, calling into question the assumption that more people will have coverage under the waiver than without it as well as whether the proposal can meet the affordability guardrail.

The draft waiver application fails to account for all of the federal budgetary effects of waiving the premium tax credit structure, including the loss of revenue owed by Georgia employers under the employer mandate. This lost revenue (which could be above \$100 million) will reduce the federal pass-through dollars available to the state, further compromising the financial health of the state subsidy program. This could make it even harder for patients with lung disease to obtain financial assistance under the Georgia Access Model and receive the affordable healthcare coverage that they need.

Finally, the draft application states that Georgia will use the federal subsidy structure for individuals between 100 and 400 percent FPL in the first year of the state-administered subsidy system, but it may change this in the future. Such changes could have major implications for the affordability of coverage for patients with pre-existing conditions and other vulnerable populations. Any changes to the subsidy structure should go through a new comment period for patients and other stakeholders to provide feedback on the impact of the changes.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments *

Georgia's proposal would allow subsidies to be used for QHPs currently offered in the state as well as for "eligible non-QHPs." This will result in more individuals enrolling in less comprehensive coverage and the Lung Association opposes this change.

The draft waiver application does not contain sufficient information about the standards for eligible non-QHPs, particularly what the state means when it says that the plans will maintain protections for people with pre-existing conditions. For example, even if these plans cannot deny coverage to patients with pre-existing conditions, could plans vary premiums based on health status? Protecting patients with lung disease and other pre-existing conditions involves much more than guarantee issue; patients need community rating, bans on exclusion periods and condition exclusions, cost-sharing protections, bans on annual and lifetime limits and many other protections currently required for plans sold on the individual market to truly access comprehensive, affordable healthcare coverage.

Other aspects of the standards for eligible non-QHPs are unclear as well. For example, how will eligible non-QHPs be part of the single risk pool with current QHPs, given how dissimilar these products could be? This would make risk adjustment – a process that discourages plans from cherry-picking healthier individuals by transferring funds from plans with lower risk enrollees to higher risk ones – difficult to implement.

The draft application does clearly state that eligible non-QHPs would not have to cover all ten essential health benefits (EHBs), which are currently required by QHPs. The state claims that eligible non-QHPs will provide 90 percent of the benefits that current QHPs cover. However, the state provides no explanation or analysis to support this assumption. In contrast, patients' recent experiences in plans where insurers are not required to cover EHBs suggests that these plans are unlikely to provide 90 percent of current benefits. For example, a review of the short-term plan market found that 43 percent of plans did not cover mental health services, 62 percent did not cover substance abuse treatment services and 71 percent did not cover outpatient prescription drugs.

Patients with lung disease require robust coverage of essential health benefits to access the preventive services, prescription medications, visits with primary care and specialist providers and other treatments and services that they need to manage their conditions and stay healthy. By offering plans that do not cover all EHBs but are still eligible for subsidies, issuers will be able to segment the market and charge lower premiums to healthier individuals for eligible non-QHPs while charging high premiums for patients with pre-existing conditions who need comprehensive coverage. This is a backdoor to discrimination against patients with pre-existing conditions. And again, this likely means that the waiver application significantly underestimates the premium increases for QHPs as a result of this proposal.

Given the destabilizing impact of the state subsidy program on the individual marketplace, it is possible that some issuers may rethink their decisions to offer QHPs in Georgia. Yet the state assumes that issuers will still offer QHPs in all ratings areas after the implementation of the new state subsidy program with no explanation to support that assumption. If this assumption does not hold, patients in some areas of the state would no longer have access to comprehensive care and have to choose between eligible non-QHPs or other skimpy plans and going without coverage. This would be unacceptable for patients with lung disease and other pre-existing conditions who rely on comprehensive coverage to maintain their health.

(character limit of 32,500)

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Comment Topic * Georgia Access - Consumer Experience

Comments *

Georgia's application proposes to no longer use Healthcare.gov for enrollment and instead have people enroll directly through insurers or brokers. This policy will make it harder for patients to enroll in comprehensive, affordable healthcare coverage and the Lung Association opposes this change.

While the state acknowledges that leaving Healthcare.gov would require a detailed transition strategy, the Lung Association fears that some of the 450,000 Georgians who currently purchase coverage through Healthcare.gov would inevitably lose coverage during the transition. This could have a serious impact on the health of patients who are in the middle of treatment for lung cancer, rely on regular visits with healthcare providers for COPD, or must take daily medications to manage their asthma and cannot afford a sudden gap in their care. The state assumes that there will be no coverage losses without any analysis to support that assumption, and it is unlikely that the Georgia Access Model will truly lead the same or more people to obtain coverage than would without the waiver.

Today, patients with lung disease who shop on Healthcare.gov can trust that they are purchasing a health insurance plan that will allow them to manage their health conditions. However, under the Georgia Access Model, issuers and brokers could sell QHPs alongside other types of plans that discriminate against people with pre-existing conditions and will not cover enrollees' medical expenses if they get sick. This could create confusion for patients and lead them to purchase coverage that does not meet their needs. There is already evidence of misleading marketing related to short-term and other skimpy plans leading individuals to unwillingly enroll in coverage that lacks key patient protections. This problem would likely worsen in Georgia under this proposal.

Healthcare.gov shows consumers all QHPs available in their area and does not favor certain plans over others. However, brokers who would be helping individuals through the enrollment process under the Georgia Access Model would not have to show individuals all of their plan options and may receive larger commissions for certain plans over others that influence their recommendations to patients. Increasing the reliance on insurers and brokers will limit the ability of patients with lung disease to compare plan price and benefit design in an unbiased manner to choose the right plan for them, and could ultimately result in harm to patients who become enrolled in sub-standard or inadequate insurance coverage that does not meet their needs. This failure to appropriately shield patients from risk is unacceptable.

(character limit of 32,500)

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Comment Topic * Georgia Access - Other

Comments *

Overall, the state predicts that 30,000 more people will have coverage as a result of the Georgia Access Model than would have coverage without the waiver. The comments above point out a number of reasons why that number is an overestimate, but even the application itself acknowledges that increased enrollment will be driven by enrollment in non-ACA compliant plans at the expense of comprehensive coverage. Enrollment in eligible non-QHPs and other skimpy plans because of the state-administered subsidy program and the new enrollment model should not count towards any calculations used to determine if as many people would be covered without the waiver as with the waiver. This approach is not consistent with the ACA and this coverage is not sufficient to meet the needs of patients with lung disease and other individuals in Georgia.

While the Lung Association supports reinsurance as a tool to stabilize premiums in the individual marketplace, we are deeply concerned that the remainder of the state's 1332 Waiver Application will jeopardize access to quality and affordable healthcare coverage for patients with lung disease and other pre-existing conditions. The American Lung Association urges Georgia to withdraw its application for the Georgia Access Model and instead focus on solutions that promote adequate, affordable and accessible coverage without jeopardizing access to care for patients with lung disease and other pre-existing conditions.

Thank you for your consideration.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * American Psychiatric Association

Stakeholder Type * Trade Association

First Name * [REDACTED] **Last Name *** [REDACTED] **First**

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** District of Columbia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

December 3, 2019

The Honorable Brian Kemp, Governor
State of Georgia
Atlanta, Georgia 30334

Dear Governor Kemp:

The American Psychiatric Association (APA), the national medical specialty society representing more than 38,500 psychiatric physicians nationwide, writes in opposition to the proposed 1332 waiver and adding work requirements in the 1115 waiver proposal. These proposals will adversely impact people with mental health and substance use disorders, making it more challenging for vulnerable populations to access the coverage they need to address important medical issues, including psychiatric conditions. We strongly urge you to withdraw these proposals.

Under the 1332 waiver proposal, all or part of four major provisions of the Affordable Care Act appear to be waived. This would include section 1301(a), requiring Qualified Health Plans (QHP) to cover the essential health benefits (EHBs) that requires coverage of mental health and substance use disorders as well as section 1311(c) that requires the Department of Health and Human Services to develop QHP certifications standards related to discriminatory benefit design, network adequacy, essential community providers, accreditation, quality improvement, standard format to compare plans, and quality ratings. It also requires mental health parity protections apply to QHP and leaves uncertain if the state would have to comply with section 1557, the nondiscrimination provision of the Affordable Care Act (ACA). The law prohibits discrimination on the basis of race, color, national origin, sex, age, or disability in certain health programs or activities. Without the requirements of the EHB, parity compliance, and 1557, we are concerned that services for the most chronically ill and complex patients would be scaled back.

These patient protections are essential since the very nature of treatment for this patient population is complicated by chronic needs and the stigma surrounding their illness. For example, addiction is a complex brain disease and seeking treatment can take several attempts. According to the National Survey on Drug Use and Health, only 12 percent of the nearly 20 million adults in America who needed substance use disorder treatment received it in 2018. These very complications have served as the basis of the historically discriminatory policies and practices of insurance companies, which have unduly limited treatment for these populations and the very reason the Mental Health Parity and Addiction Equity Act was enacted. To undermine its requirements would be an incomprehensible undermining of federally guaranteed patient access protections.

An additional area of fundamental concern is waiving the network adequacy requirements that set criteria to ensure a sufficient choice and timely access to providers, including to behavioral health providers. Waiving the requirement will exacerbate the problem of narrow provider networks, resulting in inadequate access to convenient and quality care. In addition, this could lead to adverse selection with patients who need comprehensive care and access to specialty clinicians based on their health needs having higher costs than healthier individuals that opt for a lower plan rate with a narrower network.

Adding to a patient's financial burden is the state's proposal to essentially block grant subsidies and use federal funds to subsidize certain plans. As a result, this could drive up costs for vulnerable patients that aren't able to access the subsidies for plans that best meet their health needs. Delaying care for people will in turn, drive up health care costs and burden other systems. People with psychiatric issues who are unable to access care are more likely to end up in the criminal justice system and emergency room.

Many mental illnesses are chronic, lifelong conditions with both acute and stable phases characterized by a broad array of symptoms, even among patients who have the same or similar diagnoses. If these mental illnesses go untreated, or are inappropriately treated, a patient's risk of hospitalization, persistent or significant disability, or death is heightened. Although this is particularly true when a patient needs treatment for acute symptoms like suicidality or psychosis, it is also of concern during his/her ongoing "maintenance" treatment. Clinical evidence from population-based studies clearly indicates that the risk of suicide attempts and completed suicide increases for patients with any psychiatric disorder, and this risk can increase exponentially for patients who suffer from disorders like depression and anxiety.

In addition, we are concerned about the effort to impose work requirements on Medicaid patients under the 1115 waiver. While we appreciate the intent to improve coverage, under the proposal, the effort to expand Medicaid to those working at least 80 hours a month and with incomes below 100 percent provides unnecessary barriers to coverage. People with mental illness and/or substance use disorder also face unique barriers to stable employment due to their fluctuating ability to function, which can lead to job loss. These patients disproportionately have criminal records, often tied to their medical conditions. Additionally, research shows that patients with serious mental illnesses die years earlier than the general population, with the majority of them perishing due to physical health conditions. Taking coverage away from these patients will likely lead to delayed treatment and costly physical and mental health outcomes.

Even if individuals with a mental illness and/or a substance use disorder meet the requirements of the waiver, there remains a real risk of eligible people losing coverage due to miscommunication, their inability to navigate these processes, or other breakdowns in the administrative process. For many working adults struggling with a mental illness and/or a substance use disorder, overcoming the administrative obstacles to prove they are eligible for an exemption may be cumbersome due to the nature of their condition, leading them to lose coverage on purely technical grounds. Notably, patients may find themselves in an impossible position where they may lose Medicaid coverage because they cannot get their disability documented, but they also cannot get the disability documentation because they do not have health coverage.

In just a few months, we have already identified the consequences of this policy's implementation in Arkansas. As of December 1, nearly 17,000 Arkansas Medicaid beneficiaries have lost coverage due to the new requirements. The loss of coverage for these recipients has been particularly significant in rural populations. The findings have highlighted that simply notifying recipients about the new requirements has been challenging when so many do not have stable addresses and phone numbers. Additionally, a lack of computer literacy and internet access among recipients has led to individuals not being able to set up online accounts or comply with the reporting requirements, even when they may be fulfilling the requirements. We worry that the same factors may be applicable to Georgia's Medicaid population.

These proposals will further harm individuals already experiencing hardship. Across the country, the combined death rate for alcohol, drug, and suicide increased from 43.9% to 46.6% deaths per 100,000 people from 2016 to 2017. In Georgia, the combined death rate was 36.6%. A U.S. Census Bureau report found Georgia's uninsured rate rose slightly in 2018 to 13.7 percent. The proposals taken together will likely result in a slight increase in coverage under Medicaid but could be offset by the change in the 1332 waiver that makes comprehensive coverage unaffordable and increases the number of people who are underinsured. We urge you to make changes that will help improve access for all Georgians, especially those with psychiatric conditions.

We thank you for the opportunity to respond to Georgia's proposal.

Sincerely,

Saul Levin, MD, MPA, FRCP-E
CEO and Medical Director
(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

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These patient protections are essential since the very nature of treatment for this patient population is complicated by chronic needs and the stigma surrounding their illness. For example, addiction is a complex brain disease and seeking treatment can take several attempts. According to the National Survey on Drug Use and Health, only 12 percent of the nearly 20 million adults in America who needed substance use disorder treatment received it in 2018. These very complications have served as the basis of the historically discriminatory policies and practices of insurance companies, which have unduly limited treatment for these populations and the very reason the Mental Health Parity and Addiction Equity Act was enacted. To undermine its requirements would be an incomprehensible undermining of federally guaranteed patient access protections.

An additional area of fundamental concern is waiving the network adequacy requirements that set criteria to ensure a sufficient choice and timely access to providers, including to behavioral health providers. Waiving the requirement will exacerbate the problem of narrow provider networks, resulting in inadequate access to convenient and quality care. In addition, this could lead to adverse selection with patients who need comprehensive care and access to specialty clinicians based on their health needs having higher costs than healthier individuals that opt for a lower plan rate with a narrower network.

Adding to a patient's financial burden is the state's proposal to essentially block grant subsidies and use federal funds to subsidize certain plans. As a result, this could drive up costs for vulnerable patients that aren't able to access the subsidies for plans that best meet their health needs. Delaying care for people will in turn, drive up health care costs and burden other systems. People with psychiatric issues who are unable to access care are more likely to end up in the criminal justice system and emergency room.

Many mental illnesses are chronic, lifelong conditions with both acute and stable phases characterized by a broad array of symptoms, even among patients who have the same or similar diagnoses. If these mental illnesses go untreated, or are inappropriately treated, a patient's risk of hospitalization, persistent or significant disability, or death is heightened. Although this is particularly true when a patient needs treatment for acute symptoms like suicidality or psychosis, it is also of concern during his/her ongoing "maintenance" treatment. Clinical evidence from population-based studies clearly indicates that the risk of suicide attempts and completed suicide increases for patients with any psychiatric disorder, and this risk can increase exponentially for patients who suffer from disorders like depression and anxiety.

In addition, we are concerned about the effort to impose work requirements on Medicaid patients under the 1115 waiver. While we appreciate the intent to improve coverage, under the proposal, the effort to expand Medicaid to those working at least 80 hours a month and with incomes below 100 percent provides unnecessary barriers to coverage. People with mental illness and/or substance use disorder also face unique barriers to stable employment due to their fluctuating ability to function, which can lead to job loss. These patients disproportionately have criminal records, often tied to their medical conditions. Additionally, research shows that patients with serious mental illnesses die years earlier than the general population, with the majority of them perishing due to physical health conditions. Taking coverage away from these patients will likely lead to delayed treatment and costly physical and mental health outcomes.

Even if individuals with a mental illness and/or a substance use disorder meet the requirements of the waiver, there remains a real risk of eligible people losing coverage due to miscommunication, their inability to navigate these processes, or other breakdowns in the administrative process. For many working adults struggling with a mental illness and/or a substance use disorder, overcoming the administrative obstacles to prove they are eligible for an exemption may be cumbersome due to the nature of their condition, leading them to lose coverage on purely technical grounds. Notably, patients may find themselves in an impossible position where they may lose Medicaid coverage because they cannot get their disability documented, but they also cannot get the disability documentation because they do not have health coverage.

In just a few months, we have already identified the consequences of this policy's implementation in Arkansas. As of December 1, nearly 17,000 Arkansas Medicaid beneficiaries have lost coverage due to the new requirements. The loss of coverage for these recipients has been particularly significant in rural populations. The findings have highlighted that simply notifying recipients about the new requirements has been challenging when so many do not have stable addresses and phone numbers. Additionally, a lack of computer literacy and internet access among recipients has led to individuals not being able to set up online accounts or comply with the reporting requirements, even when they may be fulfilling the requirements. We worry that the same factors may be applicable to Georgia's Medicaid population.

These proposals will further harm individuals already experiencing hardship. Across the country, the combined death rate for alcohol, drug, and suicide increased from 43.9% to 46.6% deaths per 100,000 people from 2016 to 2017. In Georgia, the combined death rate was 36.6%. A U.S. Census Bureau report found Georgia's uninsured rate rose slightly in 2018 to 13.7 percent. The proposals taken together will likely result in a slight increase in coverage under Medicaid but could be offset by the change in the 1332 waiver that makes comprehensive coverage unaffordable and increases the number of people who are underinsured. We urge you to make changes that will help improve access for all Georgians, especially those with psychiatric conditions.

We thank you for the opportunity to respond to Georgia's proposal.

Sincerely,

Saul Levin, MD, MPA, FRCP-E
CEO and Medical Director
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Business/Organization * American Society of Clinical Oncology

Stakeholder Type * Advocacy Group

First Name * [REDACTED] **Last Name *** Segel

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Virginia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

Dear Governor Kemp,

The Georgia Society of Clinical Oncology (GASCO) and the American Society of Clinical Oncology (ASCO) appreciate the opportunity to provide comments on the 1115 waiver proposed earlier this month. We are encouraged at overall progress toward more covered Georgians and congratulate the state on its existing programs for patients with cancer. However, we are concerned the proposed waiver would extend coverage to only 89,000 of the nearly 1.5 million uninsured Georgians. This proposal does not compare favorably to existing alternatives and is not the best solution for Georgia's citizens.

GASCO's primary mission is to promote the highest professional standards of oncology practice in the state of Georgia; to study, research and exchange information, leading to improvement in the practice of hematology; to support and further oncology education; and to monitor and respond to appropriate legislative and regulatory concerns of the membership. ASCO is the national organization representing more than 45,000 physicians and other health care professionals specializing in cancer treatment, diagnosis, and prevention. ASCO members are also dedicated to conducting research that leads to improved patient outcomes, and we are committed to ensuring that evidence-based practices for the prevention, diagnosis, and treatment of cancer are available to all Americans.

According to ASCO's 2014 Policy Statement on Medicaid Reform, people with cancer, for whom the costs of evaluation and treatment can be high, are particularly in need of insurance coverage to allow for timely diagnosis and high-quality treatment. As such, we urge your administration to consider alternatives that can lead to greater coverage, better health outcomes and less cost-shifting to an already strained health care delivery system. Improved access to health insurance would provide earlier detection, offer more timely access to treatment, result in lower cost of care—and dramatically improve survivability of a cancer diagnosis.

We strongly support Georgia's existing 'Breast and Cervical Cancer Prevention Program' aimed at helping uninsured Georgians, and we urge continued investment in this successful initiative. We recommend the state extend eligibility to a wider age range and include other cancers so that more Georgians can benefit.

In August 2018, ASCO released a position statement on Medicaid waivers and their impact on cancer care. We emphasize the importance of patients not being faced with delays or barriers to treatment and find that disruptions to care are linked to worse cancer outcomes. Moreover, cancer is an unexpected and life-altering event, and research has shown that those in active treatment for cancer often stop working entirely or dramatically reduce the number of hours worked, not at all by choice. This population may be impacted by the "work requirement." We would like to work with your office to mitigate this dynamic and better understand what may qualify in terms of exemptions. We note that many rural Georgians count on non-emergency medical transportation to make their appointments; eliminating or eroding this coverage could jeopardize a critical element of support for many of the state's most vulnerable citizens.

GASCO and ASCO appreciate the consequential and thoughtful investment that your new administration has made in assessing the specific challenges faced by Georgia's healthcare system and uninsured population. However, the current proposal leaves far too many Georgians out and could disproportionately jeopardize patients with cancer. We hope you will turn to our organizations as a resource for cancer care and research and we look forward to working with you to achieve high value, high quality care for all Georgians. If you would like more information or have any questions, please contact Karen Beard at karen.beard@gasco.us or Aaron Segel at aaron.segel@asco.org.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * Association of Asian Pacific Community Health Organizations

Stakeholder Type * Advocacy Group

First Name * [REDACTED] **Last Name *** Carbullido

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** District of Columbia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

December 3, 2019

Georgia Medicaid
2 Peachtree St NW
Atlanta, GA 30303

Submitted online: <https://medicaid.georgia.gov/patientsfirst/patients-first-act-public-comment>

Re: Georgia Section 1115 Demonstration Waiver Application

Dear Georgia Medicaid Department:

On behalf of the Association of Asian Pacific Community Health Organizations, I write to offer comments opposing Georgia's Section 1115 Demonstration Waiver Application for Georgia Pathways. AAPCHO is deeply concerned that this waiver will keep many low-income Asian American, Native Hawaiian, and Pacific Islander (AANHPI) Georgians from accessing and keeping comprehensive health benefits through Medicaid.

AAPCHO is a national not-for-profit association of 34 community-based health care organizations, 29 of which are Federally Qualified Health Centers, that primarily serve medically underserved AANHPIs. AAPCHO is a national voice to advocate for the unique and diverse health needs of AANHPI communities and the community health providers that serve those needs. Our work includes developing, testing, and evaluating health education and promotion programs of national significance. We also offer technical assistance and training to promote the establishment and expansion of services for medically underserved AANHPI communities.

AAPCHO opposes the proposed waiver because it falls short of expanding Medicaid to cover all Georgians, including many AANHPIs, up to 138 percent of the Federal Poverty Level (FPL) as provided by the Affordable Care Act. We are concerned that the proposal would limit eligibility to adults only up to 100 percent FPL. This limited expansion would leave a significant portion of Georgia's vulnerable population without access to Medicaid's comprehensive coverage and put the health of Georgians between 101-138 percent FPL at risk.

AAPCHO further opposes this waiver because of the burdensome work requirements and costly premiums it would require as conditions of eligibility into the Georgia Pathways Medicaid program. Specifically, we are concerned that the proposal would require all beneficiaries under 100 percent FPL to demonstrate a minimum of 80 hours of work per month and requirement monthly for individuals between 50 percent and 100 percent FPL as a condition of eligibility and continued coverage in Medicaid.

Establishing work requirements and monthly premiums is contrary to the intent of the Medicaid program to provide critical assistance to low income individuals and runs counter to demonstrated successes of Medicaid expansion elsewhere in the country. Health insurance is a critical support that enables individuals to be healthy enough to work and gain and maintain employment. In a recent assessment of Ohio's Medicaid expansion program, the majority of enrollees stated that Medicaid coverage made it easier for them to get and keep employment. The proposed waiver, however, would make it more difficult for individuals to become eligible for Medicaid coverage, jeopardizing their ability to seek and find employment.

Moreover, the recurring 80-hour monthly work threshold in order to retain Medicaid ignores the reality of low-wage employment—including unpredictable hours; seasonal shifts; and challenges associated with transportation, childcare and more—that dramatically impact an individual's ability to consistently maintain hours. As their monthly work schedules fluctuate, these individuals are likely to go in and out of Medicaid coverage as their work status and their hours change.

We are further concerned that individuals between 50-100 percent FPL will be required to pay a monthly premium in order to get and keep their health insurance. This is counter to Medicaid's intent: Medicaid has strong affordability protections to ensure that beneficiaries have access to a comprehensive service package and protects beneficiaries from out-of-pocket costs. Medicaid has generally prohibited premiums for Medicaid beneficiaries with income below 150 percent FPL. Furthermore, no Section 1115 waivers have been approved to date for any Medicaid population that include premiums as a condition of eligibility or coverage. This waiver would go further than any other waiver to date—and will result in individuals having their coverage suspended or terminated.

Finally, we are concerned that the proposed waiver would place additional barriers on beneficiaries to maintain Medicaid coverage given additional monthly reporting from the state to verify work hours as a condition of continued eligibility. The paperwork and documentation requirements associated with maintaining Medicaid are difficult, even for individuals who are already working. A significant body of literature suggests that increasing paperwork burden causes people to lose health insurance.

The additional restrictions proposed in this waiver would cause many beneficiaries to lose coverage and keep individuals who most need health coverage from obtain it. Medicaid makes it possible for people with chronic conditions to get the health care services and prescription drugs they need to get and remain healthy. Further, continuous turnover between different types of health coverage and/or repeated loss of health coverage will ultimately result in decreased health status and overall poor health outcomes for patients.

Recurrent loss of Medicaid coverage will significantly interfere with treatment and care of patients, especially those with chronic conditions. With Medicaid, an individual can seek and receive care for their chronic conditions, such as diabetes. With the implementation of Medicaid work requirements, the vast majority of Medicaid enrollees who become ineligible for Medicaid coverage will become uninsured. While uninsured, very low-income individuals with chronic diseases such as diabetes will have their diabetes and other chronic diseases become uncontrolled and more acute, increasing their likelihood of having a major medical event occur, such as a heart attack, resulting not only in high uncompensated hospital costs and financial costs to their families, but also significantly poorer health outcomes, which may prevent them from working in the future or having the resources to care for their families due to their resulting frail health status from not being able to access preventive healthcare to control their chronic diseases after losing Medicaid coverage.

Further, when individuals become eligible for Medicaid again, Medicaid's costs will increase as individuals will need to start from scratch to regain control of their chronic diseases, such as diabetes and high blood pressure, which were untreated during their lack of Medicaid coverage. As a result, fluctuations in Medicaid coverage that result from the implementation of Medicaid work requirements will create disruptions in necessary healthcare for communities, leading to poor health outcomes and increased costs for Georgians.

By creating an unnecessarily burdensome system that requires individuals to work to maintain their health insurance and to repeatedly prove their Medicaid eligibility, this proposed waiver prevents individuals them from having access to essential healthcare. AAPCHO strongly urges Georgia to withdraw this waiver proposal and instead offer comprehensive health insurance to all Georgians under 138% FPL. This will provide continuous care, increase health care outcomes, help low-income Georgians be healthy and able to work.

Sincerely,

Adam P. Carbullido
Director of Policy and Advocacy
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * Atlanta Legal Aid Society

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Anderson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

The 1115 waiver only covers individuals making under 100% FPL, despite the additional federal money the state would receive if it expanded the category to 138% FPL. The Affordable Care Act (ACA) provides 90% matching for states that expand coverage to those making up to 138% FPL, but the proposed waiver would prevent Georgia from drawing down a significant portion of those matching dollars. It would also exclude many uninsured Georgians. Over 200,000 Georgians currently make too little to qualify for a subsidy through the ACA and do not qualify for Medicaid. According to the state's own estimates, this waiver would cover less than a quarter of those caught in this coverage gap.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Premiums, Copayments, Member Rewards Account

Comments*

To receive coverage in the new eligibility category, low-income applicants would have to meet a work requirement and pay premiums. The proposal's work requirement provides for very few exceptions, and this provision would serve as yet another bureaucratic hoop for low-income families to navigate as they attempt to receive much needed coverage.

The waiver's proposed premium and copay costs present a significant barrier to coverage as well. Many Georgia citizens cannot afford to pay for a medical emergency out of pocket. This is especially true for our clients, who are often living paycheck-to-paycheck. Instead of imposing additional expenses on families who are already struggling, the state should draw down federal dollars to provide quality care. While the waiver proposes a cap on premium and copay costs, this cap does not consider the steep expenses, such as childcare, that prevent many families from setting aside even a portion of their wages for medical care. To make matters worse, the current proposal would penalize families who fall behind on their premiums. This would harm families who are already facing financial hardship.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Other

Comments*

Medicaid work requirements and "partial expansion" proposals have been routinely struck down in other states by courts and by CMS. Just this year, 1115 waiver work requirements in Kentucky and Arkansas were struck down by a federal Judge. Relatedly, CMS refused to approve Utah's request for 90% matching for people under 100% FPL, and the state currently only receives 68% matching due to its failure to expand Medicaid to 138% FPL as prescribed. CMS made this position known when reviewing Utah's proposal, stating that CMS would only approve 90% matching "if the demonstration covers the entire adult expansion group." Proposing a waiver framework that has already been deemed questionable by judges and CMS is simply wasteful. The state of Georgia should instead invest its resources into a waiver program that works for all Georgians in the coverage gap.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

The state estimates that it will spend about \$322 million – or about \$215 million excluding costs covered by user fees – to extend coverage to just under 80,000 Georgians under both proposed waivers. However, expanding Medicaid to the federal limit would extend coverage to more Georgians at a lower cost. Some research suggests that expanding Medicaid would insure 487,000 - 598,000 residents at a net state cost of \$188 million to \$213 million.

Complete Medicaid expansion would also reduce uncompensated care. Research shows that states that expanded Medicaid to the federal maximum decreased the cost of uncompensated care by 55 percent on average, compared to a decline of only 18 percent in states that do not expand Medicaid. This data provides critical context for Georgia, where seven rural hospitals have closed since 2010 in part due to shouldering the immense cost of uncompensated care.

Georgia has the opportunity to provide insurance coverage to hundreds of thousands of residents. Expanding Medicaid to the federal limit would lower barriers to care, resulting in fewer premature deaths, improved access to care, and increased financial security for those gaining coverage. , For that reason, Atlanta Legal Aid recommends that Governor Kemp discard the proposed waivers and instead work with the Georgia General Assembly as necessary to pursue complete Medicaid expansion.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

The 1332 waiver proposes alarming changes to the high quality standard of coverage set by the ACA. Under the proposal, the state would allow tax credits to be used to purchase substandard health plans that exclude coverage for essential health benefits, such as prescription drugs, maternity care, and substance abuse services.

Using tax credits for substandard plans in this manner would create adverse selection that would increase premiums for high quality plans. Healthier people, even those eligible for tax credits, would inevitably enroll in cheaper, more limited coverage to keep costs down. This move would shrink the risk pool for high-quality insurance and would consequently raise premium costs. Higher premium costs will raise the per-person costs of tax credits, resulting in a higher cost to the state.

The 1332 waiver also outlines a funding cap for subsidies, which may lead the state to turn away low-income individuals once the cap is reached. The current waiver limits state spending on tax credit subsidies, and it is unclear whether low-income families would be able to receive a subsidy once those funds were already allocated.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

The 1332 waiver proposes to remove the state from the federally-facilitated exchange platform HealthCare.gov without creating its own exchange platform. Instead, consumers would compare coverage options and enroll through private web brokers and insurers. This proposal would make it difficult to obtain clear and transparent information on insurance options. Direct enrollment entities already have a track record of steering consumers towards substandard plans. These entities often fail to alert consumers of Medicaid eligibility and inhibit meaningful plan comparisons.

Additionally, it is unclear whether or not Georgians who are satisfied with their federal exchange plan would be forced to reenroll upon implementing this waiver. Over 450,000 Georgians enjoy health exchange coverage with plans that cover essential health benefits. It remains to be seen, however, if those Georgians would be able to keep federal exchange coverage.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * Behavioral Health Services Coalition

Stakeholder Type * Other

First Name * [REDACTED] **Last Name *** Services Coalition

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

Dear Behavioral Health Innovation and Reform Commission,

The Behavioral Health Services Coalition has been serving Georgia for over 34 years. In the beginning it was called Residential Services Coalition and focused on housing issues. In the mid-90s, as the group's focus broadened, it became Mental Health Services Coalition. The current name, Behavioral Health Services Coalition, was adopted in 2016 to reflect the coalition's work in both the mental health and substance use areas. A leadership team is made up of representatives from Mental Health America of Georgia, Georgia Mental Health Consumer Network, NAMI Georgia and Georgia Parent Support Network. Our signature annual event is Mental Health Day at the Capitol, delivering a strong message that mental health is an essential component of overall health.

We are writing regarding Georgia's proposed 1115 and 1332 Waivers and the impact they will have on Georgians.

Georgia is in the midst of a public health crisis and families and communities are devastated by the increase of suicides and overdose rates. The implementation of the waivers must consider the years of work invested in Mental Health Parity and end the discrimination people continue to fight while paying more out of pocket costs for mental health and substance use treatments.

We are concerned that waiving insurance company's responsibilities to pay for mental health and substance misuse as an essential health benefit will negatively impact citizen's ability to obtain essential mental health and substance misuse treatment and services. Mental illnesses are illnesses of the brain which affect 1 in 4 Georgians every year. They should be covered on par with other illnesses.

Thank you for your dedication in serving on this commission to ensure mental health and substance use treatment and services are the very best Georgia can offer. We would be available to speak with members of the commission to further discuss the benefits of mental health parity and the fair and equal treatment for all Georgians who need and benefit from these services.

Sincerely,
The Behavioral Health Services Coalition
(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

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Comment Topic* Reinsurance - Other

Comments*

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Sincerely,
The Behavioral Health Services Coalition
(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

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Sincerely,

The Behavioral Health Services Coalition

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Business/Organization * Centene Corporation

Stakeholder Type * Health Plan

First Name * [REDACTED] **Last Name *** Shipley

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Missouri **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

Thank you for the opportunity to comment on the Georgia Pathways Section 1115 Waiver. We commend Georgia's approach to developing an innovative state-specific waiver to achieve its vision of creating "A Healthy Georgia". Centene strives to provide exceptionally-local health care design and delivery, and we can serve as a partner to Georgia as the State designs and implements a new path to Medicaid coverage through the Georgia Pathways program. We look forward to sharing our extensive experience in implementing Medicaid programs across several states.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

Centene supports Georgia's efforts to establish a regionally-focused reinsurance program with the goal of making coverage more affordable. While reinsurance programs utilizing an attachment point and coinsurance model (traditional reinsurance) have effectively mitigated premium increases in a number of states, we would like to work with the State on a new, alternative reinsurance approach that could more effectively address premium affordability at a lower cost to the State. Such savings could be used for other state priorities.

Specifically, we encourage Georgia to explore alternate reinsurance approaches that:

- Foster a competitive market with a level playing field for all issuers;
- Mitigate the risk of issuers receiving overlapping payments from risk adjustment and reinsurance; and
- Achieve state policy goals in the most cost-effective manner.

There are alternatives to a traditional reinsurance model that can achieve the above goals while likely achieving greater premium impacts. These alternatives would allow Georgia to continue to build on the innovations proposed to date and offer a model for other states to follow. We are eager to work with the State on designing such a program that best serves the needs of its residents.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

Centene supports Georgia's efforts to address health care affordability in a creative and innovative manner in the individual market. We recognize that consumers, especially those above 400% FPL, face barriers to purchasing health insurance coverage due to premium costs. Many of these individuals may even choose to remain uninsured due to the cost of premiums.

That said, premium costs are not the only affordability issue consumers are facing. Rising out-of-pocket costs (i.e., cost-sharing, deductibles) make obtaining health services unattainable for many consumers who cannot afford the cost of care regardless of their coverage status. Recent surveys of our Marketplace membership have shown that consumers view health care affordability as not only being able to pay premiums, but also being able to afford the out-of-pocket costs required to obtain quality health care services.

While the proposals in Georgia's 1332 waiver take innovative steps to address affordability, we encourage the State to continue to build upon these efforts by considering additional policies and programs to achieve affordability and ensure market stability. These issues are complex, multi-faceted, and must take into account local market needs and dynamics. To that end, we would like to partner with the State and other stakeholders to develop strategies to address premiums and out-of-pocket costs, especially for individuals above 400% FPL.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

Georgia proposes to transition from the federally-facilitated exchange (FFE) to a new model that will allow consumers to purchase non-QHP and QHP coverage through various private platforms (e.g., web-broker, issuer website, etc.).

We applaud the State for proposing options that allow the private sector to innovate and potentially bring coverage to a greater number of individuals across Georgia. In implementing these alternative plan display and enrollment platforms, we strongly encourage the State to develop clear requirements for such private entities to protect Georgians from any confusion or unintended consequences that arise from the use of these platforms.

Furthermore, we encourage the State to align the new model with CMS' enhanced direct enrollment (EDE) pathway requirements, which include stringent testing and auditing requirements to ensure privacy and security of consumer data and that accurate eligibility determinations are made. For example, the platforms should include disclaimers and educational information about the products that are available and what coverage and benefits the consumer will receive when enrolling in a product. This should include separately displaying QHPs and non-QHPs to avoid any confusion for the consumer when selecting a plan and providing necessary consumer protections.

Centene is willing to participate in any working group to provide feedback on the technical components of the model and to help ensure a seamless transition for Georgia's residents.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Georgia proposes to include eligible non-QHPs in the single-risk pool. Centene looks forward to working with the State on how non-QHPs will be incorporated into the single-risk pool and how the mechanics of single-risk pool requirements, such as risk adjustment and age rating, will be operationalized. In particular, we look forward to receiving more information on the State's plans to either utilize the CMS-operated risk adjustment program including non-QHPs or operate a state-run program. These details will be important to protect market stability and the affordability of more comprehensive QHPs.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Subsidies

Comments*

Centene appreciates the State's efforts to address affordability issues for its residents. Given the questions regarding risk adjustment and the single-risk pool, Centene is concerned that allowing subsidies to be used for less comprehensive non-QHPs may lead to adverse selection issues and may potentially be disruptive to the individual market. While the State's proposal assumes non-QHPs will have lower premiums than QHPs, some non-QHPs may have higher out-of-pocket costs. From our member research, consumers view health care affordability as not only lower premiums, but also affordable out-of-pocket costs.

We would welcome the opportunity to work with the State to develop policy alternatives to offering subsidies for non-QHPs that may help to further the State's goals. We believe there are options that are cost effective and have the potential to address the full spectrum of affordability issues in the State.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Business/Organization * Center for Law and Social Policy (CLASP)

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Thompson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** District of Columbia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

December 2, 2019

Georgia Medicaid
2 Peachtree St NW
Atlanta, GA 30303

Submitted online at: <https://medicaid.georgia.gov/patientsfirst/patients-first-act-public-comment>.

Re: Georgia Section 1115 Demonstration Waiver Application

Dear Georgia Medicaid Department,

I am writing on behalf of the Center for Law and Social Policy (CLASP). CLASP is a national, nonpartisan, anti-poverty nonprofit advancing policy solutions for low-income people. We work at both the federal and state levels, supporting policy and practice that makes a difference in the lives of people living in conditions of poverty. CLASP submits the following comments in response to Georgia's Section 1115 Demonstration Waiver Application for Georgia Pathways to Coverage and raises serious concerns about the effects of the waiver, as proposed, on the coverage and health outcomes of low-income Medicaid beneficiaries in the state.

These comments draw on CLASP's deep experience with Temporary Assistance for Needy Families (TANF) and the Supplemental Nutrition Assistance Program (SNAP), two programs where many of the policies proposed in this waiver have already been implemented – and been shown to be significant barriers to low-income people getting and retaining benefits. These comments also draw on CLASP's experience in working with six states under the Work Support Strategies project, where these states sought to dramatically improve the delivery of key work support benefits to low-income families, including health coverage, nutrition benefits, and child care subsidies through more effective, streamlined, and integrated approaches.

Medicaid plays a critical role in supporting the health and well-being of low-income adults and children. Many work in low-wage jobs where employer-sponsored health care is not offered or is prohibitively expensive. In fact, only 16 percent of poor adults receive health insurance through their jobs and, according to recent a recent survey by the Bureau of Labor Statistics, low-wage workers pay more for employer-provided medical care benefits than higher-wage workers. Others may have health concerns that threaten employment stability, and without Medicaid, would be denied access to the medical supports they need to hold a job, such as access to critical medications.

This proposal's attempt to transform Medicaid and reverse its core function will keep individuals from gaining needed coverage, contribute to poor health outcomes, and higher administrative costs. There is an extensive and strong literature that shows, as a recent New England Journal of Medicine review concludes "Insurance coverage increases access to care and improves a wide range of health outcomes." This waiver is therefore inconsistent with the Medicaid purpose of providing medical assistance and improving health and should be rejected.

Georgia is proposing to limit the increase of Medicaid eligibility to adults with incomes up to 100 percent of the Federal Poverty Line (FPL). This means that all adults between 101-138 percent of FPL who should be eligible for Medicaid under the Affordable Care Act will lose out on more affordable and comprehensive coverage. In addition, it will shift costs from the state to the federal government.

But even more egregious, Georgia is proposing to implement a work requirement as a condition of eligibility in its Georgia Pathways Medicaid program. Individuals below 100% of FPL will be required to meet work requirements, and individual between 50-100% FPL must also pay premiums, in order to be enrolled in and

requirements—and individual between 50-100 % FPL must also pay premiums—in order to be enrolled in and maintain Medicaid. CLASP strongly opposes work requirements for Medicaid beneficiaries and urges Georgia to rescind this request. Work requirements are inconsistent with the goals of Medicaid because they would act as a barrier to individuals being able to receive health insurance, particularly for those with chronic conditions and disabilities, but also for those in areas of high unemployment, or who work the variable and unpredictable hours characteristic of many low-wage jobs. In addition, while the purported goal of this provision is to promote work, the reality is that denying access to health care makes it less likely that people will be healthy enough to work. This provision would also increase administrative costs of the Medicaid program and reduce the use of preventive and early treatment services, ultimately driving up the costs of care while also leading to worse health outcomes.

CLASP opposes Georgia's proposal to limit its expansion of Medicaid, to require individuals with incomes as low as 51 percent of the FPL to pay premiums, and to limit health coverage only to individuals who meet new work requirements. Our comments that follow focus on the harmful impact the proposed work requirements will have on low-income Georgians and the state; we briefly address the other policies as well

PROPOSALS THAT MAKE WORK REQUIREMENTS A CONDITION OF ELIGIBILITY FOR GEORGIA PATHWAYS

- Proposals to Make Health Coverage Contingent On Meeting Work Requirements Do Not Promote Employment

Creating a work requirement for Medicaid eligibility is misguided and short-sighted. Lessons learned from other programs demonstrate that work requirement policies are not effective in connecting people to living-wage jobs that provide affordable health insurance and other work support benefits, such as paid leave. A much better focus for public policy is to develop skills training for jobs that are in high demand and pay living wages, help people get the education they need to climb their career ladder and foster an economy that creates more jobs.

Another consequence of a work requirement could be, ironically, making it harder for people to work. When additional red tape and bureaucracy force people to lose Medicaid, they are less likely to be able to work. People must be healthy in order to work, and consistent access to health insurance is vital to being healthy enough to work. Medicaid expansion enrollees from Ohio and Michigan reported that having Medicaid made it easier to look for employment and stay employed. Further, recent analysis by the New York Times finds that young single mothers' participation in the labor force increased four percentage points more in states that expanded Medicaid in 2014 compared to those that didn't, providing evidence that if people don't lose their health insurance when they go to work, they are more likely to work. Making Medicaid more difficult to access could have the exact opposite effect on employment that supporters of work requirements claim to be pursuing.

- Proposals to Make Health Coverage Contingent On Meeting Work Requirements Do Not Promote Employment Do Not Lead to Employer-Sponsored Insurance

The waiver request assumes that if participants become employed, they will be able to transition to affordable employer-sponsored insurance (ESI). Unfortunately, this is simply not the reality of many jobs in America. Only 49 percent of people in this country receive health insurance through their jobs—and only 16 percent of poor adults do so. The reality is that many low-wage jobs, particularly in industries like retail and restaurant work, do not offer ESI, and when they do, it is not affordable. In fact, in 2017, only 24 percent of workers with earnings in the lowest 10 percent of wages were offered employer insurance, and only 14 percent actually received coverage under their employer offered insurance. People working multiple part-time jobs or in the gig economy are particularly unlikely to have access to ESI. Even among low-income workers, Black and Hispanic workers are less likely to have access to ESI than their White counterparts.

A recent study by the Urban Institute provides additional evidence in New Hampshire – a state that was recently approved to move forward with their work reporting requirement. The paper found that New Hampshire residents who could lose Medicaid under work reporting requirements will likely face limited and costly employer-sponsored insurance options. In particular, researchers found that less than one in ten part-time private-sector employees in New Hampshire were eligible for employer-sponsored coverage and just over half of full-time employees at firms with fewer than 50 employees were eligible for employer-sponsored coverage in 2017. Additionally, annual employee contributions for a single-coverage plan would represent 12.5 percent of annual income for a minimum-wage, full-time worker and 25.0 percent of annual income for a minimum-wage, part-time worker— more than ten times the percentage premium limit in the Marketplace for individuals earning 100 percent of the federal poverty level.

- Proposals to Make Health Coverage Contingent On Meeting Work Requirements Grow Government Bureaucracy and Increase Red Tape

One of the key lessons of the Work Support Strategies initiative is that every time a client needs to bring in a verification or report a change adds to the administrative burden on caseworkers and increases the likelihood that clients will lose benefits due to failure to meet one of the requirements. In many cases, clients remain eligible and will reapply, which is costly to families who lose benefits as well as to the agencies that must process additional applications. The WSS states found that reducing administrative redundancies and barriers used workers' time more efficiently and helped with federal timeliness requirements.

As a result of Georgia's new administrative complexity and red tape, eligible people who are meeting the work requirements will have their health insurance suspended because the on-going processes to document work requirements coverage are too cumbersome—and they could become unenrolled.

Recent evidence from Arkansas' implementation of work reporting requirements confirms that bureaucratic barriers for individuals who already work or qualify for an exemption will lead to disenrollment. More than 18,000 beneficiaries lost coverage before the program was suspended by a federal judge, likely becoming uninsured because they didn't report their work or work-related activities. As reported by the Center on Budget and Policy Priorities, many of those who failed to report likely didn't understand the reporting requirements, lacked internet access or couldn't access the reporting portal through their mobile device, couldn't establish an account and login, or struggled to use the portal due to disability. The recent study looking at the Arkansas program found that "work requirements have substantially exacerbated administrative hurdles to maintaining coverage". The study found a reduction in Medicaid of 12 percent, even though more than 95% of those who were subject to the policy already met the requirement or should have been exempt.

- Proposals to Make Health Coverage Contingent On Meeting Work Requirements Do Not Reflect the Realities of Our Economy

This proposal requires that individuals demonstrate that they have 80 hours of work per month in order to be eligible for Medicaid; unfortunately, this does not reflect the realities of today's low-wage jobs. For example, seasonal workers may have a period of time each year when they are not working enough hours to meet a work requirement and as a result will have their health insurance suspended or churn on and off the program during that time of year. Or, some may have a reduction in their work hours at the last minute and therefore not meet the minimum number of hours needed to become eligible for and retain Medicaid. Many low-wage jobs are subject to last-minute scheduling, meaning that workers do not have advance notice of how many hours they will be able to work. This not only jeopardizes their health coverage if Medicaid has a work requirement but also makes it challenging to hold a second job. If you are constantly at the whim of random scheduling at your primary job, you will never know when you will be available to work at a second job.

Georgia's proposal to require 80 hours of work per month throughout the entire year for some families is incredibly blind to the reality of low-wage work. An analysis by the Urban Institute found that Kentucky's proposal to take away health care from individuals who do not work a set number of hours does not align with the reality of some working enrollees' lives. Urban found that an estimated 13 percent of nondisabled, nonelderly working Medicaid enrollees who do not appear to qualify for a student or caregiver exemption in Kentucky's Medicaid program could be at risk of losing Medicaid coverage at some point in the year under the work requirements because, despite working 960 hours a year, they may not work consistently enough throughout the year to comply with the waiver. Additional analysis from the Urban Institute shows that Medicaid enrollees who would potentially be subject to work reporting requirements are more likely to face barriers to employment, compared with privately insured adults. The analysis found that half of nonexempt Medicaid enrollees reported issues related to the labor market or nature of employment, such as difficulty finding work and restricted work schedules, as reasons for not working more, and over one-quarter reported health reasons.

- Proposals to Make Health Coverage Contingent On Meeting Work Requirements Will Harm Persons with Illness and Disabilities

Many people who are unable to work due to disability or illness will be denied access to Medicaid coverage because they can not meet the work requirement. A Kaiser Family Foundation study found that 36 percent of unemployed adults receiving Medicaid—but who are not receiving Disability/SSI—reported illness or disability as their primary reason for not working. Additional research from the Kaiser Family Foundation shows that people with disabilities were particularly vulnerable to losing coverage under the Arkansas work reporting

requirements, despite remaining eligible.

And, an Ohio study found that one-third of the people referred to a SNAP employment program that would allow them to keep their benefits reported a physical or mental limitation. Of those, 25 percent indicated that the condition limited their daily activities, and nearly 20 percent had filed for Disability/SSI within the previous two years. Additionally, those with disabilities may have a difficult time navigating the increased red tape and bureaucracy put in place to administer a work requirement. The result is that many people with disabilities will, in fact, be subject to the work requirement and be at risk of losing health coverage.

People with chronic conditions and disabilities may have periods of time where they are unable to meet the necessary hours to meet their work requirement—and will have their Medicaid suspended and quickly terminated. Once terminated from Medicaid coverage, beneficiaries will likely become uninsured. Rather than supporting these individuals with appropriate health insurance so they can regain their health and go back to work, this proposal will put needed medical services and prescription drugs out of reach, including those needed to maintain positive health outcomes.

- Proposals to Make Health Coverage Contingent On Meeting Work Requirements Are Likely to Increase Churn

Georgia's proposal to impose work requirements as a condition of Medicaid eligibility is likely to increase churn. As people are disenrolled from Medicaid for not meeting work requirements, possibly because their hours get cut one week or they have primarily seasonal employment (like construction work), they will cycle back on Medicaid as their hours increase or the seasons change. People may be most likely to seek to re-enrollment once they need healthcare, and be less likely to receive preventive care if they are not continuously enrolled in Medicaid.

When the beneficiary enrolls in Medicaid, they will be sicker and have higher health care needs. Studies repeatedly show that the uninsured are less likely than the insured to get preventive care and services for major chronic conditions.

The impact of even short-term gaps in health insurance coverage has been well documented. In a 2003 analysis, researchers from the Urban Institute found that people who are uninsured for less than 6 months are less likely to have a usual source of care that is not an emergency room, more likely to lack confidence in their ability to get care and more likely to have unmet medical or prescription drug needs. A 2006 analysis of Medicaid enrollees in Oregon found that those who lost Medicaid coverage but experienced a coverage gap of fewer than 10 months were less likely to have a primary care visit and more likely to report unmet health care needs and medical debt when compared with those continuously insured.

The consequences of disruptions in coverage are even more concerning for consumers with high health needs. A 2008 analysis of Medicaid enrollees in California found that interruptions in Medicaid coverage were associated with a higher risk of hospitalization for conditions such as heart failure, diabetes, and chronic obstructive disorders. In addition to the poorer health outcomes for patients, these avoidable hospitalizations are also costly for the state. Similarly, a separate 2008 study of Medicaid enrollees with diabetes who experienced disruptions in coverage found that the per member per month cost following reenrollment after a coverage gap rose by an average of \$239, and enrollees were more likely to incur inpatient and emergency room expenses following reenrollment compared to the period of time before the enrollee lost coverage.

- Proposals to Make Health Coverage Contingent On Meeting Work Requirements Will Have a Disparate Impact on Communities of Color

We strongly oppose the proposal due to its disproportionate impact on communities of color. As discussed in more detail in the sections that follow, many people of color face employment challenges and, under the proposed policy, would be disadvantaged in being able to access and maintain Medicaid eligibility.

Racial income disparities persist in the United States: Due to persisting racial economic disparities and discrimination in hiring practices, average hourly wages for Black and Hispanic workers are substantially lower than their white counterparts. In Georgia in 2017, for adults age 18-64, the poverty rate of the general population is approximately 14%. That percentage is significantly higher for both Black Americans and Latinos who have an estimated poverty rate of 18% in Georgia in 2017. This makes it more likely that Black and Hispanic individuals will benefit from programs that support work by helping them access health coverage.

Employment discrimination limits access to the workforce for many people of color: Studies show that racial discrimination remains a key force in the labor market. In a 2004 study, "Are Emily and Greg more employable than Lakisha and Jamal: A Field Experiment on Labor Market Discrimination," researchers randomly assigned names and quality to resumes and sent them to over 1,300 employment advertisements. Their results revealed significant differences in the number of callbacks each resume received based on whether the name sounded white or African American. More recent research indicates that this bias persists. A study from 2013 submitted fake resumes of nonexistent recent college graduates through online job applications for positions based in Atlanta, Baltimore, Portland, Oregon, Los Angeles, Boston, and Minneapolis. African-Americans were 16% less likely to get called in for an interview. Similarly, a 2017 meta-analysis of field experiments on employment discrimination since 1989 found that white Americans applying for jobs receive on average 36% more callbacks than African Americans and 24% more callbacks than Latinos.

Hispanic and Black workers have been hardest hit by the structural shift toward involuntary part-time work: Despite wanting to work more, many low-wage workers struggle to receive enough hours from their employer to make ends meet. A report from the Economic Policy Institute found that 6.1 million workers were involuntary part-time; they preferred to work full-time but were only offered part-time hours. According to the report, "involuntary part-time work is increasing almost five times faster than part-time work and about 18 times faster than all work." Hispanic and Black workers are much more likely to be involuntarily part-time (6.8 percent and 6.3 percent, respectively) than their White counterparts, of whom 3.7 percent work part time involuntarily. And Black and Latino workers are a higher proportion of involuntary part-time workers, together representing 41.1 percent of all involuntary part-time workers. The greater amount of involuntary part-time employment among Black and Hispanic workers is primarily due to their having greater difficulty finding full-time work and more often facing work conditions in which hours are variable and can be reduced without notice.

People of color are more likely to live in neighborhoods with poor access to jobs: In recent years, majority-minority neighborhoods have experienced particularly pronounced declines in job proximity. Proximity to jobs can affect the employment outcomes of residents and studies show that people who live closer to jobs are more likely to work. They also face shorter job searches and fewer spells of joblessness. As residents from households with low-incomes and communities of color shifted toward suburbs in the 2000s, their proximity to jobs decreased. Between 2000 and 2012, the number of jobs near the typical Hispanic and Black resident in major metropolitan areas declined much more steeply than for white residents.

Due to overcriminalization of neighborhoods of color, people of color are more likely to have previous histories of incarceration, which in turn limit their opportunities: People of color, particularly African Americans and Latinos, are unfairly targeted by the police and face harsher prison sentences than their white counterparts. After release, formerly incarcerated individuals fare poorly in the labor market, with most experiencing difficulty finding a job after release. Research shows that roughly half of people formerly incarcerated are still unemployed one year after release. For those who do find work, it's common to have annual earnings of less than \$500. Further, during the time spent in prison, many lose work skills and are given little opportunity to gain useful work experience. People who have been involved in the justice system struggle to obtain a driver's license, own a reliable means of transportation, acquire relatively stable housing, and maintain proper identification documents. These obstacles often prevent them from successfully re-entering the job market and are compounded by criminal background checks, which further limit access to employment. A recent survey found that 96 percent of employers conduct background checks on job applicants that include a criminal history search.

Further, work reporting requirements are part of a long history of racially-motivated critiques of programs supporting basic needs. False race-based narratives have long surrounded people experiencing poverty, with direct harms to people of color. For decades these narratives have played a role in discussions around public assistance benefits and have been employed to garner support from working-class whites. Below are a few examples of the relationship between poverty, racial bias, and access to basic needs programs.

- When the "Mother's Pension" program was first implemented in the early 1900s, it primarily served white women and allowed mothers to meet their basic needs without working outside of the home. Only when more African American women began to participate were work reporting requirements implemented.
- Between 1915 and 1970, over 6 million African Americans fled the south in the hope of a better life. As more African Americans flowed north, northern states began to adopt some of the work reporting requirements already prevalent in assistance programs in the South.
- As civil rights struggles intensified, the media's portrayal of poverty became increasingly racialized. In 1964, only 27 percent of the photos accompanying stories about poverty in three of the country's top weekly news magazines featured Black subjects; by 1967, 72 percent of photos accompanying stories about poverty featured Black Americans.

• Many of Donald Trump's presidential campaign speech anecdotes centered around a Black woman from

- Many of Ronald Reagan's presidential campaign speech anecdotes centered around a Black woman from Chicago who had defrauded the government. These speeches further embedded the idea of the Black "welfare queen" as a staple of dog whistle politics, suggesting that people of color are unwilling to work.
- In 2018, prominent sociologists released a study looking at racial attitudes on welfare. They noted that white opposition to public assistance programs has increased since 2008 — the year that Barack Obama was elected. The researchers also found that showing white Americans data suggesting that white privilege is diminishing led them to express more opposition to spending on basic needs programs. They concluded that the "relationship between racial resentment and welfare opposition remains robust."

- Proposals to Make Health Coverage Contingent On Meeting Work Requirements Will Harm Returning Citizens

Having a criminal record can make it extremely difficult to find a job and meet work requirements. Research shows that roughly half of returning citizens are still unemployed one year after release. These individuals face many legal and social impediments to finding and retaining employment which can build stability and reduce the risk of recidivism. Taking away health coverage for not working a set number of hours per month only exacerbates this challenge. People with criminal records face many more legal barriers to employment such as occupational licensing bans that preclude them from obtaining even low skilled and entry level positions. Even an arrest record can be a long-term barrier to finding and keeping employment since many businesses conduct background checks; a recent survey found that 96 percent of employers conduct background checks on job applicants that include a criminal history search.

Many people with criminal records need more time, training, and hands-on assistance to find adequate employment. Access to benefits, such as Medicaid can mean the difference between an individual successfully reintegrating into society, or recidivating.

MONTHLY PREMIUMS WOULD HARM LOW-INCOME HOUSEHOLDS

CLASP strongly opposes this waiver proposal to require adults between 50-100% FPL to pay a monthly premium, going much further than HHS has previously permitted. What is more, Georgia proposes to make payment of premiums a condition of eligibility for Medicaid—and beneficiaries are not enrolled in the program until their first month's premium is paid.

Medicaid has strong affordability protections to ensure that beneficiaries have access to a comprehensive service package and protects beneficiaries from out-of-pocket costs, particularly those due to an illness. Medicaid generally prohibits premiums for Medicaid beneficiaries with income below 150% FPL. Nonetheless, HHS has recently approved waivers allowing a few states to test the effects of imposing premiums. These states have been allowed to apply mandatory premiums for individuals with incomes between 100-150% FPL and only voluntary premiums for individuals with incomes below 100% FPL. Furthermore, no Section 1115 waivers have been approved to date for any Medicaid population that include premiums as a condition of eligibility or coverage or coverage lock-outs for non-payment for those under 100% FPL.

Studies of the Healthy Indiana waiver, which required Medicaid recipients with incomes between 100 and 138% of FPL to pay a premium or face disenrollment or lockout, have found that it deters enrollment. About one-third of individuals who applied and were found eligible were not enrolled because they did not pay the premium.

A large body of research shows that even modest premiums keep people from enrolling in coverage. Individuals, particularly during period of unemployment or other financial hardship, may be unable to afford to make the payments. Low-income consumers have very little disposable income and often must make choices and stretch limited funds across many critical purchases. While Medicaid is designed to protect consumers against costs, this proposal adds another cost to their monthly budget.

Moreover, simply the burden of understanding the premium requirements and submitting payments on a regular basis may be a challenge to people struggling with an overload of demands on their time and executive functioning capacities. In a survey of Indiana enrollees who failed to pay the required premium, more than half reported confusion about either the payment process or the plan as the primary reason, and another 13 percent indicated that they forgot. Finally, states or insurance companies may fail to process payments in a timely fashion, leading to benefit denials even for people who make the required payments.

Unlike private health insurance, the reality of this proposal is that individuals have to write checks on a monthly basis to purchase coverage. The vast majority of people with private insurance receive it through their employers, and have their share of the premiums automatically withheld from their paychecks, without having

...to take any positive action. Moreover, one-quarter of households with incomes under \$15,000 reported being "unbanked," which may create additional barriers to making regular payments.

We strongly encourage Georgia to eliminate its proposal to introduce premiums in Medicaid and to maintain Medicaid's strong affordability protections.

REMOVING CONDITIONS AROUND EXISTING RETROACTIVE COVERAGE DOES NOT FURTHER THE OBJECTIVES OF THE MEDICAID PROGRAM

Georgia's proposal would remove conditions around its existing retroactive coverage waiver, which would allow the state to waive the statutory provision requiring that Medicaid reimburse medical costs incurred by Medicaid beneficiaries for up to three months before they apply if they were eligible during the retroactive period.

Retroactive coverage, which has been a feature of Medicaid since 1972, helps prevent medical bankruptcy and provides financial security to vulnerable beneficiaries by making Medicaid payments available for expenses incurred during the three-month period before application if the beneficiary was eligible for Medicaid during that period. Data from Indiana show how important retroactive coverage is for low-income parents in the state who incurred costs prior to enrollment. Medicaid paid \$1,561 on average on behalf of parents who incurred medical costs prior to enrolling in Medicaid. Eliminating retroactive eligibility would instead lead to increased financial insecurity and instability for low-income families and higher uncompensated care costs for Medicaid providers.

As the court recognized in vacating approval of Kentucky's first waiver, the primary objective of Medicaid is to provide affordable coverage, including when an individual moves in and out of the program, or is sick and otherwise eligible for Medicaid. Taking months of coverage away from people and exposing them to financial harm does not promote the objectives of Medicaid. Without retroactive coverage, parents may go without needed medical care and incur significant medical debt for care they receive prior to the effective date of enrollment. Research shows that children's development can be negatively affected by issues resulting from poverty, such as toxic stress.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Program Goals

Comments *

In addition to helping individuals get the care they need, retroactive coverage ensures the financial stability of hospitals and other safety net providers as it allows them to be reimbursed for care they have provided during the three-month period that would otherwise have gone as uncompensated care, helping them meet their daily operating costs and maintain quality of care. Under waivers that eliminate retroactive coverage, a hospital would no longer get paid for, say, providing an emergency appendectomy or setting a broken bone for adults who are uninsured but Medicaid-eligible at the time of their accident, increasing the hospital's uncompensated care costs.

PROPOSAL LEAVES MANY GEORGIANS WITHOUT ACCESS TO MEDICAID

Georgia is proposing to limit the increase of Medicaid eligibility to adults with incomes up to 100% FPL. This means that all adults between 101-138% FPL who should be eligible for Medicaid under the Affordable Care Act will lose out on more affordable and comprehensive coverage. Georgians in the expansion group defined by the Affordable Care Act (ACA) as up to 138 percent of poverty but not included in this expansion will face higher costs and potentially fewer benefits if purchasing health insurance through the Marketplace instead of being insured through Medicaid. Moreover, persons with this level of income are less likely to enroll in Marketplace coverage due to out of pocket costs associated with Marketplace plans. As a result, the partial expansion will leave thousands of Georgians without access to affordable health insurance.

Georgia's proposal shifts costs to the federal government (assuming that people become eligible for premium tax credits under the Affordable Care Act (ACA)). Further, this limitation on eligibility will result in an increase in the number of low-income individuals who churn between Medicaid, the marketplace, and being uninsured. This will have negative health consequences, as changes in coverage often require changes in health care providers and can lead to interruptions in treatment. In one recent study, even among those who churned with no gap in coverage, 29 percent reported a decrease in their overall quality of care as a result of the transition.³ This is particularly harmful for those with significant health conditions.

Changes in employment, income, and family structure all impact churn. Low-income individuals are more at risk of churning from one type of coverage to another⁴ because low-wage work is increasingly variable in hours and/or seasonal.⁵ The Affordable Care Act deliberately created an overlap between the eligibility levels for Medicaid and the premium subsidy tax credits in order to reduce the need for consumers to frequently switch between coverage under Medicaid and the Marketplace. Further, Medicaid provides continuous enrollment year-round, whereas enrollment in Marketplace coverage is limited to select weeks of the year and when people are eligible for a special enrollment period. For this population group, especially those with complex medical and life conditions, signing up for coverage during a time-limited period may not be realistic. Medicaid ensures that these individuals don't lose out on coverage by allowing them to enroll at any point during the year. As discussed below, the likelihood of people churning on and off coverage is increased by the burdensome work requirements included in this proposal. Even people who continue to be eligible will fall through the cracks as the paperwork burden increases.

CONCLUSION

For all the reasons laid out above, the state should reconsider their approach to encouraging work and withdraw their waiver application. If Georgia is serious about expanding Medicaid and encouraging work, helping people move into jobs that allow for self-sufficiency, the state would be committed to ensuring that all adults have access to health insurance in order to ensure they are healthy enough to work.

Thank you for considering CLASP's comments. Contact Elizabeth Lower-Basch (elowerbasch@clasp.org) and Renato Rocha (rrocha@clasp.org) with any questions.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Business/Organization * Center for Reproductive Rights

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Lipscomb

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

The Center for Reproductive Rights ("the Center") respectfully submits comments in opposition to Georgia's 1115 and 1332 Medicaid demonstration waiver applications.

Founded in 1992, the Center is the only global legal advocacy organization dedicated to reproductive rights, with expertise in both U.S. constitutional and international human rights law. The Center's litigation and advocacy over the past twenty-five years have expanded access to reproductive health care around the nation and world. The Center's Maternal Health & Rights Initiative ("the Initiative") promotes the human rights of pregnant, birthing, and postpartum people in the United States. Harnessing the power of law, policy, and strategic advocacy, the Initiative seeks to improve access to safe and respectful maternal health care for all who need it, and to ensure that all people have an opportunity to attain the highest standard of maternal health possible for themselves.

The Center maintains that access to health care is a human right, protects health, and saves lives. Expanding meaningful access to affordable, comprehensive, culturally appropriate, high quality, evidence-based health care for women and pregnant people, wherever they live, throughout their lives, is essential to achieving optimal maternal health. Georgia's 1115 and 1332 demonstration waiver applications contain several restrictions that will undermine efforts to improve maternal health in the state.

Georgia has the worst maternal mortality ratio of any state in the country, and Georgia's own health experts believe that more than half of the confirmed pregnancy-related deaths in the state are preventable. For many women, health problems and barriers to health care start before pregnancy with limited access to family planning services and regular primary care. The policies outlined in Georgia's demonstration waiver applications will remove maternity care protections and will disproportionately impact women of color, who are more likely than white women to lack health insurance and live in poverty. Georgians deserve public policies that will improve access to health care without creating unnecessary barriers.

Therefore, in an effort to remove unnecessary barriers to Medicaid enrollment and health care access, the Center urges the State of Georgia to modify the 1115 and 1332 demonstration waiver applications by:

- Removing mandatory work requirements and corresponding monthly reporting
- Eliminating premium payments
- Maintaining the 10 Essential Health Benefits of the Affordable Care Act as required components of insurance coverage (i.e. maternity care and mental health services)
- Removing caps on funds available to provide financial assistance to individuals and families participating in the exchange

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

The Center for Reproductive Rights ("the Center") respectfully submits comments in opposition to Georgia's 1115 and 1332 Medicaid demonstration waiver applications.

Founded in 1992, the Center is the only global legal advocacy organization dedicated to reproductive rights, with expertise in both U.S. constitutional and international human rights law. The Center's litigation and advocacy over the past twenty-five years have expanded access to reproductive health care around the nation and world. The Center's Maternal Health & Rights Initiative ("the Initiative") promotes the human rights of pregnant, birthing, and postpartum people in the United States. Harnessing the power of law, policy, and strategic advocacy, the Initiative seeks to improve access to safe and respectful maternal health care for all who need it, and to ensure that all people have an opportunity to attain the highest standard of maternal health possible for themselves.

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(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Business/Organization * Community Foundation for Greater Atlanta

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Philipp

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

The 1115 Waiver would extend Medicaid coverage to residents with earnings below the poverty line only if they meet a burdensome work requirement and pay premiums without exception. While the state estimates over 408,000 non-elderly uninsured adult Georgians with incomes below the poverty line are uninsured, Georgia projects that only about 50,000 will eventually enroll in Medicaid through the waiver, due to its burdensome requirements.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

Instead of pursuing this harmful waiver, Georgia should accept the ACA's Medicaid expansion and allow all residents earning under 138% of the federal poverty line to qualify for Medicaid coverage. Doing so would extend coverage to between 487,000 and 598,000 residents at a similar cost to the state.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Georgia Access - Subsidies

Comments*

Under the proposed 1332 waiver, the state would allow for individuals to use tax credits to purchase substandard health plans that exclude coverage for essential health benefits, such as prescription drugs, maternity care, or mental health and substance abuse care. This would also increase premiums, because healthier people would enroll in cheaper, more limited coverage. The higher premium costs could trigger the waiver provision that allows the state to cap enrollment with tax credits, forcing future consumers to buy substandard plans, pay more for comprehensive coverage, or go without insurance.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

The proposed waiver would impact where and how consumers purchase health coverage that will undermine ACA consumer protections. Georgia would privatize functions of the marketplace by removing the state from the federally-facilitated exchange platform (HealthCare.gov) without creating its own exchange. Instead, consumers would enroll in coverage through private web brokers and insurers. Historically, direct enrollment entities have steered consumers towards substandard plans with catastrophic costs if they get sick, failed to alert consumers of Medicaid eligibility, and not allowed meaningful plan comparisons.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

The ACA 1332 Waiver would raise premiums for ACA coverage, push people into substandard plans, and likely cause many Georgians to lose coverage altogether – especially harming lower-income Georgians, people of color, and people with pre-existing health conditions. By your own estimates, this waiver would cover just 50,000 of the hundreds of thousands of low-income, uninsured Georgians, because it would impose so many barriers to coverage. Instead of pursuing this harmful waiver, Georgia should accept the ACA's Medicaid expansion and allow all residents earning under 138% of the federal poverty line to qualify for Medicaid coverage. Doing so would extend coverage to between 487,000 and 598,000 residents at a similar cost to the state.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

This ACA waiver fails to meet statutory “guardrails” to ensure that people who live in states that implement an ACA waiver are not worse off than they would be without the waiver.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Business/Organization * Cystic Fibrosis Foundation

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Webster-Mellon

Email * [REDACTED]

Address [REDACTED]

City [REDACTED]

State

Zip [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Other

Comments*

The Cystic Fibrosis Foundation appreciates the opportunity to submit comments on Georgia's 1115 Demonstration Waiver Application for its Georgia Pathways to Coverage initiative. The following comments serve to address all comment topics covered in this waiver.

Cystic fibrosis (CF) is a rare, life-threatening genetic disease that affects approximately 830 people in Georgia and roughly one quarter of adults with CF rely on Medicaid for some or all of their health coverage. CF causes the body to produce thick, sticky mucus that clogs the lungs and digestive system, which can lead to life-threatening infections. Cystic fibrosis is both serious and progressive; lung damage caused by infection can be irreversible and have a lasting impact on length and quality of life. As a complex, multi-system condition, CF requires targeted, specialized treatment and medications.

Medicaid is a crucial source of coverage for patients with serious and chronic health care needs—often serving as a payer of last resort, filling important gaps in coverage left by private health plans. For people with CF, Medicaid helps them afford medications and inpatient and outpatient care, ensuring access to life-saving services and allowing people with CF to maintain their health and well-being. Fully expanding Medicaid would increase access to affordable, high-quality health care and ensure a safety net for those who might otherwise be left without access to coverage.

