

Outnumbered

Georgians prefer Medicaid expansion
over Governor Kemp's Medicaid waiver
by a 9-to-1 ratio

When Georgia's Governor Kemp announced a plan to use an 1115 Medicaid waiver to expand Medicaid coverage to only a fraction of low-income state residents in November 2019, Georgia residents and stakeholders were asked to participate in two 30-day public comment periods to provide input on the waiver plan.

More than 2,700 comments were submitted by interested Georgians, health advocates, health care providers, and other stakeholders over the course of the state and federal comment periods in November 2019 and January 2020.

An analysis of the comments submitted reveals that 88 percent and 92 percent of all commenters expressed opposition to Governor Kemp's plan in the state and federal comment periods respectively and many stated a preference for Medicaid expansion as envisioned by the Affordable Care Act.

Commenters articulated worries about coverage for themselves, their loved ones, or sensitive populations (e.g. rural Georgians, low-income residents); the comparative benefits of full Medicaid expansion; concerns about access to mental health care; the financial cost to the state and taxpayers; and specific provisions within the plan. Stories and quotes submitted by commenters are presented within this analysis.

Acknowledgements

This report was written by Tyla Adams, MPH candidate at Emory University, Rollins School of Public Health, and Laura Colbert at Georgians for a Healthy Future. The recommendations made in this report reflect only the views of Georgians for a Healthy Future.

In November 2019,

Georgia's Governor and the Georgia Department of Community Health released a new health care proposal.

Governor Kemp's plan, called Georgia Pathways to Coverage, makes use of an 1115 Medicaid waiver to simultaneously:

- » expand eligibility for Medicaid coverage to Georgians living in poverty and
- » introduce hurdles that would make it difficult for them to enroll or keep that coverage.^{1,2}

The Governor's plan was subject to two 30-day public comment periods in November 2019 and in January 2020, during which any interested Georgian or stakeholder group could provide written, or in some cases oral, comments about the plan.

