



January 17, 2025

Maureen Corcoran, Director
Ohio Department of Medicaid
50 W. Town St., 5th Floor
Columbus, OH 43215

Sent via Email to Medical Board at: GroupVIII@ohio.medicaid.gov

RE: Group VIII 1115 Waiver

Dear Ms. Corcoran,

Thank you for the opportunity to comment on the proposed 1115 Waiver to impose a work, education, or drug and alcohol rehabilitation requirement on citizens seeking publicly funded health insurance in the Group VIII Medicaid Expansion population.

The Academy of Medicine of Cleveland & Northern Ohio (AMCNO), founded in 1824, is the region's professional medical association and the oldest professional association in Ohio. We are a non-profit 501(c)6 representing over 7,500 physicians and medical students from all the contiguous counties in Northern Ohio. We are proud to be the stewards of Cleveland's medical community of the past, present, and future.

The mission of the AMCNO is to support physicians in being strong advocates for all patients and to promote the practice of the highest quality medicine. With that in mind, we offer the following comments.

Coverage Improves Health Outcomes

We have seen since implementing the Group VIII expansion that increased coverage leads to better health outcomes. An analysis by the Ohio Department of Medicaid concluded that Ohio's Medicaid expansion increased access to medical care for enrollees, reduced unmet medical needs, improved self-reported health status, and alleviated financial distress. All these results confirm findings from other states that have expanded Medicaid.¹ If we want to see Ohioans working, they must first take care of their health. Taking away this necessary coverage will not allow Ohioans to get back to work, in many cases, it will accomplish the exact opposite—without medical care enrollees may be unable to take care of themselves, thus making it impossible for them to gain employment.

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<https://pmc.ncbi.nlm.nih.gov/articles/PMC5425861/#:~:text=A%20recent%20analysis%20by%20the,status%2C%20and%20alleviate%20financial%20distress.>

We know that the impact to our patients in Northern Ohio could be substantial. The Center for Community Solutions (CCS) estimates that between 62,000 and 450,000 Ohioans could lose coverage under this proposal. Based on ODM estimates, 8,255 Cuyahoga County residents will lose coverage, and 59,035 are at risk.² CCS also estimates that if all the at-risk residents are denied coverage, Ohio's working-age uninsured rate would climb from the current rate of 8.8 percent to 15.3 percent—levels not seen since the early 2010s. Eighteen counties, most of which are small and rural, could see uninsured rates over 20 percent as a result.

We know that health coverage leads to better health outcomes. For example, when looking at the Medicaid Expansion population, American Cancer Society researchers noted that, "We found a small yet significant shift to early-stage cancer diagnosis associated with Medicaid expansion for all cancers combined, non-Hodgkin lymphoma, and pancreatic cancer," the researchers wrote. "These findings suggest improved access to screening services and symptom assessment in expansion states."³

Legal and Financial Considerations

As we've seen in other states, such as Arkansas, Kentucky and Virginia, which have implemented worker requirements, they are not effective and end up costing more money in administrative costs to enforce them than it would cost to insure the population under consideration. Many courts have also held these requirements unconstitutional.

Efficacy

Finally, we oppose worker requirements for the expansion population, because simply, they do not work. An analysis from the Center on Budget and Policy Priorities found that, "work requirements impose administrative barriers and red tape that lead to coverage losses among both people who are working as well as people the policies purport to exempt because they have caretaking responsibilities, disabilities, or illnesses that keep them from paid work. They also lead to coverage losses for those who are between jobs. Moreover, research shows that work requirements do not increase employment."⁴

Thank you again for the opportunity to comment and for your continued efforts to advocate in the best interest of Ohio's physicians.

Sincerely,



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² https://www.communitysolutions.com/resources/ohio-medicaid-work-requirement-lose-healthcare-coverage?mc_cid=992d5687e8&mc_eid=04344db015

³ <https://jamanetwork.com/journals/jamaoncology/fullarticle/2697226>

⁴ <https://www.cbpp.org/research/health/medicaid-work-requirements-could-put-36-million-people-at-risk-of-losing-health>