The Georgia Pathways plan is not a solution to improving access to quality and affordable healthcare for low-income Georgians. The state estimates that approximately 50,000 individuals would gain coverage under the plan, whereas over 500,000 Georgians could access coverage if the state fully expanded its Medicaid program. The Cystic Fibrosis Foundation has concerns about the state's proposal to limit Medicaid expansion to working adults below 100 percent of the federal poverty level (FPL), exclude any exemptions for those with serious medical conditions, and impose premium requirements on some beneficiaries. We oppose the Georgia Pathways program and offer the following comments on the draft waiver application.

Eligibility

Under the Georgia Pathways plan, only individuals with incomes below 100 percent of the federal poverty level (\$1,778 per month for a family of three) who can prove that they work at least 80 hours per month would be eligible for Medicaid. This would make Georgia the first state to require enrollees to comply with the work reporting requirement prior to enrolling in the Medicaid program with no opportunity to demonstrate a medical or other exemption. Changing the eligibility for Medicaid is the sole purview of Congress and cannot be waived. The Cystic Fibrosis Foundation opposes this proposal.

For the first six months, members will have to report their hours and work activities monthly. This will put a significant administrative burden on enrollees, which will likely decrease the number of individuals with Medicaid coverage. For example, Arkansas also implemented a work reporting requirement where Medicaid enrollees had to report their hours worked or their exemption. During the first six months of implementation, the state terminated coverage for over 18,000 individuals. Failing to navigate these burdensome administrative requirements could have serious—even life or death—consequences for people with cystic fibrosis. If the state finds that individuals have failed to comply for one month, their coverage will be suspended, and if the state finds that individuals have failed to comply for three months, they will be disenrolled. People with CF, who rely on regular visits with an accredited CF care team and must take daily medications to manage their condition, cannot afford a gap in their care. Georgia has not provided an estimate of the coverage losses associated with this proposal in its waiver application.

While no exemption criteria can prevent the potential coverage losses associated with work reporting requirements, Georgia has not proposed any exemption criteria that would allow individuals who are unable to meet the work reporting requirements to apply for coverage. This means that patients who have serious health

meet the work reporting requirements to apply for coverage. This means that patients who have serious health conditions that prevent them from working 80 hours per month would have no pathway to coverage that could help them to treat these conditions. Once enrolled, individuals may be able to qualify for short-term exemptions in certain situations. Still, the Cystic Fibrosis Foundation is concerned that these exemption criteria may not capture all individuals with serious and chronic health conditions that prevent them from working. And regardless, even exempt enrollees may have to report their exemption, creating opportunities for administrative error that could jeopardize their coverage.

If individuals are able to meet the reporting requirements for six consecutive months, they will be exempt from further reporting and re-evaluated for eligibility during their annual redetermination. However, if individuals do not report a change in their employment status, they will be responsible for any capitation and cost-sharing expenses. This exposes already low-income individuals to enormous financial risk. People with CF already face significant costs for their care; 45 percent of people with CF spend \$5,000 or more annually in out-of-pocket costs for copayments, coinsurance, and noncovered services.

Finally, if Georgia truly cares about incentivizing and promoting employment, full Medicaid expansion would be the best way to achieve this goal. In a report looking at the impact of Medicaid expansion in Ohio, the majority of enrollees reported that being enrolled in Medicaid made it easier to work or look for work (83.5 percent and 60 percent, respectively). That report also found that many enrollees were able to get treatment for previously untreated health conditions, which made finding work easier. Preventing individuals from enrolling in Medicaid coverage until they comply with these requirements will therefore hurt rather than help people search for and obtain employment.

Financial Barriers

For the few individuals who are able to meet this limited eligibility criteria, the proposal still creates numerous financial barriers that will jeopardize their coverage. Individuals with incomes above 50 percent of the federal poverty level will have to pay monthly premiums and will lose coverage if they fail to pay premiums for three months. This policy would likely both increase the number of enrollees who lose Medicaid coverage. For example, when Oregon implemented a premium in its Medicaid program, with a maximum premium of \$20 per month, almost half of enrollees lost coverage. Nominal premiums are often unaffordable for low-income beneficiaries and the process of making a premium payment can create barriers to care for a population that may not have bank accounts or credit cards. For instance, an analysis of Indiana's Medicaid program found that nearly 30 percent of enrollees never enrolled in coverage or were disenrolled from coverage because they failed to make premium payments during the study period. The analysis found 22 percent of individuals who never enrolled because they did not make the first month's payment cited affordability concerns, and 22 percent said they were confused about the payment process.

Research has also shown that even relatively low levels of cost-sharing for low-income populations limit the use of necessary healthcare services. Georgia's proposal includes a number of copayments for individuals with incomes above 50 percent of the federal poverty level that could be a significant financial burden for patients. The most egregious of these is a \$30 copay for non-emergency use of the emergency department (ED). People with CF bear a significant cost burden and out-of-pocket costs can present a barrier to care. Specifically, a survey conducted by George Washington University of 2,500 people living with CF found that while 98 percent of people with CF have some type of health insurance coverage, 58 percent postpone necessary medical care or forgo prescribed treatments due to cost concerns. Such actions seriously jeopardize the health of people with CF and can lead to costly hospitalizations and fatal lung infections.

This policy will not only apply to—and jeopardize coverage for—new enrollees, but for individuals who are currently enrolled in Medicaid through the Transitional Medical Assistance (TMA) program. The TMA program provides Medicaid coverage for up to 12 months for families who lose eligibility for the program due to earnings if they meet certain requirements. Additionally, it unclear how the state may try to recoup capitation and other payments for any months that individuals do not pay their premiums and if, as with the work reporting requirement policy above, patients may be put at significant financial risk. The Cystic Fibrosis Foundation believes that these premiums will create significant financial barriers for patients that jeopardize their access to needed care and therefore opposes this policy.

Reduced Benefits

Individuals would be required to enroll in employer sponsored insurance (ESI) if it is available and determined to be cost effective for the state. However, the state would not provide any wraparound services for individuals regardless of the benefit package in their ESI. As a complex, multi-system condition, CF requires targeted, specialized treatments and medications, all of which require access to comprehensive care. Additionally, the state would not help individuals with the costs of coinsurance or deductibles required in their ESI. The Cystic

Fibrosis Foundation opposes the requirement to enroll in ESI without wraparound services and full financial protection for patients.

Additional Costs

Administering all of these requirements will be expensive for the state of Georgia. States such as Kentucky, Tennessee and Virginia have estimated that setting up the administrative systems to track and work activities alone will cost tens of millions of dollars. This would divert federal resources from Medicaid's core goal—providing health coverage to those without access to care—and compromise the fiscal health of Georgia's Medicaid program.

The Cystic Fibrosis Foundation opposes this waiver proposal. Instead, we urge Georgia to focus on solutions that promote adequate, affordable and accessible coverage, including a full expansion of the state's Medicaid program.

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[Topics/Waivers/1115/downloads/in/Healthy-Indiana-Plan-2/in-healthy-indiana-plan-support-20-POWER-acct-cont-assesmnt-03312017.pdf](https://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Waivers/1115/downloads/in/Healthy-Indiana-Plan-2/in-healthy-indiana-plan-support-20-POWER-acct-cont-assesmnt-03312017.pdf)

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(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

The Cystic Fibrosis Foundation appreciates the opportunity to submit comments on Georgia's Section 1332 Waiver Application to implement the Georgia Access Model. The following comments serve to address all comment topics covered in this waiver.

Cystic fibrosis (CF) is a rare, life-threatening genetic disease that affects approximately 830 people in Georgia and roughly one quarter of adults with CF rely on Medicaid for some or all of their health coverage. CF causes the body to produce thick, sticky mucus that clogs the lungs and digestive system, which can lead to life-threatening infections. Cystic fibrosis is both serious and progressive; lung damage caused by infection can be irreversible and have a lasting impact on length and quality of life. As a complex, multi-system condition, CF requires targeted, specialized treatment and medications.

While the Cystic Fibrosis Foundation supports reinsurance as a tool to stabilize premiums in the individual marketplace, we are deeply concerned that the Georgia Access Model will jeopardize access to quality and affordable healthcare coverage for patients with cystic fibrosis and other pre-existing conditions. Specifically, we are concerned about Georgia's proposals to create a new subsidy structure, waive essential health benefits (EHBs) and network adequacy requirements, place beneficiaries on a waitlist for subsidized coverage if the state exceeds its capped contribution, and transition the state away from a centralized enrollment platform.

Moreover, the state's 1332 waiver fails to satisfy the guardrails in the statutory language of the Affordable Care Act (ACA) requiring that coverage must be as affordable as it would be without the waiver; coverage must be as comprehensive as it would be without the waiver; a comparable number of people must be covered under the waiver as would be without it; and the waiver must not add to the federal deficit. The waiver would also put the healthcare coverage of the 450,000 Georgians who currently get their insurance through the state's marketplace at risk while only attempting to expand coverage for a small fraction (30,000 individuals) of the more than 1.4 million uninsured individuals in Georgia. The Cystic Fibrosis Foundation urges Georgia to withdraw its application for the Georgia Access Model.

State Subsidy Program

Georgia proposes creating a new state-administered subsidy system to replace the Advanced Premium Tax Credits (APTC) established by the ACA. There are several problems with the proposed subsidy structure—including elimination of cost-sharing reduction (CSR) payments, potential for increased premiums for qualified health plans (QHPs), inadequate resources for subsidies, and waitlist for coverage. The proposal will reduce access to affordable healthcare coverage for patients with CF and the Cystic Fibrosis Foundation opposes this change.

First, the draft application requests to waive the CSR program that helps patients with incomes below 250 percent of the federal poverty level (FPL) pay deductibles, coinsurance and other cost-sharing required by their health plan. It is unclear whether individuals who currently qualify for CSRs under the ACA will still get this financial assistance under the state-administered subsidy system.

Additionally, the state has likely underestimated the impact of the Georgia Access Model on premiums in Georgia. Eligible non-QHPs will attract healthier consumers, segmenting the market and increasing the cost of comprehensive coverage. Additionally, as discussed later in our comments, the loss of Healthcare.gov and the incentives for insurers and brokers selling products outside of an exchange will likely boost enrollment in short-term and other skimpy plans, further undermining the risk pool and destabilizing the market. A increased premiums would both make QHPs more expensive for individuals who do not qualify for subsidies and also increase the cost of QHP subsidies for the state, meaning that the state's pool of financial assistance funds would not be able to help as many individuals. People with CF already face high premium costs; about a third of people with CF pay \$10,500 or more a year for premium coverage.

of people with CF pay \$10,000 or more a year for premium expenses.

The state subsidy system is also significantly under-resourced, which would have serious implications for patients with CF and other individuals in Georgia. The state has budgeted \$13.5 million in the first three years and \$5 million thereafter for implementation costs, which seems quite low given the significant investments in new technical and administrative systems needed to operate the Georgia Access Model. Additionally, the state's contribution to the subsidy fund is just \$144 million in 2022, which will not go far if the Georgia Access Model increases premiums as predicted above.

This lack of funding is particularly dangerous for patients given the Georgia Access Model's cap on subsidy funding. Currently, any individual who meets the eligibility criteria for financial assistance for coverage under the ACA receives that financial assistance. However, patients could be placed on a wait list if the state exceeds its capped contribution under the Georgia Access Model. People with CF cannot afford to be placed on a waitlist for subsidized coverage. A survey conducted by George Washington University of 2,500 people living with CF found that while 98 percent of people with CF have some type of health insurance coverage, 58 percent of CF patients postpone necessary medical care or forgo prescribed treatments due to cost concerns. Such actions seriously jeopardize the health of people with CF and lead to costly hospitalizations and fatal lung infections.

Promotion of Substandard Plans

As mentioned in the previous section, Georgia's proposal would allow subsidies to be used for QHPs currently offered in the state as well as for "eligible non-QHPs." This will result in more individuals enrolling in less comprehensive coverage and the Cystic Fibrosis Foundation opposes this change.

The draft waiver application does not contain sufficient information about the standards for eligible non-QHPs, particularly what the state means when it says the plans will maintain protections for people with pre-existing conditions. For example, even if these plans cannot deny coverage to patients with pre-existing conditions, could plans vary premiums based on health status? Protecting patients with cystic fibrosis and other pre-existing conditions involves much more than guaranteed issue; patients need community rating, bans on exclusion periods and condition exclusions, cost-sharing protections, bans on annual and lifetime limits and many other protections currently required for plans sold on the individual market to truly access comprehensive, affordable healthcare coverage.

Other aspects of the standards for these plans are concerning and unclear as well. The draft application requests to waive network adequacy requirements, which ensure plans provide a minimum level of access to providers. Additionally, it is unclear how eligible non-QHPs could be part of the single risk pool with current QHPs given how dissimilar these products could be. This would make risk adjustment—a process that discourages plans from cherry-picking healthier individuals by transferring funds from plans with lower risk enrollees to higher risk ones—difficult to implement.

The draft application does clearly state that eligible non-QHPs would not have to cover all ten EHBs, which are currently required by QHPs. The state claims that eligible non-QHPs will provide 90 percent of the benefits that current QHPs cover. However, the state provides no explanation or analysis to support this assumption. People with CF depend on the inclusion of essential health benefits such as coverage for prescription drugs, laboratory services, and hospitalizations. By offering plans that do not cover all EHBs but are still eligible for subsidies, issuers will be able to segment the market and charge lower premiums to healthier individuals for eligible non-QHPs while charging high premiums for patients with pre-existing conditions who need comprehensive coverage. This is a backdoor to discrimination against patients with pre-existing conditions.

Finally, given the destabilizing impact of the state subsidy program on the individual marketplace, it is possible that some issuers may rethink their decisions to offer QHPs in Georgia. Yet the state assumes that issuers will still offer QHPs in all ratings areas after the implementation of the new state subsidy program with no explanation to support that assumption. If this assumption does not hold, patients in some areas of the state would no longer have access to comprehensive care and have to choose between eligible non-QHPs or other skimpy plans or going without coverage. People with CF must have access to coverage that covers the full range of CF treatments and therapies.

Enrollment Platform

In addition to administering a state subsidy program, Georgia's application proposes to no longer use Healthcare.gov for enrollment and instead have people enroll directly through insurers or brokers. This policy will make it harder for patients to enroll in comprehensive, affordable healthcare coverage and the Cystic Fibrosis Foundation opposes this change.

While the state acknowledges that leaving Healthcare.gov would require a detailed transition strategy, we fear that some of the 450,000 Georgians who currently purchase coverage through Healthcare.gov would inevitably lose coverage during the transition. People with CF cannot afford gaps in coverage, which can lead to decreased access to care and high out-of-pocket costs. The state assumes that there will be no coverage losses without any analysis to support that assumption, calling into question whether the Georgia Access Model will truly lead the same or more people to obtain coverage than would without the waiver.

Today, patients with CF who shop on Healthcare.gov can trust that they are purchasing a health insurance plan that provides a certain level of benefits and patient protections. However, under the Georgia Access Model, issuers and brokers could sell QHPs alongside other types of plans that discriminate against people with pre-existing conditions and will not cover enrollees' medical expenses if they get sick. This could create confusion for patients and lead them to purchase coverage that does not meet their needs. There is already evidence of misleading marketing related to short-term and other skimpy plans leading individuals to unwillingly enroll in coverage that lacks key patient protections. This problem would likely worsen in Georgia under this proposal.

Healthcare.gov shows consumers all QHPs available in their area and does not favor certain plans over others. However, brokers who would be helping individuals through the enrollment process under the Georgia Access Model would not have to show individuals all of their plan options and may receive larger commissions for certain plans over others that influence their recommendations to patients. Increasing the reliance on insurers and brokers will limit the ability of patients with cystic fibrosis to compare plan price and benefit design in an unbiased manner to choose the right plan for them and could ultimately result in harm to patients who become enrolled in sub-standard or inadequate insurance coverage that does not meet their needs. This failure to appropriately shield patients from risk is unacceptable.

The Cystic Fibrosis Foundation opposes this waiver proposal. Instead, we urge Georgia to focus on solutions that promote adequate, affordable and accessible coverage without jeopardizing access to care for patients with CF and other pre-existing conditions.

Thank you for your consideration.

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(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * DaVita

Stakeholder Type * Provider/Hospital

First Name * [REDACTED] **Last Name *** McMullen

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*
Impact to dialysis patients
(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

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Comment Topic* Georgia Access - Other

Comments*

Impact to dialysis patients
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- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * DaVita, Inc

Stakeholder Type * Provider/Hospital

First Name * [REDACTED] **Last Name *** McMullen

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

Dear Mr. Loke:

We respectfully submit the following comments regarding Georgia's Section 1332 Waiver. The DaVita nationwide patient population includes approximately 200,000 patients who have been diagnosed with end-stage renal disease (ESRD), who receive life-saving dialysis treatment across all 50 states and the District of Columbia. The DaVita kidney care network includes more than 2,445 locations. In Georgia, over 2,200 DaVita teammates (employees) have the privilege of serving nearly 9,500 patients. Our comprehensive, care team includes nephrologists, nephrology nurses, patient care technicians, pharmacists, clinical researchers, dieticians, social workers, and other highly-trained kidney care specialists.

BACKGROUND

End Stage Renal Disease (ESRD), or kidney failure, is the last stage (stage five) of chronic kidney disease (CKD). This stage is reached when an individual's kidneys are functioning at 10%–15% of their normal capacity or below and, therefore, cannot sustain life. Kidneys are vital organs that remove toxins from the blood and perform other functions that support the body, such as balancing fluid and electrolytes, and producing certain hormones. When kidneys fail, they cannot effectively perform these functions, and renal replacement therapy, such as dialysis or a kidney transplant, is necessary to sustain life.

The most common type of dialysis is hemodialysis, which is predominantly performed in specialized outpatient facilities. Hemodialysis is a therapy that filters waste products, removes extra fluid, and balances electrolytes (sodium, potassium, bicarbonate, chloride, calcium, magnesium and phosphate), replacing the mechanical functions of the kidney. Traditional in-center hemodialysis is generally performed a minimum of three times a week for approximately four hours each session. Due to the significant impact of dialysis treatment on the body, the resulting fragility of those with the disease, and the amount of time involved in treatment, the proper treatment of ESRD patients under the Georgia waiver is of critical importance.

Individual Market Coverage is an Important Option for Dialysis Patients

It is worth describing why a dialysis patient (who may be eligible for Medicare under Section 226A of the Social Security Act) would want to obtain individual market coverage. For many patients, factors they consider when deciding whether to continue with their individual market plan coverage or enroll in Medicare are both clinical and financial, such as:

- The benefit accrued by being able to keep the individual insurance coverage they had before they got sick as changing a plan could impact current healthcare providers and costs already paid for year to date services;
- The potential additional costs involved with enrolling in Medicare, such as applicable premiums, deductibles and coinsurance responsibilities (dialysis patients typically enroll in Medicare Parts A, B, and D);
- Additional costs of having to purchase separate insurance coverage for the patient's family;
- Although in Georgia ESRD patients under age 65 can obtain supplemental insurance coverage (Medi-Gap) to cover out-of-pocket costs that Medicare does not cover, those premiums often are unaffordable;
- Limitations on the ability to obtain coverage for ancillary services through Medicare such as dental or vision coverage, which may be vital for patients considering a transplant;
- Enrollment in Medicare Part A means individuals will lose any advanced premium tax credits (APTCs) or cost-sharing reductions (CSR) they presently receive under an Exchange plan;
- Individuals on a current transplant list could potentially lose their place on the waiting list if the transplanting facility or provider does not accept Medicare or could have a delay in transplant workup if they have a change in insurance;
- An individual who enrolls in Medicare due to ESRD cannot later change their mind and "opt-out" of Medicare enrollment without significant financial risk for amounts expended by Medicare during the period of enrollment;

enrollment without significant financial risk for amounts expended by Medicare during the period of enrollment, and

- The fact that many providers do not accept new Medicare patients.

GEORGIA SECTION 1332 WAIVER APPLICATION

Georgia's Section 1332 waiver application is broken down into two parts. Part I is a reinsurance for Plan Years 2021 – 2025 and Part II involves transitioning the individual market to the "Georgia Access Model" for Plan Years 2022 – 2025. The concerns outlined in this letter relate to Part II of the waiver.

Transitioning the individual market to the "Georgia Access Model" for Plan Years 2022 – 2025

Starting in PY 2022, the Georgia Access Model would allow individuals to purchase "Eligible non-QHPs" – plans which provide a more limited set of Essential Health Benefits (EHBs) – on the individual market. Georgia's proposed waiver also seeks to waive cost-sharing and premium tax credit subsidies under the ACA to create a state subsidy program funded with federal and state funds. These subsidies would be available for individuals selecting either QHPs or new Eligible non-QHPs for individuals between 100% and 400% of the FPL.

Although covered under the waiver, eligible non-QHPs must be in the single risk pool, maintain pre-existing condition protections, and not medically underwrite. These plans would be able to offer a more limited set of EHBs. HHS regulations (45 CFR 156.100, et seq.) define EHB based on state-specific EHB-benchmark plans. Georgia's EHB Benchmark plan (Humana Employers Health Plan of Georgia) includes dialysis as an EHB without any quantitative limits on services. Based on the information available in the waiver, we are very concerned that eligible non-QHPs could exclude dialysis as part of their benefit packages or include quantitative limits on dialysis services. Losing coverage simply because one is diagnosed with ESRD would add further hardship to an already difficult situation. Similarly disturbing would be any quantitative limits on dialysis such as limiting treatments to an insufficient amount per month or per year, which could effectively mean a death sentence for individuals reliant on this life-saving intervention.

It also is unclear whether eligible non-QHPs would have to comply with ACA protections such as caps on annual and lifetime limits. While we understand that Georgia intends to specify in its final draft submission to CMS that eligible non-QHPs would have to comply with consumer protections under 45 CFR Part 147, annual and lifetime limit statutory provisions under the Affordable Care Act provide that health plans may place annual and lifetime limits on benefits that are not EHB under Subtitle A of Title I of the ACA. We would continue to have concerns about whether waiver authority provided under Section 1332 of the ACA (which allows for the waiver of requirements under Part I of Subtitle D of Title I of the ACA) would allow for the protections we understand Georgia would intend to assert relative to regulations under 45 CFR Part 147. Without annual or lifetime limit protections, patients could hit their limits within a few months of dialysis and could therefore be subject to remaining out of pocket costs which could be thousands of dollars in addition to existing premium and out of pocket costs. Altogether these patient costs could accumulate to over \$10,000 per year.

Finally, we understand other plan options are contemplated under the Georgia Access Model such as Short-Term Limited Duration Insurance (STLDI). Because we do not view products such as STLDI as true insurance, we would be similarly concerned about whether such plans would be required to comply with ACA patient protections vital to individuals on dialysis.

In light of these concerns, we would request that Georgia explicitly state that all ACA patient protections would apply to eligible non-QHPs, full QHPs, and any other plans contemplated under the model.

We also request Georgia explicitly ensure that dialysis would not be excluded as part of an eligible non-QHP and that such plans not be allowed to provide quantitative limits on dialysis services. We would have strong concerns about individuals enrolled in these insurance products finding out they have kidney failure and being forced off their coverage simply because of their diagnosis.

Georgia Should Provide Further Details on the Impact to "Full QHPs" Under the Waiver

Georgia notes that premiums for eligible non-QHPs are expected to be 10% less than "full QHPs" (i.e. those offering ACA-compliant EHBs) and, due to the adverse selection of healthier individuals moving to skinnier benefits, Georgia calculates the availability of eligible non-QHPs to be projected to increase premiums for full QHPs by 1.1%. However, Georgia estimates (1) reinsurance payments under the waiver will more than offset this effect in the case of individuals who do not receive a subsidy and (2) affordability would be unchanged for

individuals with full QHPs who do receive a subsidy. Table 5 of the Appendix in the waiver appears to show that, on average, enrollment will increase and premiums per month will decrease.

Georgia notes in the waiver, however, that “no other state has pursued this type of model” and the “magnitude of these enrollment impacts is uncertain.” It is for that reason we would strongly encourage Georgia to show the estimated changes in total costs of care for “eligible non-QHPs” and “full QHPs” under the waiver, including premiums, deductibles, copayments and coinsurance, and out-of-pocket maximums. It may be instructive to note that a 2017 Commonwealth Fund analysis found that the best-selling STLDI, which had relatively low premiums, had out-of-pocket maximums of up to \$20,000 for just three months of coverage compared to ACA limits for out-of-pocket maximums of \$7,150 for the entire year. In other words, while premiums for “skinnier” insurance may be lower, out-of-pocket maximums may be much higher depending on the product and whether it’s ACA compliant.

Finally, we are concerned that if individuals with fewer health concerns are steered towards eligible non-QHPs because they are typically cheaper, this would tend to drive up costs for individuals more likely to stick with ACA-compliant plans, such as patients with kidney failure. Here again, it would be very helpful to understand the total cost of care impacts for “eligible non-QHPs” and “full QHPs” under the waiver, including premiums and out-of-pocket maximums. We are concerned that the movement of enrollees from full-QHP (i.e. ACA-compliant plans) and to eligible non-QHPs would tend to reduce stability for those patients remaining in ACA-compliant plans.

CONCLUSION

We appreciate Georgia’s efforts to increase health insurance coverage in the state. Our comments reflect our sincere desire to make sure that increases in health insurance coverage under the waiver do not result in higher costs of care for more vulnerable patients. In sum, making ‘skinny insurance’ available in the individual market could result in either limiting necessary benefits in the case of eligible non-QHPs or causing the total cost of care to increase in full QHP plans as a result of adverse selection. Under such a scenario, it also is likely that some patients may choose to enroll in the least expensive plans when they are healthy, but move to full QHP plans when they discover their skinny insurance does not adequately cover them. We look forward to continuing to work with you to ensure high-quality health coverage in Georgia.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * Emory University

Stakeholder Type * Provider/Hospital

First Name * [REDACTED] **Last Name *** Mackey

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

Blake Fulenwider
Chief Health Policy Officer
Georgia Department of Community Health
2 Peachtree St NW, Atlanta, GA 30303

December 3, 2019

Dear Mr. Fulenwider:

Thank you for the opportunity to provide comments on the Patient's First Act.

First, I would like to commend you, the Georgia Department of Community Health and the State of Georgia for prioritizing the need to seek solutions for the state's indigent and underinsured populations and increasing their access to quality care. Thank you for your efforts to address the needs of this vulnerable population. These first steps are critical to building a sustainable healthcare system that changes disparities of care across the state.

Emory University is proud to serve the citizens of Georgia as the state's largest academic medical center and Atlanta's largest employer. Comprised of 11 hospitals and nearly 2,800 physicians and advanced practice providers who annually care for over 98,000 admissions, 5 million outpatient visits, and more than 300,000 ER visits, Emory Healthcare is honored to serve as the largest academic and community provider. As a tertiary and quaternary provider, we care for some of state's sickest patients with over 15 percent of patients arriving at Emory University Hospital via acute-to-acute transfer after their care needs could not be met at other healthcare systems. In some of our facilities, roughly 1 in 3 hospital admissions have no insurance coverage or only Medicaid.

It is critical for the health of our state's population and the health systems that care for them that Georgia meaningfully expands coverage and access to care for our neediest Georgians. As the state contemplates the implementation of the 1115 waiver, we appreciate considerations given to avoiding issues, such as coverage lock-out, that could ultimately result in increased costs to Medicaid, as well as negative ramifications for individuals and providers.

It is our hope, in partnership, that Emory's regional strategy in partnering with rural hospitals will help bolster our state's outcomes under the Medicaid waiver. Part of our mission is to keep patients in their local hospital by helping those facilities determine what service lines are causing them to send patients out of their hospitals to Atlanta or other larger cities. Emory can then offer a slate of different options, from telehealth to continuing medical education to embedding clinical service lines in rural hospitals. For example, Emory has been able to help hospitals keep dialysis patients local. These smaller, rural facilities, like Emanuel Medical Center in Swainsboro, were sending patients a hundred miles away because they did not have a nephrologist. Emory helped them develop a nephrology program allowing the hospital to keep those patients local supported by high quality care provided by Emory.

Emory values its participation in the Georgia Medicaid program and is grateful for the state's commitment to developing solutions for this population. Please consider Emory to be at your service in any way we can be of assistance.

Thank you,

Jonathan S. Lewin, MD
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/27/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * Georgia Academy of Family Physicians

Stakeholder Type * Trade Association

First Name * [REDACTED] **Last Name *** Fulton

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

November 27, 2019

The Honorable Brian Kemp
Governor – State of Georgia
203 Capitol Place SW
Atlanta, GA 30334

Dear Governor Kemp:

Re: Public Comment – Proposed 1332 Waiver

Background: Georgia Access – 1332 Proposal

The waiver removes Georgia from the federal healthcare.gov individual market enrollment platform. The state would adopt healthcare.gov's responsibilities in validating eligibility information and determining subsidies, without establishing its own, state-level health care marketplace. Private contractors would assume customer service and other roles. Notably, the state is looking to waive qualified health plan (QHP) requirements to allow for additional ACA non-compliant plans and unlock additional funds to subsidize these plans.

Notably, unlike the current open-ended nature of individual market subsidies under the ACA, this waiver proposal would essentially block-grant the subsidies and cap the state's contribution, potentially resulting in a waiting list for individuals' subsidies, even for those who qualify. It is estimated that approximately 30,000 individuals will gain coverage through this waiver.

Comments:

On behalf of the 3,200 members of the Georgia Academy of Family Physicians and the patients that we care for that are over 1,500,000 Georgians, we appreciate the opportunity to comment on your Medicaid innovation and waiver plan.

The Georgia Academy of Family Physicians is the only medical society devoted solely to primary care. Nearly one in four of all office visits are made to general and family physicians. Today, family physicians provide the majority of care for America's underserved and rural populations. We believe that we are uniquely qualified to comment on this proposal.

While we appreciate that this proposal will not interrupt coverage with patients with pre-existing conditions, we are concerned about allowing non-ACA compliant plans into Georgia.

The current proposal to allow Georgians to buy extended, short-term health insurance (non-ACA compliant) is a step back to the days when companies sold low-value insurance policies that subjected our patients to catastrophic medical bills and medical bankruptcy.

The current proposal would allow exempt these non-compliant plans from Affordable Care Act consumer protections such as covering essential benefits, which include prescriptions, laboratory tests, hospitalization and maternity care. It would allow plans to once again establish caps on annual benefits. Limiting benefits can expose patients to extraordinarily high out-of-pocket costs, particularly for people who have chronic or life-threatening conditions that require costly treatment, close monitoring and ongoing medication.

Equally troublesome, these plans further destabilize the individual market by drawing young, healthy people away from meaningful, comprehensive coverage that meets ACA standards. Allowing the healthy to gamble with low-quality insurance will also raise ACA-compliant plans' premiums, putting better coverage beyond the

reach of millions of the sickest Americans.

The Georgia Academy has stood with the American Academy of Family Physicians in steadfastly calling for policies that ensure all Americans have access to affordable, meaningful health insurance. Georgia policies should support patient-centered insurance reforms that prohibit insurers from selling plans that fail to provide meaningful coverage.

Any plan allowed to be sold to Georgians in our state should have these minimum essential health benefits:
Benefits

At a minimum, these would include items and services in the following benefit categories:

- Ambulatory patient services
- Emergency services
- Hospitalization
- Maternity and newborn care
- Mental health and substance use disorder services, including behavioral health treatment
- Prescription drugs
- Rehabilitative and habilitative services and devices
- Laboratory services
- Preventive and wellness services and chronic disease management
- Pediatric services, including oral and vision care

In addition to requiring coverage for essential health benefits, all proposals or options will ensure that primary care is provided through the patient's primary care medical home. To foster a longitudinal relationship with a primary care physician, all proposals or options will provide the following services independent of financial barriers (i.e., deductibles and co-pays) if the services are provided by the patient's designated primary care physician:

- a. Evaluation and management services
- b. Evidence-based preventive services
- c. Population-based management
- d. Well-childcare
- e. Immunizations
- f. Basic mental health care

Thank you for your review of our comments. We look forward to working with you to support our patients who have little to no current options for affordable health coverage.

Sincerely,

Jeff Stone, MD, MBA, MHA, FAAFP
President 2019-2020
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/27/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * Georgia Academy of Family Physicians

Stakeholder Type * Trade Association

First Name * [REDACTED] **Last Name *** Fulton

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments *

November 27, 2019

The Honorable Brian Kemp
Governor – State of Georgia
203 Capitol Place SW
Atlanta, GA 30334

Dear Governor Kemp:

Re: Public Comment – Proposed 1115 Waiver

Background: Georgia Pathways – 1115 Proposal

Medicaid covers approximately 1.77 million in Georgia, which has not thus far expanded Medicaid to individuals with incomes up to 138 percent of the federal poverty level (FPL) under the Affordable Care Act (ACA). The State's proposed section 1115 waiver expands Medicaid to individuals with incomes up to 100 percent FPL (\$12,500/year) – with a 90 percent enhanced federal matching assistance percentage (FMAP) funded by the federal government. Individuals with incomes under 100 percent FPL who are not currently eligible for Medicaid would be subject to community engagement (work) requirements of 80 hours/month in order to receive coverage under this Medicaid expansion. Activities satisfying the community engagement requirements include the following:

- Full- or part-time employment
- On-the-job training/job readiness training
- Vo-tech education
- Higher education, including college/university

Individuals found not in compliance are suspended from Medicaid coverage and may re-join pending satisfaction of requirements for three months. Should an individual still not be in compliance after three months, they would be disenrolled. Individuals experiencing certain circumstances, including a birth/death of family member, serious hospitalization, temporary homelessness, or other events, would be allowed short-term exclusions from the community engagement requirements. Notably, individuals with disabilities, serious illness, or caregiver responsibilities would not be exempt from this requirement. Furthermore, individuals would have to report their employment status monthly; if in compliance for six consecutive months, they would become exempt from the reporting requirement and report only changes.

The proposed waiver would waive three months retroactive (prior quarter) coverage in the state. It would also introduce limited cost-sharing into individuals eligible for Georgia Pathways with incomes greater than 50 percent FPL, including premiums not to exceed two percent of household income, which could be used to pay for co-payments. Combined, co-pays would not exceed three percent of a household's income.

It is expected that the waiver would expand coverage to 52,000 individuals

Comments:

On behalf of the 3,200 members of the Georgia Academy of Family Physicians and the 1,500,000 qualified uninsured patients we care for, we appreciate the opportunity to comment on your Medicaid innovation and expansion waiver plan.

The Georgia Academy of Family Physicians is the only medical society devoted solely to primary care. Nearly one in four of all office visits are made to general and family physicians. Today, family physicians provide the majority of care for America's underserved and rural populations. We believe that we are uniquely qualified to

comment on this proposal.

We are supportive and encouraged by this first step to cover many poor Georgians who struggle with many social determinants of health as well as an ability to access and maintain health care coverage. We thank you for proposing to cover potentially an additional 52,000 Georgians and look forward to additional conversations to seek innovative Georgia-based solutions seeking avenues to cover additional Georgians in the future.

This current plan would seek to add these additional Georgians to the current Medicaid roles. For the coverage to increase access and improve health, these citizens must be able to find a medical home to care for them. We have a long-standing policy of encouraging all patients to seek an established relationship with a primary care physician.

For additional members of the Georgia Academy, and other primary care physicians to add additional patients to their patient panel – the payment must include the enhanced primary care codes that currently pay primary care physicians and obstetrical and gynecologists the codes up to 2018 Medicare rates. Currently these codes are paid at 2014 Medicare rates and we are asking policy leaders to consider raising that amount to 2018 Medicare rates. We believe strongly that keeping pace with Medicare payment allows many of us to care for additional patients that we typically care for at a loss.

Any proposed changes to Georgia's Medicaid program need to not create barriers to coverage and care by requiring enrollees to pay significantly higher premiums, deductibles, co-payments and other out-of-pocket costs for Medicaid enrollees compared to current federal and state requirements and/or by establishing time limits on eligibility. Studies show higher premiums and relatively small increases in cost-sharing creates barriers to coverage and access to care, especially for those with the lowest incomes:

Even relatively small levels of cost sharing in the range of \$1 to \$5 are associated with reduced use of care, including necessary services. Research also finds that cost sharing can result in unintended consequences, such as increased use of the emergency room, and that cost sharing negatively affects access to care and health outcomes. For example, studies find that increases in cost sharing are associated with increased rates of uncontrolled hypertension and hypercholesterolemia and reduced treatment for children with asthma.

The Georgia Pathways Waiver should not reduce coverage of essential benefits, maternity care, substance use disorder treatment, mental health services, immunizations, and for children, services covered under the federal Early Periodic Screening, Diagnosis and Treatment 3 (EPSDT) program, which mandates basic preventive and therapeutic health services that are deemed medically appropriate and necessary for children.

Thank you for your review of our comments. We look forward to working with you to support our patients who have little to no current options for affordable health coverage.

Sincerely,

Jeff Stone, MD, MBA, MHA, FAAFP
President 2019-2020

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Business/Organization * Georgia Association of Health Plans

Stakeholder Type * Trade Association

First Name * [REDACTED] **Last Name *** weathington

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

Georgia Association of Health Plans
Comments on Georgia Access 1332 Waiver

Ryan Loke
Office of the Governor
115 State Capitol
206 Washington St. SE
Atlanta, GA 30334

The Georgia Association of Health Plans (GAHP), representing the companies currently serving Georgia's citizens in the individual and group health benefits sector would like to take this opportunity to provide our comments in support of the proposed Section 1332 and 1115 Waiver proposals unveiled by your Administration, known as Georgia Access and Georgia Pathways. Both will have a profound impact in ways we believe will be beneficial in terms of affordability, choice, and access.

We would like to express our appreciation and commend your office for the inclusive stakeholder and public engagement process undertaken throughout the development of the proposals. A robust and meaningful effort has been made to disseminate the details of the proposals, as well as a parallel effort to solicit, process, and utilize feedback and experience from other states and stakeholder groups with relevant expertise.

Second, we applaud the tested approach involved in the design of the reinsurance program element of Georgia Access. Other states have achieved success in reducing the premiums paid by plan members by deploying a reinsurance program under the Affordable Care Act. We believe the approach outlined under Georgia Access will achieve similar results, especially in rural areas where premium costs tend to be higher due to lack of competition between providers, poor health outcomes, and limited access to care.

Third, the innovative elements of both Access and Pathways taken together should provide supported ways for more Georgians to receive health coverage under Medicaid or Employer Sponsored Insurance in a way that drives value and helps those who currently have no method to access health benefits.

We look forward to continuing to work with your office as well as the Commissioners of Insurance and Community Health as the State proceeds with the development and implementation of Georgia Access and Pathways.

Sincerely,

Frank Ulibarri, Chair
Georgia Association of Health Plans
Market President, Georgia and the Gulf States, Aetna
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Business/Organization * Georgia Budget and Policy Institute

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Harker

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

The Georgia Budget and Policy Institute shares the goals of increasing access to health care and increasing the number of people employed and making higher wages, but the proposed 1115 waiver, even when paired with the 1332 waiver, falls short of achieving those goals. In addition, it includes costly provisions that push people off coverage and won't do enough to meet the needs of rural Georgians and Georgia health care providers.

One of our concerns is that a very limited number of people are expected to gain coverage under this waiver. Although state leaders say that over 400,000 Georgians could gain health coverage based on the income parameters, they project that only about 50,000 of those Georgians—just 13 percent of those with eligible incomes—are expected to get coverage in 2022 under this 1115 waiver proposal.

Full Medicaid Expansion Covers Significantly More Georgians and Is the More Cost-Effective Option

There is still another option on the table that would cover many more Georgians at a similar cost to the state as both proposed waivers. If the state fully expanded Medicaid eligibility instead of the partial Medicaid expansion this plan proposes, about 486,000 Georgians could gain coverage in 2022 on the low end of the state auditor's estimates in a 2019 fiscal note. This would come at a net state cost (on the highest end) of \$213 million in the year 2022. In comparison, both the proposed 1115 waiver and the 1332 waiver would only cover 80,000 more people in 2022 and for a similar cost as fully expanding Medicaid.

Additionally, based on 2018 uninsured population data from the Census Bureau, the proposed waivers combined would drop the state's uninsured rate from 13.7 percent to 12.9 percent, while full Medicaid expansion would drop the state's uninsured rate from 13.7 percent to 9 percent. Georgia has the third highest uninsured rate, and the proposed waivers would not significantly reduce the high rate of uninsured.

We can still cover hundreds of thousands more Georgians at a better price by extending Medicaid eligibility to 138 percent of the poverty line and receiving the 90 percent federal match, instead of the 67 percent match upon which this proposal's calculations are based.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Program Goals

Comments*

The 1115 Waiver Will Neither Increase Long-Term Employment Nor Long-Term Wages

Another goal of this waiver is to increase the number of people employed or engaged in employment-related activities and to increase wages among the employed. However, requiring enrollees to report their work or volunteer hours to get and keep their health coverage would not promote long-term growth in employment and wages. In fact, multiple studies on work reporting requirements in other public benefit programs found modest increases in employment in the first two years, but these gains faded by the fifth year.[1] Also, most people who did gain employment in those first two years did not earn enough to get out of poverty.

Gayle Hamilton et al., "National Evaluation of Welfare-to-Work Strategies: How Effective Are Different Welfare-to-Work Approaches? Five-Year Adult and Child Impacts for Eleven Programs." MDRC, December 2001.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Premiums, Copayments, Member Rewards Account

Comments *

1115 Waiver Requirements Are Costly, Burdensome, and Will Lead to Lost Coverage

Work reporting requirements are a financial burden on the state, largely because administering work reporting requirements often necessitates additional staff and updates to information technology systems. The Government Accountability Office reported that Arkansas spent \$26 million and Indiana spent \$35 million to administer these work reporting requirements in their Medicaid programs.

Work reporting requirements are also a burden to people. Working people may face difficulties in reporting hours due to lack of reliable internet access or having seasonal work schedules. Furthermore, some people are not able to work because they are caregivers, students, have a chronic illness, are in a substance abuse or mental health treatment program, have a disability but do not qualify for disability benefits or other reasons. People who are unable to work or volunteer are often not able to get or maintain health coverage when there are work reporting requirements. Because of the many challenges these reporting requirements present, tens of thousands of people subjected to them in states like Arkansas lost their health coverage.[2]

Requiring premiums and co-payments under this waiver presents another burden to enrollees and could also lead to significant drops in coverage. Cost-sharing requirements can lead to fewer eligible people enrolling in coverage and fewer enrolled people keeping their coverage. In a study of public health insurance programs in multiple states, premiums as low as one percent of the enrollee's income reduced participation by about 15 percent.[3] Even in Wisconsin, where premiums were charged for adults with incomes above the poverty line, there was a 24 percent reduction in enrollment because of nonpayment of premiums.[4]

There are also likely administrative costs associated with managing the member rewards accounts that some enrollees would have under the proposed waiver. The Georgia Department of Audits and Accounts published a fiscal note in 2016 that estimated a health savings account pilot program for a partial Medicaid expansion population would cost the state \$4.6 to \$5.9 million in the first year and up to \$7.5 to \$9.8 million in the third year. The expense of this proposed waiver is likely to be higher than stated because these additional costs are not included.

[2] Benjamin Sommers et. al. "Medicaid Work Requirements – Results from the First Year in Arkansas." New England Journal of Medicine, September 2019.

[3] Machledt D. and Perkins J., "Medicaid Premiums and Cost Sharing." National Health Law Program, March 2014.

[4] Dague L. "The effect of Medicaid premiums on enrollment: A regression discontinuity approach". Journal of Health Economics, September 2014.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit

comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Employer Sponsored Insurance

Comments*

The cost-sharing requirements will be different for some enrollees in this proposed waiver. Some participants in this waiver plan would be receiving premium and cost-sharing assistance to enroll in their employer's health coverage plan. But these participants would likely face coinsurance and deductibles that could make those plans cost-prohibitive for people making below the poverty line.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

The 1115 Waiver Will Not Substantially Increase Health Care Access and Is Comparatively Expensive

Overall, this waiver plan covers only a fraction of eligible Georgians and is likely to cost the state more than outlined in this application when accounting for potentially higher enrollment and administrative costs. It does not do enough to increase access to health care, increase employment and wages, help rural Georgians, or significantly increase payments to health care providers.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

The reinsurance program is a good strategy to help reduce premiums and it is good that it includes targeted strategies for putting more of the money toward rural areas where premiums are higher. But the state should consider the effect the program will have on people at different income levels. Most of the reinsurance program benefits do not go to the low- and moderate-income people who receive premium tax credits. A reinsurance program is a great way to help reduce premiums for the small share of marketplace enrollees with incomes too high for premium tax credits. However, enrollees who receive premium tax credits may not see lower costs because they pay a premium that is based on their income. This waiver plan does not include additional assistance for enrolling and reducing out-of-pocket costs for subsidy-eligible individuals, who will not benefit as greatly from the reinsurance program.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Georgia Access - Subsidies

Comments*

Georgians Seeking Comprehensive Private Health Insurance Coverage Could Face Higher Costs

One of the goals from the draft 1332 waiver application is "to spur innovation while not eroding the availability and affordability of QHPs." QHPs are qualified health plans, which are the plans compliant with ACA protections and include the ten essential health benefits. The proposed changes in this waiver are likely to work against this goal and result in the qualified health plans becoming more expensive. The waiver allows people to use their premium subsidies to purchase non-qualified health plans. These plans do not have to cover all the essential health benefits. Because of this, the plans are expected to have premiums that are about 10 percent lower than the comprehensive qualified health plans. People with fewer health concerns could be steered towards these plans because of the lower cost, which would drive up costs for people who need to have comprehensive plans.

People could also face higher costs as the result of a cap the state plans to put on the premium subsidies. If more people use the premium subsidies than expected, additional enrollees would be able to enroll in plans but would only receive subsidies if more state funding becomes available. This includes people who would have otherwise been eligible for subsidies under the current federal structure. By capping the subsidies, there is a risk that some people could face higher premiums as a result of not receiving the subsidies they are qualified for.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * Georgia Chamber of Commerce

Stakeholder Type * Advocacy Group

First Name * [REDACTED] **Last Name *** Clark

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

The Georgia Chamber commends Governor Kemp and his administration for developing the 1115 & 1332 ACA waiver proposals which will effectively decrease the number of uninsured citizens, and reduce private health insurance premiums for Georgians. As we have stated before, helping Georgians should be an incremental non-partisan pursuit focused on innovation, compromise and financial soundness. Our organization views these proposals as a promising step in addressing the healthcare needs of our state especially in rural areas and for small business.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

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Comment Topic* Georgia Access - Other

Comments*

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Public Comments

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- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * Georgia Council on Aging

Stakeholder Type * Advocacy Group

First Name * [REDACTED] **Last Name *** Floyd

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

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Comment Topic* Eligibility Criteria

Comments*

December 3, 2019

Public Comment Letter to Georgia Department of Community Health regarding Georgia Section 1115 Demonstration Waiver Application Posted November 4, 2019

The Georgia Council on Aging, in its role as advisory agency to state government, is submitting public comment about Georgia's proposed Section 1115 Demonstration Waiver Application "Georgia Pathways to Coverage." We are concerned that the proposed waiver does not recognize the contribution of caregiving for elderly adults as a Qualifying Activity for work and community engagement. We believe that it is in the best interest of the state to facilitate affordable healthcare coverage to low-income caregivers so that they may remain in good health and be able to continue to provide this valuable and critical care for elderly family members.

In its letter of January 11, 2018, Centers for Medicare & Medicaid Services (CMS) issued guidance to states establishing a new policy to improve Medicaid enrollee health and well-being through Medicaid demonstration projects under section 1115(a) of the Social Security Act. With a goal of creating incentives for participation in work and community engagement activities, that guidance encouraged policy considerations for "caregivers for young children or elderly family members" for inclusion among a range of activities that could satisfy work and community-engagement requirements.

Family caregivers provide a wide array of uncompensated help for older adults with chronic, disabling, or serious health conditions. Their caregiver responsibilities range from help with activities of daily living such as bathing, dressing, paying bills, handling insurance claims, preparing meals, or providing transportation, to complex care such as medication administration or wound care, coordinating care with various health care and social service providers, and often hiring and supervising direct care workers who are assisting older adults in their homes.

Many family caregivers are also employed in other jobs, and their caregiving responsibilities may limit the scope of their participation in the labor force. Even if their household income would qualify for eligibility in Georgia Pathways to Coverage, they may not meet the Qualifying Activity 80 hours per month threshold unless their caregiving hours are included as a Qualifying Activity.

Family caregiving provides great value to our state. The Alzheimer's Association estimates that caregiving for those afflicted with Alzheimer's disease and other dementias provided over \$7.6 billion in unpaid care in 2018 in Georgia.

Among other states applying for Demonstration 1115 Waivers several have either opted to include caregiving in their Qualifying Activities or have exempted caregivers from work requirements. Tennessee, for example, exempts "Individuals providing primary caregiver services for a household member (child or adult) with a disability or incapacitation or medical frailty that prevents the caretaker from meeting work requirement." Oklahoma exempts "a parent or caretaker personally responsible for the care of an incapacitated person." Utah exempts "individuals responsible for the care of an incapacitated person." South Dakota includes "caregiving for an elderly or disabled individual" among its Qualifying Activities and also exempts "primary caregivers of elderly or disabled individuals living in the caretaker's residence."

States which have opted for a fuller expansion of Medicaid also include many caregiver exemptions from work requirements. Arkansas excludes "caregivers of an incapacitated individual." Idaho excludes "parents or caretakers who are personally providing care for a person with serious medical conditions or a disability." Michigan excludes "caretaker of an incapacitated individual even if the incapacitated individual is not a

Michigan excludes “caretaker of an incapacitated individual even if the incapacitated individual is not a dependent of the caretaker.” Montana excludes a “primary caregiver for a person who is unable to provide self-care.” Ohio excludes “individuals who are caring for a disabled or incapacitated household member.” Virginia includes a Qualifying Activity of “caregiving services for a non-dependent relative or other person with a chronic, disabling health condition.” Indiana includes “caregiving services for a non-dependent relative or other person with a chronic, disabling health condition” as work.

By including caregiving of an older adult family member in Section 2.2.2, Qualifying Activities under Community Service, Georgia could potentially extend Georgia Pathways to Coverage healthcare benefits to these caregivers, supporting and hopefully prolonging their important role within their family. The state would also avoid placing more older adults at risk of costly institutionalization should they no longer be able to receive the care they need at home and in their community.

We believe that making this change to add family caregiving to the Georgia Section 1115 Demonstration Waiver proposal fits the CMS guidance for these waivers, maintains fiscal responsibility, would help protect at-risk older adults, and would strengthen some of Georgia’s most vulnerable families.

Respectfully submitted,

Vicki Johnson
Chair, Georgia Council on Aging

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * Georgia Early Education Alliance for Ready Students

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Wells

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

GEEARS: Georgia Early Education Alliance for Ready Students seeks to provide public comment to the proposal for an 1115 waiver drafted by the Department of Community Health. GEEARS is a non-profit, non-partisan organization focused on advancing policies and research that support high-quality early learning and healthy development for Georgia's youngest children, from birth to five.

A child's brain develops most rapidly in the first three years of life, forming more than 1 million new neural connections every second. Early experiences and relationships during the early years help to shape a children's brain architecture, building the foundation for the rest of their lives. Early negative experiences, often referred to as Adverse Childhood Experiences (ACEs), can hinder healthy brain development. ACEs can include a severe parental illness or loss of a parent's job. It's critical that young children have a healthy caretaker to promote positive early experiences that help build their brains for lifelong learning and success.

We recognize that young children especially rely on their parents and caretakers to help protect and guide them through their first years of life. We also know challenges with child care during the early years can lead to challenges for parents who work. In this 2018 survey of parents across the state of Georgia, more than a quarter of surveyed parents of children under five reported a significant disruption to their or a family member's employment as a result of child care challenges. This includes quitting a job, not taking a job, or having to work fewer hours.

In its current state, Georgia's 1115 waiver proposal seeks to provide additional Medicaid coverage to approximately 50,000 additional Georgians, many of whom are parents and caretakers. GEEARS feels that additional attention should be paid to the needs of parents and caretakers of young children. We propose that the work requirement be waived for parents of children under 6. Parents should not have to choose between working, caring for their young child, and health care coverage. Children should have a healthy and engaged caretaker to guide them through their first and most formative years of life.

Exempting parents of children under 6 will bring the requirements for Medicaid in alignment with SNAP requirements, reducing the administrative burden for caseworkers who already struggle to meet standards of promptness for new applications and renewals.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Currently, 47% of Georgia's children are insured under plans purchased through the federal marketplace or their parents' employer sponsored coverage. The state's 1332 waiver proposal would allow insurers to remove popular protections guaranteed under the Patient Protection and Affordable Care Act (PPACA) and offer sub-standard plans to Georgians. Many of these plans do not include critical benefits, such as maternity care and mental health care.

Parents must have access to important maternity and mental health services in order to raise healthy children. Prenatal care is proven to reduce rates of preterm birth and low-birth weight, both public health markers where Georgia performs poorly. Mental healthcare can help parents lead more engaged, productive lives and give children a better chance at achieving lifelong success. Parents and children should only be offered plans that provide ALL essential health benefits currently provided by the PPACA.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Business/Organization * Georgia Equality

Stakeholder Type * Advocacy Group

First Name * [REDACTED] **Last Name *** Graham

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Other

Comments*

On behalf of Georgia Equality, I would like to thank you for the opportunity to comment on Georgia's proposal to waive federal rules under the Affordable Care Act (ACA) and the Medicaid program. I am writing to express my deep concern about these waivers. The ACA 1332 waiver would raise premiums for ACA coverage, push people into substandard plans, and likely cause many Georgians to lose coverage altogether – especially harming lower-income Georgians, people of color, and people with pre-existing health conditions such as HIV. Even more concerning to us is the fact that by your own estimates, the Medicaid waiver would cover just 50,000 of the hundreds of thousands of low-income, uninsured Georgians, because it would impose so many barriers to coverage. I strongly urge you to withdraw these waivers and instead adopt the ACA Medicaid expansion, which would allow Georgia to cover hundreds of thousands more people at the same or lower state cost.

Georgia Equality is a membership organization of 80,000 Georgians who represent the concerns of the estimated 360,000 adults and 60,000 youth who identify as gay, lesbian, bisexual or transgender. We have members in all 159 counties throughout the state. We also advocate on behalf of the 58,000 Georgians living with HIV, regardless of their sexual orientation or gender identity.

As with other Georgians, accessing affordable and quality health care through robust and comprehensive coverage options is a priority of LGBT individuals and families. This is especially true for people living with HIV/AIDS. The state ranks 1st among states in rate of new HIV diagnoses, 2nd in people living with AIDS, and 5th for total number of people living with HIV, as of 2016. Nearly three-quarters of those with HIV in Georgia are African American and nearly 70% are gay and bisexual men. Because the HIV rates are so high, the counties of Cobb, DeKalb, Fulton and Gwinnett have been designated as specific targets of the recently announced federal Ending the Epidemic plan.

We are currently working with a number of stakeholders to create a ten-year strategy to end the AIDS epidemic, as called for under President Trump's Ending the HIV/AIDS Epidemic initiative announced earlier this year. For that strategy to be successful, people living with HIV who are currently uninsured or underinsured must have access to comprehensive medical care, not just care for their HIV infection.

The 1115 waiver would extend Medicaid coverage to residents with earnings below the poverty line only if they meet a burdensome work requirement and pay premiums. There would be no exceptions to the work requirement, meaning people who cannot work due to a disability, serious illness, or caregiving responsibilities could not get coverage. While the state estimates over 408,000 non-elderly uninsured adult Georgians with incomes below the poverty line are uninsured, Georgia projects that only about 50,000 will eventually enroll in Medicaid through the waiver, due to its burdensome requirements.

As you are aware, under the current eligibility requirements, only those with people living with HIV whose health has deteriorated to the point that they not only have an AIDS diagnosis, but are able to meet the stiff requirements of a disability, are able to access the comprehensive care provided by Medicaid. As a result, we estimate that only 17% of people living with HIV/AIDS in Georgia are currently covered by Georgia's Medicaid program. If Georgia were to fully expand Medicaid to all individuals with incomes of less than 138% of the federal poverty level, that estimate rises to 75%. Such dramatic changes in coverage would not only provide those living with HIV the same level of care that their peers in the vast majority of the country have, it is a key to the implementation of Georgia's plan to End the HIV/AIDS Epidemic in the next decade as called for under President Trump's new initiative.

Furthermore, such an expansion would ultimately pay for itself through improved health outcomes, lower in-patient hospital costs and by supporting individuals as they return to the work force. It would also provide new funding streams to the medical providers, especially those in rural areas, who are currently underfunded through the federal Ryan White Program.

Even with a broader expansion that only reaches those with incomes below 100% of the federal poverty level, that did not include the severe work requirements of the current proposal, would bring an estimated 16,000 Georgians living with HIV into the comprehensive care that is currently denied them.

Expanding Medicaid Would Insure More People at the Same or Lower Cost

Combined, the state estimates that it will spend about \$322 million – or about \$215 million excluding costs covered by user fees – to extend coverage to just under 80,000 Georgians under the 1332 and 1115 waivers. Instead of pursuing these two harmful waivers, Georgia could accept the ACA's Medicaid expansion and allow all residents earning under 138% of the federal poverty line to qualify for Medicaid coverage. Doing so would extend coverage to between 487,000 and 598,000 residents at a net state cost of \$188 million to \$213 million, according to state estimates.

In addition to its far greater benefits for low-income Georgians, Medicaid expansion would also do more to reduce uncompensated care. States that expanded Medicaid saw larger coverage gains and a decrease in uncompensated care costs of 55 percent on average, compared to a decline of only 18 percent in states that did not expand Medicaid. This experience serves as a critical lesson for Georgia, where seven rural hospitals have closed since 2010. Upon the waivers' release, stakeholders warned that the proposals would fall short in addressing the problem of uncompensated care. The 1115 waiver "does not significantly move the needle for the rural and safety net hospitals who care for the state's uninsured patients," according to the Georgia Hospital Association.

Georgia has the opportunity to expand coverage to hundreds of thousands of people that would result in significant benefits to the state's residents, including fewer premature deaths and improved access to care and financial security for people gaining coverage. It should do so, rather than upending the state's insurance market at great risk to consumers.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

First, the 1332 waiver allows alarming changes to policies governing the financial assistance people receive to purchase health coverage under the ACA. Under the waiver, the state would allow tax credits to be used to purchase substandard health plans that exclude coverage for essential health benefits, such as prescription drugs, maternity care, or mental health and substance abuse care.

Allowing tax credits for substandard plans would create adverse selection that would increase premiums, because many healthier people, even those eligible for tax credits, would enroll in cheaper, more limited coverage. Higher premium costs will raise the per-person costs of tax credits, resulting in a higher total cost than the state budgets for and triggering the waiver provision which allows the state to cap enrollment with tax credits. Consumers shopping after the cap has been reached will lose access to tax credits, forcing them to buy substandard plans that don't meet their needs, pay more for comprehensive coverage, or go without insurance.

Second, the 1332 waiver allows changes to policies establishing where and how consumers purchase health coverage that will undermine consumer protections in the ACA. Georgia would privatize functions of the marketplace by removing the state from the federally-facilitated exchange platform (HealthCare.gov) without creating their own exchange. Instead, consumers would enroll in coverage only through private web brokers and insurers, exposing them to the same risks posed by direct enrollment in the ACA. Direct enrollment entities already have a track record of steering consumers towards substandard plans that leave them exposed to catastrophic costs if they get sick, failing to alert consumers of Medicaid eligibility, and not allowing meaningful plan comparisons.

Historically, people living with a diagnosis of HIV or AIDS have had trouble securing health insurance. With the passage of the ACA and the lifting of exclusions for pre-existing conditions, for the first time many of those individuals who are working have been able to secure insurance in the individual marketplace. Over the past several years, we have worked closely with a number of nonprofit organizations, federally qualified health clinics and individual healthcare providers to offer training on how federal funding streams, most notably the Ryan White Act, work in Georgia and how to properly assist people living with HIV to find health insurance plans that best meet their needs. This has stabilized the health of many people living with HIV, thus preventing a more serious diagnosis of AIDS, and provided a key support to help lift them out of poverty.

Unfortunately, we have grave concerns that that current 1332 waiver proposal could erode the progress that has been made over the past decade to move as many people as possible from the federal Ryan White Program to private insurance. Those concerns include confusion from both consumers and enrolment assisters who must learn to navigate a new and untested online portal and the possibility that people will be directed to plans that do not provide the access to their existing health care providers and life-saving medications as the plans they are currently on.

The ACA waiver fails to meet the statutory "guardrails" intended to ensure that people who live in states that implement an ACA waiver are not worse off than they would be without the waiver. Section 1332(b)(1) of the ACA requires that ACA waivers cover as many people, with coverage as affordable and comprehensive, as without the waiver. However, under the proposed waiver, the coverage that many Georgians would have would be less comprehensive, and more people would find themselves with less affordable coverage and out-of-pocket costs than would be the case without the waiver. Additionally, Georgia may see a reduction, rather than an increase, in coverage under the 1332 waiver. The waiver does not meet the guardrails under federal law and is not approvable.

Notably, the waiver also includes a proposal to establish a reinsurance program. Similar programs have been successfully implemented in other states, reducing premiums for unsubsidized consumers. Georgia could move forward with this proposal while dropping the harmful components of the waiver.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Business/Organization * Georgia Highlands Medical Services

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Shifflet

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

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Comment Topic* Reinsurance - Other

Comments*

I am Todd Shifflet, CEO at Georgia Highlands Medical Services.

I recently attended the 1332 Waiver Public Hearing in Gainesville on Monday, November 18, 2019 and would like to submit the following comment on behalf of Georgia Highlands Medical Services.

Georgia Highlands is a Federally Qualified Health Center (FQHC) – Community Health Center – first established in 1979 in Forsyth County, located in Northeast Georgia and now operating five medical centers, providing primary and preventive health care to 20,000 residents of Bartow, Cherokee, Dawson, Forsyth and surrounding communities in North Georgia. At least 50% of our patients have no health insurance, 73% live below 100% of the Federal Poverty Level, 98% are identified as Low-Income and 24% of patients are enrolled in Medicaid. We have grown significantly over the past four years to improve access to the uninsured.

As I hope you know, GHMS is one of 34 Community Health Centers (FQHCs) operating in Georgia that serves as the largest safety net primary care provider in the state. This system has grown significantly during the last 17 years – more than doubling the number of clinics serving Georgia’s underserved population - the poor and uninsured, including the Medicaid population. Collectively, these 34 organizations have 229 clinic sites in 123 Georgia Counties. This year, over 600,000 patients will be served by Georgia’s Community Health Centers.

Georgia’s Health Centers are on the front lines, serving the uninsured and have a first-hand understanding of what is required to improve and increase access to Georgia residents with no other options.

While I have serious doubts that the strategies outlined in the waiver request will actually work as presented, I certainly agree with the goals and vision to increase access to health care and insurance options. From the reduction of premiums, especially in high cost regions – to incentivizing carriers to offer plans in more counties – to maintaining access to QHPs – among other goals – are all critically needed to establish a sustainable, comprehensive plan to improve the provision of quality care to those most in need in Georgia.

Georgia Highlands, and all Community Health Centers across the state, have become adept at helping patients navigate the marketplace and other options in order to hopefully achieve insurance status. The FQHC model works because we maximize patient income from privately insured patients as well as facilitate self-sufficiency among our patients. Georgia Highlands is supportive of any efforts that will increase access to insurance and the ability of patients to take a more active role in their health care and their lives.

That said, within the constructs of the proposed Reinsurance and Georgia Access model, I also emphasize the importance of being inclusive of entities on the ground dealing with health care delivery challenges daily, on a patient by patient basis, as these are the issues the waiver seeks to help solve. Georgia Highlands, as do all Community Health Centers in the state, provide vital access points for thousands of patients and will continue to embrace those in search of good, quality health care in the future – health care that improves health outcomes and self-sufficiency among the most vulnerable. Such changes to be enacted by the proposed 1332 Waiver should heed and include the viability of organizations like Georgia Highlands Medical Services as integral to any plan in order to successfully, and sustainably, improve health care in Georgia. I sincerely appreciate the opportunity to make comments and would be glad to answer any questions you may have.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

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Comment Topic* Georgia Access - Other

Comments*

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Georgia Highlands is a Federally Qualified Health Center (FQHC) – Community Health Center – first established in 1979 in Forsyth County, located in Northeast Georgia and now operating five medical centers, providing primary and preventive health care to 20,000 residents of Bartow, Cherokee, Dawson, Forsyth and surrounding communities in North Georgia. At least 50% of our patients have no health insurance, 73% live below 100% of the Federal Poverty Level, 98% are identified as Low-Income and 24% of patients are enrolled in Medicaid. We have grown significantly over the past four years to improve access to the uninsured.

As I hope you know, GHMS is one of 34 Community Health Centers (FQHCs) operating in Georgia that serves as the largest safety net primary care provider in the state. This system has grown significantly during the last 17 years – more than doubling the number of clinics serving Georgia’s underserved population - the poor and uninsured, including the Medicaid population. Collectively, these 34 organizations have 229 clinic sites in 123 Georgia Counties. This year, over 600,000 patients will be served by Georgia’s Community Health Centers.

Georgia’s Health Centers are on the front lines, serving the uninsured and have a first-hand understanding of what is required to improve and increase access to Georgia residents with no other options.

While I have serious doubts that the strategies outlined in the waiver request will actually work as presented, I certainly agree with the goals and vision to increase access to health care and insurance options. From the reduction of premiums, especially in high cost regions – to incentivizing carriers to offer plans in more counties – to maintaining access to QHPs – among other goals – are all critically needed to establish a sustainable, comprehensive plan to improve the provision of quality care to those most in need in Georgia.

Georgia Highlands, and all Community Health Centers across the state, have become adept at helping patients navigate the marketplace and other options in order to hopefully achieve insurance status. The FQHC model works because we maximize patient income from privately insured patients as well as facilitate self-sufficiency among our patients. Georgia Highlands is supportive of any efforts that will increase access to insurance and the ability of patients to take a more active role in their health care and their lives.

That said, within the constructs of the proposed Reinsurance and Georgia Access model, I also emphasize the importance of being inclusive of entities on the ground dealing with health care delivery challenges daily, on a patient by patient basis, as these are the issues the waiver seeks to help solve. Georgia Highlands, as do all Community Health Centers in the state, provide vital access points for thousands of patients and will continue to embrace those in search of good, quality health care in the future – health care that improves health outcomes and self-sufficiency among the most vulnerable. Such changes to be enacted by the proposed 1332 Waiver should heed and include the viability of organizations like Georgia Highlands Medical Services as integral to any plan in order to successfully, and sustainably, improve health care in Georgia. I sincerely appreciate the opportunity to make comments and would be glad to answer any questions you may have.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * Georgia Hospital Association

Stakeholder Type * Trade Association

First Name * [REDACTED] **Last Name *** Rogers

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

December 3, 2019

Via Overnight Mail and Online Webform at
<https://medicaid.georgia.gov/patientsfirst>

Norman Boyd, Chair
Board of Community Health
c/o Lavinia Luca
Post Office Box 1966
Atlanta, Georgia 30301-1966

Re: Georgia Pathways to Coverage 1115 Demonstration Waiver (Note, figures and citations included with hard copy sent via overnight mail.)

Dear Chairman Boyd:

On behalf of the Georgia Hospital Association (GHA) and its 170 hospital and health system members, we welcome the opportunity to submit comments on the Georgia Department of Community Health's (the "Department's") Medicaid 1115 Demonstration Waiver: Georgia Pathways to Coverage ("Georgia Pathways" or the "1115 Waiver"). GHA appreciates the Department's hard work under the Patients First Act to develop a Georgia solution to ensure low-income citizens have access to affordable health care coverage. The 1115 Waiver is a positive first step toward the goal of making affordable, comprehensive health care coverage available across the state.

As you know, Georgia currently has the fourth highest percentage of uninsured residents in the nation. This is a significant contributor to the current health care crisis in our state, which has led to seven hospital closures since 2010 and resulted in a rank of 46 out of 50 for access to quality health care and preventative services. The Patients First Act provides the state with a historic opportunity to not only increase access to health care coverage, but also improve the overall health of Georgia citizens. As outlined in the 1115 Waiver, a healthier Georgia leads to a more productive workforce and a reduction in the poverty rate. With these goals in mind, GHA respectfully offers the following comments and recommendations regarding the 1115 Waiver.

GHA Strongly Supports the 1115 Waiver's Goals to Improve Access, Affordability and Quality

According to the Department's Georgia Environmental Scan Report dated July 8, 2019, "Georgia is facing challenges related to healthcare access and preventative care based on rural hospital closures..." While the challenges facing Georgia's hospitals are many, much of their struggles can be attributed to the large amount of uncompensated care hospitals provide each year. In 2018, the most recent year for which data is available, the provision of uncompensated care cost Georgia hospitals \$2.21 billion. (Note this amount represents the cost of providing care, not the charges for care.) Most of this uncompensated care is provided to uninsured patients in the form of indigent, charity or other free care.

Georgia has over 1.2 million uninsured adult, non-elderly residents. Around 408,000 of these residents have incomes below 100% of the federal poverty line (FPL) and would be eligible to participate in the Georgia

Pathways program. The fastest and most efficient way to help stabilize Georgia's hospitals is to increase access to health care coverage via the Medicaid program. GHA strongly supports the 1115 Waiver's new Medicaid eligibility category for adults with incomes below 100% of the FPL, the maximum amount allowed under current law. This new eligibility category will improve access, affordability and quality of health care by reducing the number of uninsured Georgians.

Increased Utilization of Employer-Sponsored Coverage is Good for Patients and Providers

The 1115 Waiver would increase access to employer-sponsored insurance (ESI) by implementing a mandatory Health Insurance Premium Payment (HIPPP) program. For individuals with incomes below 100% of the FPL that have access to ESI, the Medicaid program would subsidize the premiums and cost-sharing for the individual so that the ESI matches the affordability of the Medicaid coverage provided under the 1115 Waiver. Utilizing ESI rather than Medicaid when available is good for patients because it may help eliminate a potential gap in coverage when the patient begins earning too much to qualify for Medicaid. Under the 1115 Waiver, patients have a smoother transition since they already enrolled in their ESI and understand how it works.

Hospitals and other health care providers also benefit from the mandatory HIPPP program in the 1115 Waiver. ESI typically reimburses providers for the full cost of care, whereas Medicaid typically reimburses providers less than the cost of care. Even after considering all payment sources for Medicaid, hospitals were paid only 92 percent of cost for Medicaid patients. ESI plans also impose less administrative burdens on providers than Medicaid plans, allowing providers to focus more on caring for patients and less on pursuing adequate reimbursement. While ESI and other commercial health plans do not typically cover non-emergency medical transportation (NEMT), the lack of an NEMT wrap-around benefit for this low-income population disproportionately impacts rural Georgia. See below for additional comments on the potential impact of waiving the requirement to provide NEMT services.

The Department has not yet released the details of how the ESI premium and cost-sharing subsidies would flow under the 1115 Waiver. GHA respectfully requests the Department consider implementing cost-sharing subsidies in a manner that will ensure hospitals and other providers are held harmless for providing covered services to HIPPP participants. Cost-sharing subsidies should go directly to the provider rather than to the beneficiary, who would then have to pass the payment on to the provider. This is more efficient for both the provider and the patient and prevents scenarios where beneficiaries sometimes fail to reimburse the provider after receiving the funds from their health plan and the provider is left with uncompensated care in the form of bad debt. This is particularly important as ESI plans often have high deductibles and significant cost-sharing in order to help keep premiums lower.