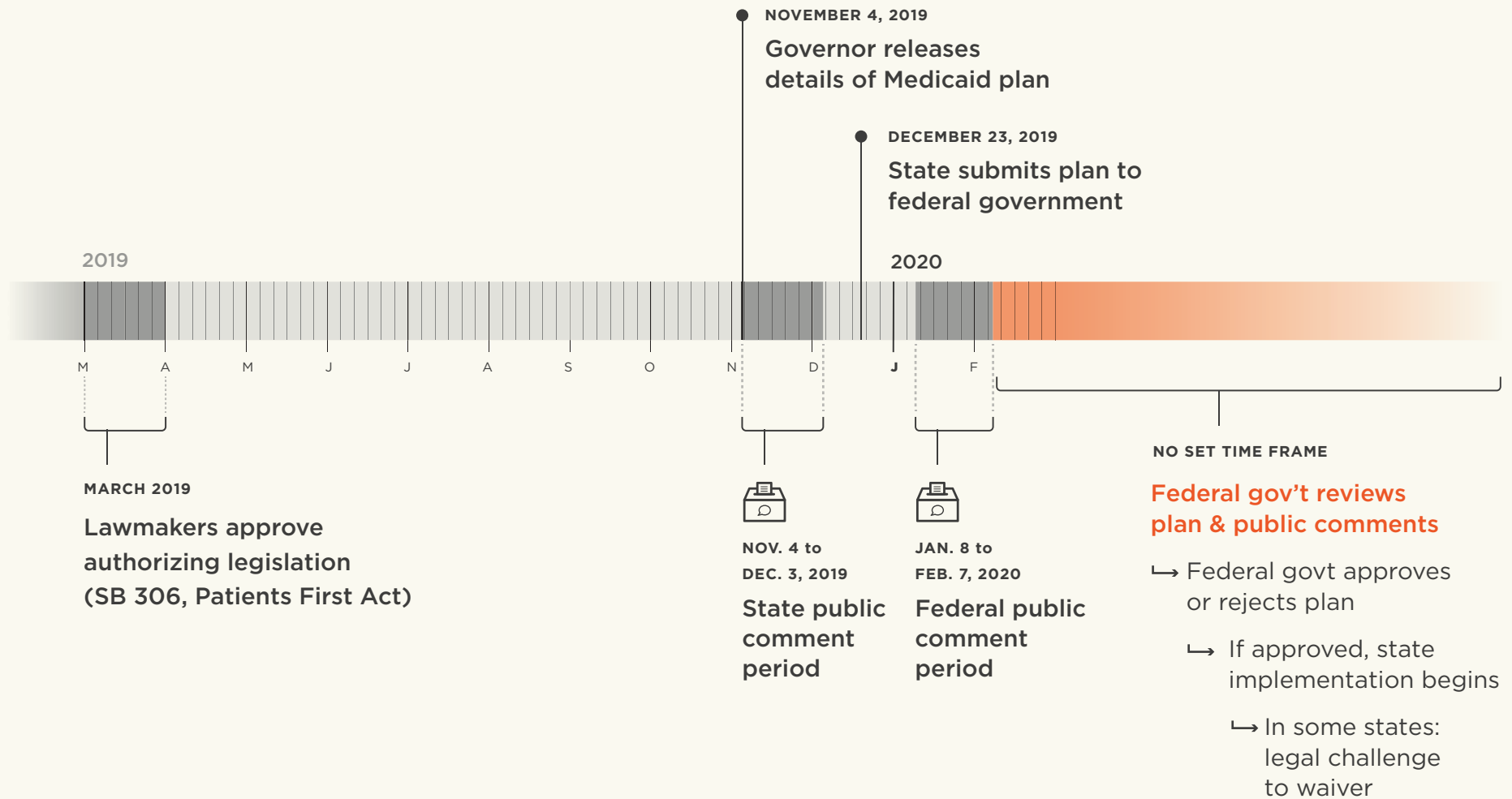
1. Georgia Section 1115 Demonstration Waiver Application, Georgia Department of Community Health. Submitted Dec. 23, 2019. Available at: <https://medicaid.georgia.gov/document/document/georgia1115draftwaiver11042019pdf/download>

2. What You Need to Know about Waivers and Medicaid Expansion, Georgia Watch. https://healthyfuturega.org/ghf_resource/what-you-need-to-know-about-waivers-and-medicaid-expansion/



