



Cindy Brock, Division of Medicaid  
Department of Health and Welfare  
P.O. Box 83720  
Boise, Idaho 83720-0009

September 16, 2019

The American Heart Association supports all Idahoans having access to adequate, affordable healthcare, and appreciates the opportunity to comment on the Medicaid 1115 waiver application for work reporting requirements. We appreciate the work being done to ensure the ballot measure passed in November 2018 to expand Medicaid is implemented, enabling low-income Idahoans to obtain the care they need. However, we oppose the 1115 work reporting requirement that will likely cause coverage losses for individuals and increase health care costs for all Idahoans.

We understand the desire to ensure those who receive state benefits contribute to earn those benefits, yet the work reporting requirements do not encourage or assist individuals ability to find work, or recognize that most of this population that is able to work already does so. This requirement simply adds the burden of navigating a complex bureaucratic process to the already challenging lives of those who work in low wage, hourly, or part time positions where work schedules are often inconsistent and can fluctuate week to week and month to month. As seen in other states that have attempted to implement these requirements, the difficulty of the reporting process itself causes many people to lose their health care coverage. A reporting requirement does not increase the number of employed individuals within this eligible population, or provide opportunity to improve financial circumstances. It simply creates another layer of administration and a barrier to health care access.

Additionally, chronic illnesses, like heart disease, require consistent monitoring, daily medication, and regular doctor visits to keep an individual healthy and productive. When coverage loss occurs, individuals with these conditions often go without this care, possibly leading to emergency room visits, hospital stays, or potential disability. Those without access to reliable health care are more likely to lose a job when they are unable to work due to deteriorating health conditions, the opposite of what this requirement seems to intend.

Further, the additional administrative costs to the state the work reporting requirements necessitate have not been factored into total costs. The churn of enrolling and dropping people on and off coverage, along with the actual health care costs that will continue to accrue for those without coverage, will undoubtedly require additional resources to administer. The secondary coverage gap when eligible individuals are dropped off Medicaid could result in higher health care costs for all Idahoans as uncompensated care is passed along through increasing health care premiums, hospital, and prescription costs. Given what we've seen take place in other states, courts have struck down work requirements similar to this, and we are likely to see lawsuits that will cost taxpayer dollars to defend work reporting requirements as well.



Living with chronic illnesses is difficult, and even more so while living near the poverty line, or without access to stable health care. Work reporting requirements do not help individuals in these circumstances obtain or excel in a job, access to adequate and dependable health care does. When a person knows they do not have to worry about an illness, or is able to see a doctor when necessary, they can focus on improving their education or achieving stability in work and income. Living without access to health care, with a chronic condition, or without a dependable income is challenging enough, the state should not use reporting requirements and administrative hassle to make it even harder.

We urge you to reject this waiver that will add costs for the state and all other Idahoans, without improving health care access or employment opportunities for those who are eligible for coverage under Medicaid expansion. We encourage you to implement the will of Idaho voters and help all Idahoans obtain adequate, accessible, and secure health care coverage and reject the 1115 waiver for work reporting requirements.

Sincerely,

Board of Directors  
American Heart Association, Idaho

Erin Bennett  
Government Relations Director  
American Heart Association, Idaho