The Legality of Medicaid Work Requirements is Uncertain

To date, the Centers for Medicare and Medicaid Services (CMS) has approved work or community engagement requirements under 1115 demonstration waivers in nine states. However, seven of these have either been set aside by the courts or voluntarily suspended by the states themselves. The other two states, Utah and Michigan, have been approved by CMS to implement work requirements beginning in 2020. Given the current legal landscape, the inclusion of a work requirement as part of the 1115 Waiver may serve to delay implementation, possibly for years. Georgia cannot wait any longer to increase access to affordable health care coverage of individuals earning less than 100% of the FPL.

As detailed in the figure below, federal legislation codified over the last ten years is expected to reduce future Medicare reimbursement to Georgia's hospitals by up to 16.3%, accounting for \$17.3 billion in revenue reductions between 2010 and 2027.

In addition, the Patient Protection and Affordable Care Act (ACA) included significant cuts to the Medicaid disproportionate share hospital (DSH) program beginning in 2014 through 2020. These cuts have since been delayed, however, the longer they are delayed the more they are projected to grow in out-years. The DSH cuts were designed on the premise that more patients would be insured due to the other provisions of the ACA (e.g., participation in the Health Insurance Marketplace and Medicaid expansion), and therefore, hospitals would not incur as much uncompensated care. The opposite has happened in Georgia where hospitals' uncompensated care has increased over the last three years. Georgia's DSH cuts, if not further delayed, will amount to \$73 million in federal fiscal year 2020 and increase to \$145 million by federal fiscal year 2021. These cuts will occur regardless of the state's decision to expand Medicaid. Georgia hospitals cannot continue

to sustain reimbursement cuts from government payers without a corresponding increase in the number of Georgians with access to health care coverage.

Therefore, GHA respectfully requests the Department consider removing the work requirement from the 1115 Waiver as a condition of Medicaid eligibility in order to ensure that implementation of the Georgia Pathways is not delayed by the courts. Work or community engagement could instead be used as an incentive to gain more favorable treatment for beneficiaries that report meeting the requirements. For example, such incentives could include access to additional services, decreased cost-sharing or additional funds placed in the Member Rewards Account. Assuming the courts eventually confirm the legality of Medicaid work requirements, Georgia could amend its eligibility requirements at that time.

Other Options to Make Targeted Improvements to Health Care Access

In addition to the activities described in the 1115 Waiver as acceptable for meeting the work requirement, there may be other activities that help advance the state's policy goals for specific categories of individuals. For example, for individuals with incomes below 100% of the FPL that are diagnosed with substance use disorder and serious mental illness, activities could include participation in evidenced-based activities shown to help patients remain stable, productive members of the community. These activities, which support the state's efforts to curb the opioid crisis, could include medication assisted treatment (MAT), peer-to-peer counseling or residential or outpatient treatment, and members could move on to the other more traditional work-related activities when appropriate.

The Department could also consider targeting eligibility toward high cost populations, where early intervention could provide overall cost savings to the state. For example, individuals with certain medical diagnoses, like HIV, substance use disorder, serious mental illness, diabetes, or other chronic conditions. Other options could include targeting eligibility to women of childbearing age to help with Georgia's various initiatives to decrease maternal mortality rates or simply increasing the current income eligibility limits for parents.

GHA respectfully requests the Department consider these or other options beyond work requirements that allow the state to maintain affordability while also helping to ensure that low-income individuals have the access to care needed for them to be healthy, productive citizens.

State Administration of Work Requirements is Complex

The administration of work requirement programs by the state can determine whether or not the programs accomplish their stated goals of empowering Georgia Pathways participants to become active participants and consumers of their health care, increasing the number of persons who become employed or engaged in employment-related activities, and increasing wage growth for those who are employed. A recent report by the United States Government Accountability Office found the estimated cost to administer Medicaid work requirements ranged from \$6.1 million to \$271.6 million for the five states reviewed.

Much of these costs are associated with enhancements to the states' IT systems necessary to implement and administer the programs. The work, premium, and copayment requirements described in the 1115 Waiver will likewise be complex for the state to administer, adding to the overall cost to the program. Reporting requirements for members can also be complex and burdensome. The 1115 Waiver would require beneficiaries to report their work status on a monthly basis, similar to some other states with approved Medicaid work requirements, including Arkansas, where its reporting requirements led to the loss of Medicaid coverage for nearly 17,000 individuals.

GHA encourages the Department to make the reporting of any work or community engagement requirements as easy as possible for both the state and the members. The Department has certainly considered this, in that if a member provides evidence of meeting the requirements for six consecutive months, the member is then exempt from the monthly reporting requirement. For these members, compliance would be reassessed during the annual re-enrollment period. Rather than require members to report that they are continuing to meet requirements through monthly reporting even for the first six months, the state could simply conduct random compliance checks.

Based on the results of these checks, the Department may ultimately determine that additional reporting is required and the increased administrative costs to the state are justified. However, the Department may also

determine through its compliance reviews that the cost of developing additional systems and procedures for monthly reporting are not needed. For members participating in certain qualifying activities that typically have a defined time period for completion (i.e., vocational educational training or enrollment in an institution of higher education), the member could be required to report back at the time qualifying activity is slated to end. Likewise, members enrolled in the HIPP program will lose their access to ESI if their work status changes so there may not be the same need to require HIPP participants to make monthly reports.

Elimination of Non-Emergency Transportation Disproportionately Impacts Rural Georgia

GHA encourages the Department to reconsider its waiver request regarding the provision of non-emergency medical transportation (NEMT) in the Georgia Pathways program. The elimination of NEMT services is likely to disproportionately impact Georgia's rural communities where individuals do not have access to public transportation. Individuals in rural communities often have to travel further to see their health care providers than they do for work or other community activities.

More than half of NEMT trips are used to access preventative care and behavioral health services. According to the Medicaid and CHIP Payment and Access Commission (MACPAC), two thirds of Medicaid NEMT users were disabled or aged 65 years or older, and 42% of users were dually eligible for Medicare and Medicaid. This means the amount of cost savings the state would realize by waiving the requirement to provide NEMT is likely minimal compared to the potential impact on rural beneficiaries seeking preventative or behavioral health services.

Elimination of Retroactive Eligibility and Hospital Presumptive Eligibility Hurts Hospitals

In addition to the outreach and education provided by the state, hospitals often serve as the main point of entry for Medicaid enrollment. This means that it is not until after a Medicaid eligible individual has had a medical crisis and needs hospital services that he or she, with the help of hospital staff, enrolls in the Medicaid program. Currently, Medicaid compensates hospitals for these services because once approved, the individual's Medicaid coverage is retroactive to the first day of the month the enrollment application was submitted.

Under the 1115 Waiver, individuals' Medicaid coverage would begin on the first day of the month after their enrollment application is approved and they have paid their first month's premium, if applicable. GHA understands and supports the state's goal to provide members with "an experience similar to commercial insurance in order to better prepare them for their transition from Medicaid into a commercial health insurance plan." However, unlike other portions of the 1115 Waiver that promote personal responsibility, it is hospitals, not members, that are penalized when Medicaid coverage is prospective only. Hospitals will continue to provide care to eligible individuals prior to their enrollment being approved, but they won't get paid for it. The cost of the care provided will be uncompensated indigent and charity care in accordance with Georgia's Indigent Care Trust Fund program. GHA respectfully requests the Department consider not seeking a waiver of retroactive eligibility for individuals covered under Georgia Pathways. Retroactive eligibility for the waiver population will decrease the amount of hospitals' uncompensated care without negatively impacting the state's goals for the 1115 Waiver.

Presumptive eligibility is another option that hospitals can use to decrease uncompensated care. Hospitals go through extensive training to be eligible to participate in the presumptive eligibility program. Once a patient is determined presumptively eligible, that eligibility lasts for up to one month while his or her Medicaid enrollment application is pending. Like retroactive eligibility, presumptive eligibility allows hospitals and other health care providers to provide post-hospitalization follow-up care without the risk of not being paid. Patients benefit as well when they don't have to wait for medically necessary follow-up care. The 1115 Waiver indicates that it is not practicable for hospitals to evaluate whether patients meet the work activities necessary to be eligible for Medicaid coverage under the waiver. However, hospitals that participate in the presumptive eligibility program already gather financial documentation like pay stubs or tax returns to determine whether patients meet Medicaid's financial eligibility requirements. Hospitals would likewise be willing to help patients gather work-related documentation in order to determine presumptive eligibility. GHA respectfully requests the Department consider allowing hospitals to determine patients' presumptive eligibility for Georgia Pathways.

Penalties for Non-Payment of Premiums Harms Providers

The 1115 Waiver provides for a three-month grace period prior to disenrollment for members who may fall behind on their premiums. GHA supports the inclusion of the grace period. The hospital community

appreciates the Department's recognition that this newly eligible population is often transient and may not always receive the monthly premium invoices. They are also not likely accustomed to paying monthly premiums for health care coverage, and it may take some time for some members to understand the system. The grace period is similar to the process used when an individual receives premium subsidies for a health plan purchased on the federal Marketplace. The Georgia Office of Insurance and Fire Safety Commissioner issued guidance to federally qualified health plans in Georgia clarifying that the plans must provide notice to providers when an enrollee is in the grace period. In order to protect providers who may provide services to Medicaid members during this grace period, GHA respectfully requests the Department consider either: (1) instructing CMOs to hold providers harmless by paying claims for services provided during the grace period; or (2) requiring CMOs to notify providers of a member's suspended status and the possibility that claims may be denied so that the provider can help educate the member on the need to pay his or her premiums.

Options to Increase Provider Reimbursement and Access to Care

Medicaid care management organizations (CMOs) currently cover only 88% of cost for hospital services provided under the current Medicaid program. However, federal regulations allow states to direct CMOs to adopt a minimum fee schedule or provide a uniform dollar or percentage increase in payments for their network providers. GHA recommends that in calculating the budget neutrality of the 1115 Waiver, the Department should include provider payment initiatives under the state's contracts with CMOs for the newly eligible population. This will give the state more flexibility in ensuring compliance with budget neutrality and increase the percentage of cost covered by the CMOs for hospital services. When more of their costs are covered, hospitals have greater ability to improve access to care by expanding existing services or establishing new service lines.

We look forward to continuing to work with the Department to help implement this important program in an efficient and effective manner. Please feel free to contact me at 770-249-4531 or erogers@gha.org with any questions or if you desire to discuss these comments further.

Respectfully submitted,

Earl V. Rogers
President and CEO

cc: Blake Fulenwider, Chief Health Policy Officer, Department of Community Health
Kevin L. Bierschenk, Board Chair, Georgia Hospital Association
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Business/Organization * Georgia Hospital Association

Stakeholder Type * Trade Association

First Name * [REDACTED] **Last Name *** Rogers

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

December 3, 2019

Via Overnight Mail and Online Webform at
<https://medicaid.georgia.gov/patientsfirst>

Brian P. Kemp, Governor
Office of the Governor
c/o Ryan Loke
206 Washington Street
Suite 115
State Capitol
Atlanta, Georgia 30334

Re: Reinsurance and Georgia Access Model – State Relief and Empowerment Waiver (Section 1332 Waiver)
(Note, citations are included in the hard copy of the letter submitted via overnight mail.)

Dear Governor Kemp:

On behalf of the Georgia Hospital Association (GHA) and its 170 hospital and health system members, we welcome the opportunity to submit comments on Georgia's State Relief and Empower Waiver: Reinsurance and Georgia Access Model (the "1332 Waiver"). GHA appreciates the state's hard work under the Patients First Act to develop a Georgia solution to reduce premiums, increase coverage, and promote a more competitive private insurance marketplace.

As you know, Georgia currently has the fourth highest percentage of uninsured residents in the nation, and health insurance premiums on the individual market are unaffordable for many. This is a significant contributor to the current health care crisis in our state, which has led to seven hospital closures since 2010 and resulted in a rank of 46 out of 50 for access to quality health care and preventative services. The Patients First Act provides the state with a historic opportunity to not only increase access to affordable, comprehensive health care coverage, but also improve the overall health of Georgia citizens in all parts of the state. With these goals in mind, GHA respectfully offers the following comments and recommendations regarding the 1332 Waiver.

GHA Supports the 1332 Waiver's Phase I Reinsurance Program

Reinsurance programs have been approved in 12 states and are proving to be effective at reducing premiums and maintaining insurer participation in the individual market. Action is needed to stabilize the marketplace for individual health plans where choice is limited and the cost is high. In 2019, residents from 75 percent of Georgia counties can choose a plan from only one insurer. The number of individuals purchasing plans on the federal Marketplace has dropped each year since 2016 as premiums have continued to rise for plans purchased on and off the federal Marketplace. In order to afford health insurance, many individuals end up purchasing plans with lower premiums, but high deductibles or other cost-sharing. These types of plans often leave patients under-insured. They have coverage, but the deductible is so high, health care services remain unaffordable.

Without access to coverage with both affordable premiums and cost-sharing, patients often put off treating

illnesses when they first appear and are the most treatable. As the illness progresses, patients often end up in the emergency room where they know they will receive treatment regardless of their ability to pay. This helps to explain why the amount of uncompensated care provided by hospitals, which was \$2.21 billion in 2018, has increased over the last three years. (Note this amount represents the cost of providing care, not the charges for care.) The tiered reinsurance program in the 1332 Waiver will help improve the health of Georgians both by increasing coverage and allowing those who already have coverage afford to use it. For these reasons, GHA strongly supports the reinsurance program in the 1332 Waiver.

The Permissibility of Phase II of the 1332 Waiver, the Georgia Access Model, is Uncertain

GHA appreciates the state's work to create an innovative 1332 Waiver that "capitalizes on commercial market resources and maximizes state flexibility and oversight to drive innovation in access, affordability, and customer service, placing the unique needs of Georgia's residents at the center." However, portions of the Georgia Access Model are untested and disputes could take years to resolve.

The greatest areas of uncertainty are the use of federal pass-through dollars to subsidize the purchase of non-qualified health plans (non-QHPs) and the implementation of a program budget cap. There is a concern that by allowing subsidies to be used to help purchase both QHPs and non-QHPs, the 1332 Waiver will not comply with the federal statutory requirement that coverage be at least as comprehensive as would be provided absent the waiver. The 1332 Waiver assumes that on average, non-QHPs will cover 90% of the benefits as QHPs, but there is no minimum set of standards that a non-QHP must meet in order to be eligible for subsidies. Nor is there information on the criteria the state will use when assessing the eligibility of non-QHPs to qualify for subsidies.

Placing a budgetary cap on the total amount of subsidies available fundamentally changes the nature of the subsidies from an entitlement to a program in which eligible individuals could be turned away if the state decides to cut funding. The 1332 Waiver indicates that the state does not anticipate having to turn away eligible individuals, however there is no guarantee. Challenges to these two portions of the Georgia Access Model will likely be costly and time consuming for the state. Therefore, GHA recommends the state consider removing the budgetary cap from Phase II of the 1332 Waiver and only allow subsidies to be used to purchase QHPs.

Capping Subsidies May Skew the Risk Pool Toward Sicker Individuals and Subsidizing Non-QHPs May Harm Individuals with Greater Health Care Needs and the Providers that Treat Them

Assuming the state is permitted to move forward with Phase II of the 1332 Waiver, allowing individuals to use subsidies to purchase non-QHPs remains a concern for the hospital community because of the large amount of uncompensated care that is already being provided to patients enrolled in QHPs through the federal Marketplace. Allowing patients to use subsidies to purchase plans that provide less coverage may undo the benefits of the Phase I reinsurance program. While we recognize that more individuals may technically have some form of health insurance under the Georgia Access Model, the increase in coverage does not improve the overall health of Georgia's health care system if the coverage is not both affordable and reasonably comprehensive. Without extensive outreach and education, consumers tend to gravitate toward the plans with the lowest premiums, often without understanding the other cost-sharing requirements and what specific services are or are not covered under the plan. Furthermore, providing subsidies for non-QHP plans will likely accelerate the shift of healthy individuals from QHP to non-QHP plans, leaving only those with higher cost health care needs in the QHP plans. The Phase I reinsurance program may be able to mitigate the negative impact on the QHP plans to an extent, but there is a significant long-term risk that the cost of the QHP plans will no longer be sustainable even with state subsidies. Regardless of the outcome of any challenges to the Georgia Access Model, GHA respectfully requests the state consider only allowing subsidies to be used to purchase QHPs.

Individuals with chronic diseases and those with pre-existing conditions are more likely to be aware of opportunities to purchase affordable health care coverage. If subsidies are capped, it is likely that the sicker, more costly individuals will be the first to obtain coverage. Many will already be receiving subsidies and simply need to re-enroll. Others who do not yet have coverage will be more likely to enroll at the beginning of the enrollment period. Either way, it is more likely that healthy individuals will be the ones denied subsidies because of a budget cap. A sicker risk pool will drive premiums up over time, costing individuals and the state more and ultimately leading to more Georgians who forego health care coverage because it is unaffordable.

Regardless of the outcome to any challenges to the Georgia Access Model, GHA respectfully requests the state consider removing the budgetary cap on subsidies.

The 1332 Waiver Creates Extensive and Complex Administrative Obligations for the State and Its Residents.

Phase II of the 1332 Waiver is certainly the most innovative of any waiver in any state to date. However, it would also be the most complex. To administer the Georgia Access Model, the state will have to develop, implement and maintain entirely new systems to:

- Review and analyze actuarial value of benefits and cost-sharing of non-QHPs;
- Certify non-QHPs as eligible to receive subsidies;
- Calculate annual budget cap based on anticipated enrollment and projected premiums;
- Provide outreach and education to individuals, insurers, brokers, agents and providers on the Georgia Access Model;
- Validate individuals' income and eligibility for subsidies;
- Calculate and disburse subsidies;
- Maintain a waitlist for subsidies once the budget cap is reached; and
- Conduct program integrity activities to ensure state and federal funds are properly utilized.

GHA respectfully recommends that the state consider waiting to submit Phase II of the 1332 Waiver until Phase I is in operation and the state has data on how much the reinsurance program has decreased the cost of health care coverage. With this new data in hand, the state will be in a better position to determine what types of modifications to the subsidies, QHPs and other variables will be the most cost effective. In the meantime, the state could solicit innovative ideas from Georgia's growing technology hubs on options to make purchasing subsidized and unsubsidized coverage on the individual market more user friendly.

Once implemented, the Georgia Access Model will also be complex for individuals purchasing insurance. While the federal Marketplace can be confusing, it does provide a centralized location where individuals can compare plans offered by different insurers. The ability to easily compare plans will be even more important under the Georgia Access Model because there will likely be more plans to compare. We recognize that creating a similar state exchange would in and of itself be a costly and time-consuming endeavor. However, relying solely on the free market will likely require individuals to search multiple websites, brokers or insurers in order to truly compare all available plan options. We urge the state to consider incentives for brokers to create online, telephonic and in-person mechanisms for individuals to compare all available plans in their geographic area.

We look forward to continuing to work with the state to help implement these important programs in an efficient and effective manner. Please feel free to contact me at 770-249-4531 or erogers@gha.org with any questions or if you desire to discuss these comments further.

Respectfully submitted,

Earl V. Rogers
President and CEO

cc: Ryan Loke, Special Projects, Office of the Governor
Kevin L. Bierschenk, Board Chair, Georgia Hospital Association
(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

December 3, 2019

Via Overnight Mail and Online Webform at
<https://medicaid.georgia.gov/patientsfirst>

Brian P. Kemp, Governor
Office of the Governor
c/o Ryan Loke
206 Washington Street
Suite 115
State Capitol
Atlanta, Georgia 30334

Re: Reinsurance and Georgia Access Model – State Relief and Empowerment Waiver (Section 1332 Waiver)
(Note, citations are included in the hard copy of the letter submitted via overnight mail.)

Dear Governor Kemp:

On behalf of the Georgia Hospital Association (GHA) and its 170 hospital and health system members, we welcome the opportunity to submit comments on Georgia's State Relief and Empower Waiver: Reinsurance and Georgia Access Model (the "1332 Waiver"). GHA appreciates the state's hard work under the Patients First Act to develop a Georgia solution to reduce premiums, increase coverage, and promote a more competitive private insurance marketplace.

As you know, Georgia currently has the fourth highest percentage of uninsured residents in the nation, and health insurance premiums on the individual market are unaffordable for many. This is a significant contributor to the current health care crisis in our state, which has led to seven hospital closures since 2010 and resulted in a rank of 46 out of 50 for access to quality health care and preventative services. The Patients First Act provides the state with a historic opportunity to not only increase access to affordable, comprehensive health care coverage, but also improve the overall health of Georgia citizens in all parts of the state. With these goals in mind, GHA respectfully offers the following comments and recommendations regarding the 1332 Waiver.

GHA Supports the 1332 Waiver's Phase I Reinsurance Program

Reinsurance programs have been approved in 12 states and are proving to be effective at reducing premiums and maintaining insurer participation in the individual market. Action is needed to stabilize the marketplace for individual health plans where choice is limited and the cost is high. In 2019, residents from 75 percent of Georgia counties can choose a plan from only one insurer. The number of individuals purchasing plans on the federal Marketplace has dropped each year since 2016 as premiums have continued to rise for plans purchased on and off the federal Marketplace. In order to afford health insurance, many individuals end up purchasing plans with lower premiums, but high deductibles or other cost-sharing. These types of plans often leave patients under-insured. They have coverage, but the deductible is so high, health care services remain unafford

Without access to coverage with both affordable premiums and cost-sharing, patients often put off treating illnesses when they first appear and are the most treatable. As the illness progresses, patients often end up in the emergency room where they know they will receive treatment regardless of their ability to pay. This helps to explain why the amount of uncompensated care provided by hospitals, which was \$2.21 billion in 2018, has increased over the last three years. (Note this amount represents the cost of providing care, not the charges for care.) The tiered reinsurance program in the 1332 Waiver will help improve the health of Georgians both by increasing coverage and allowing those who already have coverage afford to use it. For these reasons, GHA strongly supports the reinsurance program in the 1332 Waiver.

The Permissibility of Phase II of the 1332 Waiver, the Georgia Access Model, is Uncertain

GHA appreciates the state's work to create an innovative 1332 Waiver that "capitalizes on commercial market resources and maximizes state flexibility and oversight to drive innovation in access, affordability, and customer service, placing the unique needs of Georgia's residents at the center." However, portions of the Georgia Access Model are untested and disputes could take years to resolve.

The greatest areas of uncertainty are the use of federal pass-through dollars to subsidize the purchase of non-qualified health plans (non-QHPs) and the implementation of a program budget cap. There is a concern that by allowing subsidies to be used to help purchase both QHPs and non-QHPs, the 1332 Waiver will not comply with the federal statutory requirement that coverage be at least as comprehensive as would be provided absent the waiver. The 1332 Waiver assumes that on average, non-QHPs will cover 90% of the benefits as QHPs, but there is no minimum set of standards that a non-QHP must meet in order to be eligible for subsidies. Nor is there information on the criteria the state will use when assessing the eligibility of non-QHPs to qualify for subsidies.

Placing a budgetary cap on the total amount of subsidies available fundamentally changes the nature of the subsidies from an entitlement to a program in which eligible individuals could be turned away if the state decides to cut funding. The 1332 Waiver indicates that the state does not anticipate having to turn away eligible individuals, however there is no guarantee. Challenges to these two portions of the Georgia Access Model will likely be costly and time consuming for the state. Therefore, GHA recommends the state consider removing the budgetary cap from Phase II of the 1332 Waiver and only allow subsidies to be used to purchase QHPs.

Capping Subsidies May Skew the Risk Pool Toward Sicker Individuals and Subsidizing Non-QHPs May Harm Individuals with Greater Health Care Needs and the Providers that Treat Them

Assuming the state is permitted to move forward with Phase II of the 1332 Waiver, allowing individuals to use subsidies to purchase non-QHPs remains a concern for the hospital community because of the large amount of uncompensated care that is already being provided to patients enrolled in QHPs through the federal Marketplace. Allowing patients to use subsidies to purchase plans that provide less coverage may undo the benefits of the Phase I reinsurance program. While we recognize that more individuals may technically have some form of health insurance under the Georgia Access Model, the increase in coverage does not improve the overall health of Georgia's health care system if the coverage is not both affordable and reasonably comprehensive. Without extensive outreach and education, consumers tend to gravitate toward the plans with the lowest premiums, often without understanding the other cost-sharing requirements and what specific services are or are not covered under the plan. Furthermore, providing subsidies for non-QHP plans will likely accelerate the shift of healthy individuals from QHP to non-QHP plans, leaving only those with higher cost health care needs in the QHP plans. The Phase I reinsurance program may be able to mitigate the negative impact on the QHP plans to an extent, but there is a significant long-term risk that the cost of the QHP plans will no longer be sustainable even with state subsidies. Regardless of the outcome of any challenges to the Georgia Access Model, GHA respectfully requests the state consider only allowing subsidies to be used to purchase QHPs.

Individuals with chronic diseases and those with pre-existing conditions are more likely to be aware of opportunities to purchase affordable health care coverage. If subsidies are capped, it is likely that the sicker, more costly individuals will be the first to obtain coverage. Many will already be receiving subsidies and simply need to re-enroll. Others who do not yet have coverage will be more likely to enroll at the beginning of the enrollment period. Either way, it is more likely that healthy individuals will be the ones denied subsidies because of a budget cap. A sicker risk pool will drive premiums up over time, costing individuals and the state more and ultimately leading to more Georgians who forego health care coverage because it is unaffordable.

Regardless of the outcome to any challenges to the Georgia Access Model, GHA respectfully requests the state consider removing the budgetary cap on subsidies.

The 1332 Waiver Creates Extensive and Complex Administrative Obligations for the State and Its Residents.

Phase II of the 1332 Waiver is certainly the most innovative of any waiver in any state to date. However, it would also be the most complex. To administer the Georgia Access Model, the state will have to develop, implement and maintain entirely new systems to:

- Review and analyze actuarial value of benefits and cost-sharing of non-QHPs;
- Certify non-QHPs as eligible to receive subsidies;
- Calculate annual budget cap based on anticipated enrollment and projected premiums;
- Provide outreach and education to individuals, insurers, brokers, agents and providers on the Georgia Access Model;
- Validate individuals' income and eligibility for subsidies;
- Calculate and disburse subsidies;
- Maintain a waitlist for subsidies once the budget cap is reached; and
- Conduct program integrity activities to ensure state and federal funds are properly utilized.

GHA respectfully recommends that the state consider waiting to submit Phase II of the 1332 Waiver until Phase I is in operation and the state has data on how much the reinsurance program has decreased the cost of health care coverage. With this new data in hand, the state will be in a better position to determine what types of modifications to the subsidies, QHPs and other variables will be the most cost effective. In the meantime, the state could solicit innovative ideas from Georgia's growing technology hubs on options to make purchasing subsidized and unsubsidized coverage on the individual market more user friendly.

Once implemented, the Georgia Access Model will also be complex for individuals purchasing insurance. While the federal Marketplace can be confusing, it does provide a centralized location where individuals can compare plans offered by different insurers. The ability to easily compare plans will be even more important under the Georgia Access Model because there will likely be more plans to compare. We recognize that creating a similar state exchange would in and of itself be a costly and time-consuming endeavor. However, relying solely on the free market will likely require individuals to search multiple websites, brokers or insurers in order to truly compare all available plan options. We urge the state to consider incentives for brokers to create online, telephonic and in-person mechanisms for individuals to compare all available plans in their geographic area.

We look forward to continuing to work with the state to help implement these important programs in an efficient and effective manner. Please feel free to contact me at 770-249-4531 or erogers@gha.org with any questions or if you desire to discuss these comments further.

Respectfully submitted,

Earl V. Rogers
President and CEO

cc: Ryan Loke, Special Projects, Office of the Governor
Kevin L. Bierschenk, Board Chair, Georgia Hospital Association
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * Georgia Mountains Health Services, Inc.

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Miracle

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

Hello, I am Steven Miracle and the CEO of Georgia Mountains Health Services. Our organization is a non-profit Federally Qualified Health Center with offices in Blue Ridge and other rural areas in north Georgia.

On behalf of my organization...my community board...and most importantly the medically underserved residents of my community, I offer our support of the proposed 1115 waiver.

Founded in 1984, the Mission of Georgia Mountains Health is to provide primary medical, dental and behavioral health care to the uninsured and underserved... regardless of ability to pay.

In the last year, my organization provided quality health care to nearly 15,000 people. These Georgians use our full time providers as their medical and dental home. True to our mission, 44% of our patients are covered through the Medicaid program. The more striking statistic, however, is that 25% of our patients have no insurance.

The uninsured men and women in that 25% certainly receive quality primary care without the benefit of insurance coverage. But as we all know, health care needs do not stop with primary care. Where does the uninsured diabetic go who needs the specialty care of an endocrinologist? Where does the uninsured cancer victim go who needs the specialty care of an oncologist? What about the uninsured person who needs medication to control their high blood pressure or cholesterol....where do they go?

We support the proposed 1115 waiver because it will help these individuals and others.

Our Community Health Center is a member of the Georgia Primary Care Association. The Association has 34 independent Federal Qualified Health Centers in Georgia operating 229 service sites in 123 Counties.

I want you to know that Medicaid dollars spent for patient care in a Community Health Center like mine help the state meet its budget challenges. Community Health Centers actually control health care costs through a focus on preventative screenings, chronic disease management and reduction in unnecessary ER visits. I will be happy to provide documentation of this assertion if you are interested.

We appreciate Governor Kemp's leadership in addressing the need for access to health care for those Georgians who do not currently have access to insurance coverage.

I and my organization stand ready to support the proposed 1115 Waiver and other efforts to improve access, quality and affordability of health care in Georgia.

Thank you for your time. I am glad to answer any questions you may have.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Business/Organization * Georgia Primary Care Association

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Kavka

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

The Georgia Primary Care Association represents 34 independent organizations designated as Federally Qualified Health Centers. Our primary patient target group are those on Medicaid and the uninsured. We are pleased that Gov Kemp has moved so quickly on proposed improvements and expansion for the Georgia Medicaid Program. We are ready to support the 1115 Waiver once approved by CMS.

Federally Qualified Health Centers have been around for over 50 years and have established an enviable track record of improving the health status of all our patients - regardless of their insurance status and their ability to pay for their care. Georgia's Federally Qualified Health Centers are focused on becoming the medical home to our patients and as such we are focused on preventive care, medication management and patient follow-up with a goal to improve our patients health outcomes and quality of life. Further, we seek to avoid unnecessary hospitalizations and emergency room visits which can greatly reduce overall health care costs and the the financial burden of Georgia's hospitals - especially the rural hospitals.

Collectively, our member organizations will see over 200,000 Medicaid patients in 2019. We have additional capacity to see more patients and will welcome any of the additional 50,000 Georgia residents that will qualify for Medicaid under Gov Kemp's plan. We stand ready to support the plan and be a part of what we hope is just the beginning of additional future efforts by the Kemp administration to improve the overall health care status for all Georgians.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * Georgia Psychiatric Physicians Association

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Krecl

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

December 3, 2019

The Honorable Brian Kemp
Governor, State of Georgia
206 Washington Street
Suite 203, State Capitol
Atlanta, GA 30334

RE: Public comment on the proposed 1115 Waiver

Dear Governor Kemp,

The Georgia Psychiatric Physicians Association is the only statewide organization representing Georgia psychiatrists and their patients. Our members are dedicated to promoting professional values and ethics in the practice of psychiatry; improving patient access to quality mental health care; lifelong learning and professional development; and supporting education and advocacy for our profession, our patients and their families.

The Georgia Psychiatric Physicians Association commends you and the Georgia Department of Community Health for your hard work and dedication to the citizens of Georgia. We greatly appreciate the strides to improve the healthcare coverage and quality of life for hardworking Georgians.

The GPPA is certainly understanding of legislation passed in the 2019 session and recognizes that per O.C.G.A. 49-4-7, the Department may include an increase in the income threshold up to a maximum of 100 percent of the federal poverty level. While we recognize this is law, the GPPA continues to advocate for coverage for more Georgians.

We at the Georgia Psychiatric Physicians Association do have concerns about the effort to impose work requirements on Medicaid patients under the 1115 waiver. While we appreciate the intent to improve coverage, under the proposal, the effort to expand Medicaid to those working at least 80 hours a month and with incomes below 100 percent of the Federal Poverty Level provides unnecessary barriers to coverage. Individuals with mental illness and/or substance use disorder also face unique barriers to stable employment due to their fluctuating ability to function, which can potentially lead to job loss. These patients disproportionately can have criminal records, often tied to their medical conditions. Additionally, research shows that patients with serious mental illnesses die years earlier than the general population, with the majority of them perishing due to physical health conditions. Taking coverage away from these patients have the potential to lead to delayed treatment and costly physical and mental health outcomes.

Even if individuals with a mental illness and/or a substance use disorder meet the requirements of the waiver, there remains a real risk of eligible people losing coverage due to miscommunication, their inability to navigate these processes, or other breakdowns in the administrative process. For many working adults struggling with a mental illness and/or a substance use disorder, overcoming the administrative obstacles to prove they are eligible for an exemption may be cumbersome due to the nature of their condition, leading them to lose coverage on purely technical grounds. Notably, patients may find themselves in an impossible position where they may lose Medicaid coverage because they cannot get their disability documented, but they also cannot get the disability documentation because they do not have health coverage.

I greatly appreciate the opportunity to express GPPA's thoughts and position on the Georgia Pathways, Section 115 waiver proposal. If you have any questions at all, please do not hesitate to contact the GPPA Executive Office at (404) 299-7700.

Sincerely,
Sultan Simms, MD, DFAPA
President
Georgia Psychiatric Physicians Association
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Business/Organization * Georgia Quality Healthcare Association

Stakeholder Type * Trade Association

First Name * [REDACTED] **Last Name *** Weathington

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

Georgia Quality Healthcare Association
Comments on Georgia Pathways 1115 Waiver

Lavinia Luca
c/o The Board of Community Health
P.O. Box 1966
Atlanta, GA 30301-1966

The Georgia Quality Healthcare Association (GQHA), representing the companies currently serving Medicaid members in the Georgia Families program, would like to take this opportunity to provide our comments in support of the proposed Section 1115 Waiver proposal known as Georgia Pathways.

Our four member companies are proud to serve approximately 1.2 million citizens under Georgia Families and look forward to the opportunity to provide Medicaid coverage to more people under Georgia Pathways. GQHA members provide health benefits to similar populations across the nation, and we stand ready to bring our collective experience to bear as the State looks to provide access to Medicaid coverage for more Georgians.

On behalf of the Board, I would like to express our appreciation for the open and inclusive stakeholder engagement efforts undertaken by the Administration throughout the waiver development process. We look forward to continuing to work with your Administration as the State proceeds with the development and implementation of Georgia Pathways. Please do not hesitate to reach out to GQHA and our members to serve as resources in your efforts to promote the health and well-being of Georgia's citizens.

Sincerely,
Sonya K. Nelson, President
Georgia Quality Healthcare Association
Market President, WellCare of Georgia
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * Georgians for a Healthy Future

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Colbert

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

Dear Governor Kemp,

Thank you for the opportunity to comment on Georgia's 1115 Medicaid Demonstration Waiver Application. Georgians for a Healthy Future appreciates the attention that you have brought to the issue of Georgia's high uninsured rate and the urgent need to address it through state policy.

Georgians for a Healthy Future (GHF) is a statewide, non-profit consumer health advocacy and policy organization. Our organization's vision is of a day when all Georgians have access to the quality, affordable health care they need to live healthy lives and contribute to the health of their communities. Since 2012, we have actively led education and advocacy efforts to expand health coverage to low-income and under-resourced Georgians. As a part of those efforts, we have made it a priority to interview and talk with low-income Georgians across the state who stand to benefit from expanded health coverage.

The stories gathered from these Georgians in combination with data collected from the experiences of other states have informed a set of principles shared by GHF and a coalition of dozens of other patient and consumer advocacy groups. These principles articulate that any 1115 waiver that aims to expand coverage to low-income Georgians should:

1. Put a health insurance card in the pocket of more Georgians without delay.
2. Extend coverage to all Georgians with incomes up to 138% of the federal poverty line.
3. Provide access to comprehensive health care services for newly eligible Georgians.
4. Facilitate and maintain stable, affordable coverage for newly eligible Georgians.
5. Provide comprehensive benefits to newly eligible Georgians and preserve coverage for Georgians currently enrolled.

Unfortunately, the Georgia Pathways waiver application violates all of these principles.

Georgians for a Healthy Future would like to specifically document the following concerns with Georgia's waiver application.

1. Fewer Georgians would be covered at a greater expense to state taxpayers.

The Georgia Pathways waiver, per the constraints of its authorizing legislation, would expand coverage to Georgia adults only up to 100% FPL, rather than 138% FPL as permitted by the Affordable Care Act (ACA).

The State's self-imposed constraint limits the number of Georgians who would be newly-eligible for coverage to an estimated 267,000 uninsured Georgians with incomes below the poverty line. However, by the state's own estimates, only 52,509 of these Georgians will be able to successfully navigate the complex prerequisites for coverage in order to enroll.

Georgia's choice to cover fewer state residents will require the State to pay its standard match rate of 33% for costs associated with the newly eligible adult population. Under the ACA's enhanced match, Georgia would only ever pay 10% of costs, a rate three times lower than the rate the state is planning to pay under the proposed waiver.

The State could spend three times less per capita to cover 450,000 more Georgians and yet chooses not to do so. The waiver application does not attempt to address this choice and does not address how the proposal will promote coverage while leaving behind thousands of otherwise eligible Georgians.

2. The waiver application does not advance the purpose of Medicaid: covering the cost of medical care for low income people.

Congress appropriates Medicaid funds to the states in order to “furnish ... medical assistance [to] individuals whose income and resources are insufficient to meet the costs of necessary medical services...”. However, Georgia’s waiver application “focuses on encouraging and incentivizing work and other employment-related activities” in order to “improve ... overall health and well-being.” Federal judges have already rejected this attempt to rewrite federal law by state officials and Georgia’s attempt is no different.

Even if the proposed waiver’s focus on employment was legally permissible, the application’s reasoning to support its proposed work requirement is flawed. The proposal won’t achieve its stated goal of improving well-being by “encouraging and incentivizing work” because most people who can work already do. Nationally more than 6 in 10 adults with Medicaid work, and most work full time. This holds true, even in Georgia where almost 60% of adults with Medicaid coverage work and where the State’s own estimates indicate that 60% of uninsured Georgians work. The largest barriers to working that adults with Medicaid report are illness or disability; the waiver is silent as to how the work requirement will help this group overcome their health barriers to employment. In contrast, were Georgia to expand Medicaid to people with chronic health conditions like diabetes, asthma, mental health and gastrointestinal disorders, they might be better equipped to manage their health and go to work.

Full Medicaid expansion, in contrast, would achieve higher employment rates for more people at a reduced cost to the State; full Medicaid expansion improves workforce participation amongst individuals with disabilities and “large percentages of expansion beneficiaries reported that Medicaid enrollment made it easier to seek employment...or continue working.”

The waiver’s evidentiary support for its hypothesis that making work a precondition for Medicaid will improve health relies on misreading medical literature. For example, the waiver proposal cites an article by Pinto et al to support the statement that “[e]mployed individuals are both physically and mentally healthier than those who are unemployed.” In fact, Dr. Pinto’s team reviewed the medical literature and found five qualities of interventions successful in helping patients achieve employment: “a multidisciplinary intervention team with open communication to address patient needs”; “a package of services including expert advice, a job search, feedback, networking, education and training and peer mentorship”; “services are one-on-one and tailored”; “services are holistic and take a comprehensive view of social needs”; and “intervention team works with and engages employers.” Not one of the qualities of programs that successfully help patients gain employment in anyway resembles a work requirement.

Similarly, the waiver application’s stated goal of improving well-being would be better served by expanding health coverage to all low-income Georgians. A literature review by the Kaiser Family Foundation found that “a growing body of research has found an association between Medicaid expansion and improvements in certain measures of health outcomes.” As an example, one study indicates that expansion may contribute to reductions in infant mortality rates particularly among African Americans. This health improvement related to full Medicaid expansion would be especially beneficial here in Georgia which has a higher infant mortality rate than 43 other states.

3. The waiver application ignores the true barriers to health and health care for low-income Georgians.

The State’s waiver application asserts without basis that “private market policies...such as premiums, copayments, Member Rewards Accounts, and prospective Medicaid eligibility,” will “empower members to make cost-conscious healthcare decisions and take responsibility for improving their health,” and “better prepare members for their transition into the commercial health insurance market.”

However, the waiver proposal cites no evidence—and no evidence appears to exist—that low-income Georgians do not already “take responsibility” for improving their own health. Instead, many structural factors weigh against the improved health of all low-income people, even those who work and “take responsibility” for their own health. Most of those structural factors, including higher exposure to violence, lack of affordable housing, limited economic mobility, and under-resourced schools are our collective responsibilities. For an excellent discussion of the impact of social factors on health, those reviewing these comments should review “Health, Income, & Poverty: Where We Are & What Could Help,” by Khullar and Chokshi and published October 4, 2018 in Health Affairs. They will note that work reporting requirements for Medicaid are not mentioned in the recommendations for improving the health of the working poor.

The waiver’s own provisions belie the notion that the waiver is designed to promote empowerment or individual decision making about health. The waiver proposal requests that CMS waive the “Freedom of Choice,”

promised to Medicaid recipients in order to “enable Georgia to restrict the freedom of choice of providers for the Demonstration eligibility groups.” Similarly, the waiver proposes that “members with access to ESI (employer sponsored insurance) must enroll in HIPP (Health Insurance Premium Payment Program) if it is cost-effective for the state,” despite the fact that “no wraparound benefits will be provided to Georgia Pathways members enrolled in HIPP.” This provision appears to abolish a consumer’s ability to choose the plan that costs them the same amount but provides better benefits (i.e. Medicaid) over the one provided by their employer. It is difficult to understand how this provision is consistent with the stated aims of the waiver application.

4. The elimination of the non-emergency medical transportation benefits restricts access to care for low-income Georgians.

Non-emergency medical transportation (NEMT) ensures that consumers who lack transportation can still get to and from health appointments. Without access to reliable transportation, Medicaid members, especially those with chronic or complex health and social needs, regularly miss health appointments. This predictably results in worsening health, emergency room visits, and expensive inpatient hospitalizations.

A study of NEMT and health care access found that NEMT benefits are cost-effective or cost-saving for all 12 medical conditions analyzed, such as prenatal care, asthma, heart disease and diabetes. Another study found that NEMT more than pays for itself for people with chronic conditions “resulting in a total positive return on investment of over \$40 million per month per 30,000 Medicaid beneficiaries.” This data suggests that rather than saving money by eliminating the NEMT benefit, Georgia would instead end up spending more over time.

Further, the decision to eliminate NEMT would have a disproportionate impact on certain groups of newly eligible Georgians, limiting their access to care and forcing them to rely on unsafe or expensive modes of transportation to get to health services. People of color in Georgia are three times less likely to own a car than white Georgians, putting them at greater risk of being unable to access care without NEMT. People living in rural Georgia counties, almost all of which are considered health transportation shortage areas, would also experience greater harm from the elimination of NEMT benefits as they have reduced access to public transportation and greater distances to travel to access services.

5. The proposed waiver creates massive, expensive and duplicative government bureaucracy.

The waiver proposal, if implemented, would require the creation of massive new state government bureaucracies but provides no estimate for the costs of these new systems and programs. The state would have to develop new information and staffing systems for reviewing the work or work-related activities of applicants, a new member account system, a healthy behavior incentive program and an employer premium assistance program. This runs contrary to the principle of efficient government enshrined in Georgia’s Administrative Procedure Act which requires that “[i]n the formulation and adoption of any rule, an agency shall choose an alternative that does not impose excessive regulatory costs on any regulated person or entity which costs could be reduced by a less expensive alternative that fully accomplishes the stated objectives of the statutes which are the basis of the proposed rule.” It is hard to imagine a rule that would impose more regulatory costs on working poor Georgians than this proposal.

If Georgia plans to use existing information and staffing systems (e.g. Georgia Gateway) to manage these new functions, this would be cause for even greater concern. Georgia Gateway and the supporting agency functions are not robust enough at this time to accept new Medicaid applications outside of business hours, much less handle the influx of data and information needed to manage the intricacies of the proposed waiver. Further, Georgia already has one of the slowest times for approving Medicaid MAGI and CHIP Applications according to CMS’s Medicaid MAGI and CHIP Application Processing Time Report from November 9, 2019. Without significant investment from the State, it is unlikely that the implementation of this waiver could take place with the resources currently available.

In a recent study, the GAO found that the administrative costs to implement work reporting requirements in other states ranged from \$6.1 to \$271.6 million dollars. Should CMS should follow GAO’s recommendation and require Georgia to “submit projections of administrative costs,” the proposed waiver will likely not prove budget neutral for the federal government because of these added costs.

6. Georgia children and rural hospitals will continue to struggle under the proposed waiver.

According to the Georgetown Center for Children and Families, 217,000 children in Georgia were uninsured in

2018, 38,000 more than in 2016. That is more than 8% of all children in the state and puts Georgia 48th amongst states in providing health insurance to children. Georgia's continued refusal to extend health coverage to all low-income adults, including parents, contributes to this shameful outcome, because "it is well established that when states offer coverage to the whole family, children are more likely to be enrolled." One of the most effective strategies Georgia could take to increase health coverage for children in our state would be to ensure all parents, regardless of income, have coverage themselves.

Similarly, the proposed waiver does not go far enough to relieve the burden of rural hospitals in providing high levels of uncompensated care. Without a more extensive coverage expansion, Georgia's rural hospitals will continue to struggle and close as they have in recent years. According to the KFF literature review, "a study published in January 2018 found that Medicaid expansion was associated with improved hospital financial performance and significant reductions in the probability of hospital closure, especially in rural areas." Since the coverage provided under the proposed waiver will not cover the vast majority of low income people, will not cover any expenses retroactively and will not provide coverage until the first day of the month after an applicant pays the first premium, rural hospitals will likely continue to languish while federal dollars go unspent in Georgia. As rural hospitals decline, so do rural communities and the health care consumers that live in them.

GHF believes that it is possible for all Georgians, regardless of income, to have affordable, comprehensive coverage in a way that is financially sustainable for the State. At least two of the stated goals of the Georgia Pathways waiver are consistent with this belief. And yet, Georgia's waiver application does little to move Georgia closer to this outcome.

We encourage your administration to consider changes to this waiver application that would extend coverage to far more Georgians. Beyond that, we encourage you to work alongside the Georgia General Assembly in 2020 to amend the Patients First Act to allow the State to fully extend Medicaid eligibility to Georgians making up to 138% FPL.

Thank you in advance for your consideration of our comments on Georgia's 1115 Medicaid waiver application. Thank you also to Margaret Middleton, Assistant Clinical Professor of Law at Georgia State University College of Law for contributing to these comments. We hope that you will consider GHF a resource as you pursue your efforts to bring affordable, quality health coverage to more Georgians.

Sincerely,
Laura Colbert
Executive Director
Georgians for a Healthy Future
(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

Georgians for a Healthy Future is supportive of the proposed regional reinsurance program. Like those approved in other states, the reinsurance portion of Georgia's proposal would reduce premiums and provide market stability. It would be a positive move forward for Georgia consumers.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

Dear Governor Kemp,

Thank you for the opportunity to comment on Georgia's proposal to waive federal rules under the Affordable Care Act (ACA). I am writing on behalf of Georgians for a Healthy Future to express our organization's deep concern about the ACA Section 1332 waiver.

Georgians for a Healthy Future (GHF) is a statewide, non-profit consumer health advocacy and policy organization. Our organization's vision is of a day when all Georgians have access to the quality, affordable health care they need to live healthy lives and contribute to the health of their communities. Since 2010, we have been actively engaged in monitoring and advocating on ACA implementation issues that impact health care consumers in our state and we regularly field calls and questions from consumers with individual coverage as they navigate a dynamic health care landscape.

In early 2019, as the Georgia General Assembly began its considerations of the authorizing legislation for the proposed waiver, GHF laid out four principles for any 1332 waiver application sought by the State. We believe these four principles set forth a framework that builds on the successes of the ACA and promote further gains for Georgia consumers:

1. Preserve critical consumer protections, like those that protect consumers with pre-existing conditions
2. Maintain comprehensive, quality health coverage, including the requirement that all insurance plans cover the ten essential health benefits
3. Insulate consumers from rising health care costs by building a stable, robust health insurance marketplace and investing in policies that increase marketplace enrollment
4. Disallow increases in financial liabilities for low- and middle-income consumers (those between 100-400% FPL)

Unfortunately, the Georgia Access waiver violates all four of these principles. The proposal would raise premiums for comprehensive health plans, encourage consumer enrollment in substandard plans, and likely cause many Georgians to lose coverage altogether. Lower-income Georgians, people of color, and people with pre-existing health conditions would be most at risk of experiencing adverse consequences from the outlined plan.

Georgians for a Healthy Future would like to specifically document the following concerns with the Georgia Access waiver.

1. The elimination of healthcare.gov unilaterally disarms Georgia consumers against insurance companies and web-brokers.

Following its rollout in 2012, healthcare.gov has become a powerful tool for consumers as they shop for and compare comprehensive health coverage. The federally facilitated marketplace is the only unbiased platform with no financial stake in the plans purchased by Georgia consumers and limits the plans presented to those that cover the ten essential health benefits and abide by all other ACA requirements. It is structured to ease the shopping experience, even for consumers with low health literacy skills.

The State's proposal to decentralize the enrollment process and move consumers to a tangle of privately-operated sites would disadvantage Georgia shoppers to the benefit of web-brokers and insurance companies. This move decreases transparency for consumers and ignores the misalignment of incentives for web-brokers and insurance companies.

Websites operated by these private entities are permitted to show substandard plans alongside

comprehensive plans, which would require consumers to discern between the two types of plans. Many consumers struggle to successfully distinguish between non-ACA-compliant plans and comprehensive coverage that meets ACA standards. Under the State's proposal, these consumers would have difficulty understanding their choices, putting them at risk of enrolling in plans that do not cover the health services they need or plans that have consequential financial implications (e.g. benefit cap).

This dynamic is made worse by the mis-aligned incentives of web-brokers and insurers who would be newly responsible for helping consumers shop and enroll with the best interests of consumers. These privately-operated sites earn commissions for plans sold, and commissions are notably higher for substandard plans, motivating the sites to highlight these options for consumers over ACA-compliant plans, putting them at even greater risk of enrollment in an ill-fitting plan.

The risk is perhaps greater for consumers who seek coverage but whose income is low enough that they or their children would be eligible for Medicaid. Unlike healthcare.gov, there is no stated requirement or incentive that the private enrollment entities provide consumers with information about their likely Medicaid eligibility or provide Georgia's Medicaid eligibility system with their coverage application for an eligibility determination.

The waiver application assumes with no evidence that there will be no coverage loss resulting from the transition from healthcare.gov to these alternate enrollment pathways. However, it is likely that in the midst of this significant shift a meaningful number of Georgians will fall through the cracks as they struggle to understand how and where to enroll in coverage and the choices available to them.

2. Restructuring and capping financial assistance risks the finances of Georgia consumers.

In addition to Medicaid expansion, one of the ACA's most powerful mechanisms for reducing the number of uninsured Americans is the financial assistance available to lower- and moderate-income consumers who purchase individual health coverage. Of Georgia's ACA marketplace enrollees, 88% receive financial help in the form of premium tax credits to lower their monthly premiums and 66% receive cost-sharing reductions to lower their deductible and other out-of-pocket costs.

The State's proposal to take control of these subsidies, allow the funds to apply to substandard plans, and cap the subsidies available risks Georgia consumers' finances and access to care, especially for those with pre-existing conditions.

As financial assistance is allowed to apply to a wider array of plans, healthier Georgians are likely to enroll in non-ACA-compliant plans with skimpy benefits and cheaper premiums, while Georgians with chronic conditions or other health needs continue to enroll in comprehensive "qualified health plans" (QHPs). The State's application improbably suggests that the resulting adverse selection will make comprehensive coverage only 1% more expensive. However, it is reasonable to expect — and the application offers no evidence to suggest otherwise — that premiums will rise substantially, leaving Georgians (including those with pre-existing conditions) who want full coverage to pay more for their plans.

Because financial assistance is currently based on premiums for comprehensive coverage which will be more expensive, providing help to all eligible Georgians is very likely to cost more than the State's budgeted amount. If the financial cap set by this proposal is met for this reason or any other, otherwise eligible Georgians who enroll would be left with no financial help at all. Instead they would have to pay for the full costs of their plan. In this situation, a 25-year-old, single Georgian making \$12,700 annually (just over the poverty line) who purchases a silver level plan could expect to pay almost 80% of her annual income towards insurance costs, making insurance "accessible" in name only.

The financial cap is further problematic because the state is in no way obligated to maintain the proposed level of financial assistance for Georgia consumers. In an economic recession or under a future Governor with little regard for the importance of health insurance, the financial cap could be lowered, or financial assistance could be eliminated leaving lower- and moderate-income Georgians with no true pathway to coverage.

The Georgia Access waiver is silent about how the restructuring of financial assistance will impact the availability of cost-sharing reductions for consumers making between 100-250% of the federal poverty line (FPL). Without specifics, we can only assume that CSRs will be eliminated or reduced. As the costs of accessing care add up, lower-income Georgians are more likely to put off seeking care until absolutely necessary.

(If it is the case that the State will administer a cost-sharing reduction subsidy, there is no information

whatsoever about how that aspect of the program would be implemented.)

3. Expanding access to health plans that do not meet ACA standards limits access to care and undercuts protections for Georgia consumers.

The State's proposal to expand access to plans that do not meet ACA standards by waiving significant parts of the law undercuts protections for Georgians who are pregnant or planning for a family, people with chronic conditions, Georgians who need mental health or substance use services, people with limited English proficiency, and many other populations of Georgians.

Plans that do not cover the ten essential health benefits (EHBs) put consumers at risk of not having necessary coverage when they need it. These substandard plans, called "eligible non-QHPs" in the waiver application, frequently do not cover or offer very limited coverage of prescription drugs, mental health care and substance use services, or maternity care, leaving consumers fully financially responsible if they need these services while enrolled (perhaps unknowingly). One statistic most effectively underscores the implications of this proposed erosion of comprehensive coverage for Georgia consumers: Nearly half of U.S. pregnancies are unplanned.

To add to the risk for Georgia consumers, the State's waiver application is unclear about the parameters of eligible non-QHPs. It leaves open the possibilities that these newly expanded plans could charge women or seniors more for the same coverage; delay coverage of a pre-existing condition for some period of time; disregard the ACA's out-of-pocket maximum limits; or impose annual or lifetime limits on coverage. Any of these options would significantly undercut protections for Georgians with pre-existing conditions.

In order to allow financial assistance to apply to substandard plans, the Georgia Access waiver requests to waive a number of critical consumer protections. The elimination of any one of these protections is troubling and the combined effect would be dramatic for Georgia consumers.

-Mental health parity

The State's proposal to eliminate the requirement that applies federal mental health parity law to QHPs would turn back the clock to a time when insurance companies could treat mental health and substance use disorder (MH/SUD) needs differently from other health needs. Waiving this part of the ACA would allow insurance companies to establish different deductibles for MH/SUD services, charge higher co-pays, impose onerous pre-authorization procedures, or exclude MH/SUD providers from plan networks, among a bevy of other barriers that would limit access to MH/SUD services.

Moreover, federal parity law requirements only apply if MH/SUD benefits are present in a plan. Under the proposed waiver, non-QHPs would not have to cover all EHBs so plans could leave out MH/SUD coverage altogether, effectively eliminating parity for all people enrolled in those types of plans.

At a time when more and more Georgians are in need of MH/SUD services and supports, this part of the State's proposal seems especially unwise and short-sighted.

-Network adequacy

According to a 2015 study, Georgia has the narrowest provider networks in the country. Predictably, GHF regularly hears from consumers about the difficulty they have finding in-network providers, especially when seeking specialty care. Waiving the ACA's requirements related to network adequacy would only serve to exacerbate this dynamic, further inhibiting Georgians as they attempt to access needed health services. This is especially true for lower-income consumers, populations who are medically underserved, and people of color who are more likely to rely on essential community providers, as well as people with chronic diseases who need regular care from a specialist.

-Plan disclosure requirements

The ACA requires that health plans "utilize the standard format established for presenting health benefits plan options" so that consumers can easily understand plan features and costs and compare across insurers. In waiving this requirement, Georgia would remove yet another tool from consumers' toolbox to help them understand their health plan choices. This move would multiply the negative consequences of the State's proposed dismantling of healthcare.gov and would disproportionately impact Georgia consumers with lower educational attainment, limited health literacy skills, or limited English proficiency.

4. The Georgia Access waiver violates the statutory guardrails set forth in Section 1332 the Affordable Care Act.

-Comprehensiveness

A core aim of Georgia's waiver application appears to be to encourage enrollment in health coverage that is not comprehensive and would not satisfy the Section 1332 comprehensiveness guardrail. The application seems to try to downplay the implications of such an approach by relying on several unsupported assumptions:

- The application assumes that eligible non-QHPs will provide 90% of the covered benefits that QHPs do. However, it provides no analysis to support this assumption. Notably, this assumption does not apply to cost-sharing. In other words, an eligible non-QHP might provide 90% of a QHP's benefits, but also may impose severe cost-sharing limitations that would make the actuarial value of the plan far lower than its QHP counterpart.

- Crucially, the proposal assumes that comprehensive coverage (QHPs) will continue to be available in all rating areas in Georgia. However, no explanation or analysis is provided to support this assumption.

-Affordability

The program's cap on subsidy funding appears likely to violate the Section 1332 affordability guardrail as it appears in statute. By design, it would leave some individuals who qualify for coverage subsidies under the ACA without any financial assistance at all. The State's assertion that the cap will not be reached in year one cannot be credited because it is based on the unsubstantiated assumption articulated earlier (that the adverse selection caused by increased availability of skimpy plans will increase the costs of comprehensive coverage by only 1%). The actuarial document itself notes that the enrollment impacts of the program are uncertain.

It is not at all clear that the state subsidy includes any sort of cost-sharing assistance. The application would waive the cost-sharing reduction (CSR) program, including insurers' obligation to provide enrollees with this assistance. However, the application makes no mention anywhere of any cost-sharing component of the state subsidy and does not draw down any CSR pass-through funds (since the federal government is not paying CSRs at the moment, there is no funding to redirect). All calculations and assumptions refer to premium assistance only. If the program were not to contain a CSR replacement, the omission would seemingly violate the affordability guardrail on its own. Yet there is virtually nothing in the application to suggest such assistance is included in the state's vision.

-Scope of Coverage

The application projects that enrollment will increase by 30,000 as a result of the Georgia Access Model, but recognizes that both new and existing enrollment will settle in non-ACA-compliant plans at the expense of comprehensive coverage. While the federal government's October 2018 guidance on Section 1332 waivers suggests it is permissible for a waiver program to reduce enrollment in comprehensive coverage, so long as total enrollment other coverage products rises, there are significant legal questions about whether this interpretation is consistent with the federal statute.

-Federal Deficit Neutrality

The application fails to account for all of the federal budgetary effects of waiving the premium tax credit structure. In particular, the waiver would eliminate revenues that the federal government otherwise would be owed by Georgia employers under the employer mandate. These lost revenues, which could be substantial (above \$100 million), will reduce the amount of federal pass-through dollars available to the state. This reduction could result in a violation of the guardrails or a state subsidy program that is even more underfunded than it would be as designed.

5. A number of implementation issues are left unaddressed in the waiver application.

The Georgia Access waiver articulates that the newly established Office of Health Strategy and Coordination will implement many of the provisions of the proposed waiver. However, GHF is concerned that the Office will not be sufficiently resourced to carry out the full scope of its responsibilities. The implementation of the state subsidy program would be a significant undertaking, for which Georgia is budgeting \$13.5 million prior to 2022 and \$5 million annually thereafter. It is not clear whether that is sufficient and there is little detail in the application to suggest how the state plans to address the various significant technical and operational elements of its proposal.

The waiver application further asserts that eligible non-QHPs will be in the single risk pool. Plans in the single risk pool are subject to ACA risk adjustment (which cannot be waived). However, it is not clear how risk adjustment can be made to work where the pool is comprised of products as potentially dissimilar in structure as those that would be newly offered under this application.

The State's proposal says it will maintain the same subsidy eligibility and program parameters in 2022 as are currently in place. This suggests that Georgia will administer a state premium tax credit that will require yearly reconciliation at tax time by enrollees. Reconciliation is a complicated process to establish and administer and about which to educate tax professionals and the public. There is no information in the application about whether this is the state's plan, and if it is, how it would work.

Despite the significance of these decisions and others on Georgia consumers, there is no guarantee in the authorizing legislation or the waiver application that consumers will have a meaningful voice in the decision-making of the Office. While the authorizing legislation states that the Director of the Office may appoint advisory committees, GHF feels it is imperative that consumers are consistently and meaningfully engaged by the Office in the decision-making process.

Despite these enumerated concerns related to subsequent provisions of the Georgia Access waiver application, GHF is supportive of the proposed regional reinsurance program. Like those approved in other states, the reinsurance portion of Georgia's proposal would reduce premiums and provide market stability. It would be a positive move forward for Georgia consumers.

Thank you in advance for your consideration of our comments on Georgia's Section 1332 waiver application. We hope that you will consider GHF a resource as you seek to bring affordable, quality health coverage to more Georgians.

Sincerely,
Laura Colbert
Executive Director
Georgians for a Healthy Future
404-890-5804
lcolbert@healthyfuturega.org
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Business/Organization * Go2 Foundation for Lung Cancer

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Kane

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** District of Columbia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Premiums, Copayments, Member Rewards Account

Comments*

December 3, 2019

Frank W. Berry Commissioner
Georgia Department of Community Health Post Office Box 1966
Atlanta, Georgia 30301
RE: Georgia Section 1115 Demonstration Waiver Application

Dear Commissioner Berry,

GO2 Foundation for Lung Cancer appreciates the opportunity to submit comments to the Georgia Department of Community Health on the Georgia Medicaid 1115 waiver during the open comment period. As a leading lung cancer advocacy organization, GO2 Foundation supports patients by advancing research, elevating awareness and advocating for improvements in our health care system that increase access to treatment and preventive services for all those living with and at risk of lung cancer. We are writing to voice our opposition to section 3.1.1 of the 1115 waiver and we ask you to rescind your proposal to impose a tobacco surcharge on the Georgia Medicaid population. GO2 Foundation believes that such a surcharge would prohibit health care access to vulnerable Americans at risk of lung cancer as it discourages enrollment, adds increased financial burdens, and would not successfully decrease smoking rates.

Smoking Prevalence, Lung Cancer and The Expanded Medicaid Population

Lung cancer is the leading cause of cancer death in the United States. By the end of 2019, approximately 142,670 people will die from lung cancer. That is more than breast cancer, colon cancer, and prostate cancer combined¹. In Georgia alone, the Center for Disease

¹ Rick Alteri, MD; et al., Cancer Facts & Figures 2019, American Cancer Society, 2019

Smoking Prevalence, Lung Cancer and The Expanded Medicaid Population

Control estimates that more than 7,070 people will have been diagnosed with lung cancer in 2019. The CDC has found that the prevalence of smoking in the United States is the number one risk factor for Lung Cancer. In the U.S., smoking is linked to about 80% to 90% of lung cancer deaths, and Americans who smoke were found to be at least 15 times more likely to be diagnosed with lung cancer. Meanwhile, the smoking rate in Georgia above the national average. The CDC reports that 17.5% of all adults in Georgia have smoked in the last year¹. Not only is the smoking rate high, other studies suggest that low-income Americans, many of whom would gain coverage under an expansion, are significantly more likely to be smokers. According to the Center for Disease Control data from the National Survey on Drug Use and Health, Americans nationwide who have an income less than 100% of the federal income level have a 12% higher smoking rate than Americans making an income at least two times the federal poverty level. Even further, among low-income individuals in the United States, approximately 38% who's income is up to 100% of the federal poverty level reported to using tobacco products in the last year². Therefore, expanding Medicaid would provide health insurance to a large population who are likely current and former smokers and at risk for lung cancer.

Access to Lung Cancer Preventive Services

Currently, a low-dose CT scan for lung cancer is the only early detection preventive test available for those at risk of lung cancer. Given the limited expansion of Medicaid, even more Georgians would have access to this life-saving screening test. Being screened for lung cancer has been found to reduce mortality rates in the U.S. by as much as 26% in men and 39% in women. For every 303 people who get screened, one life would be saved³. In the last few years, low-dose CT scans for lung cancer screening have been a recommended

service by the U.S. Preventive Services Task force for adults aged 55 to 80 who have smoked in the last 15 years. In addition, lung cancer screening is an essential covered health benefit under Medicare and Georgia accepts the FMAP incentives for providing USPSTF recommended preventive services to their original Medicaid program, meaning, lung cancer screening is already covered. However, even with increased access, estimated figures in 2016 show that less than two percent of all eligible patients nationwide obtain screening for lung cancer⁴. Expanding access

1 Kaiser Family Foundation, Analysis of the Centers for Disease Control and Prevention (CDC)'s Behavioral Risk Factor Surveillance System (BRFSS) Survey Results., State Health Facts, Percent of Adults Who Smoke, 2017

2 Substance Abuse and Mental Health Services Administration. Results from the 2016 National Survey on Drug Use and Health: Center for Behavioral Health Statistics and Quality, 2014

3 Lung Cancer Incidence and Mortality with Extended Follow-up in the National Lung Screening Trial Journal of Thoracic Oncology, Volume 14, Issue 10, 1732 - 1742

4 PHAM et al. [http://abstracts.asco.org/214/AbstView_214_221571.html]

to these services under the Medicaid program can help increase the utilization rate, as long as barriers to Medicaid enrollment are not implemented.

The Impact of Tobacco Surcharges

While expanding Medicaid will offer coverage and access to lung cancer screening for a larger population of current smokers in Georgia, GO2 Foundation believes that including a tobacco surcharge will discourage many low-income current smokers from enrolling and preventing them access to preventive services. Section 3.1.1 of the Georgia Section 1115 Demonstration waiver proposes an additional fee on monthly premiums per household for any individual who has reported tobacco use. A \$3.00 surcharge for households who make between 50% to 84% the federal poverty level and \$5.00 for individuals from 85% to 99% the federal poverty level. While this fee may be perceived as minimal, for a household making 50% the federal poverty level, a \$3.00 surcharge is still a 40% increase on monthly premiums. For many families, already vulnerable to tobacco use, this fee will discourage enrollment, as suggested by recent initiatives elsewhere to implement a tobacco surcharge. It is well established in scientific evidence how addictive nicotine is and we all have a friend or family member that still smokes. While smoking cessation is important and included in low-dose CT screening programs, it is equally if not more important to recognize that nobody deserves to die. Indeed, lives are being saved and this disease is already showing outcomes with increased survivorship among patients with screening-detected, early-stage lung cancer.

Tobacco surcharges have been implemented in recent history, but its outcomes reveal 1) negative impact on enrollment and 2) inability to provide health coverage to current smokers in the U.S. When the Affordable Care Act first became law, it allowed plans available in the health insurance exchanges to charge an additional fee to its monthly premiums for tobacco usage.

An impact study evaluating this policy found that a minor surcharge, similar to increased premiums per month by a few dollars, was associated with a 2.2% decrease in insurance enrollment compared to plans with no tobacco surcharge to beneficiaries⁵. Meanwhile, an examination of expanded states that have implemented Medicaid programs without monetary penalties to smokers were able to provide health insurance to as high as 85% of its smoking population⁶. Unfortunately, many Medicaid beneficiaries already report significant financial barriers to healthcare as it is, and adding a \$3 monthly surcharge will not alleviate any existing financial burdens. Even for those states without a tobacco surcharge policy, 38% of Medicaid beneficiaries nationwide reported they did not obtain necessary healthcare due to the cost.

5 A. Friedman, W. Schpero, S. Busch,, Evidence Suggest that the ACA's Tobacco Surcharges Reduced Insurance Take- Up and Did not Increase Smoking Cessation, Health Affairs, 2016

6 J.Koma et al., Medicaid Coverage Expansions and Cigarette Smoking Cessation Among Low-Income Adults, Medical Care Journal, 2017

Increasing premiums for smoking will further discourage potential beneficiaries in Georgia from enrolling in Medicaid and leave behind unintended consequences resulting in poorer health, increased deaths, increased emergency room care, and increased overall cost to the state.

Coverage is critical so that those at risk for lung cancer can access appropriate screening and treatment at an earlier stage resulting in lives saved and help remove unnecessary and expensive downstream emergent care

costs.

If it is Georgia's goal to decrease smoking rates statewide, penalizing individuals who smoke with added costs will only decrease enrollment and potentially -reinforce Georgia's above average smoking rate with reduced access to evidence-based cessation programs. Indeed, the proposed GA tobacco surcharge will not lower smoking rates. For example, one study found that states that expanded their Medicaid programs were 2% more likely to get beneficiaries to complete smoking cessation compared with those states without an expanded Medicaid program⁷. For example, in the first 12 months after Massachusetts expanded its Medicaid program in 2008, the state saw a 26% decrease in smoking⁸. Meanwhile, the insurance plans on the health insurance exchange allowed to utilize tobacco surcharges reported a 5.6% decrease in smoking cessation completion among their beneficiaries over the first year of surcharge implementation⁹.

Efforts must be made to make smoking cessation more accessible, but discouraging enrollment in health insurance by monetary penalization prevents people from accessing this vital, cost- effective service and prevents those at risk of lung cancer from obtaining potentially life-saving low-dose CT lung cancer screening. GO2 Foundation strongly opposes the tobacco surcharge Medicaid policy and urges the Georgia Department of Health to rescind its proposed tobacco surcharge in its Medicaid 1115 waiver. It is our continued mission to ensure that those at risk for lung cancer have access to affordable services and healthcare coverage. We believe we can work with you to improve survivorship in

7 J.Koma et al., Medicaid Coverage Expansions and Cigarette Smoking Cessation Among Low-Income Adults, Medical Care Journal, 2017

8 T.Land et al., Medicaid Coverage for Tobacco Dependence Treatments in Massachusetts and Associated Decreases in Smoking Prevalence, Plos One, 2010

9 . Friedman, W. Schpero, S. Busch,, Evidence Suggest that the ACA's Tobacco Surcharges Reduced Insurance Take- Up and Did not Increase Smoking Cessation, Health Affairs, 2016

Georgia, but a tobacco surcharge will not allow your state and constituents to successfully reach that goal. Thank you for this opportunity to provide feedback. If you have any questions, please contact Randy Kane at rkane@go2foundation or 202-742-1889.

Sincerely,

Laurie Fenton Ambrose
Co-Founder, President and CEO GO2 Foundation for Lung Cancer
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Business/Organization * Hemophilia Federation of America

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Ramseur

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** District of Columbia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Other

Comments*

December 3, 2019

Governor Brian Kemp
206 Washington Street
Suite 203, State Capitol
Atlanta, GA 30334

Lynette Rhodes
Medicaid Director
State of Georgia, Department of Community Health
2 Peachtree Street, NW, Suite 36450
Atlanta, GA 30303

Dear Governor Kemp and Ms. Rhodes:

The United Hemophilia Foundation of Georgia (UHF) and Hemophilia Federation of America (HFA) appreciate the opportunity to detail our concerns about Georgia's Section 1115 Waiver Application to implement the Georgia Pathways to Coverage (GPC) initiative, which will severely limit access to critical health care for persons with bleeding disorders and other pre-existing conditions.