Timeline

March 2019 – present

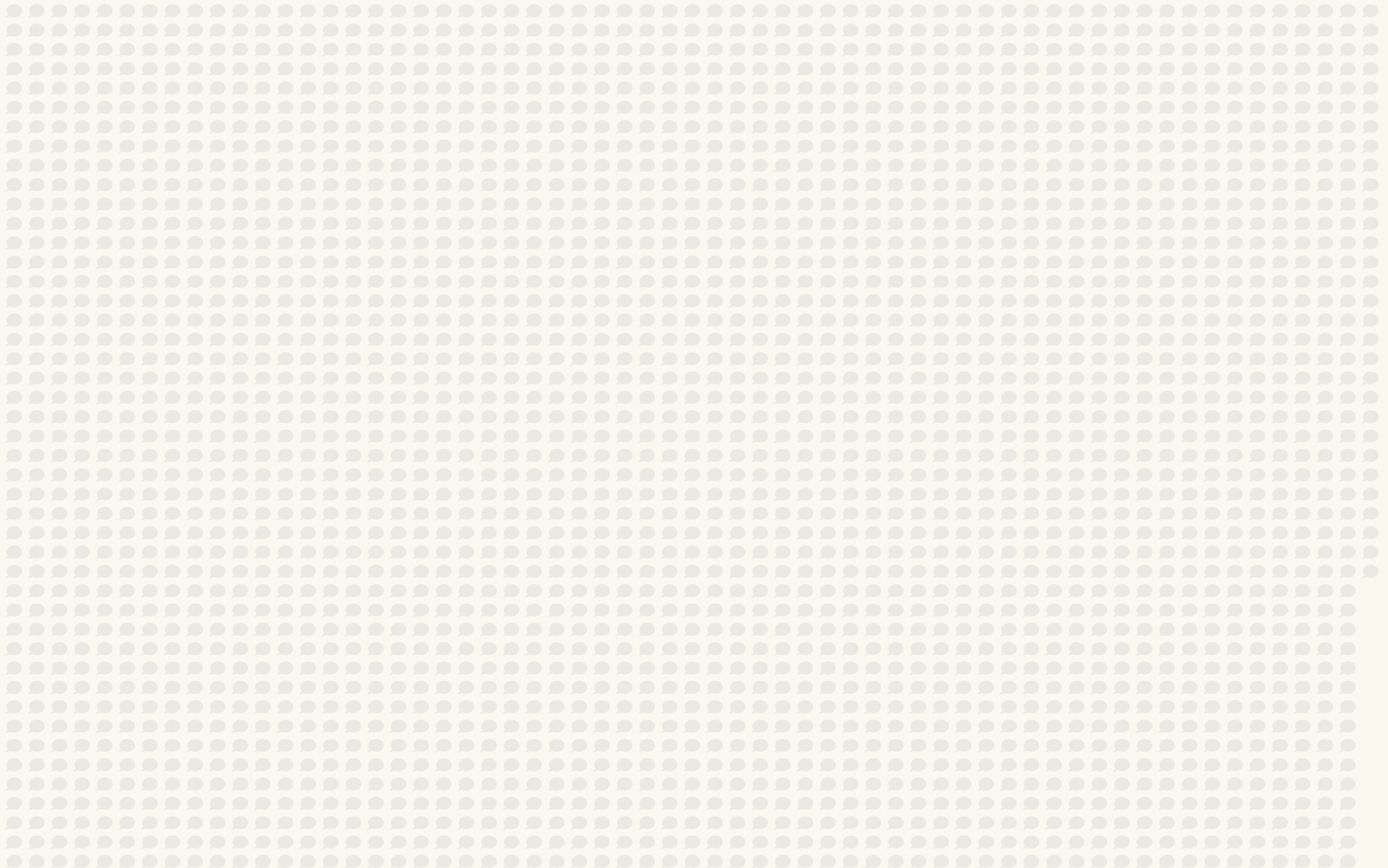




Public Comment Periods




Total Responses = 2,730

The two public comment periods garnered more than 2,700 responses from impacted Georgians, patient and consumer groups, health care providers, industry stakeholders, and other interested parties.