UHF is a 501(c)(3) nonprofit charitable organization located in Albany, Georgia, dedicated to improving the health, wellness, and overall quality of life for Georgians with hemophilia and other rare bleeding disorders through education, awareness, and advocacy. HFA is a national non-profit organization that represents individuals affected by bleeding disorders across the United States. HFA works to ensure that individuals affected by hemophilia and other inherited bleeding disorders have timely access to quality medical care, therapies, and services, regardless of financial circumstances or place of residence.

About Bleeding Disorders

Hemophilia is a rare, genetic bleeding disorder that impairs the ability of blood to clot properly. It affects about 20,000 Americans, including an estimated 500-699 males in Georgia. Without treatment, people with hemophilia bleed internally, sometimes due to trauma, but other times simply as a result of everyday activities. This bleeding can lead to severe joint damage and permanent disability, or even – with respect to bleeds in the head, throat, or abdomen – death. Related conditions include von Willebrand disease, another inherited bleeding disorder, which is estimated to affect more than three million Americans.

Individuals with bleeding disorders have complex, lifelong medical needs. They depend on prescription medications (clotting factor or other new therapies) to treat or avoid painful bleeding episodes that can lead to advanced medical issues. Current treatment and care are highly effective and allow individuals to lead healthy and productive lives. However, treatment is also extremely expensive, costing anywhere from \$250,000 to \$1 million or more annually, depending on the

severity of the disorder and whether complications such as an inhibitor are present. Access to treatment, care, and coverage are all critical needs for people living with bleeding disorders.

Overview

The GPC plan is not a sufficient solution to improve access to quality and affordable healthcare for low-income Georgians. The state estimates that approximately 50,000 individuals would gain coverage under the plan, whereas over 500,000 Georgians could access coverage if the state fully expanded its Medicaid program.

UHF and HFA recognize the potential benefit of Medicaid expansion to the bleeding disorders community. The partial expansion that Georgia proposes, however, would leave many low-income individuals without health insurance. This disserves low-income individuals, with or without a chronic condition, and is particularly threatening for people living with a bleeding disorder, who require uninterrupted access to quality coverage and care.

UHF and HFA oppose the Georgia Pathways plan and offer the following comments on the draft waiver application.

Eligibility

Under the GPC plan, only individuals with incomes below 100 percent of the federal poverty level (\$1,778 per month for a family of three) who can prove that they work at least 80 hours per month would be eligible for Medicaid. This drastically limits the number of patients with a bleeding disorder and other serious and chronic health conditions who will receive access to the quality and affordable healthcare coverage that they need.

While no exemption criteria can prevent the potential coverage losses associated with work reporting requirements, Georgia has not proposed any exemption criteria that would allow individuals who are unable to meet the work reporting requirements to apply for coverage. This means that patients who have serious health conditions that prevent them from working 80 hours per month would have no clear pathway to coverage that could help them to treat these conditions. Discrimination against patients with health conditions that prevent them from working is unacceptable.

Once enrolled, individuals may be able to qualify for short-term exemptions in certain situations. Still, UHF and HFA are concerned that these exemption criteria may not capture all individuals with serious and chronic health conditions that prevent them from working. Moreover, even exempt enrollees may have to report their exemption, creating opportunities for administrative error that could jeopardize their coverage. Again, no exemption criteria can circumvent these problems and the serious risk to the health of the people we represent.

For the first six months, members will have to report their hours and work activities monthly. This will put a significant administrative burden on enrollees, which will likely decrease the number of individuals with Medicaid coverage. For example, Arkansas also implemented a work reporting requirement where Medicaid enrollees had to report their hours worked or their exemption. During the first six months of implementation, the state terminated coverage for over 18,000

individuals. Georgia has not provided an estimate of the coverage losses associated with this proposal in its waiver application.

Failing to navigate these burdensome administrative requirements could have serious – even life or death – consequences for people with a bleeding disorder. If the state finds that individuals have failed to comply for one month, their coverage will be suspended, and if the state finds that individuals have failed to comply for three months, they will be disenrolled. Gaps in health care coverage for individuals with bleeding disorders can lead to unnecessary and/or untreated bleeding episodes, with long-term and irreversible consequences, and as such present an unacceptable threat to patient health.

If individuals are able to meet the reporting requirements for six consecutive months, they will be exempt from further reporting and re-evaluated for eligibility during their annual redetermination. However, if individuals do not report a change in their employment status, they will be responsible for any capitation and cost-sharing expenses. This exposes already low-income individuals to enormous financial risk. As noted, the costs of bleeding disorders treatments far exceed the ability of almost anyone to pay, absent coverage, and are far out of reach for low income individuals.

If Georgia truly cares about incentivizing and promoting employment, full Medicaid expansion would be the best way to achieve this goal. In a report looking at the impact of Medicaid expansion in Ohio, the majority of enrollees reported that being enrolled in Medicaid made it easier to work or look for work (83.5 percent and 60 percent, respectively). That report also found that many enrollees were able to get treatment for previously untreated health conditions, which made finding work easier. Preventing individuals from enrolling in Medicaid coverage until they comply with these requirements will therefore hurt rather than help people search for and obtain employment.

Finally, Georgia would be the first state to require enrollees to comply with the work reporting requirement prior to enrolling in the Medicaid program, with no opportunity to demonstrate a medical or other exemption. Changing the eligibility for Medicaid is the sole purview of Congress and cannot be waived. UHF and HFA oppose this policy.

Financial Barriers

For the few individuals who are able to meet Georgia's limited eligibility criteria, the proposal still creates numerous financial barriers that will jeopardize their coverage. Individuals with incomes above 50 percent of the federal poverty level will have to pay monthly premiums and will lose coverage if they fail to pay premiums for three months. This policy would likely both increase the number of enrollees who lose Medicaid coverage and also discourage eligible people from enrolling in the program. Research has shown that even relatively low levels of cost-sharing for low-income populations limit the use of necessary healthcare services. For example, when Oregon implemented a premium in its Medicaid program, with a maximum premium of \$20 per month, almost half of enrollees lost coverage. Because premiums create financial barriers that jeopardize patient access to coverage and care, UHF and HFA oppose Georgia's proposal to condition coverage upon the payment of monthly premiums.

Georgia's proposed policy will not only apply to – and jeopardize coverage for – new enrollees, but will also apply to individuals who are currently enrolled in Medicaid through the Transitional Medical Assistance (TMA) program.

Additionally, it unclear how the state may try to recoup capitation and other payments for any months that individuals do not pay their premiums. Such policies would put patients may at significant financial risk.

Georgia's premium proposal would also impose copayment obligations on individuals with incomes above 50 percent of the federal poverty level, creating another significant financial burden for patients. The most egregious of these is a \$30 copay for non-emergency use of the emergency department (ED). This policy could deter people from seeking necessary care during an emergency. A person with a bleeding disorder who forgoes emergency care when it is needed may face serious bodily injury. No person – and no parent – should face penalties for seeking lifesaving emergency care for their or their child's bleeding disorder. When people do experience severe symptoms, they should not try to self-diagnose their condition or worry that they cannot afford to seek care. Instead, they must have access to quick diagnosis and treatment in the ED.

Evidence suggests that ED cost sharing may not result in the intended cost savings. Research demonstrates that low-income individuals served by Medicaid are more price sensitive compared to others, more likely to go without needed care, and more likely to experience long-term adverse outcomes. A study of enrollees in Oregon's Medicaid program demonstrated that implementation of a copay on emergency services resulted in decreased utilization of such services but did not result in cost savings because of subsequent use of more intensive and expensive services. This provides further evidence that copays may lead to inappropriate delays in needed care. UHF and HFA oppose this punitive proposal for a \$30 copayment for non-emergent use of the ED.

Reduced Benefits

Individuals would be required to enroll in employer sponsored insurance (ESI) if it is available and determined to be cost effective for the state. However, the state would not provide any wraparound services for individuals regardless of the benefit package in their ESI, nor would the state assist individuals with cost-sharing requirements imposed by their ESI. Bleeding disorders are complex and often require collaboration with other health professionals, such as nurses, physical therapists, geneticists, and social workers. ESI that does not cover these services does not provide adequate protection for individuals with a bleeding disorder. Even worse, some ERISA plans have curtailed or dropped coverage of specialty drugs. A person with a bleeding disorder who has access to such limited coverage is, functionally, uninsured. UHF and HFA oppose the requirement to enroll in ESI without wraparound services and full financial protection for patients.

The state has also requested to waive non-emergency transportation (NEMT) for the entire demonstration population. NEMT helps low-income patients overcome barriers to care due to transportation and allows patients to keep appointments with doctors and other healthcare providers. For example, one study found patients with asthma, hypertension or heart disease who needed multiple visits to a medical professional to maintain their health were more likely to keep their appointments if they had NEMT. In a state such as Georgia that has a large rural population with little or no access to care it is imperative that residents of these areas have access to sufficient transportation services. UHF and HFA oppose a waiver of NEMT.

Additional Costs

Administering all of these requirements will be expensive for the state of Georgia. States such as Kentucky, Tennessee and Virginia have estimated that setting up the administrative systems to track and work activities alone will cost tens of millions of dollars. This would divert federal resources from Medicaid's core goal – providing health coverage to those without access to care – and compromise the fiscal health of Georgia's Medicaid program.

UHF and HFA oppose this waiver proposal. Instead, we urge Georgia to focus on solutions that promote adequate, affordable and accessible coverage, including a full expansion of the state's Medicaid program.

Thank you once again for the opportunity to submit comments. Should you have any questions or comments please do not hesitate to reach out to Miriam Goldstein, HFA Director of Policy at m.goldstein@hemophiliafed.org.

Sincerely,

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Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Business/Organization * <https://www.hemophiliafed.org/>

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Ramseur

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** District of Columbia **Zip** [REDACTED]

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

December 3, 2019

Ryan Loke, c/o The Office of the Governor
206 Washington Street
State Capitol
Atlanta, GA 30334

Re: Georgia Section 1332 State Innovation Waiver | Phase I, Reinsurance

Dear Mr. Loke:

United Hemophilia Foundation of Georgia (UHF) and Hemophilia Federation of America (HFA) appreciate the opportunity to submit comments on the reinsurance proposals (Phase I) of Georgia's Section 1332 State Innovation Waiver.

UHF is a 501(c)(3) nonprofit charitable organization located in Albany, Georgia, dedicated to improving the health, wellness, and overall quality of life for Georgians with hemophilia and other rare bleeding disorders through education, awareness, and advocacy. HFA is a national non-profit organization that represents individuals affected by bleeding disorders across the United States. HFA works to ensure that individuals affected by hemophilia and other inherited bleeding disorders have timely access to quality medical care, therapies, and services, regardless of financial circumstances or place of residence.

UHF and HFA believe everyone should have quality and affordable healthcare coverage. A strong, robust marketplace is essential for people with hemophilia and other inherited bleeding disorders to access the coverage that they need. UHF and HFA support Georgia's efforts to strengthen its marketplace by implementing a reinsurance program.

Reinsurance is an important tool to help stabilize health insurance markets. Reinsurance programs help insurance companies cover the claims of very high cost enrollees, which in turn keeps premiums affordable for other individuals buying insurance on the individual market. Reinsurance programs have been used to stabilize premiums in a number of healthcare programs, such as Medicare Part D. A temporary reinsurance fund for the individual market was also established under the Affordable Care Act and reduced premiums by an estimated 10 to 14 percent in its first year. A recent analysis by Avalere of the seven states that have already created their own reinsurance programs through Section 1332 waivers found that these states reduced individual market premiums by an average of 19.9 percent in their first year.

Georgia's proposal will create a reinsurance program starting for the 2021 plan year. This program is projected to reduce premiums by 10 percent and increase the number of individuals obtaining health insurance through the individual market by about 1,400. This would help patients with pre-existing conditions, including patients with bleeding disorders, obtain affordable, comprehensive coverage.

While UHF and HFA support reinsurance as a tool to stabilize premiums in the individual marketplace, we are deeply concerned that the remainder of the state's 1332 Waiver Application will jeopardize access to quality and affordable healthcare coverage for patients with bleeding disorders and other pre-existing conditions, as we have outlined in our related comments on the Georgia Access Model.

Thank you once again for the opportunity to submit comments. Should you have any questions or comments please do not hesitate to reach out to Miriam Goldstein, HFA Director of Policy at m.goldstein@hemophiliafed.org.

Sincerely,

Sonji Wilkes
Sr. Director, Policy, Advocacy & Government Education
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Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Business/Organization * <https://www.hemophiliafed.org/>

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Ramseur

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** District of Columbia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

December 3, 2019

Ryan Loke, c/o The Office of the Governor
206 Washington Street
State Capitol
Atlanta, GA 30334

Re: Georgia Section 1332 State Innovation Waiver | Phase II, Georgia Access Model

Dear Mr. Loke:

The United Hemophilia Foundation of Georgia (UHF) and Hemophilia Federation of America (HFA) appreciate the opportunity to detail our concerns about Georgia's Section 1332 Waiver Application to implement the Georgia Access Model (GAM), which will severely limit access to critical health care for persons with bleeding disorders and other pre-existing conditions.

UHF is a 501(c)(3) nonprofit charitable organization located in Albany, Georgia, dedicated to improving the health, wellness, and overall quality of life for Georgians with hemophilia and other rare bleeding disorders through education, awareness, and advocacy. HFA is a national non-profit organization that represents individuals affected by bleeding disorders across the United States. HFA works to ensure that individuals affected by hemophilia and other inherited bleeding disorders have timely access to quality medical care, therapies, and services, regardless of financial circumstances or place of residence.

About Bleeding Disorders

Hemophilia is a rare, genetic bleeding disorder that impairs the ability of blood to clot properly. It affects about 20,000 Americans, including an estimated 500-699 males in Georgia. Without treatment, people with hemophilia bleed internally, sometimes due to trauma, but other times simply as a result of everyday activities. This bleeding can lead to severe joint damage and permanent disability, or even – with respect to bleeds in the head, throat, or abdomen – death. Related conditions include von Willebrand disease (VWD), another inherited bleeding disorder, which is estimated to affect more than three million Americans.

Patients with bleeding disorders have complex, lifelong medical needs. They depend on prescription medications (clotting factor or other new therapies) to treat or avoid painful bleeding episodes that can lead to advanced medical issues. Current treatment and care are highly effective and allow individuals to lead healthy and productive lives. However, treatment is also extremely expensive, costing anywhere from \$250,000 to \$1 million or more annually, depending on the severity of the disorder and whether complications such as an inhibitor are present. Access to treatment, care, and coverage are all critical needs for people living with bleeding disorders.

Overview

UHF and HFA believe everyone should have quality and affordable healthcare coverage. A strong, robust marketplace is essential for people with hemophilia and other inherited bleeding disorders to access the coverage that they need.

While UHF and HFA strongly support reinsurance as a tool to stabilize premiums in the individual marketplace, we are deeply concerned that the overall GAM will jeopardize access to quality and affordable healthcare coverage for patients with bleeding disorders and other pre-existing conditions. The state's 1332 waiver fails to

satisfy the guardrails in the statutory language of the Affordable Care Act (ACA) requiring that (a) coverage must be as affordable as it would be without the waiver; (b) coverage must be as comprehensive as it would be without the waiver; (c) a comparable number of people must be covered under the waiver as would be without it; and (d) the waiver must not add to the federal deficit. The waiver would also put the healthcare coverage of the 450,000 Georgians who currently get their insurance through the state's marketplace at risk while only attempting to expand coverage for a small fraction (30,000 individuals) of the more than 1.4 million uninsured individuals in Georgia.

For these reasons, UHF and HFA urge Georgia to withdraw its application for the GAM.

State Subsidy Program

Georgia has proposed to create a new state-administered subsidy system to replace the Advanced Premium Tax Credits (APTC) created by the ACA. These subsidies would not be adequate to meet the affordability needs of patients with bleeding disorders, and would be available for use toward the purchase of "eligible non-QHPs," driving individuals towards enrollment in substandard coverage. Implementation of this new program would reduce access to affordable healthcare coverage for patients with bleeding disorders. UHF and HFA oppose this change.

First, the draft application seeks to waive the statutory cost-sharing reduction (CSR) program that helps patients with incomes below 250 percent of the federal poverty level (FPL) pay deductibles, coinsurance, and other cost-sharing required by their health plan. It is unclear whether individuals who currently qualify for CSRs under the ACA would still get this financial assistance under the state-administered subsidy system. This is of grave concern because people who live with hemophilia and other bleeding disorders rely on costly treatment in order to maintain their health. Patients – certainly those with the severe form of bleeding disorders – can expect to hit their out-of-pocket maximums every year, for life. CSRs are an essential tool for lower income patients who have to contend with financial toxicity arising from the need to manage a serious chronic health condition.

Beyond the impact on CSRs, the state has also likely underestimated the impact of the GAM on raising premiums in Georgia. Eligible non-QHPs would attract healthier consumers, segmenting the market and increasing the cost of comprehensive coverage for those who need it. Additionally, as discussed later in our comments, the loss of Healthcare.gov and the incentives for insurers and brokers selling products outside of an exchange would likely boost enrollment in short-term and other skimpy plans, further undermining the risk pool and destabilizing the market. A substantially greater premium increase would not only make QHPs more expensive for individuals who do not qualify for

subsidies, but would also increase the cost of QHP subsidies for the state, meaning that the state's pool of financial assistance funds would not be able to help as many individuals.

Furthermore, the proposed state subsidy system is significantly under-resourced, which would have serious implications for patients with bleeding disorders and other individuals in Georgia. The state has budgeted \$13.5 million in the first three years and \$5 million thereafter for implementation costs, which seems quite low given the significant investments in new technical and administrative systems needed to operate the GAM. Additionally, the state's proposed contribution

to the subsidy fund is just \$144 million in 2022, which would be inadequate if the GAM increases premiums as predicted above.

This lack of funding is particularly dangerous for patients given the GAM's cap on subsidy funding. Currently, any individual who meets the eligibility criteria for financial assistance for coverage under the ACA receives that financial assistance. However, patients could be placed on a wait list if the state exceeds its capped contribution under the GAM. Individuals with bleeding disorders require uninterrupted care and continuous coverage to pay for that care. As a result, their health would be seriously jeopardized if they end up on a wait list for financial assistance and are unable to access coverage during that interval.

Promotion of Substandard Plans

As mentioned in the previous section, Georgia's proposal would allow subsidies to be used for QHPs currently offered in the state as well as for "eligible non-QHPs." This would result in more individuals enrolling in less comprehensive coverage. UHF and HFA oppose this change.

The draft waiver application does not contain adequate information about the standards for eligible non-QHPs, particularly what the state means when it says that the plans will maintain protections for people with pre-existing conditions. For example, even if these plans cannot deny coverage to patients with pre-existing conditions, could plans vary premiums based on health status? Protecting patients with bleeding disorders and other pre-existing conditions involves much more than guaranteed issue; patients need community rating, bans on exclusion periods and condition exclusions, cost-sharing protections, bans on annual and lifetime limits, access to essential health benefits, and many other protections currently required for plans sold on the individual market to truly access comprehensive, affordable healthcare coverage.

Other aspects of the standards for these plans are unclear as well. The draft application requests to waive network adequacy requirements. UHF and HFA are concerned by this request because inadequate networks pose a serious threat to the community we serve. People with bleeding disorders rely on expert care from specialist providers, including those within the national system of federally-recognized hemophilia treatment centers (six HTC serve Georgia's bleeding disorders population). Studies from the Centers for Disease Control and Prevention have shown that mortality and hospitalization are 40 percent lower for people who use HTCs than among people who do not, despite the

fact that more severely affected patients are more likely to be seen in HTCs. If plans can avoid network adequacy requirements, Georgians with bleeding disorders may lose critically-important access to HTC care.

Additionally, it is unclear how eligible non-QHPs could be part of the single risk pool with current QHPs, given how dissimilar these products can be. This makes risk adjustment – a process that discourages plans from cherry-picking healthier individuals by transferring funds from plans with low-risk enrollees to high-risk ones – difficult to implement.

The draft application clearly states that eligible non-QHPs would not have to cover all ten essential health benefits (EHBs), in contrast to existing requirements that govern QHPs. Prior to enactment of the ACA, too many individuals with

bleeding disorders had health plans that excluded coverage for the medications and/or services necessary to control or prevent joint- and life-threatening bleeding episodes. This kind of underinsurance was functionally equivalent to a complete lack of insurance. EHB standards requiring health plans to cover prescription drugs, chronic disease management, emergency care, etc., are critical in order to protect the health and lives of people with bleeding disorders.

UHF and HFA take little comfort in Georgia's claim that eligible non-QHPs will provide 90 percent of the benefits that current QHPs cover. First, the state provides no explanation or analysis to support this assumption. Second, it is easy to envision a scenario in which bleeding disorders treatments (due to their high cost, and to the fact they are needed by a very small demographic) fall into the ten percent of benefits that Georgia expects to be dropped from coverage by eligible non-QHPs.

By promoting plans that do not cover all EHBs but are still eligible for subsidies, Georgia would create a significant risk of customer confusion and underinsurance for individuals with serious health needs who unwittingly enroll in non-QHPs. At the same time, this course of action would allow issuers to segment the market and charge lower premiums to healthier individuals for eligible non-QHPs while charging high premiums for patients with pre-existing conditions who need comprehensive coverage. This is a backdoor to discrimination against patients with pre-existing conditions.

Finally, given the destabilizing impact of the state subsidy program on the individual marketplace, it is possible that some issuers may rethink decisions to offer any QHPs in Georgia. Yet the state assumes that issuers would still offer QHPs in all ratings areas after the implementation of the new state subsidy program, while offering no support for that assumption. If this assumption does not hold, patients in some areas of the state would no longer have access to comprehensive care and could be forced to choose between eligible non-QHPs (or other skimpy plans) or going without coverage.

Enrollment Platform

In addition to administering a state subsidy program, Georgia proposes to cease using Healthcare.gov for enrollment and instead have people enroll directly through insurers or brokers. This policy would make it harder for patients to enroll in comprehensive, affordable healthcare coverage. UHF and HFA oppose this change.

While the state acknowledges that leaving Healthcare.gov would require a detailed transition strategy, UHF and HFA fear that some of the 450,000 Georgians who currently purchase coverage through Healthcare.gov would inevitably lose coverage during the transition. The state assumes that there would be no coverage losses, but offers no analysis to support that assumption, calling into question whether the GAM would truly result in comparable numbers of people obtaining coverage than would occur without the waiver.

Today, patients with bleeding disorders who shop on Healthcare.gov can trust that they are purchasing a health insurance plan that will allow them to manage their health conditions. However, under the GAM, issuers and brokers could sell QHPs alongside other types of plans that discriminate against people with pre-existing conditions and will not cover enrollees' medical expenses if they get sick. This could create confusion for patients and put them at risk of enrolling in coverage that does not meet their needs. There is already evidence of misleading marketing related to short-

term and other skimpy plans leading individuals to unwittingly enroll in coverage that lacks key patient protections. This problem would likely worsen in Georgia under this proposal.

Healthcare.gov shows consumers all QHPs available in their area and does not favor certain plans over others. However, brokers who would be helping individuals through the enrollment process under the GAM would not have to show individuals all available plan options – and, indeed, the brokers may receive larger commissions for certain plans over others that influence their recommendations to patients. Increasing the reliance on insurers and brokers would limit the ability of patients with bleeding disorders to compare plan price and benefit design in an unbiased manner to choose the right plan for them, compounding their chances of enrolling in substandard or inadequate coverage. This failure to appropriately shield patients from risk is unacceptable.

UHF and HFA oppose the GAM waiver proposal. Instead, we urge Georgia to focus on solutions that promote adequate, affordable and accessible coverage (like reinsurance for exceptionally high-cost claims) without jeopardizing access to care for patients with bleeding disorders and other pre-existing conditions.

Thank you once again for the opportunity to submit comments. Should you have any questions or comments please do not hesitate to reach out to Miriam Goldstein, HFA Director of Policy at m.goldstein@hemophiliafed.org.

Sincerely,

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Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Business/Organization * Justice in Aging

Stakeholder Type * Advocacy Group

First Name * [REDACTED] **Last Name *** Kean

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** District of Columbia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Other

Comments *

Justice in Aging appreciates the opportunity to comment on the proposed Patients First Act Waiver Demonstrations. Justice in Aging is an advocacy organization with the mission of improving the lives of low-income older Georgians and older adults nationwide. We use the power of law to fight senior poverty by securing access to affordable health care, economic security and the courts for older adults with limited resources, particularly populations that have traditionally lacked legal protection such as women, people of color, LGBTQ individuals, and people with limited English proficiency. We have decades of experience with Medicare and Medicaid and have worked extensively with advocates who represent low-income older Georgians. Justice in Aging conducts trainings and engages in advocacy regarding Medicare and Medicaid, provides technical assistance to attorneys in Georgia and across the country on how to address problems that arise under these programs, and advocates for strong consumer protections at both the state and federal level.

For the reasons discussed in our additional comments, we urge the Department of Community Health (DCH) to withdraw the Georgia Pathways to Coverage Section 1115 Medicaid Demonstration Waiver application in its entirety.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments *

The proposal to both disallow Medicaid enrollment and take Medicaid coverage away from people who fail to meet requirements to report sufficient "work and other employment-related activities" will harm thousands of low-income Georgians across demographic groups, including older adult adults under age 65, people with disabilities and serious health conditions, and family caregivers. These strict work requirements will be particularly harmful to older adults who are not eligible for Medicare and people with serious health conditions and functional limitations because they face additional challenges in meeting such requirements, and the health consequences of losing or being denied access to Medicaid coverage are likely to be especially severe. Although Medicaid eligibility rules classify a person as "disabled" or "aged", disability and health challenges that accompany age are a continuum. A Medicaid beneficiary may not be "disabled" under Medicaid law or over age 65, but nonetheless face significant health-related challenges. Data from the National Center for Health Statistics shows that approximately 40% of working-age Medicaid beneficiaries "have broadly defined disabilities, most of whom are not readily identified as such through administrative records." Similarly, data from the March 2017 Current Population Survey (reflecting 2016 health insurance coverage) show that, among Georgia's non-elderly Medicaid population not receiving Supplemental Security Income due to disability, 47% cited being ill or disabled as the reason for not being employed. Moreover, prevalence of chronic conditions, including both physical and mental health conditions, increases significantly with age. For example, a study by AARP analyzed data for the age 50–64 population, finding that 72.5% have at least one chronic condition, and almost 20% suffer from some sort of mental illness.

All these data demonstrate how older low-income Georgians who qualify for Medicaid—along with younger low-income beneficiaries with chronic conditions or functional limitations—are threatened by the restrictions imposed by the waiver. The state has provided no exemptions for people who precisely because of their health care needs or disability cannot work the requisite 80 hours. Lost months of Medicaid coverage have a human cost, especially for this population that would most benefit from coverage: less preventive care, greater decline, and avoidable deterioration in physical and mental health.

Work requirements would also unnecessarily jeopardize the health and well-being of low-income individuals who care for family members or others who cannot live independently. Many family caregivers leave the workforce or reduce their hours to provide informal care to seniors and others who need it. Therefore, these caregivers are likely to be Medicaid eligible because they are low-income and unlikely to have access to health insurance through a job or spouse. In fact, more than 1 in 4 non-elderly Medicaid enrollees not receiving SSI in Georgia cite caretaking as their reason for not engaging in the type of work activities the state is proposing to require of them.

Yet, the draft waiver application provides neither an exemption nor credit for people doing the invaluable work of caring for a family member or other individual. Even if Georgia were to recognize caregiving as work, the realities of family caregiving would make it difficult if not impossible for most people to comply with the onerous requirement. Imposing a reporting requirement puts an enormous and unnecessary burden on family caregivers to obtain documentation, and understand and comply with reporting requirements in the midst of their caregiving and other responsibilities. Most family caregivers are not providing care because a doctor told them it was necessary and would not have documentation to show that readily available. Given these realities, many family caregivers who qualify for Medicaid would be forced to choose between providing care for their loved ones and maintaining their own health.

Finally, this policy would also be counterproductive, as disallowing Medicaid enrollment or taking away coverage from low-income Georgians for not reporting work could cause their health to deteriorate, which in turn will make it harder for them to become or remain employed. Reports show that Medicaid can reduce health barriers to finding or holding a job for beneficiaries who are not working. For example, in Michigan, 55% of those who were out of work said Medicaid coverage made them better able to look for a job while 69% of those who had jobs said they did better at work once they got coverage. Ohio Medicaid enrollees reported similarly that Medicaid coverage made it easier to both seek employment and continue working. For many individuals, access to health services could be the pathway to employment; if blocked from Medicaid coverage, they could find it much more difficult to find and hold a job.

Moreover, a recent study in the *New England Journal of Medicine* found that “implementation of the first-ever work requirements in Medicaid in 2018 was associated with significant losses in health insurance coverage in the initial 6 months of the policy but no significant change in employment.” The same is likely true for Georgia residents who are eligible for Medicaid and working, but not consistently enough to meet the 80-hour work requirement each month. This data demonstrates that adding work requirements is likely to provide little actual assistance and put an already burdened population in greater danger of losing health insurance and even their jobs.

These issues are even more profound for older adults in a volatile job market who also face employment discrimination based on their age. Take for example a 60-year old woman who is caring for an aging parent who lives nearby. As her caregiving obligations grew, she was laid off because she could not work the consistent hours her employer asked her to. She is not yet eligible for Medicare and will have a difficult time finding employment given her age and constraints on her time. She is at risk of being denied Medicaid, her only possible source of health coverage, if work requirements are implemented.

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Sommers et al., "Medicaid Work Requirements — Results from the First Year in Arkansas," *New England Journal of Medicine* (Jun. 18, 2019), <https://www.nejm.org/doi/full/10.1056/NEJMSr1901772>

Brynne Keith-Jennings, Center on Budget & Policy Priorities, Policy Brief: Labor Market Facing SNAP and Medicaid Participants Offers Low-Paying, Volatile Jobs (July 24, 2018), available at <https://www.cbpp.org/research/poverty-and-inequality/policy-brief-labor-market-facing-snap-and-medicaid-participants>.

Julia Angwin, "Dozens of Companies Are Using Facebook to Exclude Older Workers from Job Ads," (Dec. 20, 2017), www.propublica.org/article/facebook-ads-age-discrimination-targeting.
(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Eligibility Criteria

Comments *

We also oppose Georgia's proposal to waive the federal protection that provides up to three months of retroactive Medicaid coverage for people eligible through Georgia Pathways. In many instances, a person who needs health care cannot be expected to apply for Medicaid coverage at the exact moment they become eligible: They may be hospitalized after an accident or unforeseen medical emergency; they may be struggling to cope with the shock of a diagnosis or sudden decline in functional ability; they may also be unfamiliar with Medicaid, or unsure about when their declining financial resources might fall within the Medicaid eligibility threshold.

Medicaid's three-month retroactivity window is a rational and humane response to these concerns. We emphasize that retroactive eligibility is only available to persons who would have met the Medicaid eligibility standards for the month[s] in question had they applied sooner. This vital protection not only enables access to necessary care and treatment by giving providers assurance that Medicaid will reimburse them, it can be the difference between financial ruin and being able to recover from an unexpected health emergency. Under Georgia's proposal, however, a person could be hit by an uninsured driver on the evening of November 29 and be liable for thousands of dollars of hospital expenses due to the "failure" to file a Medicaid application within 36 hours, when November becomes December. This is a bad policy not only because it exposes people who, by definition, cannot afford and are not eligible for other health coverage to crushing debt and can prevent them from getting the care they need, but also because it is more costly for providers and the state too. Eliminating retroactive coverage increases uncompensated care, jeopardizing the ability of providers, especially rural hospitals, to continue to serve their communities. In turn, this decreases access to care for all Medicaid enrollees and, in the case of medically underserved areas, all Georgians.

DCH's stated reason for eliminating retroactive coverage is "To better align with commercial health insurance coverage." However, this rationale makes little sense, given the substantial differences between Medicaid and commercial insurance. A principal difference is the fact that commercial insurance coverage is necessarily contingent on premium payments, while Medicaid coverage is based upon a determination that a person has limited financial resources and thus cannot afford private coverage. Retroactive coverage is not allowed in commercial insurance because the program's financing relies on premium payments in advance, before a person knows the medical services that they may require in any particular month. The same is not true in Medicaid, which is financed by the federal and state governments.

Sources:

42 U.S.C. § 1396a(a)(34).

Justice in Aging, Medicaid Retroactive Coverage: What's at Stake for Older Adults When States Eliminate this Protection? (Sept. 2019), <https://www.justiceinaging.org/wp-content/uploads/2019/09/Medicaid-Retroactive-Coverage-Issue-Brief.pdf?eType=EmailBlastContent&eld=a7bb9cdd-1ce1-4012-b154-7981533a4875>
(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

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Comment Topic* Georgia Access - Subsidies

Comments*

Justice in Aging strongly oppose the proposal to use Affordable Care Act (ACA) Section 1332 authority to create a new individual market and state subsidy program that does not guarantee subsidies to all eligible individuals nor require subsidy-eligible plans to meet ACA standards, and puts private insurers and brokers in charge of enrollment. The federally facilitated marketplace, premium tax credits, and cost-sharing reductions have enabled over 450,000 Georgians to obtain comprehensive health insurance in 2019. Nearly half of those enrollees are over age 45, and 1 in 4 are over age 55. The average premium tax credit received by over 380,000 Georgians is \$536 per month, \$22 higher than the national average. This adds up to an estimated \$2.4 billion in premium tax credits benefiting low- and middle-income Georgians. This assistance is entirely federally funded and is available to every individual and family with income within the limits. The state's proposal to cap enrollment in this assistance is misguided. Even if the state could make subsidies available to an additional 16,000 Georgians at the proposed funding level, this is well-short of helping the 1.4 million uninsured Georgians access coverage. In fact, 435,000 uninsured individuals are already eligible for premium tax credits but not enrolled. In addition, the state would be able to cover nearly 500,000 more Georgians by accepting the 90% federal match to fully expand Medicaid. Therefore, to help the most Georgians get affordable coverage, the state should fully expand Medicaid and invest in robust enrollment and outreach while maintaining the entirely federally funded marketplace subsidies.

Sources:

<https://www.kff.org/health-reform/state-indicator/marketplace-plan-selection-by-age/view/print/?currentTimeframe=0&print=true&sortModel=%7B%22colId%22:%22Location%22,%22sort%22:%22asc%22%7D>

<https://www.kff.org/health-reform/state-indicator/average-monthly-advance-premium-tax-credit-aptc/?currentTimeframe=0&selectedDistributions=average-monthly-advanced-premium-tax-credit--number-of-marketplace-enrollees-receiving-advanced-premium-tax-credits--estimated-total-annual-premium-tax-credits-received-by-marketplace-enrollees&selectedRows=%7B%22states%22:%7B%22georgia%22:%7B%7D%7D,%22wrapups%22:%7B%22united-states%22:%7B%7D%7D%7D&sortModel=%7B%22colId%22:%22Location%22,%22sort%22:%22asc%22%7D>

<https://www.kff.org/health-reform/state-indicator/distribution-of-eligibility-for-aca-coverage-among-the-remaining-uninsured/?dataView=1¤tTimeframe=0&selectedRows=%7B%22states%22:%7B%22georgia%22:%7B%7D%7D%7D&sortModel=%7B%22colId%22:%22Location%22,%22sort%22:%22asc%22%7D>
(character limit of 32,500)

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Comment Topic* Georgia Access - Plan Options

Comments*

Allowing plans that do not meet the quality and minimum coverage standards for Qualified Health Plans (QHPs) will take Georgia back to the days before the Affordable Care Act when people were dangerously underinsured and insurance companies could price people out of comprehensive coverage. The state's assumption that QHP premiums would only increase by 1.1% and that only 10% of current QHP enrollees would opt for a non-QHP plan does not seem to take into full account the combination of factors that will drive people to choose non-QHP coverage. Namely, in addition to the increase in QHP premiums, QHPs will be marketed by biased insurance companies and brokers alongside less expensive non-QHPs that are eligible for tax credits. The draft application does not explain any guardrails to prevent or limit the gap in premiums between QHPs and non-QHPs. This will hurt older adults the most because they are more likely to need comprehensive coverage from QHPs given that they are more likely to have chronic health conditions than younger adults. Thus, older adults will be faced with higher and higher premiums, amounting to another "age tax" on top of the already allowable premium increases based on age.

Finally, we have seen recent examples of people signing up for non-QHP coverage and being left with huge medical bills or having to forgo care because their plan does not cover it. This proposal would amplify this dangerous trend by making these inadequate plans even less expensive, eliminating the platform (HealthCare.gov) that presents unbiased information about QHPs, and allowing self-interested insurers and brokers to aggressively market and sell non-QHPs.

Sources:

<https://www.commonwealthfund.org/blog/2019/health-plans-that-dont-comply-with-aca-put-consumers-at-risk>
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Business/Organization * Kaiser Foundation Health Plan of Georgia

Stakeholder Type * Health Plan

First Name * [REDACTED] **Last Name *** Simpson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

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Comment Topic* Other

Comments*

Submitted electronically to: <https://medicaid.georgia.gov/patientsfirst/patients-first-act-public-comment>

December 3, 2019

Mr. Blake Fulenwider
Chief Health Policy Officer
Georgia Department of Health
2 Peachtree Street, NW.
Atlanta, GA 30303

Re: Section 1115 Medicaid Waiver – Georgia Pathways to Coverage

Dear Mr. Fulenwider:

Kaiser Permanente of Georgia appreciates the opportunity to provide written comment in response to the construction of a Georgia-specific Section 1115 Medicaid waiver.

In Georgia, Kaiser Permanente (KP) is comprised of the largest non-profit health plan (Kaiser Foundation Health Plan of Georgia) and second largest medical group in the state (The Southeast Permanente Medical Group). KP works within Metro Atlanta and Athens to provide quality care to children in Georgia's Medicaid program.

While KP is not currently permitted to be a Care Management Organization (CMO) in Georgia, Medicaid recipients have access to the Southeast Permanente Medical Group pediatricians through our partnerships with each of the existing CMOs. In this model, Medicaid enrollees receive the highest level of coordinated care in preventive and primary care services. A more complete model of KP's integrated care would align with our participation in the State Health Benefit Plan (SHBP), where KP brings care and coverage together through a unified, prepaid delivery model allowing for more cost-efficient health care delivery to the state and our members. While not currently in consideration, KP would like to continue to explore opportunities for KP's integrated model to further benefit the state and Medicaid enrollees in the geographies we serve. We are hopeful that implementation of a waiver will afford KP the opportunity to serve more Georgians in addition to our current Medicaid and SHBP populations.

KP acknowledges and appreciates the opportunity to participate in the Patients First Act Stakeholder Advisory Council and looks forward to working closely with Governor Kemp's office and the Department of Community Health on implementation of both waivers. We offer the following comments regarding the Section 1115 Medicaid waiver.

We agree that health care should be affordable and as a health insurer, KP understands the importance of members having accountability in their health care. Accountability can be accomplished in many ways, financial and otherwise. While work requirements encourage accountability, incentives for healthy activities, including well visits and smoking cessation, are also tools to encourage accountability and healthy behaviors which could positively impact eligibility of coverage. Promoting preventative and primary care early and often assists in avoiding more costly interventions when conditions are not treated in a timely manner. Encouraging active engagement in health care will enable healthier, more productive working Georgians.

Kaiser Permanente appreciates the opportunity to comment on this waiver application and we look forward to working with the state during implementation of this program. Please contact Kirk McGhee, kirkland.a.mcgee@kp.org or Shea Ross-Smith, shea.ross@kp.org with any questions.

Sincerely

Jim Simpson
President
Kaiser Foundation Health Plan
Georgia Region
(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

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Comment Topic* Reinsurance - Other

Comments*

Submitted electronically to: <https://medicaid.georgia.gov/patientsfirst/patients-first-act-public-comment>

December 3, 2019

Mr. Ryan Loke
Special Projects Coordinator
C/O Office of the Governor
203 Capitol PI SW
Atlanta, Georgia 30334

RE: Section 1332 Innovation Waiver – Reinsurance Program and Georgia Access Model

Dear Mr. Loke,

Kaiser Permanente of Georgia (Kaiser Permanente) appreciates the opportunity to provide written comments in response to the construction of a Georgia-specific Section 1332 state innovation Waiver.

As you know, Kaiser Permanente of Georgia is comprised of the largest non-profit health plan (Kaiser Foundation Health Plan of Georgia) and the second largest medical group in the state (The Southeast Permanente Medical Group). Kaiser Permanente of Georgia serves members living in Metro Atlanta and Athens.

Kaiser Permanente entered the federal marketplace at the inception of the Patient Protection and Affordable Care Act (PPACA) in 2014. Ten percent of Kaiser Permanente's business takes place in the individual market with a projected year-end total of nearly 33,000 members in 2019. Of these 33,000, nearly 26,000 rely on the federal exchange to receive health care coverage. Kaiser Permanente serves individuals and The Small Business Health Options Program (SHOP) members who utilize the federal exchange to gain health insurance coverage. It is our belief that a robust, competitive marketplace with comprehensive coverage options creates better opportunities for Georgians to obtain health insurance.

Previously, Kaiser Permanente submitted public comments in support of a reinsurance program. We see opportunities in Georgia's 1332 state innovation Waiver application and appreciate the state allowing KP's continued engagement on implementation through the Patients First Act Stakeholder Advisory Council. Kaiser Permanente's business and members will be impacted by the implementation of the Section 1332 Waiver. It is KP's intention to maximize our opportunity within the implementation of this waiver while also mitigating our risk. Our main points of risk include disadvantages due to a geographically tiered reinsurance program, difficulties placed on consumers purchasing products in a newly created marketplace, and the potential sale of non-qualified health plans.

Kaiser Permanente prides itself as an active partner to the State of Georgia and a member of the State Health Benefit Plan. In the spirit of partnership, we offer the following comments to the Section 1332 state innovation Waiver. Like Governor Kemp, it is our hope that this Waiver will benefit the Georgians that so desperately need its aid.

Phase I: Reinsurance

Funding Sources and Overlap Between Federal Risk Adjustment and State Reinsurance

Kaiser Permanente supports independent, sustainable funding sources for the state reinsurance program that will accurately reflect the risks and changes in the marketplace. A state-based reinsurance program could be

supported through state appropriations dollars (e.g., \$104 million projected contribution from the state in the first year) and appropriately tailored federal pass-through sources. We support the state's intent to not collect a state-based user fee to pay for the program in the first year (when carriers will still be paying the federal user fee for HealthCare.gov); however, we remain concerned about future state-based funding sources and duplication with the federal risk adjustment program.

The federal risk adjustment program compensates carriers for high-risk members by transferring money among carriers based on their enrollment of individuals with high cost diagnoses. As CMS noted in its 2019 Notice of Benefit and Payment Parameters regulation, the scale of such transfers plays a crucial role in issuer decisions to participate in the individual market.

Kaiser Permanente encourages the state to consider the following:

- Georgia's reinsurance program should fully account for federal risk adjustment payments and pay only for uncompensated high risks beginning at the start of the program in 2021. This will ensure reinsurance funds have the broadest impact for all consumers, incentivize new market entrants, and encourage current participants to remain in the market. Kaiser Permanente is concerned the reinsurance program proposed will lead to duplicate payments for the same members – first from the federal risk adjustment program and a second time for claims reimbursable under the Georgia reinsurance program.
- An actuarial analysis can support work to maximize the use of federal dollars and optimize the market stabilization effect of the reinsurance program. Such an analysis can quantify double payments under the Georgia 1332 Waiver proposal ensuring the profitability pattern of the individual market and the market stabilization effect of the reinsurance program. Actuarial experts endorse the reinsurance-level adjustments for risk adjustment as sound policy. For example, Milliman noted that “the current federal risk adjustment methodology does not account for payments from a state-based reinsurance program and can result in double compensation for high-risk members, both from the reinsurance program and from risk adjustment. This finding may be important to many other states considering reinsurance-like proposals under Section 1332 to help stabilize their markets. Specifically, if appropriate changes to risk-adjustment are not made, a reinsurance program could lead to pricing inefficiencies and distortions that negatively impact the market and could work against the goals of the reinsurance program overall.” Similarly, the American Academy of Actuaries has recommended against compensating insurers twice for the same risk.

Ensuring Equity for Georgians

Kaiser Permanente supports rural Georgia and believes there should be equitable premium reduction statewide. Kaiser Permanente understands the desire to focus efforts on rural Georgia, yet a geographically tiered reinsurance model could potentially create excessive disadvantages to citizens in metro areas. Kaiser Permanente supports a reinsurance program that works for all Georgians.

Any planned changes to Section 1402 (Reduced Cost-Sharing for Individuals Enrolling in a QHP) of the PPACA should receive a fair and rigorous examination by the state prior to changes in the distribution of these funds. Georgians should have the opportunity to understand the potential change of cost-share reduction (CSR) resources if the state decides to take responsibility for distribution of these funds. Removal of CSRs could have detrimental effects on Georgian's who rely on these resources to assist in paying their health care costs.

Phase II: Georgia Access Model

Direct Enrollment

On behalf of consumers, we strongly recommend a direct enrollment pathway for subsidy eligible populations which allows for meaningful transparency including the ability to compare coverage options based on cost, quality, and scope of services. The implementation of a replacement enrollment pathway should advantage Georgians who historically receive a variety of coverage information from the FFE. The average consumer should be empowered to understand and independently purchase benefits. Kaiser Permanente believes the state can ensure this by considering the following:

- Requirements for participation on Georgia Access should consistently apply to all direct enrollment participants. We recommend that brokers and carriers be required to affirmatively offer their plans on Georgia Access in a fair and balanced manner regardless of underlying levels of commission or incentives.

- To truly have an equitable marketplace, Georgians need full transparency with the ability to compare coverage options based on cost, quality, and scope of services across platforms.

State Subsidy Administration

In transitioning to a direct enrollment model, the state will still need to execute several traditional exchange functions to be successful. For Georgians who have access to subsidies through the FFE, the state should consider investing in a consumer-friendly infrastructure. Kaiser Permanente encourages the state to consider the following elements:

- Provide an electronic eligibility hub for consumers, health plans, and web brokers to securely ping enrollee data and obtain accurate subsidy eligibility information in real-time. A stable individual market requires that the consumer know and understand their subsidies, how they are going to be applied, and have the confidence that the application of those subsidies is sustainable and repeatable year over year. Such a state-sponsored IT solution should include a subsidy calculator that seamlessly interfaces with all direct enrollment pathways to allow plans and brokers to quote accurate and consistent subsidy eligibility information to consumers, ensuring the same subsidy eligibility results regardless of the enrollment platform.
- Verify enrollee income and residency data in real time and transmit such information safely and securely. A properly managed verification system creates an extra layer of security for the program to ensure that the right people are getting the right amount of subsidy at the right time. It is important that the state alone manage such sensitive enrollee verification data, given that health plans or other direct enrollment pathways do not have the necessary expertise or systems in place to conduct such functions. KP believes health plans should not be held responsible for the verification of that income information, nor held liable for relying upon that information as directed by the state.
- Clarify the verification process for special enrollment periods (SEP). Currently, the state validates SEP events on-exchange and carriers are responsible for this function off-exchange. We ask the state to provide guidance to carriers about what documentation will be acceptable and that all carriers be subject to the same rules for SEP.
- Other traditional exchange functions include: reporting and distribution of federal 1095A tax forms, creation of a state-based appeals unit to handle eligibility and enrollment appeals cases, payment reconciliation functions, and auditing of state-based subsidy amounts year over year.
- Capping consumer subsidy enrollment and utilizing a waiting list for consumers is of concern to Kaiser Permanente. Capping the number of Georgians who gain access to subsidized coverage could disproportionately impact Georgians under %400 FPL who rely heavily on federal subsidies for affordable coverage. This concern extends to risk in an age-rated marketplace. Changes to the value or accessibility of financial assistance could leave older Georgians particularly vulnerable as subsidies are also valuable to this population.
- We respectfully reiterate the well-known fact that Georgian's excluded from direct coverage will still receive healthcare services in which all businesses and individuals who directly pay for subsidies will incur.

Subsidies for Eligible Non-QHPs

It is Kaiser Permanente's interpretation that the Section 1332 Waiver proposal would allow for the inclusion of non-QHPs in Georgia Access' subsidy distribution. Georgians who intend to buy the most comprehensive benefits should receive the full advantage of state allotted subsidies. It is Kaiser Permanente's belief that non-QHP plans, with existing low consumer costs, should not be eligible for the same subsidies as qualified health plans. Subsidies should benefit individuals who seek more meaningful protections such as mental health, substance abuse, maternity benefits for women, and prescription drug coverage for chronic conditions. Kaiser Permanente supports Georgia's stated aim to establish a single risk pool for all individual market plan coverage, which must include eligible non-QHPs.

Kaiser Permanente recognizes the effort put into the program from the Governor's office, the Georgia Department of Community Health, and Deloitte. We appreciate the opportunity to comment on this Waiver application and hope to continue to partner with the state throughout the implementation of this program. Please contact Kirk McGhee, kirkland.a.mcghee@kp.org or Shea Ross-Smith, shea.ross@kp.org with any questions.

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Comments for 1332 Waiver- Georgia Access

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Jim Simpson
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Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Business/Organization * Kidsplay Therapy Center

Stakeholder Type * Business Owner

First Name * [REDACTED] **Last Name *** Clark

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

These proposed plans would significantly impact funding for children with special needs. It is critical that they receive Occupational therapy, along with speech and physical therapy, as needed to improve their deficits in order to maximize their independence and become functioning adults. Or, at least require less assistance in later years. Early intervention and continued intervention has proven to be effective in helping children with disabilities significantly improve. Loss in funding will negatively impact our state and individuals in need of therapeutic services.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

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Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

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Comment Topic* Georgia Access - Other

Comments*

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Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * Leukemia and Lymphoma Society

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Balog

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

Thank you for the opportunity to comment on the Georgia Section 1115 Demonstration Waiver Application – Georgia Pathways to Care.

The mission of the Leukemia & Lymphoma Society (LLS) is to cure leukemia, lymphoma, Hodgkin's disease and myeloma, and improve the quality of life of patients and their families. LLS is committed to ensuring that patients we represent have access to high quality, stable coverage to ensure that they are able to receive appropriate and timely care.

The Leukemia & Lymphoma Society (LLS) writes to express deep concerns about the eligibility criteria in the proposal and urges the state not to advance the waiver application.

Under the Georgia Pathways Proposal, only individuals with incomes below 100 percent of the federal poverty level (\$1,778 per month for a family of three) who can prove that they work at least 80 hours per month would be eligible for Medicaid. This drastically limits the number of patients with blood cancers and other serious and chronic health conditions who will receive access to the quality and affordable healthcare coverage that they need.

While no exemption criteria can prevent the potential coverage losses associated with work reporting requirements, the proposal does not include any exemption criteria that would allow individuals who are unable to meet the work reporting requirements to apply for coverage. If the waiver were to move forward, Georgia would be the first state to require enrollees to comply with the work reporting requirement prior to enrolling in the Medicaid program with no opportunity to demonstrate a medical or other exemption. This means that blood cancer patients who need treatments that often prevent them from working would have no pathway to coverage that could help them to treat these conditions.

Once enrolled, individuals may be able to qualify for short-term exemptions in certain situations. Still, LLS is concerned that these exemption criteria may not capture all individuals with serious and chronic health conditions that prevent them from working. Regardless, even exempt enrollees may have to report their exemption, creating opportunities for administrative error that could jeopardize their coverage. Again, no exemption criteria can circumvent these problems and the serious risk to the health of the people we represent.

LLS opposes so-called "work requirements" because they are likely to trigger significant reductions in the number of people who are able to access Medicaid coverage. For the first six months, members will have to report their hours and work activities monthly. This will put a significant administrative burden on enrollees, which will likely decrease the number of individuals with Medicaid coverage. For example, in Arkansas, where such requirements have been implemented, during just the first six months Arkansas terminated Medicaid coverage for over 18,000 individuals who did not meet the program requirements (Robin Rudowitz, MaryBeth Musumeci, and Cornelia Hall, "A Look at November State Data for Medicaid Work Requirements in Arkansas," Kaiser Family Foundation, December 18, 2018).

Failing to navigate these burdensome administrative requirements could have serious – even life or death – consequences for blood cancer patients. If the state finds that individuals have failed to comply for one month, their coverage will be suspended, and if the state finds that individuals have failed to comply for three months, they will be disenrolled. The loss of coverage is a grave prospect for anyone, in particular a patient living with a serious disease or condition. People in the midst of cancer treatment, for example, rely on regular visits with healthcare providers, and many of those patients must adhere to frequent, if not daily, medication protocols.

While this waiver includes provisions to exempt those "experiencing an acute medical condition requiring

while this waiver includes provisions to exempt those experiencing an acute medical condition requiring immediate medical treatment," it is not clear how those exemptions will be tracked. In some cases, the administrative burden of proving an exemption can result in a loss of coverage. For example, in the Temporary Assistance for Needy Families (TANF) program, many people who were working or should have qualified for exemptions from work requirements lost benefits because they did not complete required paperwork or were unable to document their eligibility for exemptions (Solomon, Judith. Kentucky Waiver Will Harm Medicaid Beneficiaries. (January 16, 2018). Center on Budget and Policy Priorities.).

If individuals are able to meet the reporting requirements for six consecutive months, they will be exempt from further reporting and re-evaluated for eligibility during their annual redetermination. However, if individuals do not report a change in their employment status, they will be responsible for any capitation and cost-sharing expenses. This exposes already low-income individuals to enormous financial risk.

In April of 2019, Judge James E. Boasberg of the Federal District Court for the District of Columbia ruled the Arkansas work requirements program unlawful on the grounds that it failed to provide medical assistance to its citizens, a "central objective of Medicaid" (Goodnough, Abby. (March 27, 2019). Judge Blocks Medicaid Work Requirements in Arkansas and Kentucky. The New York Times).

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Premiums, Copayments, Member Rewards Account

Comments*

Thank you for the opportunity to comment on the Georgia Section 1115 Demonstration Waiver Application – Georgia Pathways to Care.

The mission of the Leukemia & Lymphoma Society (LLS) is to cure leukemia, lymphoma, Hodgkin's disease and myeloma, and improve the quality of life of patients and their families. LLS is committed to ensuring that patients we represent have access to high quality, stable coverage to ensure that they are able to receive appropriate and timely care.

The Leukemia & Lymphoma Society (LLS) writes to express deep concerns about the cost-sharing requirements in the proposal and urges the state not to advance the waiver application.

Increases in premiums and cost-sharing are likely to cause Medicaid enrollees to either lose access to coverage or decrease their adherence to treatment (Artiga, S., Ubri, P., Zur, J. The Effects of Premiums and Cost Sharing on Low-Income Populations: Updated Review of Research Findings. (June 1, 2017). Kaiser Family Foundation). Cancer patients often require strict treatment protocols and any disruption to that treatment can result in serious adverse health consequences. For the limited number of individuals who are able to meet the limited eligibility criteria, the proposal still creates numerous financial barriers that will jeopardize their coverage. Individuals with incomes above 50 percent of the federal poverty level will have to pay monthly premiums and will lose coverage if they fail to pay premiums for three months.

This policy would likely both increase the number of enrollees who lose Medicaid coverage and also discourage eligible people from enrolling in the program. Research has shown that even relatively low levels of cost-sharing for low-income populations limit the use of necessary healthcare services (Samantha Artiga, Petry Ubri, and Julia Zur, "The Effects of Premiums and Cost Sharing on Low-Income Populations: Updated Review of Research Findings," Kaiser Family Foundation, June 2017). For example, when Oregon implemented a premium in its Medicaid program, with a maximum premium of \$20 per month, almost half of enrollees lost coverage (Samantha Artiga, Petry Ubri, and Julia Zur, "The Effects of Premiums and Cost Sharing on Low-Income Populations: Updated Review of Research Findings," Kaiser Family Foundation, June 2017).

This policy will not only apply to – and jeopardize coverage for – new enrollees, but for individuals who are currently enrolled in Medicaid through the Transitional Medical Assistance (TMA) program. Additionally, it is unclear how the state may try to recoup capitation and other payments for any months that individuals are not able to pay their premiums and if, as with the work reporting requirement policy above, patients may be put at significant financial risk. LLS believes that these premiums will create significant financial barriers for patients that jeopardize their access to needed care and therefore opposes this policy.

Georgia's proposal also includes a number of copayments for individuals with incomes above 50 percent of the federal poverty level that could be a significant financial burden for patients. The most egregious of these is a \$30 copay for non-emergency use of the emergency department (ED). People should not be financially penalized for seeking lifesaving care for complications during cancer treatment or any other critical health problem that requires immediate care. When people do experience severe symptoms, they should not try to self-diagnose their condition or worry that they cannot afford to seek care. Evidence suggests this type of cost sharing do not result in the intended cost savings (Chernew M, Gibson TB, Yu-Isenberg K, Sokol MC, Rosen AB, Fendrick AM. Effects of increased patient cost sharing on socioeconomic disparities in health care. J Gen Intern Med. 2008. Aug; 23(8):1131-6. Ku, L and Wachino, V. "The Effect of Increased Cost-Sharing in Medicaid: A Summary of Research Findings." Center on Budget and Policy Priorities (July 2005).

Research demonstrates that low-income individuals served by Medicaid are more price sensitive compared to others, more likely to go without needed care, and more likely to experience long-term adverse outcomes. A study of enrollees in Oregon's Medicaid program demonstrated that implementation of a copay on emergency services resulted in decreased utilization of such services but did not result in cost savings because of subsequent use of more intensive and expensive services (Wallace NT, McConnell KJ, et al. How Effective Are Copayments in Reducing Expenditures for Low-Income Adult Medicaid Beneficiaries? Experience from the Oregon Health Plan. Health Serv Res. 2008 April; 43(2): 515–530). This provides further evidence that copays may lead to inappropriate delays in needed care.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Employer Sponsored Insurance

Comments*

Thank you for the opportunity to comment on the Georgia Section 1115 Demonstration Waiver Application – Georgia Pathways to Care.

The mission of the Leukemia & Lymphoma Society (LLS) is to cure leukemia, lymphoma, Hodgkin's disease and myeloma, and improve the quality of life of patients and their families. LLS is committed to ensuring that patients we represent have access to high quality, stable coverage to ensure that they are able to receive appropriate and timely care.

The Leukemia & Lymphoma Society (LLS) writes to express deep concerns about the employer sponsored insurance and benefits in the proposal and urges the state not to advance the waiver application.

Under the proposal, individuals would be required to enroll in employer sponsored insurance (ESI) if it is available and determined to be cost effective for the state. However, the state would not provide any wraparound services for individuals regardless of the benefit package in their ESI, putting patients with complex medical conditions and risk of being underinsured. Additionally, the state would not help individuals with the costs of coinsurance or deductibles required in their ESI. LLS is very troubled by the requirement to enroll in ESI without wraparound services and full financial protection for patients.

The proposal also includes a request to waive non-emergency transportation (NEMT) for the entire demonstration population. NEMT helps low-income patients overcome barriers to care due to transportation and allows patients to keep appointments with doctors and other healthcare providers. For example, one study found patients with asthma, hypertension or heart disease who needed multiple visits to a medical professional to maintain their health were more likely to keep their appointments if they had NEMT (Michael Adelberg, Marsha Simon, "Non-Emergency Medical Transportation: Will Reshaping Medicaid Sacrifice an Important Benefit?" Health Affairs, September 20, 2017). LLS opposes a waiver of NEMT and urges the state to keep this benefit intact.

(character limit of 32,500)

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Comment Topic* State Program Cost and Budget

Comments*

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The Leukemia & Lymphoma Society (LLS) writes to express deep concerns about the costs projected to implement the proposal and urges the state not to advance the waiver application.

Combined with costs of implementing the additional proposed 1332 waiver, the state estimates that it will spend about \$322 million – or about \$215 million excluding costs covered by user fees – to extend coverage to just under 80,000 Georgians under the 1332 and 1115 waivers. Instead of pursuing these two harmful waivers, Georgia could accept the ACA's Medicaid expansion and allow all residents earning under 138% of the federal poverty line to qualify for Medicaid coverage. Doing so would extend coverage to between 487,000 and 598,000 residents at a net state cost of \$188 million to \$213 million, according to state estimates (Kyle Hayes, "Georgia Waivers: At Least as Costly to Cover Far Fewer People Than Medicaid Expansion," Center on Budget and Policy Priorities, November 14, 2019), (Laura Harker, "State Health Care Proposals Fall Short and Undermine Comprehensive Health Plans," Georgia Budget and Policy Institute, November 11, 2019).

In addition to its far greater benefits for low-income Georgians, Medicaid expansion would also do more to reduce uncompensated care. States that expanded Medicaid saw larger coverage gains and a decrease in uncompensated care costs of 55 percent on average, compared to a decline of only 18 percent in states that did not expand Medicaid (Matt Broaddus, "ACA Medicaid Expansion Drove Large Drop in Uncompensated Care," Center on Budget and Policy Priorities, November 6, 2019). This experience serves as a critical lesson for Georgia, where seven rural hospitals have closed since 2010 (Georgia Department of Community Health Waiver Project, "Georgia Environmental Scan Report," July 8, 2019). Upon the waivers' release, stakeholders warned that the proposals would fall short in addressing the problem of uncompensated care. The 1115 waiver "does not significantly move the needle for the rural and safety net hospitals who care for the state's uninsured patients," according to the Georgia Hospital Association (Jim Galloway et al, "The Jolt: The quandary an impeachment trial poses for Johnny Isakson – or his replacement," Atlanta Journal-Constitution, November 5, 2019).

In addition, administering all of these requirements will be expensive for the state of Georgia. States such as Kentucky, Tennessee and Virginia have estimated that setting up the administrative systems to track and work activities alone will cost tens of millions of dollars (Misty Williams, "Medicaid Changes Require Tens of Millions in Upfront Costs," Roll Call, February 26, 2018.). This would divert federal resources from Medicaid's core goal – providing health coverage to those without access to care – and compromise the fiscal health of Georgia's Medicaid program.

LLS opposes this waiver proposal. Instead, we urge Georgia to focus on solutions that promote adequate, affordable and accessible coverage, including a full expansion of the state's Medicaid program.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

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LLS has deep concerns with the Georgia Pathways proposal and urges the state not to advance the waiver application. The application estimates that approximately 50,000 individuals would gain coverage under the plan, whereas over 500,000 Georgians could access coverage if the state fully expanded its Medicaid program.

As the nation's public health insurance program for low-income children, adults, seniors, and people with disabilities, Medicaid covers 1 in 5 Americans (Rachel Garfield, Robin Rudowitz, and Anthony Damico, "Understanding the Intersection of Medicaid and Work," Kaiser Family Foundation, January 2018). Expanding Medicaid in Georgia critically important to ensuring access to coverage for vulnerable populations. Expansion is also beneficial to state economies and has been associated with a reduced risk of hospital closures, especially in rural areas (Richard Lindrooth, Marcelo Perrillon, Rose Hardy, and Gregory Tung, "Understanding the Relationship Between Medicaid Expansions and Hospital Closures," Health Affairs 27, no. 1 (January 2018): pp. 111-120).

While LLS strongly supports Medicaid expansion in Georgia, LLS is opposed to restricting eligibility and enrollment by imposing barriers to access on new Medicaid beneficiaries who could potentially receive coverage under this waiver.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

Thank you for the opportunity to comment on the Georgia Section 1332 Waiver Application, the proposed Georgia Access Model.

The mission of the Leukemia & Lymphoma Society (LLS) is to cure leukemia, lymphoma, Hodgkin's disease and myeloma, and improve the quality of life of patients and their families. LLS is committed to ensuring that blood cancer patients have access to high quality, stable coverage to ensure that they are able to receive appropriate and timely care. It is in service of this mission that we write to express our deep concerns with the proposal and urge the state not to advance the waiver.

Cancer patients need access to meaningful health insurance coverage in order to access necessary treatment. LLS has adopted a set of Coverage Principles that outline our perspective on what constitutes "meaningful health insurance coverage" (Principles for Meaningful Coverage. The Leukemia & Lymphoma Society). Among these, meaningful coverage for cancer patients must be both affordable and stable. Reinsurance programs in other states have shown promising initial results in controlling overall premium growth, and even, in some cases, resulting in premium reductions (State-Run Reinsurance Programs Reduce ACA Premiums by 19.9% on Average. Avalere. March 2019). States that have already created their own reinsurance program achieved a nearly 20% reduction in individual market premiums on average in their first year (State-Run Reinsurance Programs Reduce ACA Premiums by 19.9% on Average. Avalere. March 2019).

At the federal level, reinsurance has been used to stabilize premiums in a number of healthcare programs, such as Medicare Part D. Further, a temporary reinsurance fund for the individual market was also established under the Affordable Care Act and reduced premiums by an estimated 10 to 14 percent (American Academy of Actuaries, Individual and Small Group Markets Committee. An Evaluation of the Individual Health Insurance Market and Implications of Potential Changes. January 2017).

The state's creation of a reinsurance program in this application is laudable; however, as currently proposed, the entirety of the 1332 waiver makes unprecedented changes to the state's individual insurance market, and poses serious and real danger to cancer patients' ability to purchase quality health coverage for themselves and their families.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

Thank you for the opportunity to comment on the Georgia Section 1332 Waiver Application, the proposed Georgia Access Model.

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Cancer patients need access to meaningful health insurance coverage in order to access necessary treatment. LLS has adopted a set of Coverage Principles that outline our perspective on what constitutes "meaningful health insurance coverage" (Principles for Meaningful Coverage. The Leukemia & Lymphoma Society). While LLS supports reinsurance as a tool to stabilize premiums in the individual marketplace, we are deeply concerned that the Georgia Access Model will jeopardize access to quality and affordable healthcare coverage for patients with blood cancers and other pre-existing conditions.

The proposal fails to meet the statutory "guardrails" requiring intended to ensure that people who live in states that implement an ACA waiver are not worse off than they would be without the waiver. Section 1332(b)(1) of the ACA requires that ACA waivers cover as many people, with coverage as affordable and comprehensive, as without the waiver. However, under the proposed waiver, the coverage that many Georgians would have would be less comprehensive, and more people would find themselves with less affordable coverage and out-of-pocket costs than would be the case without the waiver.

Of concern, Georgia may see a reduction, rather than an increase, in coverage under the 1332 waiver. The waiver would also put the healthcare coverage of the 450,000 Georgians who currently get their insurance through the state's marketplace at risk while only attempting to expand coverage for a small fraction (30,000 individuals) of the more than 1.4 million uninsured individuals in Georgia. The waiver does not meet the guardrails under federal law and is likely not approvable.

The proposal would allow changes to policies establishing where and how consumers purchase health coverage that will undermine consumer protections in the ACA. Georgia would privatize functions of the marketplace by removing the state from the federally-facilitated exchange platform (HealthCare.gov) without creating their own exchange. Instead, consumers would enroll in coverage only through private web brokers and insurers, exposing them to the same risks posed by direct enrollment in the ACA. Direct enrollment entities already have a track record of steering consumers towards substandard plans that leave them exposed to catastrophic costs if they get sick, failing to alert consumers of Medicaid eligibility, and not allowing meaningful plan comparisons (Tara Straw, "'Direct Enrollment' in Marketplace Coverage Lacks Protections for Consumers, Exposes Them to Harm," Center on Budget and Policy Priorities, March 15, 2019).

Today, patients and consumers who shop on Healthcare.gov can trust that they are purchasing a health insurance plan that will allow them to manage their health conditions. However, under the Georgia Access Model, issuers and brokers could sell QHPs alongside other types of plans that discriminate against people with pre-existing conditions and will not cover enrollees' medical expenses if they get sick. This could create confusion for patients and lead them to purchase coverage that does not meet their needs. There is already evidence of misleading marketing related to short-term and other skimpy plans leading individuals to unwillingly enroll in coverage that lacks key patient protections (Dania Palanker, "Seeing Fraud and Misleading Marketing, States Warn Consumers About Alternative Health Insurance Products", The Commonwealth Fund, October 19, 2019). This problem would likely worsen in Georgia under this proposal.

Healthcare.gov shows consumers all QHPs available in their area and does not favor certain plans over others. However, under the Georgia Access Model, brokers who would be helping individuals through the enrollment process would not have to show individuals all of their plan options and may receive larger commissions for certain plans over others that influence their recommendations to patients. Increasing the reliance on insurers and brokers will limit the ability of patients with [condition] to compare plan price and benefit design in an unbiased manner to choose the right plan for them and could ultimately result in harm to patients who become enrolled in sub-standard or inadequate insurance coverage that does not meet their needs. This failure to appropriately shield patients from risk is unacceptable.

A strong, robust marketplace is essential for all consumers, including people with blood cancer, to access comprehensive coverage that includes all of the treatments and services they need at an affordable cost. Again, we urge the state not to move forward with this application for a waiver.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Georgia Access - Subsidies

Comments *

Thank you for the opportunity to comment on the Georgia Section 1332 Waiver Application, the proposed Georgia Access Model.

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LLS is deeply concerned by the proposed changes to policies governing the financial assistance people receive to purchase health coverage under the ACA. Under the waiver, the state would allow tax credits to be used to purchase substandard health plans that exclude coverage for essential health benefits, such as prescription drugs, maternity care, or mental health and substance abuse care. Allowing tax credits for substandard plans would create adverse selection that would increase premiums, because many healthier people, even those eligible for tax credits, would enroll in cheaper, more limited coverage. Higher premium costs will raise the per-person costs of tax credits, resulting in a higher total cost than the state budgets for and triggering the waiver provision which allows the state to cap enrollment with tax credits. Consumers shopping after the cap has been reached will lose access to tax credits, forcing them to buy substandard plans that do not meet their needs, pay more for comprehensive coverage, or go without insurance.

Additionally, the draft application requests to waive the cost-sharing reduction (CSR) program that helps patients with incomes below 250 percent of the federal poverty level (FPL) to pay deductibles, coinsurance and other cost-sharing required by their health plan. It is unclear whether individuals who currently qualify for CSRs under the ACA will still get this financial assistance under the state-administered subsidy system.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Georgia Access - Plan Options

Comments *

Thank you for the opportunity to comment on the Georgia Section 1332 Waiver Application, the proposed Georgia Access Model.

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LLS is deeply concerned that the proposal would allow subsidies to be used for QHPs currently offered in the state as well as for "eligible non-QHPs." This will result in more individuals enrolling in substandard coverage at great risk to their financial and physical health.

The draft waiver application does not contain sufficient information about the standards for eligible non-QHPs, particularly what requirements will be in place for plans to maintain protections for people with pre-existing conditions. For example, even if plans cannot deny coverage to patients with pre-existing conditions, could plans vary premiums based on health status? Protecting patients with blood cancers and other pre-existing conditions involves more than guaranteed issue; patients need community rating, bans on exclusion periods and condition exclusions, cost-sharing protections, bans on annual and lifetime limits and many other protections currently required for plans sold on the individual market to truly access comprehensive, affordable healthcare coverage.

Other aspects of the standards for these plans are unclear as well. The draft application requests to waive network adequacy requirements. Additionally, it is unclear how eligible non-QHPs could be part of the single risk pool with current QHPs given how dissimilar these products could be. This would make risk adjustment – a process that discourages plans from cherry-picking healthier individuals by transferring funds from plans with lower risk enrollees to higher risk ones – difficult to implement.

The draft application does clearly state that eligible non-QHPs would not have to cover all ten essential health benefits (EHBs), which are currently required by QHPs. However, there is no explanation or analysis to support this assumption that eligible non-QHPs will provide the promised 90 percent of benefits or what those might be. By offering plans that do not cover all EHBs but are still eligible for subsidies, issuers will be able to segment the market and charge lower premiums to healthier individuals for eligible non-QHPs while charging high premiums for patients with pre-existing conditions who need comprehensive coverage. This is a backdoor to discrimination against patients with pre-existing conditions.

Finally, given the destabilizing impact of the state subsidy program on the individual marketplace, it is possible that some issuers may rethink their decisions to offer QHPs in Georgia. Yet the application assumes that issuers will still offer QHPs in all ratings areas after the implementation of the new state subsidy program with no explanation to support that assumption. If this assumption does not hold, patients in some areas of the state would no longer have access to comprehensive care and have to choose between eligible non-QHPs or other skimpy plans or going without coverage.

(character limit of 32,500)

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Comment Topic* Georgia Access - State Program Cost and Budget

Comments*

Thank you for the opportunity to comment on the Georgia Section 1332 Waiver Application, the proposed Georgia Access Model.

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LLS has significant concern about the cost of the waiver and budget impacts. First, the state subsidy system is significantly under-resourced, which would have serious implications for patients with blood cancer and other individuals in Georgia. The state has budgeted \$13.5 million in the first three years and \$5 million thereafter for implementation costs, which seems quite low given the significant investments in new technical and administrative systems needed to operate the Georgia Access Model.

Additionally, the state's contribution to the subsidy fund is just \$144 million in 2022, which will not go far if the Georgia Access Model increases premiums as predicted. This lack of funding is particularly dangerous for patients given the Georgia Access Model's cap on subsidy funding. Currently, any individual who meets the eligibility criteria for financial assistance for coverage under the ACA receives that financial assistance. However, patients could be placed on a wait list if the state exceeds its capped contribution under the Georgia Access Model.

Lastly, the state's proposed combined proposal set forward in the Patient First Act waivers misses the opportunity to address the states most significant healthcare needs by simply fully expanding Medicaid up to 138% FPL. Combined, the state estimates that it will spend about \$322 million – or about \$215 million excluding costs covered by user fees – to extend coverage to just under 80,000 Georgians under the 1332 and 1115 waivers. Instead of pursuing these two harmful waivers, Georgia could accept the ACA's Medicaid expansion and allow all residents earning under 138% of the federal poverty line to qualify for Medicaid coverage. Doing so would extend coverage to between 487,000 and 598,000 residents at a net state cost of \$188 million to \$213 million, according to state estimates (Kyle Hayes, "Georgia Waivers: At Least as Costly to Cover Far Fewer People Than Medicaid Expansion," Center on Budget and Policy Priorities, November 14, 2019), (Laura Harker, "State Health Care Proposals Fall Short and Undermine Comprehensive Health Plans," Georgia Budget and Policy Institute, November 11, 2019).

Again, while we are pleased to support the establishment of a reinsurance program as proposed by this waiver, LLS has significant concerns about all other proposed provisions. We encourage you to withdraw the 1332 waiver as currently written, and instead work with groups like LLS to improve access to affordable, quality health coverage. Thank you for the opportunity to provide comments on this important matter. Questions or requests for further information on LLS and our position can be addressed to Sarah Balog at sarah.balog@lls.org or 678-852-6383.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Business/Organization * Medical Association of Georgia (MAG)

Stakeholder Type * Advocacy Group

First Name * [REDACTED] **Last Name *** Larosa

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic * Premiums, Copayments, Member Rewards Account

Comments *

MAG applauds the \$0 copay for primary care visits as we believe this will encourage patients to establish a medical home with a primary care physician; thus, producing overall savings to the system.

MAG supports the policy that allows patients who have transitioned to commercial insurance to still have access to their accumulated funds in their Member Rewards Account.

How will the state/insurers handle patients/members who use the emergency department for non-emergency purposes (i.e., ensure physicians aren't penalized)? This will be a significant challenge since much of the plan's target population hasn't received medical care on a regular basis.

MAG would like to strongly encourage the state to incentivize the eligible populations for "Early and Periodic Screening, Diagnostic, and Treatment" (EPSDT) participation through the patient's "Member Rewards Account."

MAG has concerns over the premium requirements as these could be a barrier to entry and make it difficult for patients to maintain active benefits.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic * Employer Sponsored Insurance

Comments *

The premium assistance feature for employer-sponsored insurance is important because the administrative burden associated with private insurers is generally lower than the one associated with care management organizations (CMOs), and private insurers typically offer adequate reimbursement rates.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic * Other

Comments *

MAG members have asked whether this proposal includes any "hold harmless" provisions (i.e., physicians would not be subjected to additional risk or liability) especially during the initial stages of implementation?

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic * Eligibility Criteria

Comments *

MAG members have expressed concern about the work requirement for adults who have chronic conditions and/or don't meet the "disabled" standards for Medicaid. MAG and its partners would request to work with the state on exemptions for specific diagnoses, especially with regards to mental health.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Program Goals

Comments *

The state should look for ways to reduce the administrative burden associated with CMOs during this program's implementation – as today's prior authorization process results in a myriad of patient care and claims problems.

The system's database should be updated adequately to ensure that practices can determine if the patient/member's coverage is up to date (i.e., not suspended for nonpayment of premium).

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * State Program Cost and Budget

Comments *

Payment/reimbursement levels must be high enough to establish and sustain an adequate network of physicians across all specialties – keeping in mind that many physicians don't accept Medicaid because they would effectively lose money on every patient they see (i.e., cost of care is higher than payment).

The state/insurers need to look for ways to address/minimize "no-shows" or missed appointments – which translate into costs the practice can't recover. The same holds true for transportation (e.g., the 'Non-Emergency Medical Transport' waiver) – as reliable transportation can be a significant obstacle for this plan's target population.

With the expansion of coverage to these new populations, we would like to see a commitment from the state to increase the reimbursement for Medicaid primary care codes (including for obstetricians/gynecologists) to equal 2018 Medicare rates, which will improve access to care.

MAG has concerns over the request to eliminate the three-month retroactive coverage as we feel the 2.2% reduction of the per member/per month spend does not justify its elimination. This coverage can only help patients transition to commercial insurance quicker, which is the overall goal of the 1115 program.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

MAG supports efforts to increase the number of Georgians who have health insurance and reduce costs for individuals who purchase health insurance.

MAG also supports the goal of moving as many patients as possible to commercial insurance over Medicaid.

MAG supports the need to continue to protect patients who have pre-existing conditions.

MAG members have asked whether this proposal includes any "hold harmless" provisions (i.e., physicians would not be subjected to additional risk or liability)?

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and
Coinsurance)

Comments*

MAG agrees that the current trajectory of rising health insurance premiums is unsustainable.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

MAG strongly supports the availability of robust Essential Health Benefits and is concerned that many patients/members may not understand what is or isn't included in a non-qualified health plan (i.e., they will purchase the cheapest plan without understanding the implications) – which is something the state/insurers should be prepared to address. The Georgia Access Model could potentially allow carriers and other private sector entities the ability to market Non-Eligible Non-Qualified Health Plans (QHPs) alongside Eligible non-QHPs. We would strongly encourage the state to work with MAG and its partners when considering the implementation of this program to ensure consumer/patient protection.

MAG has significant concerns over the insurance carriers' habitual practice of inaccurately representing their network sizes at the time of open enrollment. We would like to request the state to work with MAG and its partners on instituting a program that would decrease the coinsurance subsidy rate to insurance carriers for each instance of an inaccurate listing above a certain threshold.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

MAG has concerns about the lack of guidance or policies ensuring the state has a goal regarding network adequacy, and this could exacerbate Georgia's narrow networks that all consumers are facing, which in turn will negatively affect the Georgia Access and Reinsurance Program.

MAG has significant concerns over the insurance carriers' habitual practice of inaccurately representing their network sizes at the time of open enrollment. We would like to request the state to work with MAG and its partners on instituting a program that would decrease the coinsurance subsidy rate to insurance carriers for each instance of an inaccurate listing above a certain threshold.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Subsidies

Comments*

MAG has significant concerns over the insurance carriers' habitual practice of inaccurately representing their network sizes at the time of open enrollment. We would like to request the state to work with MAG and its partners on instituting a program that would decrease the coinsurance subsidy rate to insurance carriers for each instance of an inaccurate listing above a certain threshold.

(character limit of 32,500)

Public Comments

General Information

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- 1115 Waiver - Georgia Pathways
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- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Business/Organization * Medical Transportation Access Coalition

Stakeholder Type * Advocacy Group

First Name * [REDACTED] **Last Name *** Beckmann

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

December 3, 2019

Frank Berry, Commissioner
Georgia Department of Community Health
2 Peachtree Street, NW
Atlanta, GA 30303

Re: Draft 1115 Waiver Application dated 11/4/2019

Dear Mr. Berry:

The Medical Transportation Access Coalition (MTAC) (www.mtacoalition.org) was formed in 2017 to educate federal and state policymakers and other stakeholders about the benefits of medical transportation and the need for policies that support continued access to these services. The coalition's founding and allied members include a diverse set of transportation brokers and providers, managed care organizations and trade associations, and patient advocacy groups. Two of our founding members, LogistiCare|Circulation and Southeastrans, are NEMT brokers headquartered in Georgia.

This letter is in response to Georgia's draft application requesting Section 1115 authority to waive non-emergency medical transportation (NEMT) included as part of the broader package of new policies to be tested in the state. As discussed further below, we specifically ask Georgia to withdraw the proposal to eliminate NEMT given the following considerations: ongoing litigation, the increasing prominence of NEMT as a feature in health insurance benefit designs to improve health and well-being, and concerns regarding the NEMT waiver's effects on access to care and adherence to clinically recommended care.

Background

The NEMT benefit in Georgia is a critical, often life-sustaining, benefit for a diverse population of Medicaid beneficiaries in the state. This is borne out by the following data from Southeastrans and LogistiCare|Circulation, two MTAC members who operate as non-emergency medical transportation (NEMT) brokers in the state's five NEMT regions:

- Total trips to medically necessary care: 3,857,096 (2016); 3,785,590 (2017); 3,964,894 (2018); and 3,885,050 (as of late Nov. 2019).
- In a given NEMT region, about 6.5-12% of total beneficiaries in Georgia qualify for and use the benefit.
- The most common trip destinations are for adult day care (29%) and behavioral and mental health (25%), followed by dialysis (17%), a doctor's office such as a primary care provider for typical needs such as routine check-ups or follow-up care (8%), and specialists (5%).

Stewart v. Azar Casts Doubt on NEMT Waiver's Legality

On March 27, 2019, a federal district court judge determined CMS's approval of the entire Kentucky HEALTH demonstration program, including the waiver of NEMT, was unlawful. Adopting the framework of the Administrative Procedure Act (APA), the court found the program failed to promote the objectives of the Medicaid statute, one of which is to provide medical assistance to individuals who qualify for the program. (Stewart v. Azar, Case No. 18-152-JEB (D.D.C. Mar. 27, 2019) Like the Kentucky HEALTH program, the Georgia Pathways benefits package eliminates NEMT to be more consistent with commercial coverage. Presumably, though the application fails to explain explicitly how a commercial coverage package ties directly to the objectives of the Medicaid Act, the state believes a benefits package that is more consistent with commercial insurance helps to encourage more financial independence for beneficiaries. However, the court in

Stewart v. Azar (the Kentucky HEALTH care), noted “financial self-sufficiency is not an independent objective of the Act and, as such, cannot undergird the Secretary’s finding under § 1115 that the project promotes the Act’s goals. This is so even where the Court accords Chevron deference to his interpretation of financial independence as an ‘objective’ contemplated in § 1115. For the reasons that follow, it is an unreasonable reading of the relevant provision because it is incompatible with the surrounding statutory language and aims.”

Further, an MTAC-commissioned study confirms the linkage between transportation and access to care. 977 Medicaid beneficiaries who use NEMT to make their appointments were surveyed in 2018 in three diverse states, Louisiana, Michigan, and New Jersey. (A report prepared for the Arkansas Health Reform Task Force concluded if access to NEMT services saved only one hospitalization in 100 trips, the return on investment (ROI) would be 10 to 1. Available at: <https://www.stephengroupinc.com/images/engagements/Final-Report-Volume-II.pdf>. Another study conducted by Florida State University found NEMT’s ROI factor to be 11 to 1. J. Cronin, Florida Transportation Disadvantaged Programs Return on Investment Study, Florida State University and Marking Institute (2008). Available at: https://ctd.fdot.gov/docs/AboutUsDocs/roi_final_report_0308.pdf.) The following survey findings, in particular, show that eliminating NEMT serves no legitimate purpose and poses unnecessary risks for beneficiaries in: (1) reducing their ability to make their scheduled appointments and stay adherent to treatment guidelines; (2) posing significant financial barriers; and (3) worsening the health of certain beneficiaries who would otherwise be eligible for and utilize the NEMT benefit.

- According to the 2018 survey, without access to NEMT, 66.5% of patients receiving treatment for wound care for diabetes, 58.8% of patients receiving treatment for substance abuse, and 52.8% of dialysis patients would not be able to attend any medical appointments. On average, patients across all three treatment categories above reported that they would miss approximately 70% of their appointments without NEMT.

- Over three-quarters (82.6%) of patients said they would have to pay more out of pocket if they did not have access to NEMT, and approximately two-thirds (66.6%) reported having no other form of personal or public transportation that they could use to attend appointments as an alternative.

- A vast majority of patients surveyed (92.7%) reported their health would be “much worse” (85.3%) or “slightly worse” (7.4%) without access to NEMT. Moreover, 103 of 977 patients surveyed reported that they “would die” or “would probably die” without NEMT.

If a significant proportion of beneficiaries with common chronic conditions are unable to access health care without the provision of NEMT to manage their health—as this survey strongly suggests—we question whether the proposed continued elimination of NEMT fulfills all the objectives of the Medicaid program, including the provision of medical assistance to those that Congress intended to serve through the program.

NEMT is Increasingly Consistent with Commercial Coverage Plan Designs

Despite the fact that there is no statutory requirement under the Patients First Act to waive NEMT for the Pathways population, Georgia nonetheless seeks to waive the federal requirement to provide NEMT under 45 CFR 431.53 to be more consistent with commercial insurance benefits. However, payers in both government programs and the private sector are increasingly providing transportation for enrollees as an additional (voluntary) benefit. This is a particularly growing market trend for the most vulnerable plan members, such as enrollees with common chronic conditions or those with no other reliable, safe, and affordable means to obtain care. (For Medicare Advantage growth of transportation offerings, see e.g., Susan Jaffe, “Medicare Advantage Plans Cleared to Go Beyond Medical Coverage—Even Groceries,” Kaiser Health News, April 3, 2018, available at: <https://khn.org/news/medicare-advantage-plans-cleared-to-go-beyond-medical-coverage-even-groceries/> (last accessed: November 19, 2019); and Meg Bryant, “Cigna-HealthSpring, Lyft Tout Medicare Advantage Ride Numbers,” Healthcare Dive, Dec. 1, 2017, available at: <https://www.healthcaredive.com/news/cigna-healthspring-lyft-tout-medicare-advantage-ride-numbers/512043/> (last accessed: November 19, 2019). In the Medicare Advantage program, CMS has promoted NEMT as a supplemental benefit and, because so many private MA plan sponsors see the value of NEMT, it is being offered in 25% more plans in 2019 than in 2018. (Per CMS Medicare Advantage benefit files, Quarter 1 2018 vs. Quarter 1 2019, found at <https://www.cms.gov/Research-Statistics-Data-and-Systems/Statistics-Trends-and-Reports/MCRAdvPartDENrolData/Benefits-Data.html>) For 2020, the number of MA plans to offer transportation benefits will grow from 1,449 to 1,941, representing a 25% increase from 2019. (MTAC analysis of CMS PBP benefits files available at <https://www.cms.gov/Research-Statistics-Data-and-Systems/Statistics-Trends-and-Reports/MCRAdvPartDENrolData/Benefits-Data-Items/2020-PBP-Benefits-Q1>)

The trend in MA is expanding to the private insurance and employee benefits sector which is also providing

transportation for enrollees as an additional (voluntary) benefit. (A few examples that show the growth of transportation offerings in private insurance benefits are: (1) The Blue Cross Blue Shield Association and Lyft entered into a national partnership “to ensure Americans are not missing vital health care appointments simply because they lack reliable transportation.” The announcement notes “[W]hile assistance is available for many who receive Medicaid coverage, millions of Americans are still unable to regularly access care because they lack reliable transportation options.” Blue Cross Blue Shield Association, “Blue Cross and Blue Shield and Lyft Join Forces to Increase Access to Health Care in Communities with Transportation Deserts,” May 10, 2017, available at: <https://www.bcbs.com/news/press-releases/blue-cross-and-blue-shield-and-lyft-join-forces-increase-access-health-care> (last accessed: November 19, 2019); (2) Blue Cross Blue Shield of Michigan’s enrollee materials, available at <http://www.mibluecrosscomplete.com/content/dam/microsites/blue-cross-complete/blue-cross-complete-transportation-services.pdf> (last accessed: November 19, 2019); and (3) Blue Shield of California enrollee materials, available at: https://www.blueshieldca.com/provider/content_assets/documents/Announcements/LogistiCare_FAQ.pdf (last accessed: November 19, 2019). Just recently, Florida Blue, the largest qualified health plan issuer in Florida, announced it will offer transportation to enrollees in Exchange plans who have an unmet need, following the lead of other plans. (“Florida Blue to offer Lyft rides to some ACA members,” Orlando Sentinel, Nov. 1, 2019, available at: <https://www.orlandosentinel.com/news/os-ne-florida-blue-lyft-aca-20191101-nmjch7hudojevna73ket4yklyhm-story.html> (last accessed November 20, 2019).)

Data from Other State Demonstrations Reveal Troubling Findings

With exceptions for those who are considered medically frail or have other hardships, Iowa and Indiana have also waived NEMT for their Medicaid expansion population. Evaluations for these programs reveal troubling findings that Georgia may wish to consider. For example, Iowa’s independent initial review report found with statistical significance, that beneficiaries in the expansion population who do not receive NEMT are more likely to have some need for assistance to travel to health visits due to usually or always relying on others for transportation in comparison to Medicaid state plan beneficiaries who received the benefit. While CMS extended the waiver, it required additional evaluation to be conducted, given the lack of clarity on the impact. (<https://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Waivers/1115/downloads/ia/ia-marketplace-choice-plan-ca.pdf>)

Unfortunately, Iowa’s latest evaluation report also makes a number of troubling findings:

- There were significantly more NEMT waiver members reporting unreliable transportation (4%) when compared to Medicaid members (2%), not part of the demonstration. (This 5% figure will likely increase if MCOs do not provide unreimbursed transportation resulting in the creation of a true “control” group which can be compared to the “demonstration” group.)
- NEMT waiver members were significantly more likely to usually or always need transportation help compared to Medicaid members who were not part of the demonstration (22% compared to 18%). (To this end, we applaud CMS’s approval of North Carolina’s Healthy Opportunities pilots, which specifically allow for reimbursement for plans to supplement mandatory non-emergency medical transportation with related supports such as non-medical transportation to social services to support community engagement, payment for public transportation, credits for cost-effective private transportation, and educational assistance in gaining access to public transportation. North Carolina Department of Health and Human Services, “North Carolina’s Healthy Opportunities Pilots: Draft Pilot Service Definitions, Pricing Methodology, and Pricing Inputs, July 15, 2019, available at: <https://files.nc.gov/ncdhhs/documents/Public-Feedback-Pilot-Service-Definitions-and-Pricing-Inputs-FULL-PACKAGE-FINAL.pdf>) This statistically significant difference is one of the largest (4 percent) of all NEMT-related survey data.
- More generally, 11% of all NEMT waiver members and 12% of Medicaid members, not part of the demonstration report an unmet need for transportation, and 8% of both cohorts report they worried “a great deal” about their ability to pay for the cost of transportation to or from a health care visit. This is the case despite the voluntary provision of unreimbursed transportation by MCOs in Iowa to date. This unmet need is not unique to Iowa; it supports a call to action for all states to explore how innovative tools and programs (e.g., GPS tracking, member outreach, decreased wait times, case managers) could be better utilized to provide more reliable NEMT and in turn, financial security and access to care.

Maintaining the NEMT Benefit in Georgia Saves Money in the Long Run

Generally, Georgia and other states cover a specific NEMT trip to a specific individual when certain conditions

are met. As noted above, NEMT is a critical benefit that is only utilized by those with no other means of transportation. Conditions for coverage include:

- The beneficiary is eligible for Medicaid
- The medical service is eligible for Medicaid coverage and medically necessary
- The beneficiary has no other means of getting to and from the medical service
- The NEMT trip is authorized in advance
- The NEMT trip is to the nearest qualified medical provider
- The NEMT trip is the lowest cost available transportation mode that is appropriate for the member

Accordingly, NEMT is preserved for a small minority (6.5-12% in Georgia) of the most vulnerable Medicaid enrollees. According to data from LogistiCare|Circulation and Southeastrans, roughly 10-14% of NEMT rides are provided through lower-cost alternatives, such as mass transit, volunteer drivers, or mileage reimbursement.

Further, using Medicaid claims and clinical guidelines, an MTAC-commissioned study examined whether NEMT, by increasing treatment adherence, saves money for Medicaid programs for three chronic conditions (dialysis, SUD, and diabetic wound care). The study found per 30,000 Medicaid members (10,000 with each condition), Medicaid savings per month is \$40,040,304. (See summary of beneficiary survey data below for more information, including methodology and margin of error. Available at: <https://mtaccoalition.org/study-reveals-non-emergency-medical-transportation-nemt-is-extremely-cost-effective-and-life-saving-to-medicaid-program/>.) This study affirms previous studies which model savings delivered by NEMT. (A report prepared for the Arkansas Health Reform Task Force concluded if access to NEMT services saved only one hospitalization in 100 trips, the return on investment (ROI) would be 10 to 1. Available at: <https://www.stephengroupinc.com/images/engagements/Final-Report-Volume-II.pdf>. Another study conducted by Florida State University found NEMT's ROI factor to be 11 to 1. J. Cronin, Florida Transportation Disadvantaged Programs Return on Investment Study, Florida State University and Marking Institute (2008). Available at: https://ctd.fdot.gov/docs/AboutUsDocs/roi_final_report_0308.pdf.)

Ultimately, a state uses well-managed NEMT as a tool for containing Medicaid spend, which aligns with Georgia's goals in expanding coverage to increase the Pathways population's access to affordable coverage and to improve their health and well-being. This is why, we believe, it is appropriate to preserve NEMT as the state shapes its final waiver application for CMS review.

We appreciate your thoughtful consideration of this letter as part of the administrative record, including the cited resources hyperlinked or otherwise referenced throughout. If you have questions, please contact tricia.beckmann@faegrebd.com.

Sincerely,

Tricia Beckmann, JD
Director, Faegre Baker Daniels Consulting
Advisor to Medical Transportation Access Coalition
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Business/Organization * Mental Health America of Georgia

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Gooding

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

The 1115 waiver would extend Medicaid coverage to residents with earnings below the poverty line only if they meet a burdensome work requirement and pay premiums. There would be no exceptions to the work requirement, meaning people who cannot work due to a disability, serious illness, or caregiving responsibilities could not get coverage. While the state estimates over 408,000 non-elderly uninsured adult Georgians with incomes below the poverty line are uninsured, Georgia projects that only about 50,000 will eventually enroll in Medicaid through the waiver, due to its burdensome requirements. Inadequate mental health and addiction coverage is also tied to our State's crisis of homelessness with at least one-quarter of people experiencing homelessness on any given night in the United States suffer from a serious mental illness.

Individuals with severe and persistent mental illness are in an out of institutions including hospitals, jails and prisons are at higher risk of paying out of pocket cost or taxpayers pay for the beds of individuals unable to meet the requirements outlined in the Medicaid waiver. Imposing burdensome premiums on low-income people and conditioning Medicaid eligibility on payment of those premiums will likely result in many people becoming uninsured. Studies clearly demonstrate that imposing relatively small premiums and cost sharing on low-income individuals can cause them to become uninsured, leading to unmet health needs—like increased mental crises or chronic health conditions that exacerbates stress levels leading to mental illnesses.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

Combined, the state estimates that it will spend about \$322 million – or about \$215 million excluding costs covered by user fees – to extend coverage to just under 80,000 Georgians under the 1332 and 1115 waivers. Instead of pursuing these two harmful waivers, Georgia could accept the ACA's Medicaid expansion and allow all residents earning under 138% of the federal poverty line to qualify for Medicaid coverage. Doing so would extend coverage to between 487,000 and 598,000 residents at a net state cost of \$188 million to \$213 million, according to state estimates. ,

In addition to its far greater benefits for low-income Georgians, Medicaid expansion would also do more to reduce uncompensated care. States that expanded Medicaid saw larger coverage gains and a decrease in uncompensated care costs of 55 percent on average, compared to a decline of only 18 percent in states that did not expand Medicaid. This experience serves as a critical lesson for Georgia, where seven rural hospitals have closed since 2010. Upon the waivers' release, stakeholders warned that the proposals would fall short in addressing the problem of uncompensated care. The 1115 waiver "does not significantly move the needle for the rural and safety net hospitals who care for the state's uninsured patients," according to the Georgia Hospital Association.

Georgia has the opportunity to expand coverage to hundreds of thousands of people that would result in significant benefits to the state's residents, including fewer premature deaths and improved access to care and financial security for people gaining coverage. , It should do so, rather than upending the state's insurance market at great risk to consumers.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

Notably, the waiver also includes a proposal to establish a reinsurance program. Similar programs have been successfully implemented in other states, reducing premiums for unsubsidized consumers. Georgia could move forward with this proposal while dropping the harmful components of the waiver.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

The 1332 waiver introduces complex changes to the policies governing the financial assistance people receive to purchase health coverage under the ACA. Under the waiver, the state would allow tax credits to be used to purchase substandard health plans that exclude coverage for essential health benefits, such as prescription drugs, maternity care, or mental health and substance abuse care. A mental health crisis can occur at any time and the impact of the opioid crisis can leave many Georgians at risk of premature death without access behavioral health care. One in four adults experience a mental illness at some point in their lifetime. In Georgia, suicide is the 10th leading cause of death Without access to affordable and comprehensive health insurance, individuals would be susceptible to out of pocket cost increasing financial hardships.

The 1332 waiver allows changes to policies establishing where and how consumers purchase health coverage that will undermine consumer protections in the ACA. Georgia would privatize functions of the marketplace by removing the state from the federally facilitated exchange platform (HealthCare.gov) without creating their own exchange. Instead, consumers would enroll in coverage only through private web brokers and insurers, exposing them to the same risks posed by direct enrollment in the ACA.

Direct enrollment entities already have a track record of steering consumers towards substandard plans that leave them exposed to catastrophic costs if they get sick, failing to alert consumers of Medicaid eligibility, and not allowing meaningful plan comparisons.

It is also important to note that health plans inequitable coverage of mental health and addiction has profound economic costs that are eventually paid by taxpayers. Mental health conditions are the leading cause of disability in the United States. Depression alone costs our economy \$210 billion a year. Furthermore, when individuals cannot get needed coverage for mental health and addiction care, they frequently lose their jobs, and families often deplete savings and mortgage homes in a desperate attempt to pay for treatment out of pocket, with the end result that individuals end up on Medicaid.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

The ACA waiver fails to meet the statutory "guardrails" intended to ensure that people who live in states that implement an ACA waiver are not worse off than they would be without the waiver. Section 1332(b)(1) of the ACA requires that ACA waivers cover as many people, with coverage as affordable and comprehensive, as without the waiver. However, under the proposed waiver, the coverage that many Georgians would have would be less comprehensive, and more people would find themselves with less affordable coverage and out-of-pocket costs than would be the case without the waiver. Additionally, Georgia may see a reduction, rather than an increase, in coverage under the 1332 waiver.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/12/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * Mercy Care

Stakeholder Type * Provider/Hospital

First Name * [REDACTED] **Last Name *** Lewis

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

Please consider including the Grady pilot (Healthy Georgia Solution) in the 1115 waiver proposal. That is where the innovation comes in -- breaking down barriers not only in Atlanta but also in rural areas where access to physicians, transportation and insurance coverage is limited. Those hospitals could use the infusion of Medicaid in areas they serve. As it is, very few will get and keep coverage.

Giving people who are working an insurance card, does not address many of the reasons they are still using the ERs for care. Putting work requirements before healthcare needs also will negatively impact access to coverage being offered.

Patients with significant health, social, housing and life issues are not in a position to work until their health and social issues are addressed. As a result, Georgia Pathways will benefit only a small number of relatively healthy individuals who are currently employed or meeting other related criteria, not the 350,000 others who with healthcare could become self-sufficient. Job requirements could be phased in after they have had six months to get better.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/12/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Business/Organization * Mercy Care

Stakeholder Type * Provider/Hospital

First Name * [REDACTED] **Last Name *** Siler

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

As part of Atlanta's safety net for the homeless and uninsured, Mercy Care serves a population that is 75% uninsured and living below 100% of the federal poverty level (annual earnings of about \$12,000 for an individual and \$25,000 for a family of four). Sixty-seven percent of our patients are homeless. Our primary care and behavioral health teams are dedicated to helping people thrive by managing chronic illnesses, such as diabetes and hypertension, as well as anxiety and depression. The complex needs of our patients and lack of access to insurance make their work both difficult and essential to the health of metro Atlanta.

Mercy Care has actively supported the state's decision to pursue 1115 and 1332 waivers. We also advocated for the widely supported plan to embed Grady Health System's Healthy Georgia Solution into the waiver proposal. It offers a comprehensive and transformational approach to providing access to care for the uninsured across metro Atlanta and in rural areas. The current plan to implement Georgia Pathways, which looks like traditional Medicaid, does not address the barriers that keep people from staying healthy—lack of transportation, healthy food, health education, etc. The innovative Healthy Georgia Solution could make Georgia a leader in healthcare.

Embedding the Georgia Healthy Solution into the waiver program would also open greater access to specialty services such as cancer and heart care as well as access to more mental health services severely lacking in Georgia. Mercy Care works to increase the number of individuals we serve each year, but our clinics are at capacity with 15,000 patients served in 2018 through over 60,000 visits; 12,000 of those visits meeting mental health needs.

I appreciate the work that has gone into the 1115 waiver proposal, but the barriers built into the Georgia Pathways plan are significant. Putting work requirements before healthcare needs will negatively impact access to coverage being offered. Patients with significant health, social, housing, and life issues are not in a position to work until their health and social issues are addressed. As a result, Georgia Pathways will benefit only a small number of relatively healthy individuals who are currently employed or meeting other related criteria. The state's estimates prove it -- 400,000 uninsured in Georgia live at or below 100% of the federal poverty level, yet only 50,000 individuals across the state will be covered after five years.

I strongly encourage Governor Kemp and the state to reconsider including the Healthy Georgia Solution as part of Georgia Pathways. It is a cost-effective, efficient solution to create a healthier Georgia.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/26/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Business/Organization * MERCY CARE

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Flowers

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

Mercy Care on the proposed 1115 waiver

As part of Atlanta's safety net for the homeless and uninsured, Mercy Care serves a population that is 75% uninsured and living below 100% of the federal poverty level (annual earnings of about \$12,000 for an individual and \$25,000 for a family of four). Sixty-seven percent of our patients are homeless. Our primary care and behavioral health teams are dedicated to helping people thrive by managing chronic illnesses, such as diabetes and hypertension, as well as anxiety and depression. The complex needs of our patients and lack of access to insurance makes their work both difficult and essential to the health of metro Atlanta.

Mercy Care has actively supported the state's decision to pursue 1115 and 1332 waivers. We also advocated for the widely supported plan to embed Grady Health System's Healthy Georgia Solution into the waiver proposal. It offers a comprehensive and transformational approach to providing access to care for the uninsured across metro Atlanta and in rural areas. The current plan to implement Georgia Pathways, which looks like traditional Medicaid, does not address the barriers that keep people from staying healthy—lack of transportation, healthy food, health education, etc. The innovative Healthy Georgia Solution could make Georgia a leader in healthcare.

Imbedding the Georgia Healthy Solution into the waiver program would also open greater access to specialty services such as cancer and heart care as well as access to more mental health services severely lacking in Georgia. Mercy Care works to increase the number of individuals we serve each year, but our clinics are at capacity with 15,000 patients served in 2018 through over 60,000 visits; 12,000 of those visits meeting mental health needs.

We appreciate the work that has gone into the 1115 waiver proposal, but the barriers built into the Georgia Pathways plan are significant. Putting work requirements before healthcare needs will negatively impact access to coverage being offered. Patients with significant health, social, housing and life issues are not in a position to work until their health and social issues are addressed. As a result, Georgia Pathways will benefit only a small number of relatively healthy individuals who are currently employed or meeting other related criteria. The state's own estimates prove it -- 400,000 uninsured in Georgia live at or below of 100% of the federal poverty level, yet only 50,000 individuals across the state will be covered after five years.

We strongly encourage Governor Kemp and the state to reconsider including the Healthy Georgia Solution as part of Georgia Pathways. It is the cost-effective, efficient solution to create a healthier Georgia.

Having worked in the underserved, homeless, marginalized, under insured population in Atlanta for over 20 years, I recognized the need for more affordable means of healthcare. This effort will support a healthier Georgia with great savings cost to the patient and overall health systems cost. Please consider moving this cause forward.

Thank you
Kevin L. Flowers
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Business/Organization * Mercy Care

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Parsons

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

The proposed GA Pathways Plan will not help our clients achieve healthier outcomes in the long run. Our clients are in need and already have many different barriers that keep them from staying healthy. We need a more robust - cost effective solution that will effectively assist the 400,000 uninsured in Georgia especially the clients at Mercy Care!

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

The proposed GA Pathways Plan will not help our clients achieve healthier outcomes in the long run. Our clients are in need and already have many different barriers that keep them from staying healthy. We need a more robust - cost effective solution that will effectively assist the 400,000 uninsured in Georgia especially the clients at Mercy Care!

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * Mercy Care

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Landers

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

Mercy Care on the proposed 1115 waiver

As part of Atlanta's safety net for the homeless and uninsured, Mercy Care serves a population that is 75% uninsured and living below 100% of the federal poverty level (annual earnings of about \$12,000 for an individual and \$25,000 for a family of four). Sixty-seven percent of our patients are homeless. Our primary care and behavioral health teams are dedicated to helping people thrive by managing chronic illnesses, such as diabetes and hypertension, as well as anxiety and depression. The complex needs of our patients and lack of access to insurance makes their work both difficult and essential to the health of metro Atlanta.

Mercy Care has actively supported the state's decision to pursue 1115 and 1332 waivers. We also advocated for the widely supported plan to embed Grady Health System's Healthy Georgia Solution into the waiver proposal. It offers a comprehensive and transformational approach to providing access to care for the uninsured across metro Atlanta and in rural areas. The current plan to implement Georgia Pathways, which looks like traditional Medicaid, does not address the barriers that keep people from staying healthy—lack of transportation, healthy food, health education, etc. The innovative Healthy Georgia Solution could make Georgia a leader in healthcare.

Imbedding the Georgia Healthy Solution into the waiver program would also open greater access to specialty services such as cancer and heart care as well as access to more mental health services severely lacking in Georgia. Mercy Care works to increase the number of individuals we serve each year, but our clinics are at capacity with 15,000 patients served in 2018 through over 60,000 visits; 12,000 of those visits meeting mental health needs.

We appreciate the work that has gone into the 1115 waiver proposal, but the barriers built into the Georgia Pathways plan are significant. Putting work requirements before healthcare needs will negatively impact access to coverage being offered. Patients with significant health, social, housing and life issues are not in a position to work until their health and social issues are addressed. As a result, Georgia Pathways will benefit only a small number of relatively healthy individuals who are currently employed or meeting other related criteria. The state's own estimates prove it -- 400,000 uninsured in Georgia live at or below of 100% of the federal poverty level, yet only 50,000 individuals across the state will be covered after five years.

We strongly encourage Governor Kemp and the state to reconsider including the Healthy Georgia Solution as part of Georgia Pathways. It is the cost-effective, efficient solution to create a healthier Georgia.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Business/Organization * Mercy Care

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Cibulas

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

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(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

Many Georgians require healthcare. In regards to the reinsurance program, cutting out certain benefits, mental health and substance use disorder for differing payment systems does not support whole health and further contributes to stigma which impacts seeking treatment sn contributes deeply to poor health outcomes overall.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

Please see previous comment.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

Please see previous comment.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Business/Organization * Mercy Care

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Baxter

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Program Goals

Comments*

I have served as a board member of St. Joseph's Health system, the parent entity of Mercy Care, for many years and know first hand the great work that Mercy Care does in the Atlanta community and its deep knowledge of how to improve and enhance the services that it provides in partnership with Grady Health System and other partners.

As part of Atlanta's safety net for the homeless and uninsured, Mercy Care serves a population that is 75% uninsured and living below 100% of the federal poverty level (annual earnings of about \$12,000 for an individual and \$25,000 for a family of four). Sixty-seven percent of our patients are homeless. The primary care and behavioral health teams are dedicated to helping people thrive by managing chronic illnesses, such as diabetes and hypertension, as well as anxiety and depression. The complex needs of Mercy Care's patients and lack of access to insurance makes their work both difficult and essential to the health of metro Atlanta.

Mercy Care has actively supported the state's decision to pursue 1115 and 1332 waivers. We also advocated for the widely supported plan to embed Grady Health System's Healthy Georgia Solution into the waiver proposal. It offers a comprehensive and transformational approach to providing access to care for the uninsured across metro Atlanta and in rural areas. The current plan to implement Georgia Pathways, which looks like traditional Medicaid, does not address the barriers that keep people from staying healthy—lack of transportation, healthy food, health education, etc. The innovative Healthy Georgia Solution could make Georgia a leader in healthcare.

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We appreciate the work that has gone into the 1115 waiver proposal, but the barriers built into the Georgia Pathways plan are significant. Putting work requirements before healthcare needs will negatively impact access to coverage being offered. Patients with significant health, social, housing and life issues are not in a position to work until their health and social issues are addressed. As a result, Georgia Pathways will benefit only a small number of relatively healthy individuals who are currently employed or meeting other related criteria. The state's own estimates prove it -- 400,000 uninsured in Georgia live at or below of 100% of the federal poverty level, yet only 50,000 individuals across the state will be covered after five years.

We strongly encourage Governor Kemp and the state to reconsider including the Healthy Georgia Solution as part of Georgia Pathways. It is the cost-effective, efficient solution to create a healthier Georgia.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/13/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Business/Organization * NAMI GA

Stakeholder Type * Advocacy Group

First Name * [REDACTED] **Last Name *** Manley

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

To whom it may concern:

My 38-year-old son suffers from severe schizophrenia, and his quality of life is very poor. He is currently incarcerated in a county jail because of untreated mental illness. People living with severe and persistent mental illness need and deserve proper mental health treatment and care. Both physical and mental health care is a human right and should be treated as such.

Accordingly, it is critically important that mental health parity be a mandated component of any and all health insurance plans. I hereby request that any waiver proposal currently being considered include the enforcement of federal parity legislation. Any loss of federal mandated protections for those with serious mental illness or families seeking mental health care make it harder for people to shop for comprehensive coverage and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity in Georgia will ensure that families with mental health care needs, such as mine, have access to care EQUAL to those with physical health care needs.

Thank you for your time and consideration.

Sincerely,

Dr. Pamela Manley
(character limit of 32,500)

Public Comments

General Information

Comment Date * 11/12/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Business/Organization * NAMI GA.

Stakeholder Type * Advocacy Group

First Name * [REDACTED] **Last Name *** Kinley

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]
1619

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

It is critically important that mental health parity be a mandated component of any of these health insurance plans. We would like to see in any Waiver proposal Georgia move much more decidedly and intentionally toward the enforcement of federal parity legislation. Any loss of federal mandated protections for those with a mental illness or families seeking mental health care make it harder for people to shop for comprehensive coverage, and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity here in the state will ensure that families with mental health care needs have access to care equal to those with physical health care needs.

Those of us who have tried to get care for family members suffering from mental illness know very well how our current healthcare system not only fails our loved ones but breaks their hearts and even their will to survive. Waiving the requirement for federal mental health parity protections in Georgia's Qualified Health Plans will only make already inadequate system that much worse.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Business/Organization * National Alliance on Mental Illness (NAMI)

Stakeholder Type * Advocacy Group

First Name * [REDACTED] **Last Name *** Jones

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

Ryan Loke
c/o The Office of the Governor
206 Washington Street, Suite 115, State Capitol
Atlanta, Georgia 30334

Re: Georgia Section 1332 Draft Waiver Application

Dear Mr. Loke:

NAMI Georgia would like to thank the office of the Governor as well as the General Assembly for making access to health care a priority for Georgians. NAMI Georgia, the state chapter of the National Alliance on Mental Illness, appreciates the opportunity to comment on the Section 1332 Waiver Application. NAMI is the nation's largest grassroots mental health organization dedicated to building better lives for the millions of Americans affected by mental illness, and NAMI Georgia makes up a diverse group of stakeholders and professionals who research, treat, support and deliver services to those with a mental illness - we have 20 affiliates and more than 1,200 members across the state.

Access to coverage and care is essential for people with mental illness to successfully manage their condition and get on a path of recovery. While NAMI Georgia supports reinsurance as a tool to stabilize premiums in the individual marketplace, we would like to see Georgia move more decidedly and intentionally toward quality and affordable health care coverage for people with mental illness. We believe that Georgia can accomplish this goal.

The state's 1332 waiver seeks to be more innovative in the approach to insurance coverage. We would like to see Georgia accomplish this while protecting the 450,000 Georgians who currently get their insurance through the state's marketplace AND expanding coverage to meet the need across the state. Based on the current proposal we offer the following observations:

State Subsidy Program

Georgia has proposed to create a new state-administered subsidy system to replace the Advanced Premium Tax Credits (APTC) created by the ACA. These subsidies will be allowed to be used toward the purchase of "eligible non-QHPs," which could drive individuals towards enrolling in substandard coverage. We ask that greater parameters set around eligibility for non-QHP's to ensure protection for mental health and substance use disorders including comprehensive coverage for individuals with greater healthcare needs without discrimination.

The proposal requests to waive the cost-sharing reduction (CSR) program that helps people with incomes below 250 percent of the federal poverty level (FPL) to pay deductibles, copays, coinsurance and other cost-sharing required by their health plan. According to the 2017 National Survey on Drug Use and Mental Health, one-half of respondents who needed mental health treatment in the past year but did not receive it cited cost-related reasons for not receiving mental health care. Having affordable cost-sharing means that people with mental health conditions can better access the services that they need, when they need them. Affordable cost-sharing is vital to ensuring mental health care is truly accessible. We ask that cost-sharing reductions remain in place for any individual with mental health or substance use disorders. Additionally, we would like to see preventative and training programs incentives included to help reduce premium and co-pay costs.

The proposed state subsidy system could have serious implications for people with mental illness and other individuals in Georgia. Currently, any individual who meets the eligibility criteria for financial assistance for

coverage under the ACA receives that financial assistance. However, people could be placed on a wait list if the state exceeds its capped contribution under the Georgia Access Model, which could further exacerbate many of the affordability issues experienced by families and individuals in need of medication and services. We ask that the proposal amended to include no capped on subsidy funding.

Promotion of Substandard Plans

As mentioned in the previous section, Georgia's proposal would allow subsidies to be used for QHPs currently offered in the state as well as for "eligible non-QHPs." However, the draft waiver application does not contain sufficient information about the standards for eligible non-QHPs.

For so many people with mental health conditions, finding the right provider is a daunting process, and even with insurance, it is getting harder to access care. A recent report illustrates the current shortage of in-network mental health care providers. Specifically, people with mental health or substance use conditions are forced to go out-of-network for inpatient mental health care five times more often than for other types of medical and surgical health care. The draft application requests to waive network adequacy requirements. Specifically we are concerned that curtailing network adequacy requirements could put even more providers out of reach, giving people with mental illness fewer options for treatment.

We ask that more explicit terms to define "eligible" and "standard" as provided by the state. In particular, further clarification is needed to determine what the state means when it says that the plans will maintain protections for people with pre-existing conditions. (For example, even if these plans cannot deny coverage to people with pre-existing conditions, could plans vary premiums based on health status?)

Enrollment Platform

In addition to administering a state subsidy program, Georgia's application proposes to no longer use Healthcare.gov for enrollment and instead have people enroll directly through insurers or brokers. Increasing the reliance on insurers and brokers can limit the ability of people with mental illness to compare plan price and benefit design in an unbiased manner to choose the right plan for them and could ultimately result in harm to patients who become enrolled in sub-standard or inadequate insurance coverage that does not meet their needs.

Today, patients with mental health conditions who shop on Healthcare.gov can trust that they are purchasing a health insurance plan that covers mental health and substance use services. However, under the Georgia Access Model, issuers and brokers could sell QHPs alongside other types of plans. This could create confusion for consumers and lead them to purchase coverage that does not meet their needs. There is already evidence of misleading marketing related to short-term and other skimpy plans leading individuals to unwillingly enroll in coverage that lacks key patient protections.

We ask that Georgia maintain the functionality and ease of use model set forth by the Healthcare.gov website as a neutral consumer platform to which plans are easily compared and recommended based on the individual needs. We further ask that commissions and incentives for brokers are regulated on the site to ensure best interest of the consumer.

Mental Health Parity

Parity means that insurers are required to cover mental health and substance use disorder care in the same way they would cover physical health care. As mentioned earlier, the proposal eliminates protections for individuals with pre-existing conditions by allowing for numerous forms of insurance discrimination. This includes allowing plan structures that will not be required to offer coverage for the essential health benefits, which includes coverage for mental health and substance use disorder care just as insurers would cover physical health care. NAMI Georgia is concerned that the proposal lacks mental health parity as required by Federal Parity legislation passed in 1996 and revised in 2008.

Any loss of federally mandated protections for those with a mental illness or families seeking mental health care make it harder for people to shop for comprehensive coverage, and limits the amount of financial assistance available to Georgians to help lower their costs. Implementation of parity legislation here in the state will ensure that families with mental health care needs have access to care equal to those with physical healthcare needs.

The Governor's office recently reaffirmed the commitment to ensuring access to fair coverage for mental health and substance use treatment with the intention to add the ACA Parity protection to the proposal. We are appreciative of this inclusion and would like to continue to collaborate in an effort to ensure parity is occurring

in private insurance as well as the public insurance sector.

Conclusion

NAMI Georgia applauds the Governor's office and General Assembly focus on solutions that promote adequate, affordable and accessible coverage. We hope to see these efforts continue without jeopardizing access to care for individuals with mental illness and other pre-existing conditions.

Thank you for your consideration.

Kim Jones

Executive Director, NAMI Georgia

executive@namiga.org; 770-234-0855; cell 470-989-1167

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * National Asian Pacific American Women's Forum

Stakeholder Type * Advocacy Group

First Name * [REDACTED] **Last Name *** Forouzan

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** District of Columbia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Other

Comments*

SUBMITTED VIA MEDICAID.GEORGIA.GOV/PATIENTSFIRST
Georgia Department of Community Health (DCH)
2 Peachtree Street, NW
Atlanta, GA 30303

Re: Reconsideration of 1115

To Whom It May Concern:

I write to you on behalf of the National Asian Pacific American Women's Forum (NAPAWF) in response to the proposed 115 and 1332 Medicaid waivers. Access to healthcare is vital for the health and wellbeing of Asian Americans and Pacific Islanders (AAPIs) and other people of color. The proposed waivers, in lieu of full Medicaid expansion, would make even greater the struggle to access care. We strongly urge the Georgia Department of Community Health (DCH) to fully expand Medicaid instead.

NAPAWF is a national, multi-issue organization whose mission is to build a movement to advance the social justice and human rights of Asian American and Pacific Islander (AAPI) women and girls living in the U.S. To that end, we use policy advocacy and community organizing to advance reproductive health and rights, immigrant rights, and economic justice. As a national organization, we work in several different cities with full-time community organizers including, in Chicago, Atlanta, and New York. In addition, our membership comprises of local chapters based in eleven cities across the U.S.

At NAPAWF, we advocate through a reproductive justice lens. Reproductive justice is a framework rooted in the human right to control our bodies, our sexuality, our gender, and our reproduction. Reproductive justice will be achieved when all people, of all immigration statuses, have the economic, social, and political power and resources to define and make decisions about our bodies, health, sexuality, families, and communities in all areas of our lives with dignity and self-determination.

Access to health care is a critical issue in the fight for equality and reproductive justice for AAPI women. Nationally, almost 17 percent of Asian Americans and 34 percent of Native Hawaiians and Pacific Islanders rely on Medicaid for health coverage [1]. In Georgia, 17 percent of Asian Americans lack health insurance [2], and data from 2017 shows that 9 percent of the nonelderly AAPI population was covered by Medicaid [3]. Further, 13 percent of Asian Americans and 27 percent of Native Hawaiians and Pacific Islanders live in poverty [4].

The waivers would not adequately cover the AAPI population in Georgia. The current waivers would expend \$215 million to cover only 80,000 Georgians, while fully expanding Medicaid would expend \$213 million to cover 490,000 Georgians [5]. We thus urge the Georgia Department of Community Health to not adopt the proposed waivers and rather fully expand Medicaid.

1115 Waivers

Like the other proposed waiver, the 1115 waiver falls short of providing access to care for Georgians, particularly AAPI Georgians. Five years after implementation, this proposal would only extend coverage to only 52,509 of the nearly 408,000 Georgians that are currently living under the poverty line and do not qualify for Medicaid [6]. Additionally, this proposal imposes a work requirement on Medicaid recipients [7]. Recipients must demonstrate that they are working in a qualifying activity for at least 80 hours a month [8]. These activities include employment, on-the-job training, job readiness, community service, vocational educational training, and full-time enrollment in higher education [9]. In order to qualify, enrollees must submit documentation like paystubs or transcripts to report their hours [10]. These types of requirements make it especially difficult for women working in low-wage occupations which are usually ones with inconsistent work

hours and/or are in the informal economy and do not provide proof of employment [11]. AAPI women are overrepresented in low-wage workforces making up 4.4 percent, despite only making up to 2.9 percent of the overall workforce [12].

Additionally, Medicaid coverage will be suspended the first month that the reporting requirements are not met, and coverage will be wholly revoked if this requirement is not fulfilled for three months [13]. Work requirements are based on historical stereotypes that stigmatize people of color and are a threat to AAPI women's reproductive health and economic security [14].

Enrollees making between 50 and 100 percent of the federal poverty line will need to pay monthly premiums that range from \$7 to \$11 a month, as well as copayment up to \$30 for certain types of care [15]. Enrollees who miss premium payments for two months have their coverage suspended, and those who miss their payments for three months have their coverage revoked [16]

These changes have the potential to greatly harm AAPI communities. Medicaid work requirements disproportionately harm communities of color, who are more likely to face long-term unemployment and thus will struggle to meet these standards [17]. Asian Americans, Native Hawaiians, and Pacific Islanders have the second-highest rate of long-term unemployment. Certain ethnicities also face particularly high rates of long-term unemployment, such as Vietnamese people (41.5 percent) and Filipino people (34.2 percent) [18]. Additionally, the burdensome documentation requirements to demonstrate participation in qualifying activities will be harder to meet for individuals with limited English proficiency, those working in informal jobs, and those who work as caretakers, disproportionately impacting AAPI communities.

The proposed waivers pose significant burdens on the AAPI community in Georgia. Instead of making Medicaid coverage more accessible, these plans instead impose greater challenges. For AAPI communities in particular, work requirements and language access issues can completely detract from their enrollment under both proposed waivers. A lack of coverage for mental health under the proposed 1332 waiver will also greatly impact AAPI communities, who already face barriers to mental health care access. Ultimately, these proposed waivers will harm AAPI communities and create greater obstacles in lieu of greater coverage under full Medicaid expansion. We urge the Georgia Department of Community Health to rescind these proposed waivers and instead fully expand Medicaid.

For more information, please contact:

Kimya Forouzan, MPH, Esq.*
*Licensed to practice in Pennsylvania
Legal Fellow
National Asian Pacific American Women's Forum
kforouzan@napawf.org

Sources:

[1] Asian & Pacific Islander American Health Forum, Medicaid Work Requirements Will Harm Communities of Color, January 2018, <https://www.apiahf.org/press-release/medicaid-work-requirements-will-harm-communities-of-color/>.

[2] Asian & Pacific Islander American Vote, 2018 State Factsheet Georgia, 2018, <https://www.apiaivote.org/sites/default/files/GA-2018.pdf>

[3] Kaiser Family Foundation, Medicaid Coverage Rate for the Nonelderly by Race/Ethnicity, 2017, <https://www.kff.org/medicaid/state-indicator/rate-by-raceethnicity-3/currentTimeframe=0&sortModel=%7B%22colId%22:%22Location%22,%22sort%22:%22asc%22%7D>.

[4] Id.

[5] Laura Harker, State Health Care Proposals Fall Short and Undermine Comprehensive Health Plans, November 2019, <https://gbpi.org/2019/georgia-health-care-proposals-fall-short-undermine-comprehensive-health-plans/>.

[6] Id.

[7] *Id.*

[8] *Id.*

[9] *Id.*

[10] Harker, *supra*.

[11] National Health Law Program, Fact Sheet: Medicaid Demonstration Waivers & Reproductive Justice, 2018, <https://healthlaw.org/resource/fact-sheet-medicaid-demonstration-waivers-reproductive-justice/>.

[12] Yeung, Miriam, Overcoming the Model Minority Myth: AAPI Women Are Not Paid Equally, American Association of University Women (2016).

[13] Harker, *supra*.

[14] National Health Law Program, *supra*.

[15] *Id.*

[16] *Id.*

[17] Asian & Pacific Islander American Health Forum, *supra*.

[18] Asian & Pacific Islander American Health Forum, *supra*.
(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

SUBMITTED VIA MEDICAID.GEORGIA.GOV/PATIENTSFIRST
Georgia Department of Community Health (DCH)
2 Peachtree Street, NW
Atlanta, GA 30303

Re: Reconsideration of 1332 Medicaid Waivers

To Whom It May Concern:

I write to you on behalf of the National Asian Pacific American Women's Forum (NAPAWF) in response to the proposed 115 and 1332 Medicaid waivers. Access to healthcare is vital for the health and wellbeing of Asian Americans and Pacific Islanders (AAPIs) and other people of color. The proposed waivers, in lieu of full Medicaid expansion, would make even greater the struggle to access care. We strongly urge the Georgia Department of Community Health (DCH) to fully expand Medicaid instead.

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Access to health care is a critical issue in the fight for equality and reproductive justice for AAPI women. Nationally, almost 17 percent of Asian Americans and 34 percent of Native Hawaiians and Pacific Islanders rely on Medicaid for health coverage [1]. In Georgia, 17 percent of Asian Americans lack health insurance [2], and data from 2017 shows that 9 percent of the nonelderly AAPI population was covered by Medicaid [3]. Further, 13 percent of Asian Americans and 27 percent of Native Hawaiians and Pacific Islanders live in poverty [4].

The waivers would not adequately cover the AAPI population in Georgia. The current waivers would expend \$215 million to cover only 80,000 Georgians, while fully expanding Medicaid would expend \$213 million to cover 490,000 Georgians [5]. We thus urge the Georgia Department of Community Health to not adopt the proposed waivers and rather fully expand Medicaid.

1332 Waiver, Phase Two: Georgia Access

The Georgia Access phase of the proposed 1332 waiver would negatively impact AAPI communities in Georgia. This waiver would increase costs for some consumers, particularly families with low- and middle-income who qualify for financial help to purchase insurance [5]. Additionally, it would eliminate the requirement that insurers cover mental health services in the same ways that they cover physical health services, as well as allow insurance companies to more easily offer second-rate plans that do not cover all health services [6]. Lastly, the proposed 1332 waiver allows outreach and enrollment to be conducted by web brokers and insurance companies, as opposed to the neutral federal exchange (healthcare.gov) [7].

These changes are particularly concerning for AAPI Georgians. Specifically, removing coverage for mental

health services has the potential to make this type of care even more inaccessible. For AAPIs, accessing mental health can be an even greater challenge than it is for others due to issues of language access and a lack of cultural competency among services providers, as well as stigma such as the model minority myth, or the assumption that all AAPIs experience educational success and economic stability.

Further, private entities such as insurance companies and web brokers managing outreach and enrollment in lieu of the federal exchange can create barriers to enrollment for AAPI communities, particularly immigrant communities, who may need assistance with language access and with understanding how the healthcare system works in the United States. Instead of housing this information in one centralized, neutral location, the proposed waiver would leave outreach and enrollment to private entities, which will be more focused on selling their plans, as opposed to helping AAPI community members understand and access clear information. This is of particular concern for AAPI communities, as 42 percent of Asian adults and 25 percent of Asian youth have limited English proficiency [8].

The proposed waivers pose significant burdens on the AAPI community in Georgia. Instead of making Medicaid coverage more accessible, these plans instead impose greater challenges. For AAPI communities in particular, work requirements and language access issues can completely detract from their enrollment under both proposed waivers. A lack of coverage for mental health under the proposed 1332 waiver will also greatly impact AAPI communities, who already face barriers to mental health care access. Ultimately, these proposed waivers will harm AAPI communities and create greater obstacles in lieu of greater coverage under full Medicaid expansion. We urge the Georgia Department of Community Health to rescind these proposed waivers and instead fully expand Medicaid.

For more information, please contact:

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Sources:

[1] Asian & Pacific Islander American Health Forum, Medicaid Work Requirements Will Harm Communities of Color, January 2018, <https://www.apiahf.org/press-release/medicaid-work-requirements-will-harm-communities-of-color/>.

[2] Asian & Pacific Islander American Vote, 2018 State Factsheet Georgia, 2018, <https://www.apiavote.org/sites/default/files/GA-2018.pdf>

[3] Kaiser Family Foundation, Medicaid Coverage Rate for the Nonelderly by Race/Ethnicity, 2017, <https://www.kff.org/medicaid/state-indicator/rate-by-raceethnicity-3/currentTimeframe=0&sortModel=%7B%22colId%22:%22Location%22,%22sort%22:%22asc%22%7D>.

[4] Id.

[5] Laura Harker, State Health Care Proposals Fall Short and Undermine Comprehensive Health Plans, November 2019, <https://gbpi.org/2019/georgia-health-care-proposals-fall-short-undermine-comprehensive-health-plans/>.

[6] Id.

[7] Id.

[8] Asian Americans Advancing Justice, Why our Work Matters, <https://advancingjustice-atlanta.org/page/7>.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * National Coalition of 100 Black Women, Inc. - Metropolitan Atlanta Chapter

Stakeholder Type * Advocacy Group

First Name * [REDACTED] **Last Name *** Guyton

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

Comments on the Proposed GA Medicaid Waiver
National Coalition of 100 Black Women, Inc. - Metropolitan Atlanta Chapter

Our Georgia citizens who have been continuously marginalized in many ways will once again be a victim of marginalization if the proposed methodology for the Georgia Medicaid Waiver proceeds as is. It appears that the current proposal will once again diminish the funds in the Georgia coffers that could be used to promote long term health for our underserved citizens. Let's give all of our citizens the opportunity to become and remain healthy with a system that gives access and equity to health resources.

The currently proposed Georgia Medicaid Waiver would overall severely limit the number of eligible participants and limit the kinds of available resources. The current proposal would also subject those who are on the cusp financially to qualify to choose daily between everyday basic needs and paying for healthcare that a full federal expansion could have supported.

We are asking our Governor and lawmakers to rethink this current proposal so as to broaden the scope, making it more inclusive on all levels. Healthy and productive Georgia citizens make for a healthy and productive Georgia.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Business/Organization * National Hemophilia Foundation

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Harp

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Program Goals

Comments*

The National Hemophilia Foundation appreciates the opportunity to submit comments on Georgia's 1115 Demonstration Waiver Application for its Georgia Pathways to Coverage initiative.

NHF is a national non-profit organization that represent individuals affected by bleeding disorders across the United States. Our mission is to ensure that individuals affected by hemophilia and other inherited bleeding disorders have timely access to quality medical care, therapies, and services, regardless of financial circumstances or place of residence.

About Bleeding Disorders

Hemophilia is a rare, genetic bleeding disorder that impairs the ability of blood to clot properly. It affects about 20,000 Americans. Without treatment, people with hemophilia bleed internally, sometimes due to trauma, but other times simply as a result of everyday activities. This bleeding can lead to severe joint damage and permanent disability, or even – with respect to bleeds in the head, throat, or abdomen – death. Related conditions include von Willebrand disease (VWD), another inherited bleeding disorder, which is estimated to affect more than three million Americans.

Patients with bleeding disorders have complex, lifelong medical needs. They depend on prescription medications (clotting factor or other new therapies) to treat or avoid painful bleeding episodes that can lead to advanced medical issues. Current treatment and care are highly effective and allow individuals to lead healthy and productive lives. However, treatment is also extremely expensive, costing anywhere from \$250,000 to \$1 million or more annually, depending on the severity of the disorder and whether complications such as an inhibitor are present. Access to treatment, care, and coverage are all critical needs for people living with bleeding disorders. For low income individuals, Medicaid is a critical path to obtaining necessary coverage.

The Georgia Pathways plan is not a sufficient solution to improve access to quality and affordable healthcare for low-income Georgians. The state estimates that approximately 50,000 individuals would gain coverage under the plan, whereas over 500,000 Georgians could access coverage if the state fully expanded its Medicaid program

The National Hemophilia Foundation opposes the Georgia Pathways program and offers the following comments on the draft waiver application.

Eligibility

Under the Georgia Pathways plan, only individuals with incomes below 100 percent of the federal poverty level (\$1,778 per month for a family of three) who can prove that they work at least 80 hours per month would be eligible for Medicaid. This drastically limits the number of patients with bleeding disorders and other serious and chronic health conditions who will receive access to the quality and affordable healthcare coverage that they need.

While no exemption criteria can prevent the potential coverage, losses associated with work reporting requirements, Georgia has not proposed any exemption criteria that would allow individuals who are unable to meet the work reporting requirements to apply for coverage. This means that patients who have serious health conditions that prevent them from working 80 hours per month would have no pathway to coverage that could help them to treat these conditions. This discrimination against patients with health conditions that prevent them from working is unacceptable.

Once enrolled, individuals may be able to qualify for short-term exemptions in certain situations. Still, The National Hemophilia Foundation is concerned that these exemption criteria may not capture all individuals with

serious and chronic health conditions that prevent them from working. Regardless, even exempt enrollees may have to report their exemption, creating opportunities for administrative error that could jeopardize their coverage. Again, no exemption criteria can circumvent these problems and the serious risk to the health of the people we represent.

For the first six months, members will have to report their hours and work activities monthly. This will put a significant administrative burden on enrollees, which will likely decrease the number of individuals with Medicaid coverage. For example, Arkansas also implemented a work reporting requirement where Medicaid enrollees had to report their hours worked or their exemption. During the first six months of implementation, the state terminated coverage for over 18,000 individuals. Georgia has not provided an estimate of the coverage losses associated with this proposal in its waiver application.

Failing to navigate these burdensome administrative requirements could have serious – even life or death – consequences for people with bleeding disorders. If the state finds that individuals have failed to comply for one month, their coverage will be suspended, and if the state finds that individuals have failed to comply for three months, they will be disenrolled. This would cause extraordinary harm to an individual with a bleeding disorder, as such patients require uninterrupted care and continuous coverage to pay for that care.

If individuals are able to meet the reporting requirements for six consecutive months, they will be exempt from further reporting and re-evaluated for eligibility during their annual redetermination. However, if individuals do not report a change in their employment status, they will be responsible for any capitation and cost-sharing expenses. This exposes already low-income individuals to enormous financial risk. Patients with bleeding disorders have complex, lifelong medical needs. They depend on prescription medications (clotting factor or other new therapies) to treat or avoid painful bleeding episodes that can lead to advanced medical issues. Current treatment and care are highly effective and allow individuals to lead healthy and productive lives. However, treatment is also extremely expensive, costing anywhere from \$250,000 to \$1 million or more annually, depending on the severity of the disorder and whether complications such as an inhibitor are present.

If Georgia truly cares about incentivizing and promoting employment, full Medicaid expansion would be the best way to achieve this goal. In a report looking at the impact of Medicaid expansion in Ohio, the majority of enrollees reported that being enrolled in Medicaid made it easier to work or look for work (83.5 percent and 60 percent, respectively). That report also found that many enrollees were able to get treatment for previously untreated health conditions, which made finding work easier. Preventing individuals from enrolling in Medicaid coverage until they comply with these requirements will therefore hurt rather than help people search for and obtain employment.

Finally, Georgia would be the first state to require enrollees to comply with the work reporting requirement prior to enrolling in the Medicaid program with no opportunity to demonstrate a medical or other exemption. Changing the eligibility for Medicaid is the sole purview of Congress and cannot be waived. The National Hemophilia Foundation opposes this policy.

Financial Barriers

For the few individuals who are able to meet this limited eligibility criteria, the proposal still creates numerous financial barriers that will jeopardize their coverage. Individuals with incomes above 50 percent of the federal poverty level will have to pay monthly premiums and will lose coverage if they fail to pay premiums for three months. This policy would likely both increase the number of enrollees who lose Medicaid coverage and also discourage eligible people from enrolling in the program. Research has shown that even relatively low levels of cost-sharing for low-income populations limit the use of necessary healthcare services. For example, when Oregon implemented a premium in its Medicaid program, with a maximum premium of \$20 per month, almost half of enrollees lost coverage. This would cause extraordinary harm to an individual with a bleeding disorder, as such patients require uninterrupted care and continuous coverage to pay for that care.

This policy will not only apply to – and jeopardize coverage for – new enrollees, but for individuals who are currently enrolled in Medicaid through the Transitional Medical Assistance (TMA) program. Additionally, it unclear how the state may try to recoup capitation and other payments for any months that individuals do not pay their premiums and if, as with the work reporting requirement policy above, patients may be put at significant financial risk. The National Hemophilia Foundation believes that these premiums will create significant financial barriers for patients that jeopardize their access to needed care and therefore opposes this policy.

Georgia's premium proposal also includes an additional surcharge for tobacco users. Research is clear that these surcharges have not been proven effective in helping smokers quit and reducing tobacco use. Recent studies from Health Affairs and the Center for Health and Economics Policy at the Institute for Public Health at Washington University have suggested that tobacco surcharges do not increase tobacco cessation but do lead individuals to forgo health insurance rather than paying the surcharge. Tobacco users often have expensive comorbidities. Charging a tobacco surcharge could cause those enrollees to go without coverage and access to preventive care (including tobacco cessation), allowing comorbid health conditions to worsen, ultimately resulting in more expensive healthcare. The National Hemophilia Foundation opposes this surcharge.

Georgia's proposal also includes a number of copayments for individuals with incomes above 50 percent of the federal poverty level that could be a significant financial burden for patients. The most egregious of these is a \$30 copay for non-emergency use of the emergency department (ED). This policy could deter people from seeking necessary care during an emergency. Delays in care could have harmful impacts on the short- and long-term health of individuals with serious, acute and chronic diseases.

People should not be financially penalized for seeking lifesaving care for bleeding disorders or any other critical health problem that requires immediate care. When people do experience severe symptoms, they should not try to self-diagnose their condition or worry that they cannot afford to seek care. Instead, they must have access to quick diagnosis and treatment in the ED.

Evidence suggests this type of cost sharing may not result in the intended cost savings. Research demonstrates that low-income individuals served by Medicaid are more price sensitive compared to others, more likely to go without needed care, and more likely to experience long-term adverse outcomes. A study of enrollees in Oregon's Medicaid program demonstrated that implementation of a copay on emergency services resulted in decreased utilization of such services but did not result in cost savings because of subsequent use of more intensive and expensive services. This provides further evidence that copays may lead to inappropriate delays in needed care. The National Hemophilia Foundation opposes this punitive proposal for a \$30 copayment for non-emergent use of the ED.

Reduced Benefits

Individuals would be required to enroll in employer sponsored insurance (ESI) if it is available and determined to be cost effective for the state. However, the state would not provide any wraparound services for individuals regardless of the benefit package in their ESI. Patients with bleeding disorders have complex, lifelong medical needs. They depend on prescription medications (clotting factor or other new therapies) to treat or avoid painful bleeding episodes that can lead to advanced medical issues. Access to treatment, care, and coverage are all critical needs for people living with bleeding disorders. Additionally, the state would not help individuals with the costs of coinsurance or deductibles required in their ESI. Treatment for a bleeding is extremely expensive, costing anywhere from \$250,000 to \$1 million or more annually, depending on the severity of the disorder and whether complications such as an inhibitor are present. The National Hemophilia Foundation opposes the requirement to enroll in ESI without wraparound services and full financial protection for patients.

The state has also requested to waive non-emergency transportation (NEMT) for the entire demonstration population. NEMT helps low-income patients overcome barriers to care due to transportation and allows patients to keep appointments with doctors and other healthcare providers. For example, one study found patients with asthma, hypertension or heart disease who needed multiple visits to a medical professional to maintain their health were more likely to keep their appointments if they had NEMT. The National Hemophilia Foundation opposes a waiver of NEMT.

Additional Costs

Administering all of these requirements will be expensive for the state of Georgia. States such as Kentucky, Tennessee and Virginia have estimated that setting up the administrative systems to track and work activities alone will cost tens of millions of dollars. This would divert federal resources from Medicaid's core goal – providing health coverage to those without access to care – and compromise the fiscal health of Georgia's Medicaid program.

The National Hemophilia Foundation opposes this waiver proposal. Instead, we urge Georgia to focus on solutions that promote adequate, affordable and accessible coverage, including a full expansion of the state's Medicaid program.

The National Hemophilia Foundation appreciates the opportunity to submit comments on Georgia's 1115 Demonstration Waiver Application for its Georgia Pathways to Coverage initiative.

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About Bleeding Disorders

Hemophilia is a rare, genetic bleeding disorder that impairs the ability of blood to clot properly. It affects about 20,000 Americans. Without treatment, people with hemophilia bleed internally, sometimes due to trauma, but other times simply as a result of everyday activities. This bleeding can lead to severe joint damage and permanent disability, or even – with respect to bleeds in the head, throat, or abdomen – death. Related conditions include von Willebrand disease (VWD), another inherited bleeding disorder, which is estimated to affect more than three million Americans.

Patients with bleeding disorders have complex, lifelong medical needs. They depend on prescription medications (clotting factor or other new therapies) to treat or avoid painful bleeding episodes that can lead to advanced medical issues. Current treatment and care are highly effective and allow individuals to lead healthy and productive lives. However, treatment is also extremely expensive, costing anywhere from \$250,000 to \$1 million or more annually, depending on the severity of the disorder and whether complications such as an inhibitor are present. Access to treatment, care, and coverage are all critical needs for people living with bleeding disorders. For low income individuals, Medicaid is a critical path to obtaining necessary coverage.

The Georgia Pathways plan is not a sufficient solution to improve access to quality and affordable healthcare for low-income Georgians. The state estimates that approximately 50,000 individuals would gain coverage under the plan, whereas over 500,000 Georgians could access coverage if the state fully expanded its Medicaid program

The National Hemophilia Foundation opposes the Georgia Pathways program and offers the following comments on the draft waiver application.