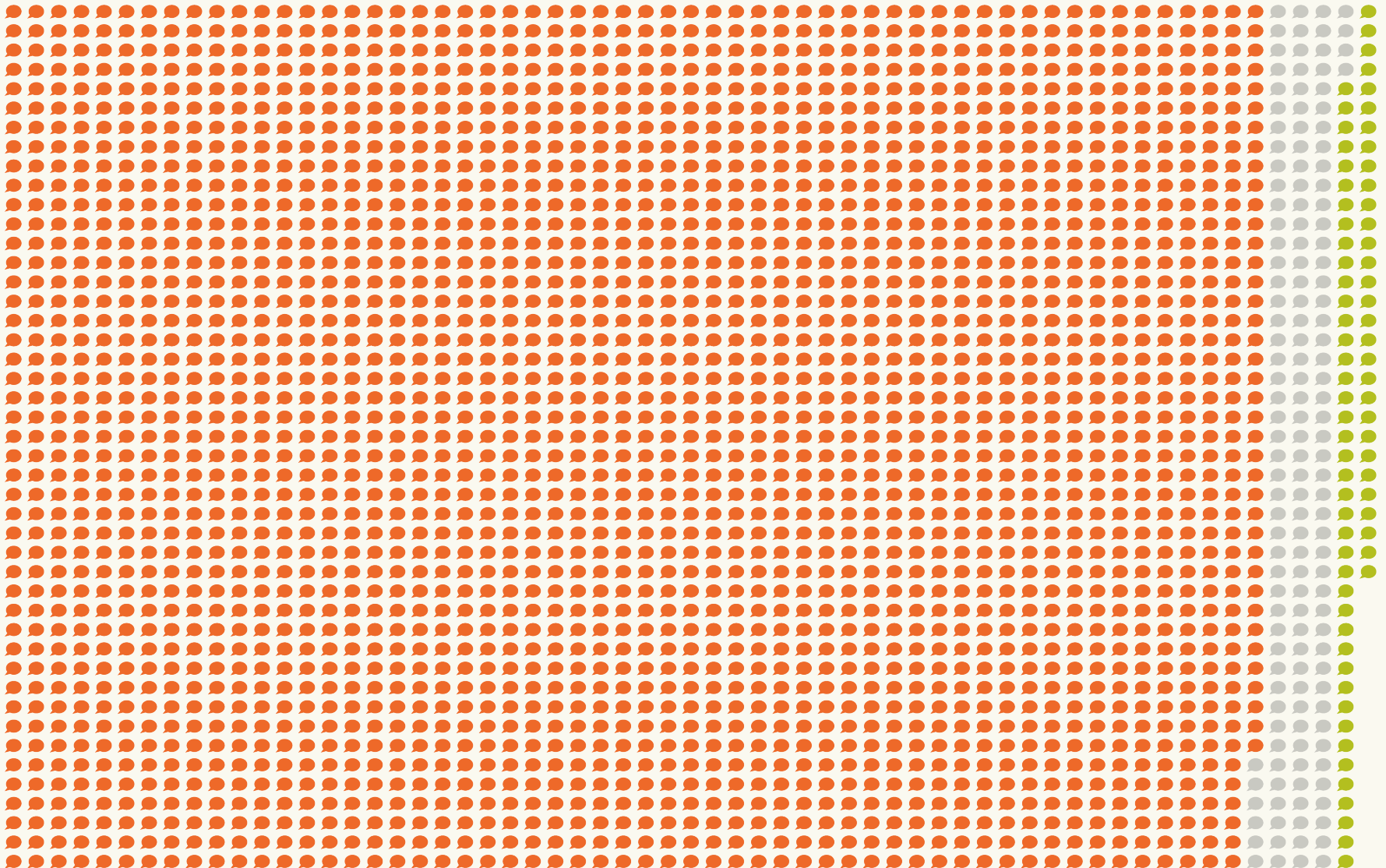




Public Comment Periods

-  **DO NOT SUPPORT** GOVERNOR KEMP'S PROPOSED PLAN
-  **NEITHER SUPPORT NOR OPPOSE** GOVERNOR KEMP'S PROPOSED PLAN
-  **SUPPORT** GOVERNOR KEMP'S PROPOSED PLAN

In each comment period, approximately **9 out of 10** commenters were **unsupportive of the proposed plan**, and in many cases expressed a **preference for full Medicaid expansion**. Here we present an analysis of the comments submitted during the state and federal comment periods respectively, and highlight the narratives offered by Georgians from across the state.





State Comment Period

November 4 – December 3, 2019

Comments Submitted During State Comment Period

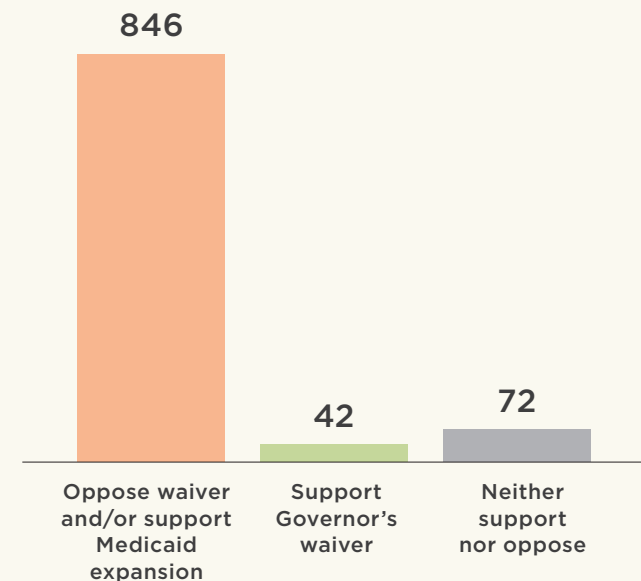
Out of the 960 comments collected about the Governor's proposal during the state comment period:

- » 846 (88%) individuals opposed the Governor's plan and/or support a full Medicaid expansion
- » 42 (4%) supported the Governor's waiver proposal
- » 72 (8%) neither supported nor opposed the proposal

During the state comment period, which ended on December 3, 2019, 960 comments were collected from interested Georgians.³

Of the 960 responses, almost nine out of ten commenters opposed the Governor's plan and most explicitly stated they supported full Medicaid expansion. Only four percent of commenters supported Governor Kemp's waiver proposal. Another 72 commenters did not clearly articulate their support or opposition for the plan.

STATE COMMENT PERIOD:
Number of commenters expressing a position
about proposed Medicaid waiver



³ Georgia's waiver application to the federal government reported that the state received 869 comments. A review of all publicly available comments by Georgians for a Healthy Future counted 960 comments. Because the state's methodology for counting comments was not detailed in public documents, GHF will use its own count for the purposes of this analysis. A detailed methodology of GHF's analysis is available in the Appendix.

Following the state's public commenting period, the Georgia Department of Community Health made a few small adjustments to the proposal and submitted the waiver to federal officials at the Centers for Medicare & Medicaid Services (CMS) for their review.

On January 8, 2020, federal officials announced that Georgia's proposal was complete, triggering the beginning of the federal public comment period.



Federal Comment Period

January 8 – February 7, 2020

Comments Submitted During Federal Comment Period

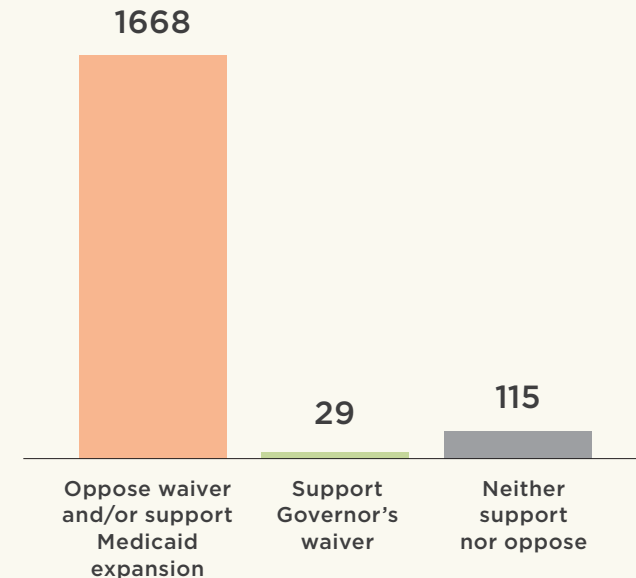
Out of the 1812 federal Medicaid comments collected:

- › 1668 (92%) opposed the waiver proposal and/or supported full Medicaid expansion
- › 29 (2%) either supported the waiver proposal or supported it with some amendments
- › 115 (6%) neither supported nor opposed the proposal

During the 30-day federal comment period, 1,812 unique responses were submitted.⁴ Of the 1,812 responses, nine out of ten respondents clearly opposed the waiver and/or supported full Medicaid expansion in Georgia. Less than two percent of commenters expressed support for the proposal or support with amendments. Another six percent of comments did not clearly express their support or opposition to the proposal.

FEDERAL COMMENT PERIOD:

Number of commenters expressing a position about proposed Medicaid waiver



4. The Centers for Medicare and Medicaid Services (CMS) comment system displays 1721 comment submissions. GHF's review of the submissions revealed that seven submissions contained comments from 185 individuals collectively. Those submissions read "I support full Medicaid expansion" followed by the first name, initial of the last name, and zip code of commenters. Additionally, 80 comments were left blank and 7 comments referred to an attachment that was not available, so these comments were excluded from the total.