Eligibility

Under the Georgia Pathways plan, only individuals with incomes below 100 percent of the federal poverty level (\$1,778 per month for a family of three) who can prove that they work at least 80 hours per month would be eligible for Medicaid. This drastically limits the number of patients with bleeding disorders and other serious and chronic health conditions who will receive access to the quality and affordable healthcare coverage that they need.

While no exemption criteria can prevent the potential coverage, losses associated with work reporting requirements, Georgia has not proposed any exemption criteria that would allow individuals who are unable to meet the work reporting requirements to apply for coverage. This means that patients who have serious health conditions that prevent them from working 80 hours per month would have no pathway to coverage that could help them to treat these conditions. This discrimination against patients with health conditions that prevent them from working is unacceptable.

Once enrolled, individuals may be able to qualify for short-term exemptions in certain situations. Still, The National Hemophilia Foundation is concerned that these exemption criteria may not capture all individuals with serious and chronic health conditions that prevent them from working. Regardless, even exempt enrollees may have to report their exemption, creating opportunities for administrative error that could jeopardize their coverage. Again, no exemption criteria can circumvent these problems and the serious risk to the health of the people we represent.

For the first six months, members will have to report their hours and work activities monthly. This will put a significant administrative burden on enrollees, which will likely decrease the number of individuals with Medicaid coverage. For example, Arkansas also implemented a work reporting requirement where Medicaid enrollees had to report their hours worked or their exemption. During the first six months of implementation, the state terminated coverage for over 18,000 individuals. Georgia has not provided an estimate of the coverage losses associated with this proposal in its waiver application.

Failing to navigate these burdensome administrative requirements could have serious – even life or death – consequences for people with bleeding disorders. If the state finds that individuals have failed to comply for one month, their coverage will be suspended, and if the state finds that individuals have failed to comply for three months, they will be disenrolled. This would cause extraordinary harm to an individual with a bleeding disorder, as such patients require uninterrupted care and continuous coverage to pay for that care.

If individuals are able to meet the reporting requirements for six consecutive months, they will be exempt from further reporting and re-evaluated for eligibility during their annual redetermination. However, if individuals do not report a change in their employment status, they will be responsible for any capitation and cost-sharing expenses. This exposes already low-income individuals to enormous financial risk. Patients with bleeding disorders have complex, lifelong medical needs. They depend on prescription medications (clotting factor or other new therapies) to treat or avoid painful bleeding episodes that can lead to advanced medical issues. Current treatment and care are highly effective and allow individuals to lead healthy and productive lives. However, treatment is also extremely expensive, costing anywhere from \$250,000 to \$1 million or more annually, depending on the severity of the disorder and whether complications such as an inhibitor are present.

If Georgia truly cares about incentivizing and promoting employment, full Medicaid expansion would be the best way to achieve this goal. In a report looking at the impact of Medicaid expansion in Ohio, the majority of enrollees reported that being enrolled in Medicaid made it easier to work or look for work (83.5 percent and 60 percent, respectively). That report also found that many enrollees were able to get treatment for previously untreated health conditions, which made finding work easier. Preventing individuals from enrolling in Medicaid coverage until they comply with these requirements will therefore hurt rather than help people search for and obtain employment.

Finally, Georgia would be the first state to require enrollees to comply with the work reporting requirement prior to enrolling in the Medicaid program with no opportunity to demonstrate a medical or other exemption. Changing the eligibility for Medicaid is the sole purview of Congress and cannot be waived. The National Hemophilia Foundation opposes this policy.

Financial Barriers

For the few individuals who are able to meet this limited eligibility criteria, the proposal still creates numerous financial barriers that will jeopardize their coverage. Individuals with incomes above 50 percent of the federal poverty level will have to pay monthly premiums and will lose coverage if they fail to pay premiums for three months. This policy would likely both increase the number of enrollees who lose Medicaid coverage and also discourage eligible people from enrolling in the program. Research has shown that even relatively low levels of cost-sharing for low-income populations limit the use of necessary healthcare services. For example, when Oregon implemented a premium in its Medicaid program, with a maximum premium of \$20 per month, almost half of enrollees lost coverage. This would cause extraordinary harm to an individual with a bleeding disorder, as such patients require uninterrupted care and continuous coverage to pay for that care.

This policy will not only apply to – and jeopardize coverage for – new enrollees, but for individuals who are currently enrolled in Medicaid through the Transitional Medical Assistance (TMA) program. Additionally, it unclear how the state may try to recoup capitation and other payments for any months that individuals do not pay their premiums and if, as with the work reporting requirement policy above, patients may be put at significant financial risk. The National Hemophilia Foundation believes that these premiums will create significant financial barriers for patients that jeopardize their access to needed care and therefore opposes this policy.

Georgia's premium proposal also includes an additional surcharge for tobacco users. Research is clear that these surcharges have not been proven effective in helping smokers quit and reducing tobacco use. Recent studies from Health Affairs and the Center for Health and Economics Policy at the Institute for Public Health at Washington University have suggested that tobacco surcharges do not increase tobacco cessation but do lead individuals to forgo health insurance rather than paying the surcharge. Tobacco users often have expensive comorbidities. Charging a tobacco surcharge could cause those enrollees to go without coverage and access to preventive care (including tobacco cessation), allowing comorbid health conditions to worsen, ultimately resulting in more expensive healthcare. The National Hemophilia Foundation opposes this surcharge.

Georgia's proposal also includes a number of copayments for individuals with incomes above 50 percent of the federal poverty level that could be a significant financial burden for patients. The most egregious of these is a

\$30 copay for non-emergency use of the emergency department (ED). This policy could deter people from seeking necessary care during an emergency. Delays in care could have harmful impacts on the short- and long-term health of individuals with serious, acute and chronic diseases.

People should not be financially penalized for seeking lifesaving care for bleeding disorders or any other critical health problem that requires immediate care. When people do experience severe symptoms, they should not try to self-diagnose their condition or worry that they cannot afford to seek care. Instead, they must have access to quick diagnosis and treatment in the ED.

Evidence suggests this type of cost sharing may not result in the intended cost savings. Research demonstrates that low-income individuals served by Medicaid are more price sensitive compared to others, more likely to go without needed care, and more likely to experience long-term adverse outcomes. A study of enrollees in Oregon's Medicaid program demonstrated that implementation of a copay on emergency services resulted in decreased utilization of such services but did not result in cost savings because of subsequent use of more intensive and expensive services. This provides further evidence that copays may lead to inappropriate delays in needed care. The National Hemophilia Foundation opposes this punitive proposal for a \$30 copayment for non-emergent use of the ED.

Reduced Benefits

Individuals would be required to enroll in employer sponsored insurance (ESI) if it is available and determined to be cost effective for the state. However, the state would not provide any wraparound services for individuals regardless of the benefit package in their ESI. Patients with bleeding disorders have complex, lifelong medical needs. They depend on prescription medications (clotting factor or other new therapies) to treat or avoid painful bleeding episodes that can lead to advanced medical issues. Access to treatment, care, and coverage are all critical needs for people living with bleeding disorders. Additionally, the state would not help individuals with the costs of coinsurance or deductibles required in their ESI. Treatment for a bleeding is extremely expensive, costing anywhere from \$250,000 to \$1 million or more annually, depending on the severity of the disorder and whether complications such as an inhibitor are present. The National Hemophilia Foundation opposes the requirement to enroll in ESI without wraparound services and full financial protection for patients.

The state has also requested to waive non-emergency transportation (NEMT) for the entire demonstration population. NEMT helps low-income patients overcome barriers to care due to transportation and allows patients to keep appointments with doctors and other healthcare providers. For example, one study found patients with asthma, hypertension or heart disease who needed multiple visits to a medical professional to maintain their health were more likely to keep their appointments if they had NEMT. The National Hemophilia Foundation opposes a waiver of NEMT.

Additional Costs

Administering all of these requirements will be expensive for the state of Georgia. States such as Kentucky, Tennessee and Virginia have estimated that setting up the administrative systems to track and work activities alone will cost tens of millions of dollars. This would divert federal resources from Medicaid's core goal – providing health coverage to those without access to care – and compromise the fiscal health of Georgia's Medicaid program.

The National Hemophilia Foundation opposes this waiver proposal. Instead, we urge Georgia to focus on solutions that promote adequate, affordable and accessible coverage, including a full expansion of the state's Medicaid program.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Business/Organization * National Hemophilia Foundation

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Harp

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

The National Hemophilia Foundation appreciates the opportunity to submit comments on Georgia's Section 1332 Waiver Application to implement the Georgia Access Model.

NHF is a national non-profit organization that represent individuals affected by bleeding disorders across the United States. Our mission is to ensure that individuals affected by hemophilia and other inherited bleeding disorders have timely access to quality medical care, therapies, and services, regardless of financial circumstances or place of residence.

About Bleeding Disorders

Hemophilia is a rare, genetic bleeding disorder that impairs the ability of blood to clot properly. It affects about 20,000 Americans. Without treatment, people with hemophilia bleed internally, sometimes due to trauma, but other times simply as a result of everyday activities. This bleeding can lead to severe joint damage and permanent disability, or even – with respect to bleeds in the head, throat, or abdomen – death. Related conditions include von Willebrand disease (VWD), another inherited bleeding disorder, which is estimated to affect more than three million Americans.

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While, The National Hemophilia Foundation supports reinsurance as a tool to stabilize premiums in the individual marketplace, we are deeply concerned that the Georgia Access Model will jeopardize access to quality and affordable healthcare coverage for patients with bleeding disorders and other pre-existing conditions. The state's 1332 waiver fails to satisfy the guardrails in the statutory language of the Affordable Care Act (ACA) requiring that coverage must be as affordable as it would be without the waiver; coverage must be as comprehensive as it would be without the waiver; a comparable number of people must be covered under the waiver as would be without it; and the waiver must not add to the federal deficit. The waiver would also put the healthcare coverage of the 450,000 Georgians who currently get their insurance through the state's marketplace at risk while only attempting to expand coverage for a small fraction (30,000 individuals) of the more than 1.4 million uninsured individuals in Georgia. The National Hemophilia Foundation urges Georgia to withdraw its application for the Georgia Access Model.

State Subsidy Program

Georgia has proposed to create a new state-administered subsidy system to replace the Advanced Premium Tax Credits (APTC) created by the ACA. These subsidies are not satisfactory to meet the affordability needs of patients with bleeding disorders and will be allowed to be used toward the purchase of "eligible non-QHPs," driving individuals towards enrolling in substandard coverage. The proposal will reduce access to affordable healthcare coverage for patients with bleeding disorders and The National Hemophilia Foundation opposes this change.

First, the draft application requests to waive the cost-sharing reduction (CSR) program that helps patients with incomes below 250 percent of the federal poverty level (FPL) to pay deductibles, coinsurance and other cost-sharing required by their health plan. It is unclear whether individuals who currently qualify for CSRs under the ACA will still get this financial assistance under the state-administered subsidy system. Treatments for a bleeding disorder extremely expensive, costing anywhere from \$250,000 to \$1 million or more annually,

depending on the severity of the disorder and whether complications such as an inhibitor are present. For low income individuals, this cost saving tool, is a critical path to obtaining necessary coverage.

Additionally, the state has likely underestimated the impact of the Georgia Access Model on premiums in Georgia. Eligible non-QHPs will attract healthier consumers, segmenting the market and increasing the cost of comprehensive coverage. Additionally, as discussed later in our comments, the loss of Healthcare.gov and the incentives for insurers and brokers selling products outside of an exchange will likely boost enrollment in short-term and other skimpy plans, further undermining the risk pool and destabilizing the market. A substantially greater premium increase would both make QHPs more expensive for individuals who do not qualify for subsidies and also increase the cost of QHP subsidies for the state, meaning that the state's pool of financial assistance funds would not be able to help as many individuals.

The state subsidy system is significantly under-resourced, which would have serious implications for patients with bleeding disorders and other individuals in Georgia. The state has budgeted \$13.5 million in the first three years and \$5 million thereafter for implementation costs, which seems quite low given the significant investments in new technical and administrative systems needed to operate the Georgia Access Model. Additionally, the state's contribution to the subsidy fund is just \$144 million in 2022, which will not go far if the Georgia Access Model increases premiums as predicted above. This lack of funding is particularly dangerous for patients given the Georgia Access Model's cap on subsidy funding. Currently, any individual who meets the eligibility criteria for financial assistance for coverage under the ACA receives that financial assistance. However, patients could be placed on a wait list if the state exceeds its capped contribution under the Georgia Access Model. Patients with bleeding disorders have complex, lifelong medical needs. They depend on prescription medications (clotting factor or other new therapies) to treat or avoid painful bleeding episodes that can lead to advanced medical issues. Any type of delay could have severe impacts for patients with a bleeding disorder.

Promotion of Substandard Plans

As mentioned in the previous section, Georgia's proposal would allow subsidies to be used for QHPs currently offered in the state as well as for "eligible non-QHPs." This will result in more individuals enrolling in less comprehensive coverage and The National Hemophilia Foundation opposes this change.

The draft waiver application does not contain sufficient information about the standards for eligible non-QHPs, particularly what the state means when it says that the plans will maintain protections for people with pre-existing conditions. For example, even if these plans cannot deny coverage to patients with pre-existing conditions, could plans vary premiums based on health status? Protecting patients with bleeding disorders and other pre-existing conditions involves much more than guarantee issue; patients need community rating, bans on exclusion periods and condition exclusions, cost-sharing protections, bans on annual and lifetime limits and many other protections currently required for plans sold on the individual market to truly access comprehensive, affordable healthcare coverage.

Other aspects of the standards for these plans are unclear as well. The draft application requests to waive network adequacy requirements. Access to treatment, care, and coverage are all critical needs for people living with bleeding disorders. Additionally, it is unclear how eligible non-QHPs could be part of the single risk pool with current QHPs given how dissimilar these products could be. This would make risk adjustment – a process that discourages plans from cherry-picking healthier individuals by transferring funds from plans with lower risk enrollees to higher risk ones – difficult to implement.

The draft application does clearly state that eligible non-QHPs would not have to cover all ten essential health benefits (EHBs), which are currently required by QHPs. The state claims that eligible non-QHPs will provide 90 percent of the benefits that current QHPs cover. However, the state provides no explanation or analysis to support this assumption. Patients with bleeding disorders should have access to all essential health benefits (EHBs). By offering plans that do not cover all EHBs but are still eligible for subsidies, issuers will be able to segment the market and charge lower premiums to healthier individuals for eligible non-QHPs while charging high premiums for patients with pre-existing conditions who need comprehensive coverage. This is a backdoor to discrimination against patients with pre-existing conditions.

Finally, given the destabilizing impact of the state subsidy program on the individual marketplace, it is possible that some issuers may rethink their decisions to offer QHPs in Georgia. Yet the state assumes that issuers will still offer QHPs in all ratings areas after the implementation of the new state subsidy program with no explanation to support that assumption. If this assumption does not hold, patients in some areas of the state would no longer have access to comprehensive care and have to choose between eligible non-QHPs or other

skimpy plans or going without coverage. Access to treatment, care, and coverage are all critical needs for people living with bleeding disorders.

Enrollment Platform

In addition to administering a state subsidy program, Georgia's application proposes to no longer use Healthcare.gov for enrollment and instead have people enroll directly through insurers or brokers. This policy will make it harder for patients to enroll in comprehensive, affordable healthcare coverage and The National Hemophilia Foundation opposes this change.

While the state acknowledges that leaving Healthcare.gov would require a detailed transition strategy, The National Hemophilia Foundation fears that some of the 450,000 Georgians who currently purchase coverage through Healthcare.gov would inevitably lose coverage during the transition. Continuous access to treatment, care, and coverage are all critical needs for people living with bleeding disorders.

The state assumes that there will be no coverage losses without any analysis to support that assumption, calling into question whether the Georgia Access Model will truly lead the same or more people to obtain coverage than would without the waiver.

Today, patients with bleeding disorders who shop on Healthcare.gov can trust that they are purchasing a health insurance plan that will allow them to manage their health conditions. However, under the Georgia Access Model, issuers and brokers could sell QHPs alongside other types of plans that discriminate against people with pre-existing conditions and will not cover enrollees' medical expenses if they get sick. This could create confusion for patients and lead them to purchase coverage that does not meet their needs. There is already evidence of misleading marketing related to short-term and other skimpy plans leading individuals to unwillingly enroll in coverage that lacks key patient protections. This problem would likely worsen in Georgia under this proposal.

Healthcare.gov shows consumers all QHPs available in their area and does not favor certain plans over others. However, brokers who would be helping individuals through the enrollment process under the Georgia Access Model would not have to show individuals all of their plan options and may receive larger commissions for certain plans over others that influence their recommendations to patients. Increasing the reliance on insurers and brokers will limit the ability of patients with bleeding disorders to compare plan price and benefit design in an unbiased manner to choose the right plan for them and could ultimately result in harm to patients who become enrolled in sub-standard or inadequate insurance coverage that does not meet their needs. This failure to appropriately shield patients from risk is unacceptable.

The National Hemophilia Foundation opposes this waiver proposal. Instead, we urge Georgia to focus on solutions that promote adequate, affordable and accessible coverage without jeopardizing access to care for patients with bleeding disorders and other pre-existing conditions.

Thank you for your consideration.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Business/Organization * National Hemophilia Foundation

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Harp

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** [REDACTED] **Zip** [REDACTED]

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

The National Hemophilia Foundation appreciates the opportunity to submit comments on Georgia's Section 1332 Waiver Application for a reinsurance program.

NHF is a national non-profit organization that represent individuals affected by bleeding disorders across the United States. Our mission is to ensure that individuals affected by hemophilia and other inherited bleeding disorders have timely access to quality medical care, therapies, and services, regardless of financial circumstances or place of residence.

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Hemophilia is a rare, genetic bleeding disorder that impairs the ability of blood to clot properly. It affects about 20,000 Americans. Without treatment, people with hemophilia bleed internally, sometimes due to trauma, but other times simply as a result of everyday activities. This bleeding can lead to severe joint damage and permanent disability, or even – with respect to bleeds in the head, throat, or abdomen – death. Related conditions include von Willebrand disease (VWD), another inherited bleeding disorder, which is estimated to affect more than three million Americans.

Patients with bleeding disorders have complex, lifelong medical needs. They depend on prescription medications (clotting factor or other new therapies) to treat or avoid painful bleeding episodes that can lead to advanced medical issues. Current treatment and care are highly effective and allow individuals to lead healthy and productive lives. However, treatment is also extremely expensive, costing anywhere from \$250,000 to \$1 million or more annually, depending on the severity of the disorder and whether complications such as an inhibitor are present. Access to treatment, care, and coverage are all critical needs for people living with bleeding disorders.

The National Hemophilia Foundation believes everyone should have quality and affordable healthcare coverage. A strong, robust marketplace is essential for people with bleeding disorders to access the coverage that they need. The National Hemophilia Foundation supports the use of reinsurance programs to strengthen state marketplaces.

Reinsurance is an important tool to help stabilize health insurance markets. Reinsurance programs help insurance companies cover the claims of very high cost enrollees, which in turn keeps premiums affordable for other individuals buying insurance on the individual market. Reinsurance programs have been used to stabilize premiums in a number of healthcare programs, such as Medicare Part D. A temporary reinsurance fund for the individual market was also established under the Affordable Care Act and reduced premiums by an estimated 10 to 14 percent in its first year. A recent analysis by Avalere of seven states that have already created their own reinsurance programs through Section 1332 waivers found that these states reduced individual market premiums by an average of 19.9 percent in their first year.

Georgia's proposal will create a reinsurance program starting for the 2021 plan year. This program is projected to reduce premiums by 10 percent and increase the number of individuals obtaining health insurance through the individual market by about 1,400. This would help patients with pre-existing conditions, including patients with bleeding disorders, obtain affordable, comprehensive coverage.

While The National Hemophilia Foundation supports reinsurance as a tool to stabilize premiums in the individual marketplace, we are deeply concerned that the remainder of the state's 1332 Waiver Application will jeopardize access to quality and affordable healthcare coverage for patients with bleeding disorders and other pre-existing conditions, as we have outlined in our related comments on the Georgia Access Model.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * National MS Society

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Breeden

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

The National Multiple Sclerosis Society (Society) appreciates the opportunity to submit comments on Georgia's 1115 Demonstration Waiver Application for its Georgia Pathways to Coverage initiative.

Nearly one million people are living with multiple sclerosis (MS) in the United States, more than twice the original estimate. MS is an unpredictable, often disabling disease of the central nervous system that disrupts the flow of information within the brain, and between the brain and body. Symptoms vary from person to person and range from numbness and tingling, to walking difficulties, fatigue, dizziness, pain, depression, blindness and paralysis. The progress, severity and specific symptoms of MS in any one person cannot yet be predicted but advances in research and treatment are leading to better understanding and moving us closer to a world free of MS.

The Georgia Pathways plan is not a sufficient solution to improve access to quality and affordable healthcare for low-income Georgians. The state estimates that approximately 50,000 individuals would gain coverage under the plan, whereas over 500,000 Georgians could access coverage if the state fully expanded its Medicaid program. Medicaid is a critical safety net program that provides an array of benefits and services for individuals living with MS such as access to rehabilitative services and durable medical equipment (including wheelchairs), which allow people with MS to maintain their health and well-being. Medicaid also provides essential prescription drug access. Studies show that early and ongoing treatment with a disease-modifying therapy is the best way to modify the course of the disease, slow the accumulation of disability and protect the brain from damage due to MS. Adherence to medication is a key element of treatment effectiveness. Medicaid is also our country's primary payer for long-term services and supports, including home- and community-based services that allow people with MS to remain independent and avoid premature admission to costlier facilities such as nursing homes. All Georgians should have access to quality, affordable and comprehensive health care.

The Society opposes the Georgia Pathways program and offers the following comments on the draft waiver application.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

Under the Georgia Pathways plan, only individuals with incomes below 100 percent of the federal poverty level (\$1,778 per month for a family of three) who can prove that they work at least 80 hours per month would be eligible for Medicaid. This drastically limits the number of patients with MS and other serious and chronic health conditions who will receive access to the quality and affordable healthcare coverage that they need.

While no exemption criteria can prevent the potential coverage losses associated with work reporting requirements, Georgia has not proposed any exemption criteria that would allow individuals who are unable to meet the work reporting requirements to apply for coverage. This means that patients who have serious health conditions that prevent them from working 80 hours per month would have no pathway to coverage that could help them to treat these conditions. This discrimination against patients with health conditions that prevent them from working is unacceptable. Most people with MS are diagnosed between the ages of 20 and 50 - prime working years. Some people with MS will need to transition to part-time, flexible employment to

accommodate their disease and its symptoms. Others whose MS has progressed greatly are unable to work at all. Fewer than half of all individuals with MS are in the workforce ten years after their diagnosis. People with MS should not be penalized if their health condition prevents them from working, particularly in a manner that revokes health coverage and access to costly treatments and services. The Society believes work requirements will jeopardize patients' access to care and harm individuals with serious, acute and chronic diseases such as MS.

Once enrolled, individuals may be able to qualify for short-term exemptions in certain situations. Still, the Society is concerned that these exemption criteria may not capture all individuals with serious and chronic health conditions that prevent them from working. Furthermore, people with MS may experience significant MS symptoms or exacerbations that temporarily interfere with their ability to work, but they may not qualify for an SSDI exemption or may not be considered "medically frail." Having to endure an administrative process in order to be deemed sick enough to qualify for an exemption may be lengthy, time consuming and mentally exhausting for people with MS. There will undoubtedly be deliberation about whether or not certain persons with MS qualify for an exemption and this could result in a gap in coverage. Regardless, even exempt enrollees may have to report their exemption, creating opportunities for administrative error that could jeopardize their coverage. Again, no exemption criteria can circumvent these problems and the serious risk to the health of the people we represent.

For the first six months, members will have to report their hours and work activities monthly. This will put a significant administrative burden on enrollees, which will likely decrease the number of individuals with Medicaid coverage. For example, Arkansas also implemented a work reporting requirement where Medicaid enrollees had to report their hours worked or their exemption. During the first six months of implementation, the state terminated coverage for over 18,000 individuals. Georgia has not provided an estimate of the coverage losses associated with this proposal in its waiver application.

Failing to navigate these burdensome administrative requirements could have serious – even life or death – consequences for people with MS. If the state finds that individuals have failed to comply for one month, their coverage will be suspended, and if the state finds that individuals have failed to comply for three months, they will be disenrolled. A growing body of evidence indicates that early and ongoing treatment with a Food and Drug Administration (FDA) approved disease-modifying therapy (DMT) is the best way to manage the MS disease course, prevent accumulation of disability and protect the brain from damage due to MS. Loss of coverage, or even a gap in access to critical treatment, may result in increased disease activity, loss of function and possible irreversible progression of disability.

If individuals are able to meet the reporting requirements for six consecutive months, they will be exempt from further reporting and re-evaluated for eligibility during their annual redetermination. However, if individuals do not report a change in their employment status, they will be responsible for any capitation and cost-sharing expenses. This exposes already low-income individuals to enormous financial risk. The financial impact of living with MS is high. In 2019, the median price for brand name MS DMTs is \$88,853. In addition to the cost of medications, people with MS can require costly visits to the doctor, hospital, or specialists. To lose coverage in the middle of treatment would have a disastrous effect on an individual's physical and emotional health, and financial well-being.

If Georgia truly cares about incentivizing and promoting employment, full Medicaid expansion would be the best way to achieve this goal. In a report looking at the impact of Medicaid expansion in Ohio, the majority of enrollees reported that being enrolled in Medicaid made it easier to work or look for work (83.5 percent and 60 percent, respectively). That report also found that many enrollees were able to get treatment for previously untreated health conditions, which made finding work easier. Preventing individuals from enrolling in Medicaid coverage until they comply with these requirements will therefore hurt rather than help people search for and obtain employment.

Finally, Georgia would be the first state to require enrollees to comply with the work reporting requirement prior to enrolling in the Medicaid program with no opportunity to demonstrate a medical or other exemption. Changing the eligibility for Medicaid is the sole purview of Congress and cannot be waived. The Society opposes this policy.

(character limit of 32,500)

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Comment Topic * Premiums, Copayments, Member Rewards Account

Comments *

For the few individuals able to meet this limited eligibility criteria, the proposal creates numerous financial barriers that will jeopardize their coverage. Individuals with incomes above 50 percent of the federal poverty level will have to pay monthly premiums and will lose coverage if they fail to pay premiums for three months. This policy would likely increase the number of enrollees who lose Medicaid coverage and also discourage eligible people from enrolling in the program. Research has shown that even relatively low levels of cost-sharing for low-income populations limit the use of necessary healthcare services. For example, when Oregon implemented a premium in its Medicaid program, with a maximum premium of \$20 per month, almost half of enrollees lost coverage. The Society believes that premiums are a barrier to healthcare access, particularly for individuals with pre-existing conditions such as MS. Even small premium amounts may be substantial for a low-income person or family, potentially making coverage unaffordable for those who need it most. A broad array of studies demonstrate that imposing premiums on low-income individuals creates a barriers to care and fails to improve health outcomes.

This policy will not only apply to – and jeopardize coverage for – new enrollees, but for individuals who are currently enrolled in Medicaid through the Transitional Medical Assistance (TMA) program. Additionally, it unclear how the state may try to recoup capitation and other payments for any months that individuals do not pay their premiums and if, as with the work reporting requirement policy above, patients may be put at significant financial risk. The Society believes that these premiums will create significant financial barriers for patients that jeopardize their access to needed care and therefore opposes this policy.

Georgia's premium proposal also includes an additional surcharge for tobacco users. Research is clear that these surcharges have not been proven effective in helping smokers quit and reducing tobacco use. Recent studies from Health Affairs and the Center for Health and Economics Policy at the Institute for Public Health at Washington University have suggested that tobacco surcharges do not increase tobacco cessation but do lead individuals to forgo health insurance rather than paying the surcharge. Tobacco users often have expensive comorbidities. Charging a tobacco surcharge could cause those enrollees to go without coverage and access to preventive care (including tobacco cessation), allowing comorbid health conditions to worsen, ultimately resulting in more expensive healthcare. The Society opposes this surcharge.

Georgia's proposal also includes multiple copayments for individuals with incomes above 50 percent of the federal poverty level that could be a significant financial burden for patients. The most egregious of these is a \$30 copay for non-emergency use of the emergency department (ED). This policy could deter people from seeking necessary care during an emergency. Individuals living with MS face significant health challenges and sometimes must seek treatment for an exacerbation at an emergency room. An exacerbation can cause new symptoms or the worsening of existing symptoms. Individuals living with MS experience commonly experience increased numbness, tingling or weakness during an exacerbation. That person might not able to tell if the sudden numbness or weakness is a temporary exacerbation, or something more serious, like a stroke or heart attack.

People should not be financially penalized for seeking care for potentially dangerous MS symptoms or any other critical health problem requiring immediate care. When people do experience severe symptoms, they should not try to self-diagnose their condition or worry that they cannot afford to seek care. Instead, they need access to a rapid diagnosis and treatment in an emergency medicine setting.

Evidence suggests this type of cost sharing as proposed by Georgia may not result in the intended cost savings. Research demonstrates that low-income individuals served by Medicaid are more price sensitive compared to others, more likely to go without needed care, and more likely to experience long-term adverse outcomes. A study of enrollees in Oregon's Medicaid program demonstrated that implementation of a copay on emergency services resulted in decreased utilization of such services but did not result in cost savings because of subsequent use of more intensive and expensive services. This provides further evidence that copays may lead to inappropriate delays in needed care. The Society opposes this punitive proposal for a \$30 copayment for non-emergent use of the emergency department.

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Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Employer Sponsored Insurance

Comments *

Individuals would be required to enroll in employer sponsored insurance (ESI) if it is available and determined to be cost effective for the state. However, the state would not provide any wraparound services for individuals regardless of the benefit package in their ESI. People living with MS may require care from neurology, rehabilitation, radiology, mental health and other specialists, as well as treatments, services and products from pharmacies, durable medical equipment providers, home care agencies and more to live their best lives. If benefit design of an ESI plan does not offer comprehensive coverage, an individual living with MS would have to forgo critical care. Additionally, the state would not help individuals with the costs of coinsurance or deductibles required in their ESI. If an individual is not able afford to pay their premiums and other cost-sharing requirements, they would go without recommended disease modifying therapies which have shown to reduce disease activity and disease progression. Interruptions in treatment reduces effectiveness and health outcomes will decline as financial burdens hinder the individual's ability to pursue and receive care, and may eventually result in the individual being unable to work due to their declining health. The Society opposes the requirement to enroll in ESI without wraparound services and full financial protection for patients.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic * Other

Comments *

The state also requests to waive non-emergency transportation (NEMT) for the entire demonstration population. NEMT helps low-income patients overcome barriers to care due to transportation and allows patients to keep appointments with doctors and other healthcare providers. For example, one study found patients with asthma, hypertension or heart disease who needed multiple visits to a medical professional to maintain their health were more likely to keep their appointments if they had NEMT. The Society opposes a waiver of NEMT.

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Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic * State Program Cost and Budget

Comments *

Administering these requirements will be expensive for the state of Georgia. States such as Kentucky, Tennessee and Virginia have estimated that setting up the administrative systems to track and work activities alone will cost tens of millions of dollars. This would divert federal resources from Medicaid's core goal – providing health coverage to those without access to care – and compromise the fiscal health of Georgia's Medicaid program.

The Society opposes this waiver proposal. Instead, we urge Georgia to focus on solutions that promote adequate, affordable and accessible coverage, including a full expansion of the state's Medicaid program.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic * Other

Comments *

1 Robin Rudowitz, MaryBeth Musumeci, and Cornelia Hall, "A Look at November State Data for Medicaid Work Requirements in Arkansas," Kaiser Family Foundation, December 18, 2018. Available at: <https://www.kff.org/medicaid/issue-brief/a-look-at-november-state-data-for-medicaid-work-requirements-in-arkansas/>; Arkansas Department of Health and Human Services, Arkansas Works Program, December 2018. Available at: http://d31hzhk6di2h5.cloudfront.net/20190115/88/f6/04/2d/3480592f7fbd6c891d9bacb6/011519_AWRReport.pdf

2 Ohio Department of Medicaid, 2018 Ohio Medicaid Group VII Assessment: Follow-Up to the 2016 Ohio Medicaid Group VIII Assessment, August 2018. Accessed at: <http://medicaid.ohio.gov/Portals/0/Resources/Reports/Annual/Group-VIII-Final-Report.pdf>.

3 Samantha Artiga, Petry Ubri, and Julia Zur, "The Effects of Premiums and Cost Sharing on Low-Income Populations: Updated Review of Research Findings," Kaiser Family Foundation, June 2017. Available at: <https://www.kff.org/medicaid/issue-brief/the-effects-of-premiums-and-cost-sharing-on-low-income-populations-updated-review-of-research-findings/>.

4 Id.

5 Friedman, A.S., Schpero, W. L., Busch, S.H. Evidence Suggests That The ACA's Tobacco Surcharges Reduced Insurance Take-Up and Did Not Increase Smoking Cessation. *Health Aff* 2016; 35:1176-1183. doi: 10.1377/hlthaff.2015.1540 accessed at: <http://content.healthaffairs.org/content/35/7/1176.abstract>

6 Monti, D., Kusemchak, M., Politi, M., Policy Brief: The Effects of Smoking on Health Insurance Decisions Under the Affordable Care Act. Center for Health and Economics Policy Institute for Public Health at Washington University. July 2016. Accessed at: <https://publichealth.wustl.edu/wp-content/uploads/2016/07/The-Effects-of-Smoking-on-Health-Insurance-Decisions-under-the-ACA.pdf>

7 See for example: Chernew M, Gibson TB, Yu-Isenberg K, Sokol MC, Rosen AB, Fendrick AM. Effects of increased patient cost sharing on socioeconomic disparities in health care. *J Gen Intern Med*. 2008. Aug; 23(8):1131-6. Ku, L and Wachino, V. "The Effect of Increased Cost-Sharing in Medicaid: A Summary of Research Findings." Center on Budget and Policy Priorities (July 2005), available at <http://www.cbpp.org/5-31-05health2.htm>.

8 Wallace NT, McConnell KJ, et al. How Effective Are Copayments in Reducing Expenditures for Low-Income Adult Medicaid Beneficiaries? Experience from the Oregon Health Plan. *Health Serv Res*. 2008 April; 43(2): 515-530.

9 <https://www.healthaffairs.org/doi/10.1377/hblog20170920.062063/full/>

10 Misty Williams, "Medicaid Changes Require Tens of Millions in Upfront Costs," Roll Call, February 26, 2018. Available at <https://www.rollcall.com/news/politics/medicaid-kentucky>.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Business/Organization * National MS Society

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Breeden

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

While the Society supports reinsurance as a tool to stabilize premiums in the individual marketplace, we are deeply concerned that the Georgia Access Model will jeopardize access to quality and affordable healthcare coverage for patients with MS and other pre-existing conditions.

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Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

The National Multiple Sclerosis Society (Society) appreciates the opportunity to submit comments on Georgia's Section 1332 Waiver Application to implement the Georgia Access Model.

Nearly one million people are living with multiple sclerosis (MS) in the United States, more than twice the original estimate. MS is an unpredictable, often disabling disease of the central nervous system that disrupts the flow of information within the brain, and between the brain and body. Symptoms vary from person to person and range from numbness and tingling, to walking difficulties, fatigue, dizziness, pain, depression, blindness and paralysis. The progress, severity and specific symptoms of MS in any one person cannot yet be predicted but advances in research and treatment are leading to better understanding and moving us closer to a world free of MS.

While the Society supports reinsurance as a tool to stabilize premiums in the individual marketplace, we are deeply concerned that the Georgia Access Model will jeopardize access to quality and affordable healthcare coverage for patients with MS and other pre-existing conditions. The state's 1332 waiver fails to satisfy the guardrails in the statutory language of the Affordable Care Act (ACA) requiring that coverage must be as affordable as it would be without the waiver; coverage must be as comprehensive as it would be without the waiver; a comparable number of people must be covered under the waiver as would be without it; and the waiver must not add to the federal deficit. The waiver would also put the healthcare coverage of the 450,000 Georgians who currently get their insurance through the state's marketplace at risk while only attempting to expand coverage for a small fraction (30,000 individuals) of the more than 1.4 million uninsured individuals in Georgia. The Society urges Georgia to withdraw its application for the Georgia Access Model.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Subsidies

Comments*

Georgia has proposed to create a new state-administered subsidy system to replace the Advanced Premium Tax Credits (APTC) created by the ACA. These subsidies are not satisfactory to meet the affordability needs of patients with MS and will be allowed to be used toward the purchase of "eligible non-QHPs," driving individuals towards enrolling in substandard coverage. The proposal will reduce access to affordable healthcare coverage for patients with MS and the Society opposes this change.

First, the draft application requests to waive the cost-sharing reduction (CSR) program that helps patients with incomes below 250 percent of the federal poverty level (FPL) to pay deductibles, coinsurance and other cost-sharing required by their health plan. It is unclear whether individuals who currently qualify for CSRs under the ACA will still get this financial assistance under the state-administered subsidy system. For people with MS, access to needed health care services and early and consistent control of disease activity plays a key role in preventing accumulation of disability and allows people with MS to remain active in their communities. Eliminating CSR will likely lead to interruptions in critical care for a person living with MS. If an individual is not able afford to pay their deductibles, coinsurance and other cost-sharing requirements, they would go without healthcare, including their recommended disease modifying therapies (DMT) which have shown to reduce disease activity and disease progression. Interruptions in treatment reduces effectiveness and health outcomes will decline as financial burdens hinder the individual's ability to pursue and receive care.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic * Georgia Access - Consumer Experience

Comments *

Additionally, the state has likely underestimated the impact of the Georgia Access Model on premiums in Georgia. Eligible non-QHPs will attract healthier consumers, segmenting the market and increasing the cost of comprehensive coverage. Additionally, as discussed later in our comments, the loss of Healthcare.gov and the incentives for insurers and brokers selling products outside of an exchange will likely boost enrollment in short-term and other skimpy plans, further undermining the risk pool and destabilizing the market. A substantially greater premium increase would both make QHPs more expensive for individuals who do not qualify for subsidies and also increase the cost of QHP subsidies for the state, meaning that the state's pool of financial assistance funds would not be able to help as many individuals. The Society believes that premiums are a barrier to healthcare access, particularly for individuals with pre-existing conditions such as MS. Even small premium amounts may be substantial for a low-income person or family, potentially making coverage unaffordable for those who need it most. A broad array of studies have demonstrated that imposing premiums on low-income individuals creates a barrier to care and fails to improve health outcomes. An increase in the cost of premiums as a result of market destabilization will have a devastating effect on the ability of people living with MS to the health insurance needed to access high-quality healthcare.

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Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic * Georgia Access - Subsidies

Comments *

The state subsidy system is significantly under-resourced, which would have serious implications for patients with MS and other individuals in Georgia. The state has budgeted \$13.5 million in the first three years and \$5 million thereafter for implementation costs, which seems quite low given the significant investments in new technical and administrative systems needed to operate the Georgia Access Model. Additionally, the state's contribution to the subsidy fund is just \$144 million in 2022, which will not go far if the Georgia Access Model increases premiums as predicted above. This lack of funding is particularly dangerous for patients given the Georgia Access Model's cap on subsidy funding. Currently, any individual who meets the eligibility criteria for financial assistance for coverage under the ACA receives that financial assistance. However, patients could be placed on a wait list if the state exceeds its capped contribution under the Georgia Access Model. A growing body of evidence indicates that early and ongoing treatment with a Food and Drug Administration (FDA) approved DMT is the best way to manage the MS disease course, prevent accumulation of disability and protect the brain from damage due to MS. If a person living with MS must wait for subsidies to be able to afford access to critical care, they will likely have to delay or forgo needed treatments, which may result in increased disease activity, loss of function and possible irreversible progression of disability.

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Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic * Georgia Access - Plan Options

Comments *

As mentioned in the previous section, Georgia's proposal would allow subsidies to be used for QHPs currently offered in the state as well as for "eligible non-QHPs." This will result in more individuals enrolling in less comprehensive coverage and the Society opposes this change.

The draft waiver application does not contain sufficient information about the standards for eligible non-QHPs, particularly what the state means when it says that the plans will maintain protections for people with pre-existing conditions. For example, even if these plans cannot deny coverage to patients with pre-existing conditions, could plans vary premiums based on health status? Protecting patients with MS and other pre-existing conditions involves much more than guarantee issue; patients need community rating, bans on exclusion periods and condition exclusions, cost-sharing protections, bans on annual and lifetime limits and many other protections currently required for plans sold on the individual market to truly access comprehensive, affordable healthcare coverage.

Other aspects of the standards for these plans are unclear as well. The draft application requests to waive network adequacy requirements. Network inadequacy raises particular concerns for people living with MS and others with specialized and complex healthcare needs. People living with MS may require care from neurology, rehabilitation, radiology, mental health and other specialists, as well as treatments, services and products from pharmacies, durable medical equipment providers, home care agencies and more to live their best lives. Additionally, it is unclear how eligible non-QHPs could be part of the single risk pool with current QHPs given how dissimilar these products could be. This would make risk adjustment – a process that discourages plans from cherry-picking healthier individuals by transferring funds from plans with lower risk enrollees to higher risk ones – difficult to implement.

The draft application does clearly state that eligible non-QHPs would not have to cover all ten essential health benefits (EHBs), which are currently required by QHPs. The state claims that eligible non-QHPs will provide 90 percent of the benefits that current QHPs cover. However, the state provides no explanation or analysis to support this assumption. By offering plans that do not cover all EHBs but are still eligible for subsidies, issuers will be able to segment the market and charge lower premiums to healthier individuals for eligible non-QHPs while charging high premiums for patients with pre-existing conditions who need comprehensive coverage. This is a backdoor to discrimination against patients with pre-existing conditions.

Finally, given the destabilizing impact of the state subsidy program on the individual marketplace, it is possible that some issuers may rethink their decisions to offer QHPs in Georgia. Yet the state assumes that issuers will still offer QHPs in all ratings areas after the implementation of the new state subsidy program with no explanation to support that assumption. If this assumption does not hold, patients in some areas of the state would no longer have access to comprehensive care and have to choose between eligible non-QHPs or other skimpy plans or going without coverage.

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Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

In addition to administering a state subsidy program, Georgia's application proposes to no longer use Healthcare.gov for enrollment and instead have people enroll directly through insurers or brokers. This policy will make it harder for patients to enroll in comprehensive, affordable healthcare coverage and the Society opposes this change.

While the state acknowledges that leaving Healthcare.gov would require a detailed transition strategy, the Society fears that some of the 450,000 Georgians who currently purchase coverage through Healthcare.gov would inevitably lose coverage during the transition. Access consistent treatment can reduce the number of new lesions and exacerbations, slow progression of disability, and may reduce future disease activity, while gaps in treatment can result in disease progression, increased disability and potentially permanent loss of function. The state assumes that there will be no coverage losses without any analysis to support that assumption, calling into question whether the Georgia Access Model will truly lead the same or more people to obtain coverage than would without the waiver.

Today, patients with MS who shop on Healthcare.gov can trust that they are purchasing a health insurance plan that will allow them to manage their health conditions. However, under the Georgia Access Model, issuers and brokers could sell QHPs alongside other types of plans that discriminate against people with pre-existing conditions and will not cover enrollees' medical expenses if they get sick. This could create confusion for patients and lead them to purchase coverage that does not meet their needs. There is already evidence of misleading marketing related to short-term and other skimpy plans leading individuals to unwillingly enroll in coverage that lacks key patient protections. This problem would likely worsen in Georgia under this proposal.

Healthcare.gov shows consumers all QHPs available in their area and does not favor certain plans over others. However, brokers who would be helping individuals through the enrollment process under the Georgia Access Model would not have to show individuals all of their plan options and may receive larger commissions for certain plans over others that influence their recommendations to patients. Increasing the reliance on insurers and brokers will limit the ability of patients with MS to compare plan price and benefit design in an unbiased manner to choose the right plan for them and could ultimately result in harm to patients who become enrolled in sub-standard or inadequate insurance coverage that does not meet their needs. This failure to appropriately shield patients from risk is unacceptable.

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Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

The National MS Society opposes this waiver proposal. Instead, we urge Georgia to focus on solutions that promote adequate, affordable and accessible coverage without jeopardizing access to care for patients with MS and other pre-existing conditions.

Thank you for your consideration.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Business/Organization * National Organization for Rare Disorders (NORD)

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Gallagher

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** District of Columbia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

Re: NORD Comments on Georgia's 1115 Medicaid Wavier Application

The National Organization for Rare Disorders (NORD) appreciates the opportunity to submit comments on Georgia's 1115 Demonstration Waiver Application for its Georgia Pathways to Coverage initiative.

NORD is a unique federation of voluntary health organizations dedicated to helping people with rare "orphan" diseases and assisting the organizations that serve them. We are committed to the identification, treatment, and cure of rare disorders through programs of education, advocacy, research, and patient services.

The Georgia Pathways plan is not a sufficient solution to improve access to quality and affordable healthcare for low-income Georgians. The state estimates that approximately 50,000 individuals would gain coverage under the plan, whereas over 500,000 Georgians could access coverage if the state fully expanded its Medicaid program.

NORD opposes the Georgia Pathways program and offers the following comments on the draft waiver application.

Eligibility

Under the Georgia Pathways plan, only individuals with incomes below 100 percent of the federal poverty level (\$1,778 per month for a family of three) who can prove that they work at least 80 hours per month would be eligible for Medicaid. This drastically limits the number of patients with rare diseases and other serious and chronic health conditions who will receive access to the quality and affordable healthcare coverage that they need.

While no exemption criteria can prevent the potential coverage losses associated with work reporting requirements, Georgia has not proposed any exemption criteria that would allow individuals who are unable to meet the work reporting requirements to apply for coverage. This means that patients who have serious health conditions that prevent them from working 80 hours per month would have no pathway to coverage that could help them to treat these conditions. This discrimination against patients with health conditions that prevent them from working is unacceptable.

Once enrolled, individuals may be able to qualify for short-term exemptions in certain situations. Still, NORD is concerned that these exemption criteria may not capture all individuals with serious and chronic health conditions that prevent them from working. Regardless, even exempt enrollees may have to report their exemption, creating opportunities for administrative error that could jeopardize their coverage. Again, no exemption criteria can circumvent these problems and the serious risk to the health of the people we represent.

For the first six months, members will have to report their hours and work activities monthly. This will put a significant administrative burden on enrollees, which will likely decrease the number of individuals with Medicaid coverage. For example, Arkansas also implemented a work reporting requirement where Medicaid enrollees had to report their hours worked or their exemption. During the first six months of implementation, the state terminated coverage for over 18,000 individuals (footnote 1). Georgia has not provided an estimate of the coverage losses associated with this proposal in its waiver application.

Failing to navigate these burdensome administrative requirements could have serious – even life or death – consequences for people with rare diseases. If the state finds that individuals have failed to comply for one month, their coverage will be suspended, and if the state finds that individuals have failed to comply for three months, they will be disenrolled.

If individuals are able to meet the reporting requirements for six consecutive months, they will be exempt from further reporting and re-evaluated for eligibility during their annual redetermination. However, if individuals do not report a change in their employment status, they will be responsible for any capitation and cost-sharing expenses. This exposes already low-income individuals to enormous financial risk.

If Georgia truly cares about incentivizing and promoting employment, full Medicaid expansion would be the best way to achieve this goal. In a report looking at the impact of Medicaid expansion in Ohio, the majority of enrollees reported that being enrolled in Medicaid made it easier to work or look for work (83.5 percent and 60 percent, respectively) (footnote 2). That report also found that many enrollees were able to get treatment for previously untreated health conditions, which made finding work easier. Preventing individuals from enrolling in Medicaid coverage until they comply with these requirements will therefore hurt rather than help people search for and obtain employment.

Finally, Georgia would be the first state to require enrollees to comply with the work reporting requirement prior to enrolling in the Medicaid program with no opportunity to demonstrate a medical or other exemption. Changing the eligibility for Medicaid is the sole purview of Congress and cannot be waived. NORD opposes this policy.

1- Robin Rudowitz, MaryBeth Musumeci, and Cornelia Hall, "A Look at November State Data for Medicaid Work Requirements in Arkansas," Kaiser Family Foundation, December 18, 2018. Available at:

<https://www.kff.org/medicaid/issue-brief/a-look-at-november-state-data-for-medicaid-work-requirements-in-arkansas/>; Arkansas Department of Health and Human Services, Arkansas Works Program, December 2018. Available at: http://d31hzhk6di2h5.cloudfront.net/20190115/88/f6/04/2d/3480592f7fd6c891d9bacb6/011519_AWRReport.pdf

2- Ohio Department of Medicaid, 2018 Ohio Medicaid Group VII Assessment: Follow-Up to the 2016 Ohio Medicaid Group VIII Assessment, August 2018. Accessed at:

<http://medicaid.ohio.gov/Portals/0/Resources/Reports/Annual/Group-VIII-Final-Report.pdf>.

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Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Premiums, Copayments, Member Rewards Account

Comments *

Financial Barriers

For the few individuals who are able to meet this limited eligibility criteria, the proposal still creates numerous financial barriers that will jeopardize their coverage. Individuals with incomes above 50 percent of the federal poverty level will have to pay monthly premiums and will lose coverage if they fail to pay premiums for three months. This policy would likely both increase the number of enrollees who lose Medicaid coverage and also discourage eligible people from enrolling in the program. Research has shown that even relatively low levels of cost-sharing for low-income populations limit the use of necessary healthcare services (footnote 3). For example, when Oregon implemented a premium in its Medicaid program, with a maximum premium of \$20 per month, almost half of enrollees lost coverage (footnote 4).

This policy will not only apply to – and jeopardize coverage for – new enrollees, but for individuals who are currently enrolled in Medicaid through the Transitional Medical Assistance (TMA) program. Additionally, it unclear how the state may try to recoup capitation and other payments for any months that individuals do not pay their premiums and if, as with the work reporting requirement policy above, patients may be put at significant financial risk. NORD believes that these premiums will create significant financial barriers for patients that jeopardize their access to needed care and therefore opposes this policy.

Georgia's premium proposal also includes an additional surcharge for tobacco users. Research is clear that these surcharges have not been proven effective in helping smokers quit and reducing tobacco use. Recent studies from Health Affairs (footnote 5) and the Center for Health and Economics Policy at the Institute for Public Health (footnote 6) at Washington University have suggested that tobacco surcharges do not increase tobacco cessation but do lead individuals to forgo health insurance rather than paying the surcharge. Tobacco

users often have expensive comorbidities. Charging a tobacco surcharge could cause those enrollees to go without coverage and access to preventive care (including tobacco cessation), allowing comorbid health conditions to worsen, ultimately resulting in more expensive healthcare. NORD opposes this surcharge.

Georgia's proposal also includes a number of copayments for individuals with incomes above 50 percent of the federal poverty level that could be a significant financial burden for patients. The most egregious of these is a \$30 copay for non-emergency use of the emergency department (ED). This policy could deter rare disease patients from seeking necessary care during an emergency.

People should not be financially penalized for seeking lifesaving care for their rare disease or any other critical health problem that requires immediate care. When people do experience severe symptoms, they should not try to self-diagnose their condition or worry that they cannot afford to seek care. Instead, they must have access to quick diagnosis and treatment in the ED.

Evidence suggests this type of cost sharing may not result in the intended cost savings (footnote 7). Research demonstrates that low-income individuals served by Medicaid are more price sensitive compared to others, more likely to go without needed care, and more likely to experience long-term adverse outcomes. A study of enrollees in Oregon's Medicaid program demonstrated that implementation of a copay on emergency services resulted in decreased utilization of such services but did not result in cost savings because of subsequent use of more intensive and expensive services (footnote 8). This provides further evidence that copays may lead to inappropriate delays in needed care. NORD opposes this punitive proposal for a \$30 copayment for non-emergent use of the ED.

3- Samantha Artiga, Petry Ubri, and Julia Zur, "The Effects of Premiums and Cost Sharing on Low-Income Populations: Updated Review of Research Findings," Kaiser Family Foundation, June 2017. Available at: <https://www.kff.org/medicaid/issue-brief/the-effects-of-premiums-and-cost-sharing-on-low-income-populations-updated-review-of-research-findings/>.

4- Id.

5- Friedman, A.S., Schpero, W. L., Busch, S.H. Evidence Suggests That The ACA's Tobacco Surcharges Reduced Insurance Take-Up and Did Not Increase Smoking Cessation. *Health Aff* 2016; 35:1176-1183. doi: 10.1377/hlthaff.2015.1540 accessed at: <http://content.healthaffairs.org/content/35/7/1176.abstract>

6 - Monti, D., Kusemchak, M., Politi, M., Policy Brief: The Effects of Smoking on Health Insurance Decisions Under the Affordable Care Act. Center for Health and Economics Policy Institute for Public Health at Washington University. July 2016. Accessed at: <https://publichealth.wustl.edu/wp-content/uploads/2016/07/The-Effects-of-Smoking-on-Health-Insurance-Decisions-under-the-ACA.pdf>

7- See for example: Chernew M, Gibson TB, Yu-lsenberg K, Sokol MC, Rosen AB, Fendrick AM. Effects of increased patient cost sharing on socioeconomic disparities in health care. *J Gen Intern Med*. 2008. Aug; 23(8):1131-6. Ku, L and Wachino, V. "The Effect of Increased Cost-Sharing in Medicaid: A Summary of Research Findings." Center on Budget and Policy Priorities (July 2005), available at <http://www.cbpp.org/5-31-05health2.htm>.

8- Wallace NT, McConnell KJ, et al. How Effective Are Copayments in Reducing Expenditures for Low-Income Adult Medicaid Beneficiaries? Experience from the Oregon Health Plan. *Health Serv Res*. 2008 April; 43(2): 515-530.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Employer Sponsored Insurance

Comments *

Reduced Benefits

Individuals would be required to enroll in employer sponsored insurance (ESI) if it is available and determined to be cost effective for the state. However, the state would not provide any wraparound services for individuals regardless of the benefit package in their ESI. Additionally, the state would not help individuals with the costs of coinsurance or deductibles required in their ESI. NORD opposes the requirement to enroll in ESI without wraparound services and full financial protection for patients.

The state has also requested to waive non-emergency transportation (NEMT) for the entire demonstration population. NEMT helps low-income patients overcome barriers to care due to transportation and allows patients to keep appointments with doctors and other healthcare providers. For example, one study found patients with asthma, hypertension or heart disease who needed multiple visits to a medical professional to maintain their health were more likely to keep their appointments if they had NEMT (footnote 10). NORD opposes a waiver of NEMT.

9- <https://www.healthaffairs.org/doi/10.1377/hblog20170920.062063/full/>

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Program Goals

Comments *

Additional Costs

Administering all of these requirements will be expensive for the state of Georgia. States such as Kentucky, Tennessee and Virginia have estimated that setting up the administrative systems to track and work activities alone will cost tens of millions of dollars (footnote 11). This would divert federal resources from Medicaid's core goal – providing health coverage to those without access to care – and compromise the fiscal health of Georgia's Medicaid program.

NORD opposes this waiver proposal. Instead, we urge Georgia to focus on solutions that promote adequate, affordable and accessible coverage, including a full expansion of the state's Medicaid program.

Sincerely,

/s/

Rachel Sher,
Vice President of Policy and Regulatory Affairs

10 - Misty Williams, "Medicaid Changes Require Tens of Millions in Upfront Costs," Roll Call, February 26, 2018. Available at <https://www.rollcall.com/news/politics/medicaid-kentucky>.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * National Organization for Rare Disorders (NORD)

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Gallagher

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** District of Columbia **Zip** [REDACTED]

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

Re: NORD Comments on Georgia's 1332 Wavier Application

The National Organization for Rare Disorders (NORD) appreciates the opportunity to submit comments on Georgia's Section 1332 Waiver Application for a reinsurance program.

NORD is a unique federation of voluntary health organizations dedicated to helping people with rare "orphan" diseases and assisting the organizations that serve them. We are committed to the identification, treatment, and cure of rare disorders through programs of education, advocacy, research, and patient services.

Reinsurance is an important tool to help stabilize health insurance markets. Reinsurance programs help insurance companies cover the claims of very high cost enrollees, which in turn keeps premiums affordable for other individuals buying insurance on the individual market. Reinsurance programs have been used to stabilize premiums in a number of healthcare programs, such as Medicare Part D. A temporary reinsurance fund for the individual market was also established under the Affordable Care Act and reduced premiums by an estimated 10 to 14 percent in its first year (footnote 1). A recent analysis by Avalere of seven states that have already created their own reinsurance programs through Section 1332 waivers found that these states reduced individual market premiums by an average of 19.9 percent in their first year (footnote 2).

Georgia's proposal will create a reinsurance program starting for the 2021 plan year. This program is projected to reduce premiums by 10 percent and increase the number of individuals obtaining health insurance through the individual market by about 1,400. This would help patients with pre-existing conditions, including patients with rare diseases, obtain affordable, comprehensive coverage.

While NORD supports reinsurance as a tool to stabilize premiums in the individual marketplace, we are deeply concerned that the remainder of the state's 1332 Waiver Application will jeopardize access to quality and affordable healthcare coverage for patients with rare diseases and other pre-existing conditions, as we have outlined in our related comments on the Georgia Access Model.

Sincerely,

/s/

Rachel Sher,
Vice President of Policy and Regulatory Affairs

1- American Academy of Actuaries, Individual and Small Group Markets Committee. An Evaluation of the Individual Health Insurance Market and Implications of Potential Changes. January 2017. Retrieved from https://www.actuary.org/files/publications/Acad_eval_indiv_mkt_011817.pdf.

2- Avalere. State-Run Reinsurance Programs Reduce ACA Premiums by 19.9% on Average. March 2019. Retrieved from <https://avalere.com/press-releases/state-run-reinsurance-programs-reduce-aca-premiums-by-19-9-on-average>.

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Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Business/Organization * National Organization for Rare Disorders (NORD)

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Gallagher

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** District of Columbia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

December 3, 2019

Re: NORD Comments on Georgia's 1332 Wavier Application – GA Access Model

The National Organization for Rare Disorders (NORD) appreciates the opportunity to submit comments on Georgia's Section 1332 Waiver Application to implement the Georgia Access Model.

NORD is a unique federation of voluntary health organizations dedicated to helping people with rare "orphan" diseases and assisting the organizations that serve them. We are committed to the identification, treatment, and cure of rare disorders through programs of education, advocacy, research, and patient services.

While NORD supports reinsurance as a tool to stabilize premiums in the individual marketplace, we are deeply concerned that the Georgia Access Model will jeopardize access to quality and affordable healthcare coverage for patients with rare diseases and other pre-existing conditions. The state's 1332 waiver fails to satisfy the guardrails in the statutory language of the Affordable Care Act (ACA) requiring that coverage must be as affordable as it would be without the waiver; coverage must be as comprehensive as it would be without the waiver; a comparable number of people must be covered under the waiver as would be without it; and the waiver must not add to the federal deficit. The waiver would also put the healthcare coverage of the 450,000 Georgians who currently get their insurance through the state's marketplace at risk while only attempting to expand coverage for a small fraction (30,000 individuals) of the more than 1.4 million uninsured individuals in Georgia (footnote 1). NORD urges Georgia to withdraw its application for the Georgia Access Model.

State Subsidy Program

Georgia has proposed to create a new state-administered subsidy system to replace the Advanced Premium Tax Credits (APTC) created by the ACA. These subsidies are not satisfactory to meet the affordability needs of patients with rare diseases and will be allowed to be used toward the purchase of "eligible non-QHPs," driving individuals towards enrolling in substandard coverage. The proposal will reduce access to affordable healthcare coverage for patients with rare diseases and NORD opposes this change.

First, the draft application requests to waive the cost-sharing reduction (CSR) program that helps patients with incomes below 250 percent of the federal poverty level (FPL) to pay deductibles, coinsurance and other cost-sharing required by their health plan. It is unclear whether individuals who currently qualify for CSRs under the ACA will still get this financial assistance under the state-administered subsidy system.

Additionally, the state has likely underestimated the impact of the Georgia Access Model on premiums in Georgia. Eligible non-QHPs will attract healthier consumers, segmenting the market and increasing the cost of comprehensive coverage. Additionally, as discussed later in our comments, the loss of Healthcare.gov and the incentives for insurers and brokers selling products outside of an exchange will likely boost enrollment in short-term and other skimpy plans, further undermining the risk pool and destabilizing the market. A substantially greater premium increase would both make QHPs more expensive for individuals who do not qualify for subsidies and also increase the cost of QHP subsidies for the state, meaning that the state's pool of financial assistance funds would not be able to help as many individuals.

The state subsidy system is significantly under-resourced, which would have serious implications for patients with rare diseases and other individuals in Georgia. The state has budgeted \$13.5 million in the first three years and \$5 million thereafter for implementation costs, which seems quite low given the significant investments in new technical and administrative systems needed to operate the Georgia Access Model. Additionally, the state's contribution to the subsidy fund is just \$144 million in 2022, which will not go far if the Georgia Access Model increases premiums as predicted above. This lack of funding is particularly dangerous

for patients given the Georgia Access Model's cap on subsidy funding. Currently, any individual who meets the eligibility criteria for financial assistance for coverage under the ACA receives that financial assistance. However, patients could be placed on a wait list if the state exceeds its capped contribution under the Georgia Access Model.

Promotion of Substandard Plans

As mentioned in the previous section, Georgia's proposal would allow subsidies to be used for QHPs currently offered in the state as well as for "eligible non-QHPs." This will result in more individuals enrolling in less comprehensive coverage and NORD opposes this change.

The draft waiver application does not contain sufficient information about the standards for eligible non-QHPs, particularly what the state means when it says that the plans will maintain protections for people with pre-existing conditions. For example, even if these plans cannot deny coverage to patients with pre-existing conditions, could plans vary premiums based on health status? Protecting patients with rare diseases and other pre-existing conditions involves much more than guarantee issue; patients need community rating, bans on exclusion periods and condition exclusions, cost-sharing protections, bans on annual and lifetime limits and many other protections currently required for plans sold on the individual market to truly access comprehensive, affordable healthcare coverage.

Other aspects of the standards for these plans are unclear as well. The draft application requests to waive network adequacy requirements. Without this, patients in the rare disease community may not have access to their lifesaving providers that help maintain their health. Additionally, it is unclear how eligible non-QHPs could be part of the single risk pool with current QHPs given how dissimilar these products could be. This would make risk adjustment – a process that discourages plans from cherry-picking healthier individuals by transferring funds from plans with lower risk enrollees to higher risk ones – difficult to implement.

The draft application does clearly state that eligible non-QHPs would not have to cover all ten essential health benefits (EHBs), which are currently required by QHPs. The state claims that eligible non-QHPs will provide 90 percent of the benefits that current QHPs cover. However, the state provides no explanation or analysis to support this assumption. By offering plans that do not cover all EHBs but are still eligible for subsidies, issuers will be able to segment the market and charge lower premiums to healthier individuals for eligible non-QHPs while charging high premiums for patients with pre-existing conditions who need comprehensive coverage. This is a backdoor to discrimination against patients with pre-existing conditions.

Finally, given the destabilizing impact of the state subsidy program on the individual marketplace, it is possible that some issuers may rethink their decisions to offer QHPs in Georgia. Yet the state assumes that issuers will still offer QHPs in all ratings areas after the implementation of the new state subsidy program with no explanation to support that assumption. If this assumption does not hold, patients in some areas of the state would no longer have access to comprehensive care and have to choose between eligible non-QHPs or other skimpy plans or going without coverage. [As a result, the choose between coverage for patients could lead to h].

Enrollment Platform

In addition to administering a state subsidy program, Georgia's application proposes to no longer use Healthcare.gov for enrollment and instead have people enroll directly through insurers or brokers. This policy will make it harder for patients to enroll in comprehensive, affordable healthcare coverage and NORD opposes this change.

While the state acknowledges that leaving Healthcare.gov would require a detailed transition strategy, NORD fears that some of the 450,000 Georgians who currently purchase coverage through Healthcare.gov would inevitably lose coverage during the transition. This gap in coverage could negatively impact rare disease patients who rely on this care and put their health in jeopardy. The state assumes that there will be no coverage losses without any analysis to support that assumption, calling into question whether the Georgia Access Model will truly lead the same or more people to obtain coverage than would without the waiver.

Today, patients with rare diseases who shop on Healthcare.gov can trust that they are purchasing a health insurance plan that will allow them to manage their health conditions. However, under the Georgia Access Model, issuers and brokers could sell QHPs alongside other types of plans that discriminate against people with pre-existing conditions and will not cover enrollees' medical expenses if they get sick. This could create confusion for patients and lead them to purchase coverage that does not meet their needs. There is already evidence of misleading marketing related to short-term and other skimpy plans leading individuals to unwilling

enroll in coverage that lacks key patient protections (footnote 2). This problem would likely worsen in Georgia under this proposal.

Healthcare.gov shows consumers all QHPs available in their area and does not favor certain plans over others. However, brokers who would be helping individuals through the enrollment process under the Georgia Access Model would not have to show individuals all of their plan options and may receive larger commissions for certain plans over others that influence their recommendations to patients. Increasing the reliance on insurers and brokers will limit the ability of patients with rare diseases to compare plan price and benefit design in an unbiased manner to choose the right plan for them and could ultimately result in harm to patients who become enrolled in sub-standard or inadequate insurance coverage that does not meet their needs. This failure to appropriately shield patients from risk is unacceptable.

NORD opposes this waiver proposal. Instead, we urge Georgia to focus on solutions that promote adequate, affordable and accessible coverage without jeopardizing access to care for patients with rare diseases and other pre-existing conditions.

Thank you for your consideration.

Sincerely,

/s/

Rachel Sher,
Vice President of Policy and Regulatory Affairs

1 - American Community Survey Tables for Health Insurance Coverage, Health Insurance Coverage Status and Type of Coverage by State and Age for All People: 2018. Available at:

<https://www.census.gov/data/tables/time-series/demo/health-insurance/acs-hi.html>.

2 - <https://www.commonwealthfund.org/blog/2019/seeing-fraud-and-misleading-marketing-states-warn-consumers-about-alternative-health>, <https://www.rwjf.org/en/library/research/2019/01/the-marketing-of-short-term-health-plans.html>

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Business/Organization * National Psoriasis Foundation

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Moran

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Virginia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

December 3, 2019

On behalf of the more than eight million Americans living with psoriasis and psoriatic arthritis, the National Psoriasis Foundation (NPF) appreciates the opportunity to submit comments on Georgia's 1115 Demonstration Waiver Application for its Georgia Pathways to Coverage initiative. As the patient advocacy organization for the psoriatic disease community for more than 50 years, the NPF is keenly aware of the improvements in health outcomes that have resulted from advances in treatment innovation. Therefore, the NPF remains committed to ensuring beneficiaries with psoriasis and psoriatic arthritis have access to the full range of treatments and therapies necessary to successfully manage their disease. In its current form, NPF urges Georgia to withdraw its application for the Georgia Pathways program. In order to address these complex and serious issues, we request that the state convene a group of stakeholders to discuss solutions how to adequately provide affordable and comprehensive health care coverage for our patients in Georgia.

Eligibility

Under the Georgia Pathways plan, only individuals with incomes below 100 percent of the federal poverty level (\$1,778 per month for a family of three) who can prove that they work at least 80 hours per month would be eligible for Medicaid. This could drastically limit the number of patients with serious and chronic conditions like psoriasis and psoriatic arthritis who receive access to the quality and affordable healthcare coverage that they need.

While no exemption criteria can prevent the potential coverage losses associated with work reporting requirements, Georgia has not proposed any exemption criteria that would allow individuals who are unable to meet the work reporting requirements to apply for coverage. This means that patients who have serious health conditions that prevent them from working 80 hours per month would have no pathway to coverage that could help them to treat these conditions. Patients living with psoriasis or psoriatic arthritis dedicate a significant amount of time and effort to maintaining their disease, and comorbid conditions, while managing work and family life. Data shows 79% of Medicaid enrollees are in families with at least one worker, with nearly two-thirds (64%) with a full-time worker and another 14% with a part-time worker; one of the adults in such families may not work, often due to caregiving or other responsibilities. However, employed Medicaid enrollees facing work requirements have trouble with reporting requirements. While exceptions to work requirements may apply, as many psoriatic disease patients know, exceptions processes can also be overly burdensome. This discrimination against patients with health conditions that prevent them from working is unacceptable.

Once enrolled, individuals may be able to qualify for short-term exemptions in certain situations. Still, the NPF is concerned that these exemption criteria may not capture all individuals with serious and chronic health conditions that prevent them from working. Regardless, even exempt enrollees may have to report their exemption, creating opportunities for administrative error that could jeopardize their coverage.

For the first six months, members will have to report their hours and work activities monthly. This will put a significant administrative burden on enrollees, which will likely decrease the number of individuals with Medicaid coverage. For example, Arkansas also implemented a work reporting requirement where Medicaid enrollees had to report their hours worked or their exemption. During the first six months of implementation, the state terminated coverage for over 18,000 individuals. Georgia has not provided an estimate of the coverage losses associated with this proposal in its waiver application.

Failing to navigate these burdensome administrative requirements could have serious – even life or death – consequences for people with psoriatic disease. If the state finds that individuals have failed to comply for one month, their coverage will be suspended, and if the state finds that individuals have failed to comply for three months, they will be disenrolled. Due to the heterogeneous characteristics of this chronic immune-mediated

disease, psoriatic disease requires sophisticated medical care. Treatments that work for one person may not work for others, and many patients cycle through numerous accepted treatment options. Without the tools to control their symptoms, people with psoriatic disease cycle through periods of intense pain; fatigue; unbearable itch; whole-body inflammation; flaking and bleeding of large swaths of the skin; and joint degradation. Recent research also suggests that the risk for comorbidities such as cardiovascular disease may increase with the severity of psoriatic disease, thereby magnifying the critical need for continuous access to effective treatment options.

If individuals are able to meet the reporting requirements for six consecutive months, they will be exempt from further reporting and re-evaluated for eligibility during their annual redetermination. However, if individuals do not report a change in their employment status, they will be responsible for any capitation and cost-sharing expenses. This exposes already low-income individuals to enormous financial risk. Unfortunately, patients with psoriatic disease are all too familiar with the burden that comes with the high cost of therapies, which can result in reduced access, outcomes and overall well-being. A 2018 NPF Advocacy survey of NPF members found that nearly 50 percent of psoriasis and psoriatic arthritis patients, many of who live on a fixed income, experienced financial strain due to the cost of their therapies. Even more alarming, almost one in four patients with psoriatic disease spend more than \$150 per month in out-of-pocket costs to access treatment needed to manage their chronic conditions. Due to these burdensome work requirements and the threat of our patients losing continuous coverage, the NPF is opposed to this policy.

Financial Barriers

For the few individuals who are able to meet this limited eligibility criteria, the proposal still creates numerous financial barriers that will jeopardize their coverage. Individuals with incomes above 50 percent of the federal poverty level will have to pay monthly premiums and will lose coverage if they fail to pay premiums for three months. This policy would likely both increase the number of enrollees who lose Medicaid coverage and also discourage eligible people from enrolling in the program. Research has shown that even relatively low levels of cost-sharing for low-income populations limit the use of necessary healthcare services. For example, when Oregon implemented a premium in its Medicaid program, with a maximum premium of \$20 per month, almost half of enrollees lost coverage.

This policy will not only apply to – and jeopardize coverage for – new enrollees, but for individuals who are currently enrolled in Medicaid through the Transitional Medical Assistance (TMA) program. Additionally, it is unclear how the state may try to recoup capitation and other payments for any months that individuals do not pay their premiums and if, as with the work reporting requirement policy above, patients may be put at significant financial risk. NPF is concerned that these premiums will create significant financial barriers for patients that jeopardize their access to needed care and therefore opposes this policy.

Georgia's proposal also includes a number of copayments for individuals with incomes above 50 percent of the federal poverty level that could be a significant financial burden for patients. The most egregious of these is a \$30 copay for non-emergency use of the emergency department (ED). This policy could deter people from seeking necessary care during an emergency.

People should not be financially penalized for seeking lifesaving care or any other critical health problem that requires immediate care. When people do experience severe symptoms, they should not try to self-diagnose their condition or worry that they cannot afford to seek care. Instead, they must have access to quick diagnosis and treatment in the ED.

Evidence suggests this type of cost sharing may not result in the intended cost savings. Research demonstrates that low-income individuals served by Medicaid are more price sensitive compared to others, more likely to go without needed care, and more likely to experience long-term adverse outcomes. A study of enrollees in Oregon's Medicaid program demonstrated that implementation of a copay on emergency services resulted in decreased utilization of such services but did not result in cost savings because of subsequent use of more intensive and expensive services. This provides further evidence that copays may lead to inappropriate delays in needed care. NPF opposes this punitive proposal for a \$30 copayment for non-emergent use of the ED.

Reduced Benefits

Individuals would be required to enroll in employer sponsored insurance (ESI) if it is available and determined to be cost effective for the state. However, the state would not provide any wraparound services for individuals regardless of the benefit package in their ESI. Combined, these factors would be very problematic for patients like those in the psoriatic disease community who rely on health insurance to provide meaningful coverage for

medically necessary services. Additionally, the state would not help individuals with the costs of coinsurance or deductibles required in their ESI. A 2019 survey of NPF patient members showed that over half of our community takes a prescribed biologic and nearly 50 percent utilize more than one treatment to manage their disease. NPF opposes the requirement to enroll in ESI without wraparound services and full financial protection for patients.

Additional Costs

Administering any number of these requirements will be expensive for the state of Georgia. States such as Kentucky, Tennessee and Virginia have estimated that setting up the administrative systems to track and work activities alone will cost tens of millions of dollars. This would divert federal resources from Medicaid's core goal – providing health coverage to those without access to care – and compromise the fiscal health of Georgia's Medicaid program.

In its current form, NPF opposes this waiver proposal. Instead, we urge Georgia to focus on solutions that promote adequate, affordable and accessible coverage. We request that the state convene a group of stakeholders to discuss solutions how to adequately provide affordable and comprehensive health care coverage for our patients in Georgia.

We appreciate your consideration of our comments. If you or your colleagues have any questions, please feel free to contact the NPF by reaching out to Matthew Moran, Federal Government Relations & Health Policy Manager at mmoran@psoriasis.org.

Sincerely,

Patrick Stone Vice President, Government Relations & Advocacy
(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - Parameters (Cap, Attachment Point, and Coinsurance)

Comments*

December 3, 2019

On behalf of the more than eight million Americans living with psoriasis and psoriatic arthritis, the National Psoriasis Foundation (NPF) appreciates the opportunity to submit comments on Georgia's Section 1332 Waiver Application for a reinsurance program. As the patient advocacy organization for the psoriatic disease community for more than 50 years, the NPF is keenly aware of the improvements in health outcomes that have resulted from advances in treatment innovation. Therefore, the NPF remains committed to ensuring beneficiaries with psoriasis and psoriatic arthritis have access to the full range of treatments and therapies necessary to successfully manage their disease.

NPF believes everyone should have quality and affordable healthcare coverage. A strong, robust marketplace is essential for people with psoriasis and psoriatic arthritis to access the coverage that they need. NPF supports the use of reinsurance programs to strengthen state marketplaces.

Reinsurance is an important tool to help stabilize health insurance markets. Reinsurance programs help insurance companies cover the claims of very high cost enrollees, which in turn keeps premiums affordable for other individuals buying insurance on the individual market. Reinsurance programs have been used to stabilize premiums in a number of healthcare programs, such as Medicare Part D. A temporary reinsurance fund for the individual market was also established under the Affordable Care Act and reduced premiums by an estimated 10 to 14 percent in its first year. A recent analysis by Avalere of seven states that have already created their own reinsurance programs through Section 1332 waivers found that these states reduced individual market premiums by an average of 19.9 percent in their first year.

Georgia's proposal will create a reinsurance program starting for the 2021 plan year. This program is projected to reduce premiums by 10 percent and increase the number of individuals obtaining health insurance through the individual market by about 1,400. This would help patients with pre-existing conditions, including patients with psoriatic disease obtain affordable, comprehensive coverage.

While the NPF supports reinsurance as a tool to stabilize premiums in the individual marketplace, we are deeply concerned that the remainder of the state's 1332 Waiver Application will jeopardize access to quality and affordable healthcare coverage for patients with psoriasis and psoriatic arthritis and other pre-existing conditions, as we have outlined in our related comments on the Georgia Access Model.

We appreciate your consideration of our comments. If you or your colleagues have any questions, please feel free to contact the NPF by reaching out to Matthew Moran, Federal Government Relations & Health Policy Manager at mmoran@psoriasis.org.

Sincerely,

Patrick Stone Vice President, Government Relations & Advocacy
(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Georgia Access - Subsidies

Comments*

December 3, 2019

On behalf of the more than eight million Americans living with psoriasis and psoriatic arthritis, the National Psoriasis Foundation (NPF) appreciates the opportunity to submit comments on Georgia's Section 1332 Waiver Application to implement the Georgia Access Model. As the patient advocacy organization for the psoriatic disease community for more than 50 years, the NPF is keenly aware of the improvements in health outcomes that have resulted from advances in treatment innovation. Therefore, the NPF remains committed to ensuring beneficiaries with psoriasis and psoriatic arthritis have access to the full range of treatments and therapies necessary to successfully manage their disease.

While NPF supports reinsurance as a tool to stabilize premiums in the individual marketplace, we are concerned that the Georgia Access Model will jeopardize access to quality and affordable healthcare coverage for patients with psoriasis and psoriatic arthritis and other pre-existing conditions. The state's 1332 waiver fails to satisfy the guardrails in the statutory language of the Affordable Care Act (ACA) and would also put the healthcare coverage of the 450,000 Georgians who currently get their insurance through the state's marketplace at risk while only potentially expanding coverage for a small fraction (30,000 individuals) of the more than 1.4 million uninsured individuals in Georgia. In its current form, NPF urges Georgia to withdraw its application for the Georgia Access Model. In order to address these complex and serious issues, we request that the state convene a group of stakeholders to discuss solutions to adequately provide affordable and comprehensive healthcare coverage for our patients in Georgia.

State Subsidy Program

Georgia has proposed to create a new state-administered subsidy system to replace the Advanced Premium Tax Credits (APTC) created by the ACA. These subsidies do not meet the affordability needs of patients with psoriatic disease and will be allowed to be used toward the purchase of "eligible non-QHPs," driving individuals towards enrolling in substandard coverage. The proposal will reduce access to affordable healthcare coverage for patients with psoriasis and psoriatic arthritis and NPF opposes this proposed change.

First, the draft application requests to waive the cost-sharing reduction (CSR) program that helps patients with incomes below 250 percent of the federal poverty level (FPL) to pay deductibles, coinsurance and other cost-sharing required by their health plan. It is unclear whether individuals who currently qualify for CSRs under the ACA will still get this financial assistance under the state-administered subsidy system. CSR payments (often referred to as a subsidy) are a critical aspect to making healthcare affordable for patients. Many health plans often require patients to pay out-of-pocket for healthcare costs in the form of deductibles, copayments and coinsurance. A recent study showed that individuals enrolled in the lowest-tier plan offered in the 2017 exchange averaged more than \$6,000 in out-of-pocket expenses. Patients living with psoriatic disease and other chronic illnesses, especially those treating with biologics, can encounter extremely high prescription drug costs for these therapies. For individuals with low or fixed incomes, these high costs can be an extreme burden.

Additionally, the state has likely underestimated the impact of the Georgia Access Model on premiums in Georgia. Eligible non-QHPs will attract healthier consumers, segmenting the market and increasing the cost of comprehensive coverage. As discussed later in our comments, the loss of Healthcare.gov and the incentives for insurers and brokers selling products outside of an exchange will likely boost enrollment in short-term and other skimpy plans, further undermining the risk pool and destabilizing the market. A substantially greater premium increase would both make QHPs more expensive for individuals who do not qualify for subsidies and also increase the cost of QHP subsidies for the state, meaning that the state's pool of financial assistance funds would not be able to help as many individuals.

The state subsidy system is significantly under-resourced, which would have serious implications for patients with psoriasis and psoriatic arthritis and other individuals in Georgia. The state has budgeted \$13.5 million in the first three years and \$5 million thereafter for implementation costs, which seems quite low given the significant investments in new technical and administrative systems needed to operate the Georgia Access Model. Additionally, the state's contribution to the subsidy fund is just \$144 million in 2022, which will not go far if the Georgia Access Model increases premiums as predicted above. This lack of funding is particularly dangerous for patients given the Georgia Access Model's cap on subsidy funding. Currently, any individual who meets the eligibility criteria for financial assistance for coverage under the ACA receives that financial assistance. However, patients could be placed on a wait list if the state exceeds its capped contribution under the Georgia Access Model.

Promotion of Substandard Plans

As mentioned in the previous section, Georgia's proposal would allow subsidies to be used for QHPs currently offered in the state as well as for "eligible non-QHPs." This will result in more individuals enrolling in less comprehensive coverage and these decision-making issues may be magnified when the costs and benefits of each option are difficult to evaluate, as in the market for health insurance. That is why transparency around what is being sold, in particular non-QHP and skimpy plans, is critical for Georgians to understand the different coverage options they are purchasing.

The draft waiver application does not contain sufficient information about the standards for eligible non-QHPs, particularly what the state means when it says that the plans will maintain protections for people with pre-existing conditions. For example, even if these plans cannot deny coverage to patients with pre-existing conditions, could plans vary premiums based on health status? Protecting patients with psoriasis and psoriatic arthritis and other pre-existing conditions involves much more than guarantee issue; patients need community rating, bans on exclusion periods and condition exclusions, cost-sharing protections, bans on annual and lifetime limits and many other protections currently required for plans sold on the individual market to truly access comprehensive, affordable healthcare coverage.

Other aspects of the standards for these plans are unclear as well. The draft application requests to waive network adequacy requirements. When psoriasis and psoriatic arthritis is successfully managed it is done so as part of an on-going, multi-faceted relationship between the patient, provider and the entire care team. It is essential that patients with serious chronic conditions like psoriatic disease have access to providers without these arbitrary limits on care. Furthermore, our patients already face challenges when attempting to access the necessary specialty care required to manage their disease. This is particularly true in rural or medically underserved areas of the country and those for whom traveling to a medical appointment is an added obstacle. Unfortunately, research indicates that there are fewer dermatologists practicing in this country than are needed and the distribution of specialists does not align with geographic need. In 2016, 35 percent of dermatology providers practiced in the 100 densest census areas, while fewer than 2 percent practiced in the 100 least dense areas. Additionally, it is unclear how eligible non-QHPs could be part of the single risk pool with current QHPs given how dissimilar these products could be. This would make risk adjustment – a process that discourages plans from cherry-picking healthier individuals by transferring funds from plans with lower risk enrollees to higher risk ones – difficult to implement.

The draft application does clearly state that eligible non-QHPs would not have to cover all ten essential health benefits (EHBs), which are currently required by QHPs. The state claims that eligible non-QHPs will provide 90 percent of the benefits that current QHPs cover. However, the state provides no explanation or analysis to support this assumption. This approach is particularly harmful to patients with psoriasis and psoriatic arthritis who are likely managing comorbidities as a result of their psoriatic disease. As indicated in the joint American Academy of Dermatology (AAD) and NPF guidelines released earlier this year, individuals with psoriatic disease are at a heightened risk of developing a number of comorbid conditions including cardiovascular disease and stroke, diabetes and hypertension, as well as depression and anxiety.

By offering plans that do not cover all EHBs but are still eligible for subsidies, issuers will be able to segment the market and charge lower premiums to healthier individuals for eligible non-QHPs while charging high premiums for patients with pre-existing conditions who need comprehensive coverage. This is a backdoor to discrimination against patients with pre-existing conditions. Many in our community recall all too well the questionable benefits packages that existed prior to the ACA and are not interested in returning to those days.

Enrollment Platform

In addition to administering a state subsidy program, Georgia's application proposes to no longer use Healthcare.gov for enrollment and instead have people enroll directly through insurers or brokers. This policy

will make it harder for patients to enroll in comprehensive, affordable healthcare coverage and NPF opposes this change.

While the state acknowledges that leaving Healthcare.gov would require a detailed transition strategy, NPF fears that many of the 450,000 Georgians who currently purchase coverage through Healthcare.gov would inevitably lose coverage during the transition. Due to the heterogeneous characteristics of this chronic immune-mediated disease, psoriatic disease requires sophisticated medical care. Treatments that work for one person may not work for others, and many patients cycle through numerous accepted treatment options. Without the tools to control their symptoms, people with psoriatic disease cycle through periods of intense pain; fatigue; unbearable itch; whole-body inflammation; flaking and bleeding of large swaths of the skin; and joint degradation. The nature and characteristics of this disease magnifies the critical need for patients to have access to timely and effective treatment options. The state assumes that there will be no coverage losses without any analysis to support that assumption, calling into question whether the Georgia Access Model will truly lead the same or more people to obtain coverage than would without the waiver.

Today, patients with psoriasis or psoriatic arthritis who shop on Healthcare.gov can trust that they are purchasing a health insurance plan that will allow them to manage their health conditions. However, under the Georgia Access Model, issuers and brokers could sell QHPs alongside other types of plans that discriminate against people with pre-existing conditions and will not cover enrollees' medical expenses if they get sick. This could create confusion for patients and lead them to purchase coverage that does not meet their needs. There is already evidence of misleading marketing related to short-term and other skimpy plans leading individuals to unwillingly enroll in coverage that lacks key patient protections. This problem would likely worsen in Georgia under this proposal.

Healthcare.gov shows consumers all QHPs available in their area and does not favor certain plans over others. However, brokers who would be helping individuals through the enrollment process under the Georgia Access Model would not have to show individuals all of their plan options and may receive larger commissions for certain plans over others that influence their recommendations to patients. Increasing the reliance on insurers and brokers will limit the ability of patients with psoriatic disease to compare plan price and benefit design in an unbiased manner to choose the right plan for them and could ultimately result in harm to patients who become enrolled in sub-standard or inadequate insurance coverage that does not meet their needs. This failure to appropriately shield patients from risk is unacceptable.

In its current form, NPF opposes this waiver proposal. Instead, we urge Georgia to focus on solutions that promote adequate, affordable and accessible coverage without jeopardizing access to care for patients with psoriatic disease and other pre-existing conditions. In order to address these complex and serious issues, we request that the state convene a group of stakeholders to discuss solutions how to adequately provide affordable and comprehensive healthcare coverage for our patients in Georgia.

We appreciate your consideration of our comments. If you or your colleagues have any questions, please feel free to contact the NPF by reaching out to Matthew Moran, Federal Government Relations & Health Policy Manager at mmoran@psoriasis.org.

Sincerely,

Patrick Stone Vice President, Government Relations & Advocacy
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Business/Organization * Open Hand Atlanta

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** McLean

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

Open Hand Atlanta commends Governor Kemp and the state of Georgia for recognizing the important role of addressing the health related needs of Georgia's low income uninsured citizens. In 2017, the CDC ranks the leading cause of death as heart disease, followed by diabetes and kidney disease ranked at number 7 and 8. All of these conditions are nutrition sensitive and can be treated, better managed and even prevented with medically tailored nutrition interventions in the form of medically tailored meals (MTM) and medical nutrition therapy (MNT). Medically Tailored Meals are meals designed by a Registered Dietitian Nutritionist based on a nutritional assessment and referral from a health care provider to address a medical diagnosis and ensure the best possible health outcomes.

Recent research has demonstrated significant improvements in health outcomes and associated cost savings for Medicare and Medicaid beneficiaries. In an article published in Health Affairs in 2018, researchers used claims data and found providing MTMs for patients dually eligible for Medicaid and Medicare resulted in fewer emergency department visits, emergency transportation services, and inpatient admissions as compared to dually eligible patients not enrolled in the meal program. Specifically, as compared to matched controls, dually eligible patients receiving MTMs experienced a 70% reduction in emergency department visits, a 52% reduction in inpatient admissions, and a 72% reduction in emergency transportation events.

The MTM intervention resulted in a 16% net reduction in health care costs. The net savings after factoring in the cost of the meals was \$220 per month per patient. A similar MTM program deployed in a managed care Medicaid population in Philadelphia saw 28% lower health care costs for Medicaid patients receiving MTMs as compared to a similar group of Medicaid patients. Researchers found that individuals who received MTMs had hospital stays that were 37% shorter, visited the hospital 50% less, and were 20% more likely to be discharged to their homes. A MTM program in Denver similarly recorded a 24% decrease in health care costs for patients enrolled in their services in a retrospective cohort analysis and found a 13% decrease in all cause, 30-day readmission rate. Finally, another study conducted in San Francisco found that for HIV patients connected to MTM, adherence to antiretroviral therapy increased from 47% to 70%, and perceived diabetes self-management significantly increased for diabetic patients. The same study also found reduction of diabetes-related distress and recorded improved depressive symptoms and decreased binge drinking.

These studies suggest that MTMs not only improve an individual's health outcomes, but can also reduce total health care costs. As a result, private insurers across the country are looking for ways to bring these meals to their members, especially within their Medicaid and Medicare managed care plans. The time is right to examine the efficacy of administering MTMs within our public insurance programs.

What we propose if the current version of the 1115 waiver is approved, is to consider including MTMs as a benefit to persons in the program.

Connecting patients with complex health conditions to MTMs is an effective and low-cost strategy to improve health outcomes, decrease utilization of expensive health services, and enhance quality of life for Medicaid patients.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

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1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Business/Organization * Opportunity Solutions Project

Stakeholder Type * Advocacy Group

First Name * [REDACTED] **Last Name *** Archambault

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Florida **Zip** [REDACTED]

Comments for 1332 Waiver - Reinsurance

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Comment Topic* Reinsurance - Other

Comments*

Georgia has a dynamic economy, but to remain a destination for entrepreneurs and those that are self-employed as part of the telecommuting economy, Georgia needs to take steps to heal the broken individual insurance market under ObamaCare.

Georgia has multiple policy options to make health insurance more affordable and to expand access to primary and specialty care. The state should expand access to copper plans, split the single risk pool, and expand access to plans that wrap around direct health care agreements.

These reforms will produce plans with significantly lower premiums. They will expand access to more high-quality care in rural areas, including primary care, mental health, and specialists.

These reforms will also allow providers to spend more time with their patients and help those with chronic conditions get healthier more quickly, driving down spending and premiums in the future.

With these changes, Georgia's individual will improve without a government bailout. The result will be more affordable options for those that want to live and work in Georgia.

Skyrocketing premiums are driving people out of Georgia's individual market

Skyrocketing premiums have forced thousands of Georgians out of the individual market in recent years. Since 2013, premiums in Georgia's individual market have nearly tripled.¹⁻⁴ As premiums have continued to soar in recent years, more and more Georgians have fled the market.

Between 2016 and 2018, the number of people buying unsubsidized plans in the individual market dropped by a startling 71 percent.⁵ Unsubsidized enrollment dropped by 60 percent in 2018 alone, the second-highest decline in the entire country.⁶

Nearly 185,000 fewer Georgians are now buying individual market coverage than just a few short years ago.⁷ As premiums continue to rise, more enrollees will continue to flee the market, causing a never-ending, reinforcing cycle of higher premiums and fewer enrollees.

Georgia's individual market could improve with just a few steps

New federal rules initiated by President Trump on Health Reimbursement Arrangements (HRAs) can be a game-changer for small companies. For the first time ever, small businesses can empower their employees to enter the individual market and purchase the plan that is right for their family with tax-advantaged dollars.⁸ This will be especially important in Georgia, where fewer than one in four small businesses are able to offer health insurance coverage to their employees.⁹

This is an opportunity to increase private health insurance coverage, but also stabilize the individual market. However, skyrocketing premiums threaten to minimize this massive potential this rule might otherwise have. Many employers will be hesitant to send their employees to an individual market with growing premiums and a shrinking enrollment base.

By ensuring more affordable options are made available, Georgia can reset the foundation of the individual market, attract new healthy enrollees into the individual market, and draw back in many that have dropped out, breaking the downward cycle of the individual market. Four additional ideas could improve Georgia's proposed waiver request.

Georgia can expand access to Copper plans

Under ObamaCare, the individual market has four “tiers” of plans, based on cost-sharing levels. Platinum plans have the lowest cost-sharing and thus typically have the highest premiums. Catastrophic plans, also known as Copper plans, have the highest cost-sharing and usually have the lowest premiums. Because government subsidies cannot be used to pay for Copper plans, they also have their own, separate risk pool, which is significantly healthier than the subsidized market.

However, these plans are currently only available to individuals who are under age 30 or who otherwise meet hardship criteria. Georgia could seek a waiver to increase access to these plans to more people, providing potential enrollees with greater choices. It could allow individuals in their 30s and 40s to access these plans, with the maximum age set at the level determined by actuaries as necessary to ensure the greatest premium relief.

The average premiums for Copper plans in Georgia are roughly 13 percent lower than average premiums for Bronze plans, and 34 percent lower than average Silver plan premiums.¹⁰ While allowing slightly older enrollees into the Copper plan market could somewhat moderate these premium savings, finding the right age cut-off will ensure that premiums are still significantly more affordable.

The waiver proposal could increase the age of those that can access copper plans, but make these plans available only off-exchange, to avoid the added expense of building an ObamaCare exchange or reimbursing the federal government for a custom IT build of HealthCare.gov.

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While those receiving subsidies have been insulated against skyrocketing premiums in the deteriorating individual market, those paying the full cost of their premiums have suffered most. Splitting the risk pool would allow for significant premium relief for those buying off-exchange, attracting additional enrollees back into the individual market. Because 88 percent of Georgia exchange enrollees receive subsidies, this would have little effect on exchange enrollees’ net premium costs.¹² The remaining 12 percent of Georgia exchange enrollees who do not receive subsidies could move off-exchange to take full advantage of the premium savings other off-exchange enrollees would see.

Splitting the risk pool could also spur more employers to take advantage of the new HRA rule. Under the new rule, employers can provide tax-free dollars to employees to buy individual coverage. In order for individuals to pay the difference between their employers’ HRA contributions and total premiums with tax-advantaged dollars, they must purchase off-exchange. They could then have the difference deducted from their paycheck on a pre-tax basis through a section 125 plan.

But many employers may be unwilling to adopt this HRA option, and many employees may be reluctant to take it up, if their premiums are driven heavily by on-exchange enrollees. In Georgia, the average risk score in the individual market—driven virtually entirely by subsidized on-exchange enrollees—is roughly 25 percent higher than the average risk score in the current small group market.¹³ By splitting the risk pool, Georgia could ensure the small group market and off-exchange market had similar risk scores, enticing more employers to take advantage of the new HRA flexibility.

Lower premiums off-exchange could also induce individuals with small and moderate subsidy levels to shift out of the exchange, thereby reducing costs to taxpayers. Additionally, it could encourage more small companies to take advantage of the new HRA flexibility, empowering their employees to move into the individual market. For those that currently offer employer-based insurance, the switch to the off-exchange individual market could mean lower premiums for employees and higher wages, thereby resulting in some additional tax revenues to offset any subsidy costs for changes to those left on the exchange. For those not offering coverage today,

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The current waiver proposal already seeks to waive the single risk pool requirement for reinsurance purposes. Georgia should consider splitting the risk pool altogether to maximize the effectiveness of such a policy change.

Georgia can allow more plans to wrap around direct medical care arrangements

Direct Medical Care (DMC) arrangements have enormous potential to lower costs and provide high-quality care, especially for those remaining in the individual market. DMCs build off the success of the direct primary care (DPC) model that has been shown to deliver high-value care and save money in the process. These arrangements can increase access in rural areas, as it is easier for practices to thrive with small patient panels and virtual DMC arrangements are becoming more and more prevalent nationwide.

As DPCs can provide the vast majority of care for most patients, and other DMC arrangements can be added as needed, a waiver offers the opportunity to introduce products onto the market that wrap around these agreements. As a result, the plans will cost far less as they will be reserved for only major medical events.

Wrapping lower premium coverage plans around DMC could also remove perverse incentives that currently lead to billions of dollars in unnecessary treatment. This system would challenge the wildly inefficient and costly way that most health care is delivered now. Allowing consumers to pair DMC arrangements with health plans that wraparound DMC services would give Georgians more affordable options to consider.

Georgia could utilize invisible risk-sharing as its reinsurance model

The current waiver proposal adopts a reinsurance plan to reduce premiums in the individual market. Some states, like Maine, have had success in reducing premiums by setting up condition-based reinsurance—often called invisible risk-sharing. This allows reinsurance money to be more efficiently deployed when compared to other approaches. It maximizes premium reduction and does not segment out those with specific conditions, but keeps everyone in the individual market on the same type of plans. In addition, risk-sharing requires insurers to better manage enrollees upfront, as they are on the hook for certain costs in the future if the individual is not part of the invisible risk program.

The benefit of such an approach can lead to lower and more stable premiums and can attract younger enrollees based on the resulting lower premiums. This approach also protects those with pre-existing conditions and allows them access to coverage, while lowering premiums for others in the market. If Georgia split the risk pool, public resources would be maximized if invisible risk-sharing was targeted to off-exchange plans.

(character limit of 32,500)

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic * Reinsurance - Other

Comments *

Added by mistake.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

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(character limit of 32,500)

Public Comments

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Comment Date * 12/2/2019

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- 1115 Waiver - Georgia Pathways
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On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * Pathfinder Patient Advocacy Group

Stakeholder Type * Business Owner

First Name * [REDACTED] **Last Name *** Gatton

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

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Comment Topic* State Program Cost and Budget

Comments*

I am writing to request that Governor Kemp's proposed Medicaid waiver be opposed. As an independent patient advocate, I deal with cases on a routine basis of Georgians who go without health insurance because they work, but fall in the gap of making too much money to qualify for Medicaid and not enough to qualify for a subsidy on the Marketplace. In other states they would have healthcare coverage. The proposed waiver program covers too few people for the cost; as a state we are missing out on federal dollars that would allow us to move out of the bottom fourth of US states in terms of the health of our residents so that individuals who are working for minimum wage won't have to forego healthcare to pay rent.

(character limit of 32,500)

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Business/Organization * Planned Parenthood Southeast

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Stallworth

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

December 3, 2019

VIA ELECTRONIC SUBMISSION

Lavinia Luca
C/O the Board of Community Health
P.O. Box 1966
Atlanta, Georgia 30301-1966

Re: Planned Parenthood Southeast on Georgia's Draft Section 1115 Waiver Application

Dear Commissioner Berry:

Planned Parenthood Southeast (Planned Parenthood) submits these comments regarding the Georgia Department of Community Health's (Georgia) application to seek a limited Medicaid expansion with work requirements and cost-sharing requirements.

Planned Parenthood is a safety net provider for the populations in Georgia most in need of health services. Planned Parenthood operates four health centers across the state of Georgia and serves as a leading women's health care provider and advocate and a trusted, nonprofit source of primary and preventive care for women, men, and young people. Our health centers range in size and locations from small rural clinic practices to larger metropolitan clinics. Every year, our health centers provide affordable birth control, lifesaving cancer screenings, testing and treatment for STDs, and other essential care to thousands of patients. The vast majority of Planned Parenthood patients have low incomes and lack health insurance.

Medicaid is a vital part of the health care system and plays a major role in ensuring access to essential primary and preventive care services for women, men, and young people. Further, approximately 1 in 5 women of reproductive age use Medicaid. The program is the largest payer of reproductive health care coverage, paying for 75 percent of family planning services. And for nearly half of women giving birth, Medicaid is the source of coverage for essential care, including prenatal and delivery care; recent data found that in 24 states 50 percent or more of births are covered by Medicaid.

Due to racism and other systemic barriers that have contributed to income inequality, women of color disproportionately comprise the Medicaid population; 30 percent of African-American women and 24 percent of Hispanic women are enrolled in Medicaid, compared to only 14 percent of white women. Medicaid, as designed by Congress, is critical to improving the health and well-being of women and families with low incomes across Georgia and the rest of the nation. In particular, Medicaid coverage of family planning services and supplies helps women's health, lives, educational success, and economic empowerment.

We are deeply concerned that Georgia is proposing a limited Medicaid expansion while requesting an enhanced federal match and seeking to condition Medicaid coverage on mandatory participation in work or work-like activities. Moreover, we are troubled that Georgia is also seeking to require payment of premiums and copayments, as well as including requirements for enrollment in employer sponsored insurance (ESI). Even though Georgia's proposal will expand Medicaid to some individuals with low incomes, limited expansion is not enough to provide coverage to the near poor individuals who need coverage. The additional mandatory work, cost-sharing, and ESI requirements will undermine the state's goal of improving health care access for the specific individuals that Georgia's proposal captures, including many of the patients that we serve. Finally, while one of the stated goals of the Georgia 1115 demonstration Waiver request is to promote economic stability and improve health outcomes, the result will be the exact opposite and people's health will suffer.

stability and improve health outcomes, the result will be the exact opposite and people's health will suffer.

For decades, Medicaid has provided benefits for all eligible individuals—with eligibility being determined by income and/or special characteristic (e.g., pregnancy, being a child under 19, or having a disability). Under Georgia's proposal, the state would be allowed to narrow eligibility and dampen enrollment for non-disabled adults.

This proposal clearly contravenes the objectives of Medicaid and does not serve a legitimate experimental purpose. The outcome is predictable – women and families will lose access to affordable health insurance coverage and, as a result, to critical health care services. We urge Georgia to rescind its Waiver request, as it contradicts longstanding federal law and policy and erects barriers to health care access.

Georgia Should Rescind its Proposal to Implement a Limited Medicaid Expansion with Enhanced Match.

Congress designed Medicaid as an entitlement program. With very few exceptions, every person who meets the eligibility criteria outlined in the Medicaid Act receives medical assistance. As a result of the Affordable Care Act (ACA), adults who do not have children and have incomes at or below 138 percent of the federal poverty level are entitled to Medicaid coverage if their state chooses to expand Medicaid. For states that choose to fully expand Medicaid, the federal government provides an enhanced match (93% in 2019 and 90% in 2020 and thereafter), which is substantially higher than the traditional Medicaid matching rate.

However, Georgia is proposing to limit Medicaid expansion to individuals up to 100 percent of the federal poverty line (FPL), while receiving the enhanced federal matching rate for these individuals. This is directly counter to the current policy set out by the ACA, requiring states to fully expand Medicaid up to 138 percent of the FPL to receive the enhanced match. And notably, this type of proposal has not yet been approved in any other state, with the Centers of Medicare and Medicaid Services (CMS) having gone as far as explicitly rejecting this type of proposal earlier this year, stating that "CMS will continue to only approve demonstrations that comply with the current policy."

In order to be approved pursuant to Section 1115 of the Social Security Act, Georgia's Waiver application must:

- propose an "experiment, pilot or demonstration";
- waive compliance only with requirements in 42 U.S.C. § 1396a;
- be likely to promote the objectives of the Medicaid Act; and
- be approved only "to the extent and for the period necessary" to carry out the experiment.

Georgia's proposal to limit Medicaid expansion is contrary to the purpose of the Medicaid program. Medicaid is a medical assistance program, and although states have flexibility in designing and administering their Medicaid programs, the Medicaid Act requires that states provide medical assistance as far as practicable to all individuals who meet the eligibility criteria established in federal law.

To date, 36 states and DC have adopted the Medicaid expansion and 14 states have not adopted the expansion, including Georgia. As a result, Georgia already lags behind in covering people with low incomes broadly and specific vulnerable populations that other states have been covering through adopting Medicaid expansion. Further, pursuing a limited form of Medicaid expansion would continue to exacerbate barriers to health care access already felt by communities with low incomes and deepen health inequities, particularly among women of color.

Georgia Should Rescind its Proposal that Requires Employment or Other Work-Like Activities as a Condition to Medicaid Coverage.

Georgia's proposal to implement an employment or other work-like activities requirement is not only misguided and dangerous, but will threaten access to critical health coverage for many women and families with low incomes. In fact, Georgia includes no estimate on how many Medicaid expansion enrollees will lose coverage due to the work requirement. However, Georgia can expect widespread coverage loss as over 18,000 individuals lost Medicaid coverage in 2018 after a similar requirement was implemented in Arkansas.

Once again, the work requirements proposed by Georgia are not likely to promote Medicaid's objectives. The purpose of Medicaid is to enable states to furnish medical assistance to individuals with low incomes who are unable to meet the costs of medical care and to furnish such assistance and services to help these individuals attain or retain the capacity for independence and self-care. Conditioning Medicaid eligibility on participation in work activities would block access to coverage and care that help individuals attain and retain independence

or self-care and, as a result, be able to work.

Research confirms that Medicaid coverage actually helps individuals to obtain and maintain employment. In a study of Ohio's Medicaid program, 74.8 percent of unemployed Medicaid expansion enrollees reported Medicaid made it easier to secure and maintain employment. As an example, Medicaid coverage helped an Ohio woman who was suffering from a severe hernia and was previously unable to get out of bed to receive the surgery she needed to improve her health and go back to work. Medicaid enrollees also report less financial stress and depression, and greater financial security than individuals who are uninsured.

Second, imposing Medicaid work requirements is a policy proposal to address a non-existent problem, as the vast majority of people with Medicaid coverage work or have valid reasons for not working. According to Health Affairs, 87 percent of Medicaid expansion enrollees are already working, in school, or looking for work. If they are not working, it is likely the result of an illness, disability, or care-giving responsibility. For example, the Kaiser Family Foundation found that among adults with Medicaid coverage who did not work, it was likely because they were: going to school (15%); taking care of their home or family (30%); retired (9%); unable to find work (6%); or dealing with illness or disability (36%).

Finally, implementing work requirements significantly increases oversight burden and administrative costs for states. A recent Government Accountability Office study found implementing work requirements in five states ranged from under \$10 million to over \$250 million. Moreover, these estimates did not include planned costs as outlined in the states' waiver applications.

Taken together, it is clear that the work requirements will lead to a large number of individuals, including those who work or are exempt from the requirement, losing Medicaid coverage and becoming uninsured, with serious consequences for the health and well-being of themselves and their families and ultimately greater costs to the state health care system. These outcomes are in direct conflict with the objectives of Medicaid.

Rather than imposing these harmful requirements on people with Medicaid and increasing red tape and barriers to accessing care, the state of Georgia should focus on voluntary, evidence-based anti-poverty efforts that will provide legitimate and equitable opportunities for women and families, such as educational assistance, job training, and affordable child care. We urge Georgia to rescind this proposal to impose burdensome work requirements as it will result in thousands of people losing needed health coverage, thus threatening their health and economic circumstances.

Georgia Should Rescind its Proposal to Impose Premiums, Copayments, and Required ESI Enrollment on Medicaid Enrollees.

We urge Georgia to rescind the provision in Georgia's 1115 Waiver request that would impose premiums and copayments for health care coverage for certain Medicaid enrollees with incomes between 50 and 100 percent of the federal poverty line (FPL). Georgia proposes to impose a tiered premium structure based on income (up to 2% of household income), with premiums ranging from \$4 to \$11, with up to a \$5 tobacco surcharge. Individuals above 50 percent of the FPL who fail to make premium payments will be locked out of their health coverage and face debt collection. Similarly, copayments apply to the same non-exempt populations and can be as high as \$30 for services. Many Medicaid enrollees will be unable to afford these extra expenses on top of other necessary expenses they are already paying for, including: rent, food, transportation, and child care.

Moreover, allowing Georgia to impose premiums on enrollees and withhold coverage from individuals who do not make their premium payments undermines congressional intent for the Medicaid program, and also violates the federal requirement that Section 1115 waivers further the objectives of the Medicaid program. Constructing financial barriers to health care clearly has no connection to improving Medicaid coverage, access, or health outcomes.

In fact, Georgia can expect thousands of families with low incomes to lose their health coverage as a result of premium requirements. States that have imposed similar premium requirements for people who enroll in Medicaid have seen reductions in enrollment, increased financial hardship for enrollees, reduced use of preventative services, increased use of expensive hospital services, and worse health outcomes. Given these findings, Georgia should rescind its Waiver request to impose premiums.

In the same vein, we oppose Georgia's initiative to institute copayments for care on Medicaid enrollees. Like premiums, imposing copayments on Medicaid enrollees not only undercuts the objectives of the Medicaid program, it also further burdens Medicaid enrollees, who already experience significant financial strain paying

for housing, transportation, food, and other basic necessities. After these expenses, copayments are simply unaffordable and act as an additional barrier to accessing care.

Finally, we strongly oppose Georgia's proposal that requires those who are eligible for ESI plans to enroll and pay their portion of their health insurance premium as a condition of Medicaid coverage. Working families experience a high and often growing burden of health care costs, with ESI premiums rising faster than income. As a result, families and individuals with low incomes take home less money to help pay for immediate costs such as food, housing, transportation, and child care. Reimbursing families and individuals later for their share of the ESI premiums not only provides families with economic assistance too late, it will place an extraordinary burden and stress on already financially struggling families and individuals to cope with immediate costs. This proposal will have widespread consequences; according to Georgia's own estimates, this proposal will apply to as many as 25,028 enrollees in Demonstration Year 1 and an expected 52,509 enrollees by Demonstration Year 5.

Instead of increasing financial burden on enrollees, leading to poorer health outcomes, Georgia should focus on how to increase access to care that helps its Medicaid enrollees achieve greater wellbeing and independence. The cost-sharing measures in this proposal (premiums, copayments, mandatory enrollment in ESI) will have far-reaching and adverse consequences. As such, Planned Parenthood urges Georgia to rescind this Waiver request.

We appreciate the opportunity to comment on Georgia's proposed Section 1115 Waiver request. As the state works to formalize the Waiver and seek federal approval, we urge Georgia to eliminate from the Waiver proposal any provisions that would gut access to health care and undermine Medicaid coverage. If you require additional information about the issues raised in this letter, please contact me at alicia.stallworth@ppse.org.

Respectfully submitted,

Alicia Stallworth
Georgia State Director
Planned Parenthood Southeast
214 Peachtree Street NE, Suite 400
Atlanta, Georgia 30303
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Business/Organization * Positive Impact Health Centers, Inc.

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Lehman

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Eligibility Criteria

Comments*

Positive Impact Health Centers, Inc. (PIHC) is one of the largest AIDS service organizations in Georgia. Since its founding in 1991, PIHC has been on the frontlines working to end the HIV/AIDS epidemic in Georgia. Currently, the organization serves more than 10,000 people a year at three established clinics located in Dekalb, Gwinnett, and Cobb counties. PIHC provides comprehensive services that include HIV/ STI testing and prevention, pre- and post- exposure prophylaxis (PrEP/PEP), HIV/AIDS specialty medical treatment, behavioral and mental health services, substance abuse treatment, nutritional counseling, medical case management, in-house pharmacy, and housing assistance. We look forward to continuing to work with all federal, state, and local partners to end the epidemic.

After passage of SB 106, the "Patients First Act," Positive Impact Health Centers, Inc. was supportive of the Governor's efforts to take meaningful steps to end the epidemic through a partial expansion of Medicaid that could have provided healthcare to more than half of the 19,000 Georgians living with HIV who are not currently in treatment. However, we were greatly disappointed that the 1115 waiver proposal would only cover an estimated 10.4% or 50,000 out of 480,000 uninsured Georgians living below 100% of the Federal Poverty Level (FPL). Not only does the proposal fall short in providing coverage to the vast majority of low-income, uninsured Georgians, the imposition of cumbersome work requirements will perpetuate the status quo that has left Georgia with an HIV epidemic that is comparable to third world countries.

Covering all Georgians up to 100% of the FPL would provide more than 2,000 people living with HIV currently in our care with reliable access to healthcare. This would help patients stay in treatment and become virally suppressed as well as provide access to comprehensive services needed to live a healthy life. Moreover, many of our patients face significant barriers to employment, such as their physical and mental health, lack of housing and transportation, and other social determinants that must first be addressed. Increasing access to healthcare for these vulnerable Georgians, without work requirements that have been struck down in other states, will enable them to become self-sufficient, contributing members of society that will help build a healthier, stronger workforce.

Accordingly, we respectfully urge Governor Kemp to reconsider the 1115 waiver proposal by removing the proposed work requirements and fully expanding Medicaid as the most effective method to increase access to health care coverage and life-saving medications to end the HIV/AIDS epidemic in Georgia.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Business/Organization * Practical Solutions Counseling, LLC

Stakeholder Type * Business Owner

First Name * [REDACTED] **Last Name *** Witcraft-Shiau

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* State Program Cost and Budget

Comments*

I'd prefer to see more Georgians covered for lower cost. Accept the ACA funding. I'm happy to see more Medicaid patients in my practice.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Reinsurance - State Program Cost and Budget

Comments*

Let's cover more Georgians for less by accepting the Medicaid expansion. Too many non Metro areas are struggling to fund coverage.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Consumer Experience

Comments*

Reiterating: we can cover tens of thousands of rural Georgians for less if we expand Medicaid and accept funding. Our maternal mortality rates are atrocious in particular. If you're really pro life & fiscally responsible, cover more people for less state investment.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/4/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * SisterLove, Inc.

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Tosto

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

December 3, 2019
Georgia Department of Community Health
2 Peachtree Street NW
Atlanta, GA 30303

VIA ELECTRONIC SUBMISSION

Re:

We are writing to express our deep concern and full opposition to the Georgia Demonstration Medicaid 1115 Waiver Program ("waiver") to be submitted to the Centers for Medicare & Medicaid Services (CMS) for Georgia Pathways to Coverage (Georgia Pathways). The proposed waiver program does not protect the Georgians in need and instead puts more strain on them to attain healthcare. The current program is structured to allow adults below the poverty line to enroll in medicaid, but must complete paperwork each month to prove they are working, enrolled in school, or volunteering or else they are kicked off the program. Further, people who are living in poverty are still forced to pay premiums and if they fail to pay for three months they are kicked off of coverage. The proposed plan further subjects people living in poverty to more structural barriers. This system is incredibly difficult to navigate and puts more strain on those struggling to stay afloat. Further, it ignores the large Georgia population that lives just above the poverty line who are now left without coverage. The state ends up paying more to cover less Georgians than a full Medicaid Expansion program would.

Founded in July 1989, SisterLove, Inc. is an HIV/AIDS and reproductive justice nonprofit service organization focusing on women, particularly women of African descent. SisterLove's mission is to eradicate the adverse impact of HIV/AIDS and other sexual and reproductive oppressions upon all women, their families, and their communities in the United States and worldwide through education, prevention, support, and human rights advocacy. To realize this mission, SisterLove engages in advocacy, reproductive health education, and prevention. SisterLove seeks to educate and empower youth and women of color to influence the laws and policies that disparately impact them. In the fight against HIV, health insurance is paramount. A Medicaid program that actually covers a majority of Georgians is necessary.

As articulated below, the Section 1115 Waiver should be rescinded because

Full Medicaid Expansion is both more cost-effective and cover more Georgians
Expanded Medicaid would cover almost 486,000 Georgians, while the current proposal would cover only 80,000 Georgians and it would cost almost the same price. The uninsured rate would drop less than one percent while a full Medicaid expansion would drop the rate over three percent (13.7 to 9).

The Waiver will not benefit employment

Studies show working reporting requirements in other similar program show little increase in short term employment and even less growth in long term employment. Short term employment does not help people get out of poverty. Those living with HIV already face increased difficulty attaining and maintaining employment due to stigma and other societal factors. The waiver program will not be a legitimate incentive for them to get employment, since many have tried and are unable.

The Waivers are burdensome and will lead to less coverage

Adding a reporting requirement will lead to a financial handling the requirements

People will be burdened due to this recording requirements and will lose their health care if they are unable to comply. People will also lose their coverage due to inability to pay premiums and copayments. Those living with

comply. People will also lose their coverage due to inability to pay premiums and copayments. Those living with HIV already deal with a large amount of burdens and adding another would only add more stress to their lives. Those living with HIV should not be forced to prove employment or acceptable volunteering in order to obtain life saving and necessary health insurance.

(Information found at <https://gbpi.org/2019/1115-waiver-public-comments/>)

Conclusion

For the aforementioned reasons, DCH should immediately rescind the 1115 Waiver. The Waiver program will not benefit the state of Georgia and is an ineffective way to provide coverage. We appreciate the opportunity to comment on the proposed 1115 waivers. If you require any additional information about the issues raised in this letter, please contact Sequoia Ayala, JD, MA, Director of Policy and Advocacy, sayala@sisterlove.org.

Signed,
SisterLove, Inc.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/4/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Business/Organization * SisterLove, Inc.

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Tosto

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

December 3, 2019

Georgia Department of Community Health
2 Peachtree Street NW
Atlanta, GA 30303

VIA ELECTRONIC SUBMISSION

Re: Patients First Act Public Comment, Section 1332 Waiver - Georgia Access Model

We are writing to express our deep concern and full opposition to the Georgia Access Model proposed within the State Review and Empowerment Waiver (Section 1332 Waiver) ("waiver") to be submitted by the State of Georgia to the Department of Treasury and the Centers of Medicare & Medicaid Services (CMS) in the Department of Health and Human Services (HHS). The restructuring of premium tax credits and privatizations of Georgia's marketplace under the proposed model poses significant risks for Georgians including, increased premiums for ACA coverage, pushing consumers into substandard plans, and likely causing many individuals to lose coverage altogether, particularly low-income Georgians. We strongly urge the state to amend the current State Innovation Waiver to maintain a centralized enrollment platform such as healthcare.gov; prohibit the use of premium subsidies for non-qualified health plans; and remove the cap on premium subsidies to ensure that everyone eligible for subsidies can continue to receive them and afford their health coverage.

Founded in July 1989, SisterLove, Inc. is an HIV/AIDS and reproductive justice nonprofit service organization focusing on women, particularly women of African descent. SisterLove's mission is to eradicate the adverse impact of HIV/AIDS and other sexual and reproductive oppressions upon all women, their families, and their communities in the United States and worldwide through education, prevention, support, and human rights advocacy. To realize this mission, SisterLove engages in advocacy, reproductive health education, and prevention. SisterLove seeks to educate and empower youth and women of color to influence the laws and policies that disparately impact them.

As articulated below, the Georgia Access Model portion of the Section 1332 Waiver should be rescinded and revised, because:

Divestment from the Federally Facilitated Exchange (Healthcare.gov) creates unnecessary risks for consumers.

Abolishing the requirement to cover ten essential health benefits and mental health parity jeopardizes access to critical services for Georgians. Capping and distributing subsidies on a "first in, first out" basis means that eligible people could be denied assistance.

The waiver violates the "Guardrails" outlined in the Affordable Care Act (ACA), and therefore is not approvable under federal law. The waiver fails to comply with the guidance on State Relief and Empowerment waivers released by the U.S. Departments of Health and Human Services (HHS) in October of 2018.

The risks posed by the waiver will disproportionately impact Queer and Trans People of Color.

The Georgia Access Model Risks Coverage Disruption for More Than 400,000 individuals.

The Georgia Access Model comprises the second-phase of Governor Brian Kemp's draft waiver application under Section 1332 of the Affordable Care Act (ACA). Governor Kemp's plan seeks to expand coverage to only 30,000 out of the 1.4 million individuals who are uninsured in Georgia. The model eliminates the use of Healthcare.gov and forces consumers to enroll directly through private web-brokers and insurers. The state also plans to establish a subsidy structure allowing for the subsidization of plans that do not fully comply with ACA requirements and would cap enrollment if subsidy costs exceed federal and state funds. If approved, the model will drastically undermine comprehensive coverage for more than 400,000 consumers currently enrolled

model will drastically undermine comprehensive coverage for more than 400,000 consumers currently enrolled in coverage through the marketplace.

Privatizing Georgia's Marketplace forfeits the benefits and protections provided by the current Federally Facilitated Exchange.

Transitioning the state from a Federally Facilitated Exchange (FEE) (Healthcare.gov) to the Georgia Access model creates an unnecessary risk for consumers by allowing private entities, including web-brokers and insurers, to manage consumer-facing outreach and enrollment functions, such as plan comparisons, customer services, plan selection, and the application process.

The Privatization of marketplace functions is especially concerning because direct enrollment entities have been known to steer consumers towards substandard plans and fail to alert them of Medicaid eligibility.

Evidenced by common practices prior to the establishment of the ACA, it is likely that web brokers and insurers will target outreach and assistance to healthier populations exclusively, creating a barrier to access for those most in need. The proposed plan will force consumers to navigate numerous websites, translate inaccessible language, and grapple with conflicting information. By waiving Section 1311 of the Affordable Care Act requiring states to have health care exchange, the state seeks to waive the ACA's mental health parity requirement. Mental health parity is essential because it requires health insurance plans to cover mental health and substance abuse treatment at the same level as physical health treatment. We urge the state to build a stable, robust health insurance marketplace and invest in policies to increase marketplace enrollment.

Permitting the use of state-administered subsidies to purchase non-comprehensive health insurance plans, including association health plans and short-term plans, threatens critical access for consumers.

The proposed plan permits private entities to display both qualified health plans (QHPs) that meet the ACA's full requirements and eligible non-QHPs that do not meet all ACA requirements.

Eligible non-QHPs could decline to cover entire health benefit categories including ambulatory patient services; hospitalization; pregnancy, maternity, and newborn care; mental health and substance use disorder services, including behavioral health treatment; prescription drugs; rehabilitative services and devices; laboratory services; preventative and wellness services, including chronic disease management; and pediatric services, including oral and vision care.

The state's actuarial analysis projects that ten percent of current Qualified Health Plan enrollees would opt to purchase a non-qualified plan under the proposal

The proposed cap on subsidy spending will limit enrollment and compromise access to affordable health insurance.

Under the Georgia Access Plan, state-specific subsidies would be funded through federal pass-through funding under section 1332. However, the state plans to cap its contribution towards the waiver on an annual basis. If more people are eligible for subsidies than the state estimates, those individuals will be placed on a waitlist and would only receive subsidies if more state funding becomes available. Georgia's plan to distribute subsidies on a first-come, first-served basis until the funding cap is reached puts affordable coverage into question for consumers. The proposed cap creates a risk of higher premiums for individuals that are unable to receive the subsidies they are qualified for.

II. The proposed waiver would result in a reduced, less affordable, and incomprehensive coverage, and therefore is not approvable under federal law. Pursuant to federal law, states are permitted to make changes to the Affordable Care Act (ACA) if a comparable number of individuals have coverage that is at least as comprehensive and affordable as they would have under the ACA. Further, the proposed changes are not permitted to increase the federal deficit.

Georgia's proposal fails to meet the following "guardrails" outlined by the ACA:

Provide coverage that is at least as comprehensive as without the waiver (as ACA plans);

Provide coverage that is at least as affordable as without the waiver;

Cover at least a comparable number of state residents; and Does not increase the federal deficit. The proposed plan even fails to meet guidance issued by the Administration to weaken standards for 1332 waivers. Under guidance issued by the Administration in October of 2018, waivers will be evaluated based on whether residents have access to comprehensive and affordable coverage under the waiver. as without the waiver.

Georgia's waiver would allow consumers to utilize tax credits to purchase non-qualified health plans that are not required to meet ACA comprehensive coverage standards. Plans may exclude coverage of ten essential health benefits outlined by the ACA such as mental health care and prescription drugs. The state's plan to cap funding for subsidies alone prevents individuals from accessing affordable coverage comparable to the ACA. When combined with the proposed 1115 Medicaid waiver, the state plans to spend \$215 million in 2022 to cover approximately 80,000 individuals.

III. The risks posed by the Georgia Access Model will disproportionately impact People Living with HIV. Individuals living with HIV have similar health concerns as the general population, but experience particular health challenges at higher rates, and face unique health challenges.

The state of Georgia has the third largest uninsured population in the country. Approximately 1.4 million Georgians were uninsured in 2018.

Georgia is also home to the one of the highest HIV populations in the country with approximately 51,350 residents.

People living with HIV are in desperate need of preventative care and rely on health insurance to maintain their viral load through life saving treatment.

The state's plan to waive the ACA's mental health parity is especially concerning because HIV individuals are more likely to experience depression, anxiety, and substance misuse.

Conclusion

For the aforementioned reasons, DCH should immediately amend the Georgia Access and Reinsurance 1332 Waiver to prohibit premium subsidies from being used for non-qualified health plans; remove the cap on premium subsidies; and maintain a centralized enrollment experience. We appreciate the opportunity to comment on the proposed 1332 waiver. If you require any additional information about the issues raised in this letter, please contact Sequoia Ayala, JD, MA, Director of Policy and Advocacy, sayala@sisterlove.org.

Signed,
SisterLove, Inc.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/2/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Business/Organization * South Central Primary Care Center, Inc.

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Tucker

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

As the CEO of a Community Health Center that is located in rural South Georgia, I appreciate Governor Kemp's Leadership in recognizing the need to boost and build a robust rural health care system in Georgia. South Central Primary Care Center and Community Health Centers all over the state stand ready to support this 1115 Waiver and other efforts to improve access, quality, and affordability of health care in Georgia.

The mission of the Community Health Center system is to improve access to comprehensive primary health care services for medically underserved Georgians.

Community Health Centers in Georgia began their work over 50 years ago, partnering with communities to bring access to health care in areas that are medically underserved.

Currently, there are 34 separate and distinct Health Center organizations - all non-profit 501(c)(3), governed by a local volunteer Board of Directors comprised of community leaders and patients. Collectively, these 34 organizations have 229 clinic sites in 123 Georgia Counties. Many of these clinics are in rural communities, where there is limited access to health care and patients experience high rates of poverty.

Over the past 17 years, Georgia has experienced tremendous growth of the Health Center system- more than doubling the number of clinics serving Georgia's underserved population - the poor and uninsured, including the Medicaid population.

This year, over 600,000 patients will be served by Georgia's Community Health Centers. Health Centers are the largest safety provider for primary care, serving Georgia patients.

From an economic impact perspective, Georgia's Community Health Centers employ over 3,500 individuals with an estimated annual payroll of 137 million dollars.

Medicaid dollars spent for patient care in a Community Health Center, helps the state meet its budget challenges. Patients seen in Community Health Centers result in savings through chronic disease management and the reduction of unnecessary ER visits thus saving money. Community Health Centers are also known as Federally Qualified Health Centers because they receive grant dollars to assist in providing health care to the uninsured and underinsured.

Again, we support the 1115 waiver and doing our part to make it a success.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

1115 Waiver - Georgia Pathways

1332 Waiver - Georgia Access

1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself

Business/Organization

Business/Organization * SPARK Reproductive Just NOW!, Inc.

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Mahan

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

December 3, 2019

Georgia Department of Community Health
2 Peachtree Street NW
Atlanta, GA 30303

VIA ELECTRONIC SUBMISSION

Re: Patients First Act Public Comment, Section 1332 Waiver - Georgia Access Model

We are writing to express our deep concern and full opposition to the Georgia Access Model proposed within the State Review and Empowerment Waiver (Section 1332 Waiver) ("waiver") to be submitted by the State of Georgia to the Department of Treasury and the Centers of Medicare & Medicaid Services (CMS) in the Department of Health and Human Services (HHS). (Office of the Governor, Georgia Section 1332 Waiver Application (Nov. 4, 2019) [hereinafter Section 1332 Waiver Application]). The restructuring of premium tax credits and privatizations of Georgia's marketplace under the proposed model poses significant risks for Georgians including, increased premiums for ACA coverage, pushing consumers into substandard plans, and likely causing many individuals to lose coverage altogether, particularly low-income Georgians. We strongly urge the state to amend the current State Innovation Waiver to maintain a centralized enrollment platform such as healthcare.gov; prohibit the use of premium subsidies for non-qualified health plans; and remove the cap on premium subsidies to ensure that everyone eligible for subsidies can continue to receive them and afford their health coverage.

Since 2007, SPARK Reproductive Justice NOW!, Inc. ("SPARK") has worked to build and strengthen the power of our communities and a reproductive justice movement that centers Black Women, Women of Color, and Queer & Trans Young People of Color in Georgia and the South. Based in Atlanta, Georgia, we have fostered a dynamic, collaborative model of advocacy, leadership development, collective action, and discourse that creates change and impact for Black women and Queer people's struggles for reproductive justice. Our mission is to build new leadership, change culture, and advance knowledge in Georgia and the South to ensure individuals and communities have the resources and power to make sustainable and liberatory decisions about our bodies, gender, sexualities, and lives. Our analysis is specifically anchored in the historical lasting legacy of enslavement and exploitation of Black people in the South – through economic disenfranchisement, racial inequality, and reproductive oppression. This legacy informs how we understand bodies, politics, labor, and reproduction in the South. We are working towards a world free of reproductive violence and oppression that works to uphold and reinforce dangerous and negative policies, practices, and culture. Achieving comprehensive, affirming healthcare for Queer, Trans, and Non-binary people in Georgia is an achievable goal that will bring us closer to securing reproductive justice for all.

As articulated below, the Georgia Access Model portion of the Section 1332 Waiver should be rescinded and revised, because:

- Divestment from the Federally Facilitated Exchange (Healthcare.gov) creates unnecessary risks for consumers.
- Abolishing the requirement to cover ten essential health benefits and mental health parity jeopardizes access to critical services for Georgians.
- Capping and distributing subsidies on a "first in, first out" basis means that eligible people could be denied assistance.

- The waiver violates the “Guardrails” outlined in the Affordable Care Act (ACA), and therefore is not approvable under federal law.

- The waiver fails to comply with the guidance on State Relief and Empowerment waivers released by the U.S. Departments of Health and Human Services (HHS) in October of 2018.

- The risks posed by the waiver will disproportionately impact Queer and Trans People of Color.

I.The Georgia Access Model Risks Coverage Disruption for More Than 400,000 individuals.

The Georgia Access Model comprises the second-phase of Governor Brian Kemp’s draft waiver application under Section 1332 of the Affordable Care Act (ACA) (Section 1332 Waiver Application, *supra* note 1, at 17–19). Governor Kemp’s plan seeks to expand coverage to only 30,000 out of the 1.4 million individuals who are uninsured in Georgia (*Id.*). The model eliminates the use of Healthcare.gov and forces consumers to enroll directly through private web-brokers and insurers (*id.* at 6-7). The state also plans to establish a subsidy structure allowing for the subsidization of plans that do not fully comply with ACA requirements and would cap enrollment if subsidy costs exceed federal and state funds (*id.*). If approved, the model will drastically undermine comprehensive coverage for more than 400,000 consumers currently enrolled in coverage through the marketplace (The Georgia Access Plan: A Bad Deal for Consumers, GEORGIANS FOR A HEALTHY FUTURE (Nov. 20, 2019, 1:25 PM), <https://healthyfuturega.org/2019/11/20/the-georgia-access-plan-a-bad-deal-for-consumers/>).

A.Privatizing Georgia’s Marketplace forfeits the benefits and protections provided by the current Federally Facilitated Exchange.

- Transitioning the state from a Federally Facilitated Exchange (FEE) (Healthcare.gov) to the Georgia Access model creates an unnecessary risk for consumers by allowing private entities, including web-brokers and insurers, to manage consumer-facing outreach and enrollment functions, such as plan comparisons, customer services, plan selection, and the application process (Section 1332 Waiver Application, *supra* note 1, at 17).

- The Privatization of marketplace functions is especially concerning because direct enrollment entities have been known to steer consumers towards substandard plans and fail to alert them of Medicaid eligibility (Tara Straw, Direct Enrollment in Marketplace Coverage Lacks Protections for Consumers, Exposes Them to Harm, CENTER ON BUDGET AND POLICY PRIORITIES (Mar. 15, 2019), <https://www.cbpp.org/research/health/direct-enrollment-in-marketplace-coverage-lacks-protections-for-consumers-exposes>).

- Evidenced by common practices prior to the establishment of the ACA, it is likely that web brokers and insurers will target outreach and assistance to healthier populations exclusively, creating a barrier to access for those most in need (*id.*).

- The proposed plan will force consumers to navigate numerous websites, translate inaccessible language, and grapple with conflicting information (*id.*).

- By waiving Section 1311 of the Affordable Care Act requiring states to have health care exchange, the state seeks to waive the ACA’s mental health parity requirement. Mental health parity is essential because it requires health insurance plans to cover mental health and substance abuse treatment at the same level as physical health treatment (GEORGIANS FOR A HEALTHY FUTURE, *supra* note 6).

- We urge the state to build a stable, robust health insurance marketplace and invest in policies to increase marketplace enrollment.

B.Permitting the use of state-administered subsidies to purchase non-comprehensive health insurance plans, including association health plans and short-term plans, threatens critical access for consumers.

- The proposed plan permits private entities to display both qualified health plans (QHPs) that meet the ACA’s full requirements and eligible non-QHPs that do not meet all ACA requirements (Section 1332 Waiver Application, *supra* note 1, at 6–7).

- Eligible non-QHPs could decline to cover entire health benefit categories including ambulatory patient services; hospitalization; pregnancy, maternity, and newborn care; mental health and substance use disorder services. including behavioral health treatment: prescription drugs: rehabilitative services and devices:

laboratory services; preventative and wellness services, including chronic disease management; and pediatric services, including oral and vision care (Laura Harker, State Health Care Proposals Fall Short and Undermine Comprehensive Health Plans, GEORGIA BUDGET AND POLICY INSTITUTE 4 (Nov. 2019), <https://cdn.gbpi.org/wp-content/uploads/2019/11/GBPI-Analysis-of-Proposed-1115-and-1332-Waivers.pdf>).

- The state's actuarial analysis projects that ten percent of current Qualified Health Plan enrollees would opt to purchase a non-qualified plan under the proposal (Katie Keith, Georgia Releases Broad 1332 Waiver Application, HEALTH AFFAIRS (Nov. 5, 2019), <https://www.healthaffairs.org/doi/10.1377/hblog20191105.878300/full/>).

C. The proposed cap on subsidy spending will limit enrollment and compromise access to affordable health insurance.

- Under the Georgia Access Plan, state-specific subsidies would be funded through federal pass-through funding under section 1332. However, the state plans to cap its contribution towards the waiver on an annual basis (Section 1332 Waiver Application, *supra* note 1, at 19).

- If more people are eligible for subsidies than the state estimates, those individuals will be placed on a waitlist and would only receive subsidies if more state funding becomes available. (*Id.* at 20).

- Georgia's plan to distribute subsidies on a first-come, first-served basis until the funding cap is reached puts affordable coverage into question for consumers (*id.*).

- The proposed cap creates a risk of higher premiums for individuals that are unable to receive the subsidies they are qualified for (Harker, *supra* note 13, at 6).

II. The proposed waiver would result in a reduced, less affordable, and incomprehensive coverage, and therefore is not approvable under federal law.

- Pursuant to federal law, states are permitted to make changes to the Affordable Care Act (ACA) if a comparable number of individuals have coverage that is at least as comprehensive and affordable as they would have under the ACA. Further, the proposed changes are not permitted to increase the federal deficit (Sarah Lueck & Jessica Schubel, Understanding the Affordable Care Act's State Innovation ("1332") Waivers, CENTER ON BUDGET AND POLICY PRIORITIES (Sept. 5, 2017), <https://www.cbpp.org/research/health/understanding-the-affordable-care-acts-state-innovation-1332-waivers>).

- Georgia's proposal fails to meet the following "guardrails" outlined by the ACA:

1. Provide coverage that is at least as comprehensive as without the waiver (as ACA plans);
2. Provide coverage that is at least as affordable as without the waiver;
3. Cover at least a comparable number of state residents; and
4. Does not increase the federal deficit (*id.*).

A. The proposed plan even fails to meet guidance issued by the Administration to weaken standards for 1332 waivers.

- Under guidance issued by the Administration in October of 2018, waivers will be evaluated based on whether residents have access to comprehensive and affordable coverage under the waiver, as without the waiver (Timothy Jost, Using the 1332 State Waiver Program to Undermine the Affordable Care Act State by State, COMMONWEALTH FUND (Oct.30, 2018), <https://www.commonwealthfund.org/blog/2018/using-1332-state-waiver-program-undermine-affordable-care-act-state-state>).

- Georgia's waiver would allow consumers to utilize tax credits to purchase non-qualified health plans that are not required to meet ACA comprehensive coverage standards. Plans may exclude coverage of ten essential health benefits outlined by the ACA such as mental health care and prescription drugs (Harker, *supra* note 13, at 4).

•The state's plan to cap funding for subsidies alone prevents individuals from accessing affordable coverage comparable to the ACA.

•When combined with the proposed 1115 Medicaid waiver, the state plans to spend \$215 million in 2022 to cover approximately 80,000 individuals (id. at 5).

III. The risks posed by the Georgia Access Model will disproportionately impact Queer and Trans People of Color.

•LGBTQ individuals have similar health concerns as the general population, but experience particular health challenges at higher rates, and face unique health challenges (Jen Kates et. al, Health and Access to Care and Coverage for Lesbian, Gay, Bisexual, and Transgender Individuals in the U.S, HENRY J. KAISER FAMILY FOUNDATION 1 (2018), <http://files.kff.org/attachment/Issue-Brief-Health-and-Access-to-Care-and-Coverage-for-LGBT-Individuals-in-the-US>).

•The state of Georgia has the third largest uninsured population in the country. Approximately 1.4 million Georgians were uninsured in 2018 (Ariel Hart, Georgia adds 36,000 to uninsured rolls, ranks third worst in U.S., ATLANTA JOURNAL CONSTITUTION (Sept. 10, 2019), <https://www.ajc.com/news/state--regional-govt--politics/georgia-adds-000-uninsured-rolls-ranks-third-worst/dBiv1qGR4qb7Ono1gUukrL/#>).

•Georgia is also home to the second largest LGBTQ African-American population with approximately 73,000 residents (Laura Durso & Gary Gates, Serving Our Youth: Findings from a National Survey of Service Providers Working with Lesbian, Gay, Bisexual, and Transgender Youth who are Homeless or At Risk of Becoming Homeless, WILLIAMS INSTITUTE (2012), <http://williamsinstitute.law.ucla.edu/wp-content/uploads/Durso-Gates-LGBT-Homeless-Youth-Survey-July-2012.pdf>).

•The African-American LGBTQ community is less likely to have health insurance (21% are uninsured) than non-LGBTQ African-Americans nationwide (Angeliki Kastanis & Gary Gates, LGBT African-Americans and African-American Same-sex Couples, WILLIAMS INSTITUTE (2012), <http://williamsinstitute.law.ucla.edu/wp-content/uploads/Census-AFAMER-Oct-2013.pdf>).

•The state's plan to waive the ACA's mental health parity is especially concerning because LGBTQ individuals are two and a half times more likely to experience depression, anxiety, and substance misuse (Kates, supra note 24, at 8).

Conclusion

For the aforementioned reasons, the Department of Community Health should immediately amend the Georgia Access and Reinsurance 1332 Waiver to prohibit premium subsidies from being used for non-qualified health plans; remove the cap on premium subsidies; and maintain a centralized enrollment experience. We appreciate the opportunity to comment on the proposed 1332 waiver. If you require any additional information about the issues raised in this letter, please contact Jennifer Mahan, If/When/How Law and Policy Fellow, at Jenn@sparkrj.org or Dr. Krystal Redman, Executive Director, at Krystal@sparkrj.org.

Signed,

SPARK Reproductive Justice NOW!, Inc.
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Business/Organization * SPARK Reproductive Justice Now, Inc.

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Mahan

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Other

Comments*

December 3, 2019
Georgia Department of Community Health
2 Peachtree Street NW
Atlanta, GA 30303

VIA ELECTRONIC SUBMISSION

Re: Patients First Act Public Comment, Section 1115 Waiver

We are writing to express our deep concern and full opposition to the Georgia Medicaid 1115 Waiver Program ("waiver") to be submitted by the State of Georgia to the Department of Treasury and the Centers of Medicare & Medicaid Services (CMS) in the Department of Health and Human Services (HHS). The proposed waiver program does not protect the Georgians in need and instead puts more strain on them to attain healthcare. The current program is structured to allow adults below the poverty line to enroll in medicaid, but must complete paperwork each month to prove they are working, enrolled in school, or volunteering or else they are kicked off the program. Further, people who are living in poverty are still forced to pay premiums and if they fail to pay for three months they are kicked off of coverage. The proposed plan further puts people living in poverty with more structural barriers. This system is incredibly difficult to navigate and puts more strain on those struggling to stay afloat. Further, it ignores the large Georgia population that lives just above the poverty line who are now left without coverage. The state ends up paying more to cover less Georgians than a full Medicaid Expansion would

Since 2007, SPARK Reproductive Justice NOW!, Inc. ("SPARK") has worked to build and strengthen the power of our communities and a reproductive justice movement that centers Black Women, Women of Color, and Queer & Trans Young People of Color in Georgia and the South. Based in Atlanta, Georgia, we have fostered a dynamic, collaborative model of advocacy, leadership development, collective action, and discourse that creates change and impact for Black women and Queer people's struggles for reproductive justice. Our mission is to build new leadership, change culture, and advance knowledge in Georgia and the South to ensure individuals and communities have the resources and power to make sustainable and liberatory decisions about our bodies, gender, sexualities, and lives. Our analysis is specifically anchored in the historical lasting legacy of enslavement and exploitation of Black people in the South – through economic disenfranchisement, racial inequality, and reproductive oppression. This legacy informs how we understand bodies, politics, labor, and reproduction in the South. We are working towards a world free of reproductive violence and oppression that works to uphold and reinforce dangerous and negative policies, practices, and culture. Achieving comprehensive, affirming healthcare for Queer, Trans, and Non-binary people in Georgia is an achievable goal that will bring us closer to securing reproductive justice for all.

As articulated below, the Section 1115 Waiver should be rescinded because

I. Full Medicaid Expansion is both more cost-effective and cover more Georgians

- Expanded Medicaid would cover almost 486,000 Georgians, while the current proposal would cover only 80,000 Georgians and it would cost almost the same price

- The uninsured rate would drop less than one percent while a full Medicaid expansion would drop the rate over three percent (13.7 to 9).

II. The Waiver will not benefit employment

- Studies show working reporting requirements in other similar program show little increase in short term employment and even less growth in long term employment.

- Short term employment does not help people get out of poverty

III. The Waivers are burdensome and will lead to less coverage

- Adding a reporting requirement will lead to a financial handling the requirements

- People will be burdened due to this recording requirements and will lose their health care if they are unable to comply

- People will also lose their coverage due to inability to pay premiums and copayments (Information found at <https://gbpi.org/2019/1115-waiver-public-comments/>).

IV. The risks posed by the waiver will disproportionately impact Queer and Trans People of Color.

- LGBTQ individuals have similar health concerns as the general population, but experience particular health challenges at higher rates, and face unique health challenges. (Jen Kates et. al, Health and Access to Care and Coverage for Lesbian, Gay, Bisexual, and Transgender Individuals in the U.S, HENRY J. KAISER FAMILY FOUNDATION 1 (2018), <http://files.kff.org/attachment/Issue-Brief-Health-and-Access-to-Care-and-Coverage-for-LGBT-Individuals-in-the-US>).

- The state of Georgia has the third largest uninsured population in the country. Approximately 1.4 million Georgians were uninsured in 2018. (Ariel Hart, Georgia adds 36,000 to uninsured rolls, ranks third worst in U.S., ATLANTA JOURNAL CONSTITUTION (Sept. 10, 2019), <https://www.ajc.com/news/state--regional-govt--politics/georgia-adds-000-uninsured-rolls-ranks-third-worst/dBiv1qGR4qb7Ono1gUukrL/#>).

- Georgia is also home to the second largest LGBTQ African-American population with approximately 73,000 residents. (Laura Durso & Gary Gates, Serving Our Youth: Findings from a National Survey of Service Providers Working with Lesbian, Gay, Bisexual, and Transgender Youth who are Homeless or At Risk of Becoming Homeless, WILLIAMS INSTITUTE (2012), <http://williamsinstitute.law.ucla.edu/wp-content/uploads/Durso-Gates-LGBT-Homeless-Youth-Survey-July-2012.pdf>).

- The African-American LGBTQ community is less likely to have health insurance (21% are uninsured) than non-LGBTQ African-Americans nationwide. (Angeliki Kastanis & Gary Gates, LGBT African-Americans and African-American Same-sex Couples, WILLIAMS INSTITUTE (2012), <http://williamsinstitute.law.ucla.edu/wp-content/uploads/Census-AFAMER-Oct-2013.pdf>).

- Without Medicaid expansion, many low-income LGBTQ people are shut out of the gains in reproductive health access provided by the ACA. The community lacks coverage in part because LGBTQ African-Americans are more likely to be unemployed (15%) than non-LGBTQ African-American populations (12%). African-American LGBTQ families raising children earn \$15,000 less than heterosexual counterparts each year. African-American women in same-sex couples take home \$20,000 less than African-American men in same-sex couples. These families along with all Georgian families deserve affordable care. (Why Medicaid Expansion Matters to LGBTQ African-Americans in Georgia, SPARK REPRODUCTIVE JUSTICE NOW! (2014), <http://www.sparkrj.org/website/wp-content/uploads/2016/07/Medicaid-for-LGBTQQ-African-Americans-rev.-9.17.2014.pdf>).

Conclusion

For the aforementioned reasons, the Department of Community Health should immediately rescind the 1115 Waiver. The Waiver program will not benefit the state of Georgia and is an ineffective way to provide coverage. We appreciate the opportunity to comment on the proposed 1115 waivers. If you require any additional information about the issues raised in this letter, please contact Jennifer Mahan, If/When/How Law and Policy Fellow, at Jenn@sparkrj.org or Dr. Krystal Redman, Executive Director, at Krystal@sparkrj.org.

Signed,

SPARK Reproductive Justice NOW!, Inc.

(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Business/Organization * SYNERGY (Plus+) An Association for I/DD Professionals (Compliance software)

Stakeholder Type * Business Owner

First Name * [REDACTED] **Last Name *** Burgess

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

As the CEO/Founder of SYNERGY (Plus+)- A compliance software company that provides educational compliance tracking tools for I/DD Professionals; With over nine years as an I/DD professional consultant (DDP), I realized the need for technology and compliance to work together to ensure more efficient and reliable oversight supports for providers and for the professionals that serve them. www.synergyiddplus.com

On September 25, 2019: Synergy's tools were demoed for DBHDD (Lori Campbell & Ron Wakefield), with emphasis on leveraging the use of technology to improve quality monitoring and oversight supports.

According to Medicaid.gov, "Section 1115 of the Social Security Act gives the Secretary of Health and Human Services authority to approve experimental, pilot, or demonstration projects that are found by the Secretary to be likely to assist in promoting the objectives of the Medicaid program. The purpose of these demonstrations, which give states additional flexibility to design and improve their programs, is to demonstrate and evaluate state-specific policy approaches to better serving Medicaid populations."

I support the 1115 waiver if it indeed includes the expansion of medicaid dollars that also pours into adopting updated systems and software that support and educate providers and professionals; in managing day to day administrative workloads, and individual care.

I ask as a professional and as an advocate for professionals that CMS views states' ability to test different approaches as an important tool for continuous improvement.

Please feel free to view links below for more information:

- https://www.linkedin.com/posts/timmeshaburgess_bbwrnetwork-unesco-unicef-activity-6604805290883981312-3xOz

- https://www.linkedin.com/posts/timmeshaburgess_the-culture-of-ddps-activity-6590955712719962112-xhzR

- https://www.linkedin.com/posts/timmeshaburgess_worldhealthorganization-unwomen-unicef-activity-6572231502933880832-g0zb

- https://www.linkedin.com/posts/timmeshaburgess_thank-you-supriya-prasad-ceo-of-spb-productions-activity-6549693248770764800-q4xF

- https://www.linkedin.com/posts/timmeshaburgess_idd-professional-administrative-supports-activity-6592054836324253696-oPTc

- https://www.linkedin.com/posts/timmeshaburgess_5-keys-to-surviving-an-idd-compliance-audit-activity-6592054921250525184-7Mu8

- <https://www.linkedin.com/feed/update/urn:li:activity:6526285826609987584>
(character limit of 32,500)

Public Comments

General Information

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- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself Business/Organization

Business/Organization * The Carter Center Mental Health Program

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Ellingson

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Program Goals

Comments*

Two Health Waivers (1115 and 1332) Proposed by Governor Kemp Will Significantly Restrict Access to Health Care

The Carter Center Mental Health program is concerned that the announced plans to submit two waivers regarding public and private health insurance in Georgia will:

- 1.) Drastically limit the number of uninsured citizens who will have access to Medicaid coverage, and
- 2.) Significantly reduce Georgia residents' ability to obtain qualified health insurance plans covering the ten essential health benefits, and
- 3.) Eliminate required coverage of mental health and substance misuse treatment and supports

Because Georgia has one of the highest rates of uninsured people in the country, it is ranked as one of the worst states for many health indicators. We are concerned that the state is opting to insure approximately 80,000 people over two years, when the state could spend approximately the same amount of money and insure closer to 500,000 people. Sound health policy in Georgia would require pursuing more cost-effective ways of providing coverage for a greater number of uninsured citizens.

Many people who are uninsured in Georgia suffer from mental illness and addiction, and these people may be unable to meet the work requirements outlined in the 1115 plan. Therefore, they will not be able to access Medicaid coverage. These Georgians need access to health insurance first, so that they can stabilize their conditions and become capable of holding a steady job to support themselves in the long term.

We are in the midst of a mental health and substance use crisis – overdose and suicide rates are devastating our Georgia families and communities. Mental health and substance misuse treatment and supports should be covered on par with other health issues. Waiving insurance companies' responsibility to cover mental health and substance misuse as an essential health benefit, as proposed in the 1332 waiver plan, will impact citizens' ability to obtain critical mental health and substance misuse treatment and services. They will either purchase plans that do not have the coverage they need, or they will end up paying significantly more for that coverage. Mental illness and addictive disorders are illnesses of the brain that must be covered on par with physical illnesses. The 1332 waiver plan proposes to decrease access to mental health and substance services that will be paid for on par with other health issues by insurance companies. Many people in Georgia already have to pay more out of pocket for mental health and substance abuse care than for other physical illnesses, and our state needs to make strides toward ensuring parity for mental health coverage. The current waiver is taking the state a step in the opposite direction.

The current proposed waivers will decrease Georgia residents' ability to acquire health insurance, decrease their ability to choose a quality health insurance policy that covers mental and behavioral health treatment, and decrease access to mental health and substance services paid for on par with other health issues by their insurance. This will negatively impact the overall health of Georgia's population, contribute to our mental and behavioral health crisis, and result in less productive employees and the health of families.

(character limit of 32,500)

Comments for 1332 Waiver - Reinsurance

Comment details for 1332 Waiver - Reinsurance

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the ["Click Here to Add Additional Comments"](#) at the bottom of the page.

Comment Topic* Reinsurance - Other

Comments*

Two Health Waivers (1115 and 1332) Proposed by Governor Kemp Will Significantly Restrict Access to Health Care

The Carter Center Mental Health program is concerned that the announced plans to submit two waivers regarding public and private health insurance in Georgia will:

- 1.) Drastically limit the number of uninsured citizens who will have access to Medicaid coverage, and
- 2.) Significantly reduce Georgia residents' ability to obtain qualified health insurance plans covering the ten essential health benefits, and
- 3.) Eliminate required coverage of mental health and substance misuse treatment and supports

Because Georgia has one of the highest rates of uninsured people in the country, it is ranked as one of the worst states for many health indicators. We are concerned that the state is opting to insure approximately 80,000 people over two years, when the state could spend approximately the same amount of money and insure closer to 500,000 people. Sound health policy in Georgia would require pursuing more cost-effective ways of providing coverage for a greater number of uninsured citizens.

Many people who are uninsured in Georgia suffer from mental illness and addiction, and these people may be unable to meet the work requirements outlined in the 1115 plan. Therefore, they will not be able to access Medicaid coverage. These Georgians need access to health insurance first, so that they can stabilize their conditions and become capable of holding a steady job to support themselves in the long term.

We are in the midst of a mental health and substance use crisis – overdose and suicide rates are devastating our Georgia families and communities. Mental health and substance misuse treatment and supports should be covered on par with other health issues. Waiving insurance companies' responsibility to cover mental health and substance misuse as an essential health benefit, as proposed in the 1332 waiver plan, will impact citizens' ability to obtain critical mental health and substance misuse treatment and services. They will either purchase plans that do not have the coverage they need, or they will end up paying significantly more for that coverage. Mental illness and addictive disorders are illnesses of the brain that must be covered on par with physical illnesses. The 1332 waiver plan proposes to decrease access to mental health and substance services that will be paid for on par with other health issues by insurance companies. Many people in Georgia already have to pay more out of pocket for mental health and substance abuse care than for other physical illnesses, and our state needs to make strides toward ensuring parity for mental health coverage. The current waiver is taking the state a step in the opposite direction.

The current proposed waivers will decrease Georgia residents' ability to acquire health insurance, decrease their ability to choose a quality health insurance policy that covers mental and behavioral health treatment, and decrease access to mental health and substance services paid for on par with other health issues by their insurance. This will negatively impact the overall health of Georgia's population, contribute to our mental and behavioral health crisis, and result in less productive employees and the health of families.

(character limit of 32,500)

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Other

Comments*

Two Health Waivers (1115 and 1332) Proposed by Governor Kemp Will Significantly Restrict Access to Health Care

The Carter Center Mental Health program is concerned that the announced plans to submit two waivers regarding public and private health insurance in Georgia will:

- 1.) Drastically limit the number of uninsured citizens who will have access to Medicaid coverage, and
- 2.) Significantly reduce Georgia residents' ability to obtain qualified health insurance plans covering the ten essential health benefits, and
- 3.) Eliminate required coverage of mental health and substance misuse treatment and supports

Because Georgia has one of the highest rates of uninsured people in the country, it is ranked as one of the worst states for many health indicators. We are concerned that the state is opting to insure approximately 80,000 people over two years, when the state could spend approximately the same amount of money and insure closer to 500,000 people. Sound health policy in Georgia would require pursuing more cost-effective ways of providing coverage for a greater number of uninsured citizens.

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(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Business/Organization * The Southern Poverty Law Center

Stakeholder Type * Advocacy Group

First Name * [REDACTED] **Last Name *** Early

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]
1287

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

SUBMITTED BY ONLINE PORTAL

The Southern Poverty Law Center
P.O. Box 1287
Decatur, GA 30031-1287

December 3, 2019

Lavinia Luca
c/o the Board of Community Health
Post Office Box 1966
Atlanta, Georgia 30301-1966
<https://medicaid.georgia.gov/patients-first-act-public-comment>

Re: Comment on Georgia's Proposed Section 1115 Demonstration Waiver

Dear Madam:

The Southern Poverty Law Center (SPLC) writes regarding the Georgia Department of Community Health's (DHS) proposed Georgia Pathways to Coverage Section 1115 Demonstration Waiver. We appreciate the opportunity to submit comments on this critical issue that impacts the daily lives of thousands of Georgians in every part of the State.

The SPLC is a non-profit legal organization with offices in Georgia and other states across the Deep South. For over four decades, the SPLC has sought justice for, and represented the needs of, the most vulnerable members of our society. The SPLC is committed to ensuring that low-income people across America have access to health coverage and care. With this commitment, and for the reasons explained below, the SPLC respectfully urges the Georgia Department of Community Health to withdraw the proposed Section 1115 Demonstration Waiver.

The core purpose of Medicaid is to provide health insurance to our most vulnerable members of society. The Medicaid program was created because leaders across the United States recognized, over five decades ago, that in order to create a healthier America for everyone, the most vulnerable among us need health insurance. To this end, states that participate in Medicaid must comply with federal eligibility, coverage, and service requirements.

Section 1115 of the Medicaid Act authorizes states to seek limited waivers of certain federal Medicaid requirements by proposing demonstration projects for approval by the federal government. Although Section 1115 waivers provide states with a measure of flexibility to administer and deliver Medicaid services to recipients, the waivers must ultimately promote the principal objective of the Medicaid Act: furnishing medical assistance to the most vulnerable members of our society. Georgia's proposed Section 1115 waiver will fail to meet this goal.

Georgia currently has one of the most limited Medicaid programs in the United States, enrolling only children, the elderly, people with disabilities, pregnant women, and families with extremely low or no income (e.g., less than \$6,600 per year for a family of three—30% of the Federal Poverty Guidelines). And, as a result of Georgia's decision not to expand its Medicaid program in the past, between 450,000 and 536,000 individuals in Georgia are currently ineligible for Medicaid, including 267,000 Georgians who fall into the Medicaid gap

because their incomes are too high to qualify for Medicaid but too low to qualify for subsidies under the Affordable Care Act. For these reasons, Georgia's uninsured rate currently is 12.9%—the fifth highest in the country; and in rural Georgia, the uninsured rate could reach more than 25% by 2026.

The proposed Section 1115 waiver, which sets forth strict work requirements, mandatory copays, and monthly premiums and penalizes noncompliance with suspension or cancellation of enrollment in Medicaid, will not significantly reduce Georgia's uninsured rate and will deprive many newly eligible people of health care. Additionally, individuals enrolled under the waiver will not be able to access the same scope of services current enrollees are able to access due to the waiver's elimination of retroactive eligibility and non-emergency medical transportation (NEMT), as set forth below. If the Section 1115 waiver is approved, Georgia projects that only 47,362 new Georgians will enroll in Medicaid by 2022, and only 52,509 will enroll by 2025. These estimates represent only a small fraction of the 408,000 Georgians living under 100% of the poverty line who would be newly eligible for healthcare under the waiver's limited expansion. Based on the State's own projections, only 11.6% of those eligible will have enrolled under the waiver by 2022; by 2025, this number will increase only marginally to 12.87%. In addition to reducing access to Medicaid through burdensome requirements, the proposed waiver's expansion—which limits the extension of Medicaid coverage to parents, caretakers, or guardians with household incomes from 35 to 100% of the federal poverty line and adults without dependent children with household incomes up to 100% of the federal poverty line—does not go far enough to reach other low-income populations in Georgia. As set forth below, the proposed Section 1115 waiver does not meaningfully expand Medicaid access to hundreds of thousands of Georgians who currently live without health care coverage.

Work requirements, monthly premiums, copayments, and cancellation of NEMT are inconsistent with the purposes of the Medicaid Act and the stated objectives of the Section 1115 waiver

Georgia's Section 1115 waiver does not meaningfully advance the primary goal of the Medicaid Act. Although the proposed waiver would extend Medicaid coverage to some Georgians who are not currently eligible for Medicaid, it fails to account for the thousands of people likely to lose coverage under the limited expansion due to its rigorous eligibility requirements. To illustrate, coverage under the Section 1115 waiver is contingent upon an individual's ability to demonstrate 80 hours of employment, job training, community service, or education. It also requires individuals to pay monthly premiums and copayments for services. Failure to meet the work requirement or to pay required monthly premiums results in penalties, including suspension of Medicaid enrollment and disenrollment.

Far from expanding access to healthcare to low-income families who desperately need it, the proposed Section 1115 waiver creates unnecessary obstacles to Medicaid access, resulting in scanty coverage of the population made newly eligible under the waiver. The waiver proposal is therefore fundamentally inconsistent with the core values and principles of the Medicaid program. For these reasons, the proposed Section 1115 waiver is likely to suffer the same fate as similar proposals advanced in other states, including Kentucky and Arkansas, whose approvals were recently vacated because they erected similar barriers to accessing Medicaid.

The proposed Section 1115 waiver is also inconsistent with its own stated goals and objectives. Georgia's waiver proposal lists among its objectives "support[ing] Georgians on their journey to self-sufficiency," "reduc[ing] the number of uninsured," and "[i]mprov[ing] the health of low-income Georgians by increasing their access to affordable healthcare coverage by encouraging work and other employment-related activities." However, conditioning Medicaid eligibility upon work and the payment of premiums and copayments lacks empirical support and defies logic. Studies have shown that mandated work programs have actually worsened health outcomes, failed to increase long-term employment, and failed to reduce poverty. An analysis of other public benefit assistance programs that imposed work requirements on recipients has shown only modest increases in employment at the outset of the requirement that have decreased over time. Moreover, far from leading to self-sufficiency, the vast majority of people subjected to work requirements in other assistance programs have not escaped poverty, and some have fallen deeper into poverty.

Conversely, studies have shown that access to healthcare through Medicaid enrollment increases the likelihood that an individual will obtain employment. In Ohio, for example, Medicaid recipients enrolled in Medicaid expansion reported that having coverage made it easier for them to maintain their employment, and among those recipients who were unemployed, nearly 75% reported that having Medicaid coverage made it easier to look for employment. Health coverage also makes it easier for families to buy food, pay housing costs, and pay off existing debts. People simply cannot work if their basic needs are not met or if they are not healthy. And far from incentivizing work, stripping people of insurance will lead to a spike in medical debt, as

individuals find themselves unable to pay their health care bills and thus fall deeper into poverty. This hurts all Georgians.

Like the work requirements, the requirements to pay monthly premiums and copayments also undermine Georgia's stated goals of the Section 1115 waiver to improve the health of low-income Georgians and to increase the number of persons who become employed or engage in employment-related activities. Conditioning Medicaid eligibility upon low-income Georgians' ability to pay copayments and monthly premiums sets these individuals up to fail. Consider, for example, individuals who can demonstrate their participation in 80 hours per month of job training, community service, or enrollment in higher education. Despite meeting the proposed work requirement under Georgia's Section 1115 waiver, many of these individuals who fulfill the requirement through training, volunteer, or educational hours would not be compensated for those 80 hours and, without an income, would be at high risk of losing their Medicaid eligibility for inability to pay their monthly premiums.

Additionally, individuals with incomes above 50% of the federal poverty line, who are not otherwise exempted, must pay up to 5% of their household income on premiums and copayments. This means that Georgians earning incomes at 50% of the federal poverty line—approximately \$6,000 for an individual or \$10,500 for a family of three—could owe up to \$300 or \$525, respectively, in premiums and copayments. This imposes an enormous burden on residents who are already struggling to make ends meet. If Georgia wishes to improve the health of low-income Georgians, then it must not penalize its most vulnerable residents by withholding healthcare from them based on their economic status.

Georgia's decision to attach work and monthly premium requirements to its proposed expansion of coverage is especially cruel, given that nearly 15% of Georgia's population lives below the federal poverty level; 15.5% of women and 11.6% of men aged 18 through 64 live in poverty; and 21% of Georgian children live in households below the federal poverty line. Rates of poverty in Georgia are even higher among communities of color, with 23.4% of Latinos, 21.5% of African Americans, 19.9% of Native Americans, and 9.4% of Asian Americans living under the poverty line, compared to 11% of Whites. The proposed work requirements will thus have a disproportionately negative impact on these communities of color, especially given that 46% of Medicaid recipients in Georgia are African-American. Moreover, research has shown that African-American public benefit recipients are more likely to be punished for non-compliance than white beneficiaries. Accordingly, the waiver does not go far enough to help vulnerable individuals and communities of color maintain health coverage and care, or address significant concerns that it could exacerbate Georgia's racial disparities with regard to health; worse, it penalizes these populations for being unable to meet strict work and monetary requirements.

The proposed waiver also unfairly burdens parents and caregivers, who would be forced to complete 80 hours per month of work, job training, higher education, or community service to receive and continue receiving Medicaid coverage in addition to maintaining their fulltime caretaking responsibilities. In Georgia, 28% of adults enrolled in Medicaid reported caretaking responsibilities as the primary reason for not working. And because most recipients are likely only be able to obtain low-wage employment that often comes with a volatile schedule, many will be forced to choose between caring for their children and loved ones and meeting the proposed work requirement.

Hamstrung by work and monthly premium requirements, the expansion is too limited to shore up Georgia's rural and safety-net healthcare providers. All Georgians get sick and most will eventually need medical care, regardless of whether they have insurance. As people lose their Medicaid coverage, many will be turned away by private providers and thus will have to rely on emergency rooms to access treatment, both for emergencies and for routine health services. For example, as Georgia's opioid crisis worsens and takes an indiscriminate and devastating toll on Georgia's families, hospitals must treat those suffering from addiction as well as those bearing the burden of secondary effects of addiction, including infants and children. Because hospitals primarily bear the cost of treating the uninsured, many face closure when Medicaid reimbursements are not available. Across Georgia, seven rural hospitals have closed since 2013, and more than half of the state's remaining rural hospitals are financially vulnerable to closure. By limiting Medicaid coverage and imposing strict requirements on eligible recipients, the proposed Section 1115 waiver is unlikely to stem the closure of these hospitals, which are the last resort for many poor Georgians. Furthermore, the waiver is silent about how hospitals and other health facilities will make up for the additional cost for uncompensated care. Indeed, Earl Rogers, president and CEO of the Georgia Hospital Association, recently stated that the "[w]aiver does not significantly move the needle for the rural and safety net hospitals who care for the state's uninsured patients."

As hospitals continue to close in rural areas, individuals who do not have access to private transportation increasingly rely on NEMT to travel significant distances to receive medical care. Indeed, as of 2013, Medicaid

enrollees in Georgia used NEMT to make nearly 4 million trips to access medical care. Thus, the proposed waiver's elimination of NEMT will hinder Medicaid's and the waiver's objectives of expanding access to health care by making it more difficult for Georgians to get to their medical appointments. Millions of Americans, and especially individuals from low-income, minority, and rural communities, already miss non-emergency medical appointments each year due to lack of transportation. And in Georgia, more than 80% of counties already have a health transportation shortage. The proposed waiver's cancellation of NEMT will therefore only exacerbate Georgia's coverage shortfall and ensure that even those who maintain Medicaid eligibility will not receive care if they cannot find transportation.

Additional key concerns with Georgia's Section 1115 waiver proposal

In addition to the problems with work requirements, premiums, and copayments detailed above, Georgia's waiver proposal suffers from the following deficiencies as to how the waiver will actually be implemented, leaving the public with substantial uncertainty about the proposal's operation:

- The proposal does not explain how it accounts for the loss of coverage that will result from the failure to meet its eligibility requirements. The proposal estimates that over 47,000 additional people will enroll under the Section 1115 waiver by 2022 and that over 52,000 will enroll by 2025. Yet the proposal does not explain how these estimates account for the number of individuals in a given year who will lose coverage because they are unable to meet the 80-hour work requirement or pay monthly premiums. The loss of coverage resulting from the proposed waiver's requirements undermines the fundamental purpose of Medicaid to provide healthcare coverage to those who cannot afford it. Indeed, similar proposals by other states have been struck down for the failure to consider impacts on coverage and possible disenrollment.

- The proposal does not provide for exemptions from the work and activities requirement for people who are chronically ill or otherwise unable to work or engage in employment-related activities for 80 hours per month. The proposal recognizes "temporary" impediments to compliance with the work and activities requirement, such as family emergencies or "other life changing event[s]," the birth or death of a family member, serious illness or hospitalization, severe weather, homelessness, and other "good cause reasons" approved by the State. However, it does not explain whether exemptions will be made for those who cannot meet the requirement due to chronic conditions or other long-term factors rendering them unable to satisfy the 80-hour requirement. Individuals who suffer from chronic conditions or circumstances that render them unable to work or engagement in employment-related activities 80 hours per month will face particularly severe burdens in meeting these requirements, yet the waiver proposal offers no additional support or resources. The proposal is also silent about whether and how recipients could challenge their suspension or disenrollment from Medicaid for failure to comply with the work and activities requirement due to a chronic medical condition.

- The proposal does not provide for exemptions from payment of the monthly premium for people with chronic illnesses or others who are simply unable to pay. The proposal provides several exceptions to the requirement that individuals must pay "sliding scale flat rate monthly premium payments tiered based on family income." However, the proposal does not explain whether exemptions will be made for those who cannot make their monthly payments due to chronic illness or other factors. Nor does it explain whether it will allow enrolled individuals to show good cause for their inability to pay before their enrollment is suspended or terminated. The proposal is also silent about whether and how recipients could challenge their suspension or disenrollment from Medicaid for failure to pay a monthly premium.

- The proposal ignores the impact of parental and caretaker health coverage on children. The health and stability of children largely depends on the health and stability of their parents and caretakers. In recent years, as several states have moved to expand Medicaid under the ACA, the impacts have not only been felt by newly eligible adults, but also by their children, because children with insured parents are more likely to receive pediatric care and preventive services. As parents lose coverage, their children are also likely to lose their coverage, even if the child remains eligible for Medicaid and CHIP. Taking away parents' and caretakers' health insurance leads to financial instability and distress for the whole family, creating a greater risk to children's health. If the real intent of the proposal is to make families healthier, Georgia must consider the impacts that losing parental and caretaker coverage will have on the entire family.

- The proposal does not account for Georgians' inability to report compliance with the work requirements. The proposal purports to create a new eligibility pathway for those who can demonstrate an hours and activities threshold of 80 hours per month of engagement in a qualifying activity, such as work, job training, enrollment in higher education, or community service. Georgia's proposal will permit recipients to report their hours online as well as in person. But in Georgia, over 25% of Georgian households lack broadband internet service.

Additionally, the transportation shortage in many of Georgia's counties will also hinder Georgians' ability to report in person. Thus, many low-income families will struggle to comply with the reporting requirements, even if they are compliant with the work requirement, simply because they lack reliable internet access and transportation.

- The proposal is modeled after commercial healthcare plans and does not grant recipients the full array of services available under the Medicaid State Plan. The proposal states that it seeks "to provide a benefit package more consistent with commercial plan benefits" by requesting a waiver for certain services, including NEMT and certain vision and dental services for 19 and 20-year-olds. The proposal does not explain why recipients enrolled pursuant to the Section 1115 waiver will not have access to the full range of benefits provided under the Medicaid State Plan, including NEMT. Nor does it explain its rationale for modeling Medicaid after commercial plans or how doing so will advance Medicaid's goal of providing healthcare to the country's most vulnerable families and individuals.
- The proposal eliminates retroactive coverage, undermining the goals of Medicaid. The proposal seeks a waiver of the requirement of providing three months retroactive coverage "[t]o better align with commercial health insurance coverage." However, the proposal's alignment with commercial plans does nothing to advance Medicaid's objective of expanding access to health care. Nor does the proposal consider that waiving retroactive coverage will create gaps in coverage and reduce access to Medicaid services by weakening the network of providers serving enrollees. As with Arkansas's similar waiver, Georgia's proposal to "limit[] retroactive coverage may lead 'Medicaid-eligible persons [to] wait even longer to have their conditions treated to avoid incurring medical bills they cannot pay.' And when they do eventually arrive for treatment, they will be covered for less time than they would have been before [the waiver] t[a]k[es] effect. . . , by definition reducing their Medicaid coverage." This undermines Medicaid's most fundamental goals of extending coverage to the nation's poorest people and improving health outcomes.
- The proposal is silent on the costs of administering and monitoring compliance with the work requirements. Even though Georgia does not provide any estimates on administrative costs, one can look at other states, such as Kentucky, Tennessee, and Virginia, to gather a sense of just how much this proposal will cost Georgia. Kentucky projected that enacting work requirements would cost the state more money to cover fewer people. To administer the work requirements and monitor compliance, states must develop new programming and infrastructure and hire additional staff, costing taxpayers tens of millions of dollars. These substantial expenses will have particularly negative consequences for participants in Georgia's Medicaid program, which has been historically underfunded.
- The proposal is unnecessarily costly to cover a small number of people, by Georgia's own estimates. Given that the Section 1115 waiver falls far short on coverage, it is also needlessly costly, thus undercutting the State's supposed rationale that the waiver promotes fiscal sustainability of Medicaid. Under the proposed partial expansion, Georgia will pay more to cover this small fraction of its poorest residents than it would have had the State fully expanded Medicaid coverage to individuals earning up to 138% of the federal poverty line, as other states have done. By 2022, the State will spend approximately \$215 million to cover a mere 47,000 people made eligible for Medicaid under both the 1115 Medicaid and 1332 waivers. By contrast, a full expansion of Medicaid would permit Georgia to extend coverage to over 400,000 more people for a total of \$213 million. The reason is simple: if Georgia fully expands Medicaid, it will receive a 90% federal matching rate, in contrast to the mere 67% federal matching rate Georgia stands to receive for a partial expansion through the proposed Section 1115 waiver. In addition to spending more state funds for less coverage, Georgia risks leaving billions of federal dollars on the table. As detailed, the proposed waiver is a missed opportunity that will have devastating impacts on Georgia's most vulnerable communities and on its health care providers and hospitals.
- The proposal does not provide recipients with information about work support services or explain how it would pay for these services. States mandating work as a condition of Medicaid coverage are required to provide work support services such as job training, transportation, and child care, which are critical to moving low-income individuals into the workforce. Yet, the Centers for Medicare and Medicaid Services prohibits states from using federal Medicaid funding to provide work support services, and the proposal does not state that Georgia would provide these required services, let alone specify how the State would pay for them. Thus, Georgia must find funds in its limited Medicaid budget to provide work support services. Additionally, not only will the proposal drive up administrative costs for the Georgia Medicaid Agency itself, but it will also burden already overburdened and underfunded social workers and direct service providers, who will be forced to shift their focus from assisting their clients with their needs to ensuring that their clients comply with the work requirements.

The proposed Section 1115 waiver will not further Medicaid's core objective of expanding access to health coverage and care, nor will it make Georgians healthier or the economy stronger. The proposal will, however, strike a blow to far too many Georgians living in deep poverty, particularly in communities of color, while simultaneously driving up costs for already overburdened state budgets and local hospitals. The SPLC sincerely hopes that the Georgia Department of Community Health will withdraw this proposal after considering the numerous concerns expressed above and in public comments by other interested persons and organizations. However, if the Agency decides not to withdraw this disastrous and cruel proposal, and the waiver is approved, the SPLC will stand by the families who will be impacted and defend their ability to fully participate in the Georgia Medicaid program.

Thank you again for the opportunity to comment on this issue.

Sincerely,
/s/ Emily C.R. Early
Emily C.R. Early
Senior Staff Attorney

/s/ Anjana Joshi
Anjana Joshi
Law Fellow

The Southern Poverty Law Center
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Business/Organization * The Southern Poverty Law Center

Stakeholder Type * Advocacy Group

First Name * [REDACTED] **Last Name *** C.R. Early

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

1287

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Other

Comments*

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Georgia currently has one of the most limited Medicaid programs in the United States, enrolling only children, the elderly, people with disabilities, pregnant women, and families with extremely low or no income (e.g., less than \$6,600 per year for a family of three—30% of the Federal Poverty Guidelines). And, as a result of Georgia's decision not to expand its Medicaid program in the past, between 450,000 and 536,000 individuals in Georgia are currently ineligible for Medicaid, including 267,000 Georgians who fall into the Medicaid gap because their incomes are too high to qualify for Medicaid but too low to qualify for subsidies under the Affordable Care Act. For these reasons, Georgia's uninsured rate currently is 12.9%—the fifth highest in the country; and in rural Georgia, the uninsured rate could reach more than 25% by 2026.

The proposed Section 1115 waiver, which sets forth strict work requirements, mandatory copays, and monthly premiums and penalizes noncompliance with suspension or cancellation of enrollment in Medicaid, will not significantly reduce Georgia's uninsured rate and will deprive many newly eligible people of health care. Additionally, individuals enrolled under the waiver will not be able to access the same scope of services current enrollees are able to access due to the waiver's elimination of retroactive eligibility and non-emergency medical transportation (NEMT), as set forth below. If the Section 1115 waiver is approved, Georgia projects that only 47,362 new Georgians will enroll in Medicaid by 2022, and only 52,509 will enroll by 2025. These estimates represent only a small fraction of the 408,000 Georgians living under 100% of the poverty line who would be newly eligible for healthcare under the waiver's limited expansion. Based on the State's own projections, only 11.6% of those eligible will have enrolled under the waiver by 2022; by 2025, this number will increase only marginally to 12.87%. In addition to reducing access to Medicaid through burdensome requirements, the proposed waiver's expansion—which limits the extension of Medicaid coverage to parents, caretakers, or guardians with household incomes from 35 to 100% of the federal poverty line and adults

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-Work requirements, monthly premiums, copayments, and cancellation of NEMT are inconsistent with the purposes of the Medicaid Act and the stated objectives of the Section 1115 waiver

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Far from expanding access to healthcare to low-income families who desperately need it, the proposed Section 1115 waiver creates unnecessary obstacles to Medicaid access, resulting in scanty coverage of the population made newly eligible under the waiver. The waiver proposal is therefore fundamentally inconsistent with the core values and principles of the Medicaid program. For these reasons, the proposed Section 1115 waiver is likely to suffer the same fate as similar proposals advanced in other states, including Kentucky and Arkansas, whose approvals were recently vacated because they erected similar barriers to accessing Medicaid.

The proposed Section 1115 waiver is also inconsistent with its own stated goals and objectives. Georgia's waiver proposal lists among its objectives "support[ing] Georgians on their journey to self-sufficiency," "reduc[ing] the number of uninsured," and "[i]mprov[ing] the health of low-income Georgians by increasing their access to affordable healthcare coverage by encouraging work and other employment-related activities." However, conditioning Medicaid eligibility upon work and the payment of premiums and copayments lacks empirical support and defies logic. Studies have shown that mandated work programs have actually worsened health outcomes, failed to increase long-term employment, and failed to reduce poverty. An analysis of other public benefit assistance programs that imposed work requirements on recipients has shown only modest increases in employment at the outset of the requirement that have decreased over time. Moreover, far from leading to self-sufficiency, the vast majority of people subjected to work requirements in other assistance programs have not escaped poverty, and some have fallen deeper into poverty.

Conversely, studies have shown that access to healthcare through Medicaid enrollment increases the likelihood that an individual will obtain employment. In Ohio, for example, Medicaid recipients enrolled in Medicaid expansion reported that having coverage made it easier for them to maintain their employment, and among those recipients who were unemployed, nearly 75% reported that having Medicaid coverage made it easier to look for employment. Health coverage also makes it easier for families to buy food, pay housing costs, and pay off existing debts. People simply cannot work if their basic needs are not met or if they are not healthy. And far from incentivizing work, stripping people of insurance will lead to a spike in medical debt, as individuals find themselves unable to pay their health care bills and thus fall deeper into poverty. This hurts all Georgians.

Like the work requirements, the requirements to pay monthly premiums and copayments also undermine Georgia's stated goals of the Section 1115 waiver to improve the health of low-income Georgians and to increase the number of persons who become employed or engage in employment-related activities. Conditioning Medicaid eligibility upon low-income Georgians' ability to pay copayments and monthly premiums sets these individuals up to fail. Consider, for example, individuals who can demonstrate their participation in 80 hours per month of job training, community service, or enrollment in higher education. Despite meeting the proposed work requirement under Georgia's Section 1115 waiver, many of these individuals who fulfill the requirement through training, volunteer, or educational hours would not be compensated for those 80 hours and, without an income, would be at high risk of losing their Medicaid eligibility for inability to pay their monthly premiums.

Additionally, individuals with incomes above 50% of the federal poverty line, who are not otherwise exempted, must pay up to 5% of their household income on premiums and copayments. This means that Georgians earning incomes at 50% of the federal poverty line—approximately \$6,000 for an individual or \$10,500 for a family of three—could owe up to \$300 or \$525, respectively, in premiums and copayments. This imposes an

enormous burden on residents who are already struggling to make ends meet. If Georgia wishes to improve the health of low-income Georgians, then it must not penalize its most vulnerable residents by withholding healthcare from them based on their economic status.

Georgia's decision to attach work and monthly premium requirements to its proposed expansion of coverage is especially cruel, given that nearly 15% of Georgia's population lives below the federal poverty level; 15.5% of women and 11.6% of men aged 18 through 64 live in poverty; and 21% of Georgian children live in households below the federal poverty line. Rates of poverty in Georgia are even higher among communities of color, with 23.4% of Latinos, 21.5% of African Americans, 19.9% of Native Americans, and 9.4% of Asian Americans living under the poverty line, compared to 11% of Whites. The proposed work requirements will thus have a disproportionately negative impact on these communities of color, especially given that 46% of Medicaid recipients in Georgia are African-American. Moreover, research has shown that African-American public benefit recipients are more likely to be punished for non-compliance than white beneficiaries. Accordingly, the waiver does not go far enough to help vulnerable individuals and communities of color maintain health coverage and care, or address significant concerns that it could exacerbate Georgia's racial disparities with regard to health; worse, it penalizes these populations for being unable to meet strict work and monetary requirements.

The proposed waiver also unfairly burdens parents and caregivers, who would be forced to complete 80 hours per month of work, job training, higher education, or community service to receive and continue receiving Medicaid coverage in addition to maintaining their fulltime caretaking responsibilities. In Georgia, 28% of adults enrolled in Medicaid reported caretaking responsibilities as the primary reason for not working. And because most recipients are likely only be able to obtain low-wage employment that often comes with a volatile schedule, many will be forced to choose between caring for their children and loved ones and meeting the proposed work requirement.

Hamstrung by work and monthly premium requirements, the expansion is too limited to shore up Georgia's rural and safety-net healthcare providers. All Georgians get sick and most will eventually need medical care, regardless of whether they have insurance. As people lose their Medicaid coverage, many will be turned away by private providers and thus will have to rely on emergency rooms to access treatment, both for emergencies and for routine health services. For example, as Georgia's opioid crisis worsens and takes an indiscriminate and devastating toll on Georgia's families, hospitals must treat those suffering from addiction as well as those bearing the burden of secondary effects of addiction, including infants and children. Because hospitals primarily bear the cost of treating the uninsured, many face closure when Medicaid reimbursements are not available. Across Georgia, seven rural hospitals have closed since 2013, and more than half of the state's remaining rural hospitals are financially vulnerable to closure. By limiting Medicaid coverage and imposing strict requirements on eligible recipients, the proposed Section 1115 waiver is unlikely to stem the closure of these hospitals, which are the last resort for many poor Georgians. Furthermore, the waiver is silent about how hospitals and other health facilities will make up for the additional cost for uncompensated care. Indeed, Earl Rogers, president and CEO of the Georgia Hospital Association, recently stated that the "[w]aiver does not significantly move the needle for the rural and safety net hospitals who care for the state's uninsured patients."

As hospitals continue to close in rural areas, individuals who do not have access to private transportation increasingly rely on NEMT to travel significant distances to receive medical care. Indeed, as of 2013, Medicaid enrollees in Georgia used NEMT to make nearly 4 million trips to access medical care. Thus, the proposed waiver's elimination of NEMT will hinder Medicaid's and the waiver's objectives of expanding access to health care by making it more difficult for Georgians to get to their medical appointments. Millions of Americans, and especially individuals from low-income, minority, and rural communities, already miss non-emergency medical appointments each year due to lack of transportation. And in Georgia, more than 80% of counties already have a health transportation shortage. The proposed waiver's cancellation of NEMT will therefore only exacerbate Georgia's coverage shortfall and ensure that even those who maintain Medicaid eligibility will not receive care if they cannot find transportation.

-Additional key concerns with Georgia's Section 1115 waiver proposal

In addition to the problems with work requirements, premiums, and copayments detailed above, Georgia's waiver proposal suffers from the following deficiencies as to how the waiver will actually be implemented, leaving the public with substantial uncertainty about the proposal's operation:

- The proposal does not explain how it accounts for the loss of coverage that will result from the failure to meet its eligibility requirements. The proposal estimates that over 47,000 additional people will enroll under the Section 1115 waiver by 2022 and that over 52,000 will enroll by 2025. Yet the proposal does not explain how these estimates account for the number of individuals in a given year who will lose coverage because they are

unable to meet the 80-hour work requirement or pay monthly premiums. The loss of coverage resulting from the proposed waiver's requirements undermines the fundamental purpose of Medicaid to provide healthcare coverage to those who cannot afford it. Indeed, similar proposals by other states have been struck down for the failure to consider impacts on coverage and possible disenrollment.

- The proposal does not provide for exemptions from the work and activities requirement for people who are chronically ill or otherwise unable to work or engage in employment-related activities for 80 hours per month. The proposal recognizes "temporary" impediments to compliance with the work and activities requirement, such as family emergencies or "other life changing event[s]," the birth or death of a family members, serious illness or hospitalization, severe weather, homelessness, and other "good cause reasons" approved by the State. However, it does not explain whether exemptions will be made for those who cannot meet the requirement due to chronic conditions or other long-term factors rendering them unable to satisfy the 80-hour requirement. Individuals who suffer from chronic conditions or circumstances that render them unable to work or engagement in employment-related activities 80 hours per month will face particularly severe burdens in meeting these requirements, yet the waiver proposal offers no additional support or resources. The proposal is also silent about whether and how recipients could challenge their suspension or disenrollment from Medicaid for failure to comply with the work and activities requirement due to a chronic medical condition.

- The proposal does not provide for exemptions from payment of the monthly premium for people with chronic illnesses or others who are simply unable to pay. The proposal provides several exceptions to the requirement that individuals must pay "sliding scale flat rate monthly premium payments tiered based on family income." However, the proposal does not explain whether exemptions will be made for those who cannot make their monthly payments due to chronic illness or other factors. Nor does it explain whether it will allow enrolled individuals to show good cause for their inability to pay before their enrollment is suspended or terminated. The proposal is also silent about whether and how recipients could challenge their suspension or disenrollment from Medicaid for failure to pay a monthly premium.

- The proposal ignores the impact of parental and caretaker health coverage on children. The health and stability of children largely depends on the health and stability of their parents and caretakers. In recent years, as several states have moved to expand Medicaid under the ACA, the impacts have not only been felt by newly eligible adults, but also by their children, because children with insured parents are more likely to receive pediatric care and preventive services. As parents lose coverage, their children are also likely to lose their coverage, even if the child remains eligible for Medicaid and CHIP. Taking away parents' and caretakers' health insurance leads to financial instability and distress for the whole family, creating a greater risk to children's health. If the real intent of the proposal is to make families healthier, Georgia must consider the impacts that losing parental and caretaker coverage will have on the entire family.

- The proposal does not account for Georgians' inability to report compliance with the work requirements. The proposal purports to create a new eligibility pathway for those who can demonstrate an hours and activities threshold of 80 hours per month of engagement in a qualifying activity, such as work, job training, enrollment in higher education, or community service. Georgia's proposal will permit recipients to report their hours online as well as in person. But in Georgia, over 25% of Georgian households lack broadband internet service. Additionally, the transportation shortage in many of Georgia's counties will also hinder Georgians' ability to report in person. Thus, many low-income families will struggle to comply with the reporting requirements, even if they are compliant with the work requirement, simply because they lack reliable internet access and transportation.

- The proposal is modeled after commercial healthcare plans and does not grant recipients the full array of services available under the Medicaid State Plan. The proposal states that it seeks "to provide a benefit package more consistent with commercial plan benefits" by requesting a waiver for certain services, including NEMT and certain vision and dental services for 19 and 20-year-olds. The proposal does not explain why recipients enrolled pursuant to the Section 1115 waiver will not have access to the full range of benefits provided under the Medicaid State Plan, including NEMT. Nor does it explain its rationale for modeling Medicaid after commercial plans or how doing so will advance Medicaid's goal of providing healthcare to the country's most vulnerable families and individuals.

- The proposal eliminates retroactive coverage, undermining the goals of Medicaid. The proposal seeks a waiver of the requirement of providing three months retroactive coverage "[t]o better align with commercial health insurance coverage." However, the proposal's alignment with commercial plans does nothing to advance Medicaid's objective of expanding access to health care. Nor does the proposal consider that waiving retroactive coverage will create gaps in coverage and reduce access to Medicaid services by weakening the network of providers serving enrollees. As with Arkansas's similar waiver, Georgia's proposal to "limit[] retroactive coverage may lead 'Medicaid-eligible persons [to] wait even longer to have their conditions treated to avoid incurring medical bills they cannot pay.' And when they do eventually arrive for treatment, they will be covered for less time than they would have been before [the waiver] t[a]k[es] effect. . . , by definition reducing their Medicaid coverage." This undermines Medicaid's most fundamental goals of extending coverage to the nation's poorest people and improving health outcomes.

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- The proposal is silent on the costs of administering and monitoring compliance with the work requirements. Even though Georgia does not provide any estimates on administrative costs, one can look at other states, such as Kentucky, Tennessee, and Virginia, to gather a sense of just how much this proposal will cost Georgia. Kentucky projected that enacting work requirements would cost the state more money to cover fewer people. To administer the work requirements and monitor compliance, states must develop new programming and infrastructure and hire additional staff, costing taxpayers tens of millions of dollars. These substantial expenses will have particularly negative consequences for participants in Georgia's Medicaid program, which has been historically underfunded.
- The proposal is unnecessarily costly to cover a small number of people, by Georgia's own estimates. Given that the Section 1115 waiver falls far short on coverage, it is also needlessly costly, thus undercutting the State's supposed rationale that the waiver promotes fiscal sustainability of Medicaid. Under the proposed partial expansion, Georgia will pay more to cover this small fraction of its poorest residents than it would have had the State fully expanded Medicaid coverage to individuals earning up to 138% of the federal poverty line, as other states have done. By 2022, the State will spend approximately \$215 million to cover a mere 47,000 people made eligible for Medicaid under both the 1115 Medicaid and 1332 waivers. By contrast, a full expansion of Medicaid would permit Georgia to extend coverage to over 400,000 more people for a total of \$213 million. The reason is simple: if Georgia fully expands Medicaid, it will receive a 90% federal matching rate, in contrast to the mere 67% federal matching rate Georgia stands to receive for a partial expansion through the proposed Section 1115 waiver. In addition to spending more state funds for less coverage, Georgia risks leaving billions of federal dollars on the table. As detailed, the proposed waiver is a missed opportunity that will have devastating impacts on Georgia's most vulnerable communities and on its health care providers and hospitals.
- The proposal does not provide recipients with information about work support services or explain how it would pay for these services. States mandating work as a condition of Medicaid coverage are required to provide work support services such as job training, transportation, and child care, which are critical to moving low-income individuals into the workforce. Yet, the Centers for Medicare and Medicaid Services prohibits states from using federal Medicaid funding to provide work support services, and the proposal does not state that Georgia would provide these required services, let alone specify how the State would pay for them. Thus, Georgia must find funds in its limited Medicaid budget to provide work support services. Additionally, not only will the proposal drive up administrative costs for the Georgia Medicaid Agency itself, but it will also burden already overburdened and underfunded social workers and direct service providers, who will be forced to shift their focus from assisting their clients with their needs to ensuring that their clients comply with the work requirements.

The proposed Section 1115 waiver will not further Medicaid's core objective of expanding access to health coverage and care, nor will it make Georgians healthier or the economy stronger. The proposal will, however, strike a blow to far too many Georgians living in deep poverty, particularly in communities of color, while simultaneously driving up costs for already overburdened state budgets and local hospitals. The SPLC sincerely hopes that the Georgia Department of Community Health will withdraw this proposal after considering the numerous concerns expressed above and in public comments by other interested persons and organizations. However, if the Agency decides not to withdraw this disastrous and cruel proposal, and the waiver is approved, the SPLC will stand by the families who will be impacted and defend their ability to fully participate in the Georgia Medicaid program. Thank you again for the opportunity to comment on this issue.

Sincerely,
 Emily C.R. Early
 Senior Staff Attorney

Anjana Joshi
 Law Fellow
 The Southern Poverty Law Center

ENDNOTES (continued on next comment page)

1. Although DHS has proposed the Section 1115 waiver in conjunction with the Georgia Access Section 1332 Waiver, we do not write regarding the 1332 waiver at this time.
2. Congress passed Medicaid "[f]or the purpose of enabling each State, as far as practicable . . . to furnish (1) medical assistance on behalf of" families and individuals "whose income and resources are insufficient to meet the costs of necessary medical services, and (2) rehabilitation and other services to help such families and individuals attain or retain capability for independence or self-care." 42 U.S.C. § 1396-1.

3. Georgia Budget and Policy Institute, Medicaid Works for Georgia 1-2 (2017), <http://bit.ly/2ReJHBB>.
4. Georgia Department of Audits and Accounts, Fiscal Note on HB 37 (LC 46 0015) (2019), available at <http://bit.ly/2sHMKbs>.
5. Kaiser Family Foundation, Medicaid in Georgia (2019), <http://bit.ly/33Nsz8C>.
6. Laura Harker, Georgia Budget and Policy Institute, Fast Facts on Georgia's Coverage Gap (2018), <http://bit.ly/2YkUJql>.
7. See *Gresham v. Azar*, 363 F. Supp. 3d 165 (D.D.C. 2019) (vacating U.S. Department of Health and Human Services' approval of Arkansas's Section 1115 waiver, which conditioned eligibility on work requirements and elimination of retroactivity, where it did not address effects of coverage loss from waiver and thus violated Medicaid's core objectives), appeal docketed, No. 19-5094 (D.C. Cir. Apr. 11, 2019); *Stewart v. Azar*, 366 F. Supp. 3d 125 (D.D.C. 2019) (same with respect to federal reapproval of Kentucky's Section 1115 waiver, which included work requirements, premiums, and copayments, and eliminated retroactive eligibility, among other components), appeal docketed, No. 19-5095 (D.C. Cir. Apr. 11, 2019); *Stewart v. Azar*, 313 F. Supp. 3d 237 (D.D.C. 2018) (same with respect to initial federal approval of Kentucky's Section 1115 waiver).
8. Hannah Katch, Center on Budget and Policy Priorities, Medicaid Work Requirements Would Limit Health Care Access Without Significantly Boosting Employment (2016), <http://bit.ly/2rNlqHg>; Robert Rector, Heritage Foundation, Work Requirements in Medicaid Won't Work. Here's a Serious Alternative (2017), <https://heritag.org/3839qmqz>.
9. LaDonna Pavetti, Ctr. on Budget & Policy Priorities, Work Requirements Don't Cut Poverty, Evidence Shows 9-11 (2016), <http://bit.ly/2RdGqmd>.
10. *Id.*
11. Ohio Dep't of Medicaid, Ohio Medicaid Group VII Assessment: A Report to the Ohio General Assembly (2017), <http://bit.ly/2RizYKC>.
12. Center for Law & Social Policy, The Evidence Builds: Access to Medicaid Helps People Work 1 (2017), <http://bit.ly/2Pb7DTL>.
13. Office of the Assistant Secretary for Planning and Evaluation, Poverty Guidelines (2019), <http://bit.ly/2Rg6VHC>.
14. Talk Poverty, Georgia 2018 (2018), <http://bit.ly/2LjnSwS>.
15. *Id.*
16. United Health Foundation, Health Impact: Children in Poverty (2018), <http://bit.ly/2OLf6dr>; see also Nedra Rhone, The Atlanta Journal-Constitution, Georgia Remains Among the States where Childhood is Most Threatened (May 30, 2018), <http://bit.ly/381MxzZ>.
17. Talk Poverty, *supra* note 14.
18. Kaiser Family Foundation, Medicaid Enrollment by Race/Ethnicity (2013), <http://bit.ly/2YkVhwm>.
19. Sanford F. Schram et al., Deciding to Discipline: Race, Choice, and Punishment at the Frontlines of Welfare Reform, 74 Am. Soc. Rev. 398 (2009).
20. Rachel Garfield, Robin Rudowitz & Anthony Damico, Kaiser Family Foundation, Understanding the Intersection of Medicaid and Work 10 (2018), <http://bit.ly/2rNINsa>.
21. Center for Law & Social Policy, Doubling Down: How Work Requirements in Public Benefit Programs Hurt Low-Wage Workers 1-3 (2017), <http://bit.ly/2rakZb2>.
22. Craig Garthwaite, Tal Gross & Matthew J. Notowidigdo, Hospitals as Insurers of Last Resort (Nat'l Bureau of Econ. Research, Working Paper No. 21290, 2015), available at <http://bit.ly/380PDEI>; Kellogg School of Mgmt., Northwestern Univ., Who Bears the Cost of the Uninsured? Nonprofit Hospitals (2015), <http://bit.ly/2YdpAVR>.
23. American Academy of Pediatrics, America's Opioid Crisis: The Unseen Impact on Georgia Children, <http://bit.ly/2P8Qt9A>; see also Chelsea Stephens, Georgia.gov, Blog, Georgia's Opioid Epidemic and Ways to Get Help (Dec. 12, 2017), <http://bit.ly/2LmQtlg>.
24. See Adam Searing, Georgetown University Health Policy Institute, Center for Children and Families, More Rural Hospitals Closing in States Refusing Medicaid Coverage Expansion (Oct. 29, 2018), <http://bit.ly/2LjgeTf>; see also Jayne O'Donnell and Laura Ungar, USA Today, Rural Hospitals in Critical Condition (Nov. 12, 2014), <http://bit.ly/2Rf4Hs4>.
25. Harker, *supra* note 6.
26. Laura Harker, Georgia Budget and Policy Institute, State Health Care Proposals Fall Short and Undermine Comprehensive Health Plans 7 (2019), <http://bit.ly/2OIVA13>.
27. Jim Galloway, Tia Mitchell, Greg Bluestein, & Tamar Hallerman, The Atlanta Journal-Constitution, The Jolt: The Quandary an Impeachment Trial Poses for Johnny Isakson—or His Replacement (Nov. 5, 2019), <http://bit.ly/2DLwCaU>.
28. Jennifer Rainey Marquez, Atlanta Magazine, In Much of Rural Georgia, Maternal Healthcare is Disappearing (July 12, 2017), <http://bit.ly/3824BKkn>.
29. Suzie Edrington, Linda Cherrington, et al., Transportation Research Board of the National Academies, State-by-State Profiles for Examining the Effects of Non-Emergency Medical Transportation Brokerages on Transportation Coordination (2018), <http://bit.ly/2OLvFWz>.
30. P. Hughes-Cromwick, R. Wallace, H. Mull, et al. Altarum Institute. Cost Benefit Analysis of Providing Non-

Emergency Medical Transportation 4 (2005), <http://bit.ly/2P8QM4e>.

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32. See e.g., Gresham, 363 F. Supp. 3d at 175 (noting that HHS Secretary's failure to "offer[] his own estimates of coverage loss [] or grapple[] with comments in the administrative record projecting that the Amendments would lead a substantial number of Arkansas residents to be disenrolled from Medicaid" rendered waiver approval arbitrary and capricious).

33. Maya Venkataramani, Craig Evan Pollack & Eric T. Roberts, Spillover Effects of Adult Medicaid Expansions on Children's Use of Preventive Services, *Pediatrics* (2017), <http://bit.ly/33MTMZf> (finding that children with insured parents are nearly 30% more likely to receive at least one pediatric check-up).

34. Georgetown Univ. Ctr. for Children and Families, Health Coverage for Parents and Caregivers Helps Children (2017), <http://bit.ly>

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Comments *

Continuation of Endnotes to the Southern Poverty Law Center's comment on Georgia's Section 1115 Demonstration Waiver

35. *Id.*

36. U.S. Census Bureau, Computer and Internet Use in the United States (2015), <http://bit.ly/3833kCN>.

37. Voices for Georgia's Children, *supra* note 31.

38. Gresham, 363 F. Supp. 3d at 179 (alternation in original) (citing administrative record).

39. Deborah Yetter, Bevin's Medicaid changes actually mean Kentucky will pay more to provide health care, *The Courier-Journal* (Feb. 14, 2018), <http://bit.ly/2LjoCCa/>.

40. Linda Li, Abigail Barker, Leah Kemper, & Timothy McBride, Center for Health Economics and Policy, Institute for Public Health at Washington University, Weighing the Cost Savings of Medicaid Work Requirements in a Non-Expansion State, 2 (2018), <http://bit.ly/2DFiWyk>.

41. See, e.g., Georgians for a Healthy Future, Report Highlights Harmful Effects of Federal Medicaid Cuts on Georgia's Economy (2009), <http://bit.ly/2LjoEKi>; Andy Miller, Kaiser Health News, Legislators to Drop Hospital Tax Used to Raise Funds for Medicaid (Oct. 3, 2012), <http://bit.ly/2rezjzl>.

42. Harker, *supra* note 26 at 5–6.

43. *Id.* at 5.

44. *Id.* at 6; see also Georgia Department of Audits and Accounts, *supra* note 4.

45. Though Georgia has applied for a 90% federal matching rate for its partial Medicaid expansion, the Centers for Medicare and Medicaid Services has already denied a similar proposal from Utah, in line with its policy of providing enhanced federal funding only for a full Medicaid expansion. See Dep't of Health and Human Servs., Letter to Governor Herbert (Aug. 16, 2019), <http://bit.ly/2rezsCT>.

46. Li, et al., *supra* note 40.

47. Ctr. for Medicare & Medicaid Services, Dept. of Health & Human Services, Letter to State Medicaid Directors re: Opportunities to Promote Work and Community Engagement Among Medicaid Beneficiaries (Jan. 11, 2018), at 7, available at: <http://bit.ly/2ra2R0Z>.

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Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

Myself Business/Organization

Business/Organization * Voices for Georgia's Children

Stakeholder Type * Non-Profit

First Name * [REDACTED] **Last Name *** Fener Sitkoff

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1115 Waiver - Georgia Pathways

Comment details for 1115 Waiver - Georgia Pathways

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Dear Sir/Madam:

Thank you for the opportunity to comment on the Georgia Pathways to Coverage 1115 Demonstration Waiver (hereinafter referred to as "the proposal"). Voices for Georgia's Children respectfully submits the following comments in response to the proposal.

We appreciate the foresight of our state leaders in seizing opportunities to reduce the health care coverage gap. However, we are concerned that this does little to address the coverage needs of parents, caretakers, and women of reproductive age. As a result, this is a missed opportunity to positively impact children and their families in our state.

Recent studies have shown that increasing the availability of health care coverage for adults, parents, guardians, and caregivers, are associated with tangible improvements to child well-being, including a reduction in incidents of neglect. As I am sure you are aware, child neglect, can cause further damage to children in the form of both physical and behavioral health problems, as well as poor educational outcomes well into adulthood. [1]

Covering whole families also ensures that the entire family is protected from high medical bills and medical debt. Finally, research is very clear that covering parents actually reduces the rate of uninsured children as well. [2] This is critically important at a time when Georgia's uninsured rate for children (already high) is on the rise. From 2016 to 2018, an additional 38,000 children became uninsured in Georgia – an increase of over 20 percent. [3]

As Georgia's only non-partisan statewide child policy and advocacy organization, we urge you to reconsider your proposal and offer the following considerations to strengthen the proposal as presented:

1.The proposal's eligibility criteria are missing a critical work-related activity – caring for young or disabled children.

To the detriment of families with young or disabled children, the proposal does not include child caregiving as a qualifying activity. Therefore, in order to be eligible for the program, primary caregivers, parents or guardians would have to comply with another qualifying activity, regardless of child care responsibilities. This omission is problematic, as the cost of quality child care in Georgia is extremely prohibitive for many families, particularly those with lower earnings, and many parents of young children simply cannot "afford" to work. In fact, a recent study of 400 Georgia parents with children under five found that over 20 percent of them had to quit work, school or vocational training programs due to child care challenges.[4] While Georgia offers subsidies through the Childcare and Parent Services (CAPS) program, subsidies are limited and priority groups (i.e. children in the custody of the Division of Children and Family Services, minor parents, grandparents raising grandchildren) may prevent eligible families from becoming beneficiaries. Recognizing the challenges faced by primary caregivers, other states with work requirements, such as Indiana and Michigan, have exempted caregivers of dependent children under the age of seven and children with disabilities. [5,6] Therefore, we strongly urge that Georgia similarly revise its eligibility criteria to allow caregiving for children under the age of seven or with disabilities as a qualifying activity.

2.The proposal's work requirements will lead to coverage losses.

The proposal's requirement that in order to remain eligible for the program, individuals must participate in and report on 80 hours per month of engagement in qualifying activities, will very likely lead to coverage loss for qualified beneficiaries. Recent data from Arkansas and New Hampshire, which included work requirements in

qualified beneficiaries. Recent data from Arkansas and New Hampshire, which included work requirements in their 1115 waivers, show that more than 18,000 people lost coverage within seven months in Arkansas, and in New Hampshire about 40 percent of the Medicaid beneficiaries would have lost coverage had the state not suspended the requirement. [7] In both cases, coverage loss was often attributed to red tape (such as confusing requirements or difficult reporting procedures) rather than a lack of work hours. [7,8] Georgia's proposal is just as complicated, with multiple requirements to become eligible and remain enrolled and additional layers of red tape, such as premiums, copayments, and mandated enrollment in employer-sponsored insurance, and will likely cause similar confusion, and therefore coverage loss among beneficiaries. A lack of coverage can lead to unaddressed illness, which is particularly concerning for parents and caregivers, as untreated physical and behavioral conditions can compromise a family's financial stability and the well-being of their children.

[1] Brown, E.C.B, Garrison, M.M., Bao, H. (2019). Assessment of rates of child maltreatment in states with Medicaid expansion vs states without Medicaid expansion. JAMA, 2(6)
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[8] Kaiser Family Foundation (2018). Medicaid work requirements in Arkansas: Experience and perspectives of enrollees. Retrieved from <https://www.kff.org/medicaid/issue-brief/medicaid-work-requirements-in-arkansas-experience-and-perspectives-of-enrollees/>
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Comment Topic * Premiums, Copayments, Member Rewards Account

Comments *

3. The proposed premiums, cost-sharing, and exclusion of a non-emergency medical transportation (NEMT) benefit may lead to underutilization of services, and increased financial burden.

The proposal embraces several policies that are similar to private market insurance, such as premiums and copayments, which could negatively impact certain individuals enrolled in Georgia Pathways (with incomes of 50% -100% FPL) or receiving Transitional Medical Assistance (TMA). Research has found that premiums and copayments serve as a barrier to coverage and care, leading to greater unmet needs, decreased use of care, poor health outcomes, and increased financial burden among low-income individuals and families.[9] Given that the proposal is aiming to provide coverage for low-income adults, it is important to consider the financial strain premiums and copayments may have on families. A family of four, at 50 percent FPL, has a monthly family income of around \$1,000 to cover all of their expenses – child care, clothing/washing, rent, groceries, utilities, transportation, etc. This does not leave much room in an overall budget for premium payments or copayments. Additionally, because the proposal does not provide NEMT for beneficiaries, they must also cover the cost of transportation to appointments. While premium payments can be used to pay for co-payments via an individual's Member Rewards Account, for a low-income family, when taken together the loss of monthly income to premiums, copayments, and medical transportation from a tight monthly budget remains problematic.

[9] Kaiser Family Foundation (2017). The Effects of Premiums and Cost Sharing on Low-Income Populations: Updated Review of Research Findings. Retrieved from <https://www.kff.org/medicaid/issue-brief/the-effects-of-premiums-and-cost-sharing-on-low-income-populations-updated-review-of-research-findings/>
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Comment Topic * State Program Cost and Budget

Comments *

4.Uncertainty about enhanced Federal Match (FMAP) potential is particularly concerning considering current overall economic unpredictability.

While options for increased Medicaid enrollment are appreciated, proposed enrollee income limits are, nevertheless, likely to prevent maximization of the Medicaid federal match. As a result of seemingly viable economic forecasts, recent state budget direction to cut 4 percent in the current fiscal year and 6 percent in FY 2021, while exempting Medicaid, nevertheless force the state to choose winners and losers in other programs and areas which also serve families and children living at or below 138 percent of the FPL. Therefore, the current proposal's likely missed opportunity regarding a full 90 percent federal match will continue to deny coverage to parents and caregivers who fall in the 100-138 FPL gap, and additionally contribute to state economic strain on other services and supports (e.g. accountability courts, mental health supports, public health initiatives, etc.) which many of the parents and caregivers in the gap need to help ensure family stability. This point is underscored when coupled with anticipated administrative burdens that accompany implementation of additional eligibility requirements. [10]

[10] Office of Program Policy Analysis & Government Accountability. (2008). Medicaid Reform: Few Beneficiaries Have Participated in the Opt-Out Program.

Sincerely,

Erica Fener Sitkoff
Executive Director
Voices for Georgia's Children
(character limit of 32,500)

Public Comments

General Information

Comment Date * 12/3/2019

Comments for.. * Please let us know what you are commenting on. (check all that apply)

- 1115 Waiver - Georgia Pathways
- 1332 Waiver - Georgia Access
- 1332 Waiver - Reinsurance

On behalf of * I am commenting on behalf of.. (choose one)

- Myself
- Business/Organization

Business/Organization * Voices for Georgia's Children

Stakeholder Type * Advocacy Group

First Name * [REDACTED] **Last Name *** Sitkoff

Email * [REDACTED]

Address [REDACTED]

City [REDACTED] **State** Georgia **Zip** [REDACTED]

Comments for 1332 Waiver- Georgia Access

Comment details for 1332 Waiver - Georgia Access

Select the topic area that applies to the comments being submitted and type comments into the field below. To submit comments on multiple topics select the "[Click Here to Add Additional Comments](#)" at the bottom of the page.

Comment Topic* Georgia Access - Plan Options

Comments*

Dear Sir or Madam,

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Currently, any health plan sold and receiving subsidies in the Marketplace must meet a standard of comprehensiveness for coverage of items and services in 10 essential health benefit categories, all of which are critical to an individual's ability to reach and sustain good health and well-being. The currently required 10 essential health benefit categories of care are: 1) outpatient care, 2) emergency services, 3) hospitalizations, 4) prenatal and newborn care, 5) mental health and substance use disorder services, 6) prescription drugs, 7) rehabilitative services, 8) laboratory services, 9) preventive and wellness services, and 10) pediatric services. [2]

Over 40% of children in Georgia have at least one chronic health condition, [3] and almost 20% of children in Georgia have special health care needs (requiring ongoing use of prescription medication, services, specialized therapies, or treatment for emotional or developmental problems). [4] For all children, but these children in particular, each of the essential health benefit categories and the items and services currently covered therein, are an indispensable part of the comprehensive health insurance coverage necessary to allow them to achieve their best health and well-being:

- Preventive services including well-child visits, vaccinations, developmental screenings, hearing and vision checks, are critical to ensuring that children stay or receive the help necessary to get back on track toward healthy development.
- Prescription drug coverage allows common childhood ailments, such as ear infections, or chronic conditions such as asthma, to be remedied or managed, before they cause prolonged absence from school, or escalation to emergency services.
- Children's mental health services, such as outpatient therapy to treat mental health conditions (such as ADHD, anxiety, depression, or post-traumatic stress disorder), help children to function soundly in family, social, and school environments, and help to prevent children from reaching a state of mental health crisis, and potentially harming themselves or others.
- Emergency services after an unexpected fall, car accident, asthma attack, or mental health crisis, can be life-saving for a child.

A lack of coverage for any of these categories of care (and standard services within), can result in families delaying or forgoing important care. [5] This may in turn lead to poor health and other negative outcomes, including absenteeism and poor performance at school, [6] and caregiver loss of time and productivity at work to tend to a sick child.

Further, while the absence of essential health benefits coverage may initially save families money on health insurance premiums, they can wreak financial havoc on those that experience unforeseen health care needs. For example, children's mental health needs, particularly for conditions with internalizing behaviors such as depression or anxiety, can often go unnoticed and undiagnosed until a crisis arises. Once a crisis arises, if a family has chosen a plan with limited or no mental health coverage, they can be hit with exorbitant costs, including cost of an emergency room visit (approx. \$350 to over \$4,000 per visit), individual psychotherapy (approx. \$100-260 per session), and depending on the severity – partial hospitalization (approx. \$600 a day) or inpatient hospitalization (approx. \$1,500 a day for room and board). [7] This children's mental health example is of particular note in Georgia, where suicide is the second leading cause of death for teens, [8] and in the 2017-2018 school year 571,327 of our state's 6th – 12th grade students reported seriously considering harming themselves during the past year. [9]

For these reasons, incentivizing the purchase of non-QHPs, which lack comprehensive coverage of critical health benefits, such as mental health services, through subsidies, is not in the long-term best interest of children or families, and should be reconsidered.

2. In order to help families make informed decisions about their health care coverage, including the choice of whether to purchase a QHP or non-QHP, better consumer protections, including education components, must be established.

Under the proposal, families may still purchase QHPs meeting essential health benefit benchmark requirements, and the state will continue to certify QHP metal levels in order for consumers to understand benefits and costs associated with the different QHPs. However, the proposal appears to lack the development of robust consumer protection mechanisms, including education components, in order to ensure that families and other consumers make informed decisions when choosing health care coverage (including whether to purchase a QHP v. non-QHP) in the individual market.

First, the proposal appears to lack the development of a corresponding rating system for non-QHPs. In order for families and other consumers to fully understand the benefit differences and cost implications of all subsidized plan choices and get true “apples to apples” comparisons of QHPs and non-QHPs – they should all be rated based on the same benefit standard.

Second, the proposal appears to lack the development of more robust commercial market consumer protections for insurers and web brokers selling QHP and non-QHP plans. This is critical, as many brokers and companies employ aggressive sales tactics over the phone or internet and provide minimal clarity about plan benefit differences and policy limitations, [10] which can compound confusion for families seeking to fully understand the differences and risks between QHPs and non-QHPs. The findings of a recent study on short-term plans and consumer behaviors, commissioned by consumer representatives to the National Association of Insurance Commissioners illustrates this concern. It found that in the short-term market, “consumers face significant challenges in understanding the differences between short-term plans and other types of coverage”, including coverage benefits, limitations, and cost implications, and that federally mandated disclosures did not reduce the confusion. [11] With the addition of subsidized non-QHPs and the switch to commercial-only individual insurance sales, it is probable that Georgia could face similar challenges on a larger scale.

Therefore, in order to help families make informed, sound decisions about their choice of health insurance coverage, including whether to purchase a QHP or non-QHP, we request that the proposal include an assurance of the development of strict consumer protection and education measures, including applying the same rating system for QHPs to non-QHPs.

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10. Sabrina Corlette et al. (2019). The Marketing of Short-Term Health Plans: An Assessment of Industry Practices and State Regulatory Responses, Georgetown University Center on Health Insurance Reforms. Retrieved from <https://www.rwjf.org/en/library/research/2019/01/the-marketing-of-short-term-health-plans.html>

11. Kleimann Communication Group on behalf of National Association of Insurance Commissioners (NAIC) Consumer Representatives (2019). Retrieved from https://healthyfuturega.org/ghf_resource/new-consumer-testing-shows-limited-consumer-understanding-of-short-term-plans-and-need-for-continued-state-and-naic-action/

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Comment Topic * Georgia Access - Subsidies

Comments *

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Comment Topic * Georgia Access - Consumer Experience

Comments *

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