Commenters in their own words

Commenters opposed the Governor's Medicaid plan for many reasons including worries about coverage for themselves, their loved ones, or sensitive populations (e.g. rural Georgians, low-income residents); the comparative benefits of full Medicaid expansion; concerns about access to mental health care; the financial cost to the state and taxpayers; and specific provisions within the plan.

The vast majority of commenters articulated a preference for Medicaid expansion as envisioned by the Affordable Care Act.

Personal connections to Georgians in the coverage gap.

Many commenters told stories about themselves or their loved ones who are caught in the coverage gap. Parents, especially those whose child had a chronic illness or extenuating financial circumstances, worried about their children's well-being and future healthcare coverage. Other commenters worried about their partners, friends, and co-workers. The theme of caregiving resonated through many of the comments from people with personal stories. Educators voiced concerns about coverage for parents of young students and for recent graduates.

“While I have been lucky enough to have healthcare through my employer, I have a young friend who is not so lucky. He has battled cancer for a number of years. Without the... ACA he would not be here today. We need to care for our friends and neighbors. Our fellow Georgians deserve it, and I don't mean just the wealthy ones.”

— COMMENTER

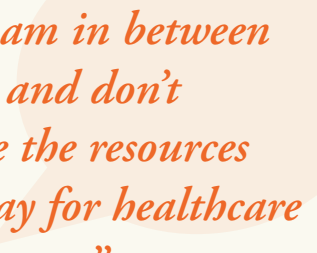
“I am a person living with HIV and Medicaid expansion is critically important for me. Under the partial Medicaid expansion proposal, I would not be eligible because I make too much. However, I am in between jobs and don’t have the resources to pay for healthcare coverage. I am concerned that the funds allocated could be better utilized to serve more Georgians like myself. Georgia would have to pay 3 times more per person than it would under Medicaid expansion.” — COMMENTER

“In five years my youngest daughter will be without healthcare. She is on the (autism) spectrum and has learning disabilities. She will be very challenged to find full time work with benefits. Without the expansion how is she supposed to help herself?”

— COMMENTER


“My mom died three weeks ago, because she could not afford to go to a doctor and had no insurance. I guess my mom can’t die a second time. For everyone else though, how about we actually do something.” — COMMENTER

“Please expand Medicaid fully. The Governor’s plan will be more costly and cover fewer individuals. My son has Type 1 diabetes. He currently works full time but has many serious complications. At the point that he can no longer work, he will die without Medicaid as he will be unable to afford paying premiums into an insurance plan. This is literally a life and death situation for him and many like him.” — COMMENTER



“...I am in between jobs and don’t have the resources to pay for healthcare coverage.”

“ . . . my fiancé is a full-time caretaker of her mom with stage 4 cancer. This waiver has burdensome work requirements. Under this waiver, my fiancé would not be eligible for Medicaid. . . she does not have the time to volunteer or work 20 hours per week, and she CERTAINLY doesn't have the time to report those work hours through our completely defunct state Medicaid management website. Did you know that website is only open from 9am to 4:30pm?⁵ The website we are suppose to report on ISN'T EVEN OPEN 24/7... Lastly, the premiums outlined in this plan are insulting. People in poverty should NOT have to pay a premium for vital healthcare. My fiancé should not be penalized for taking care of a sick parent. Georgians should not be left out of Medicaid because they live in a rural area and would have trouble reporting their hours every month.” — COMMENTER




“In order to help lift our families out of poverty, they HAVE to be healthy.”

“I work in a school with the large majority of families on Medicaid. The best thing to do for my students is to support Medicaid expansion. Students cannot learn well if they are sick or if their parents are sick. They miss days at school, they are distracted, they don't have money to get the supplies they need due to parents missing work... In order to help lift our families out of poverty, they HAVE to be healthy. In order for Georgia to have a strong economy, it has to have a healthy workforce. Please work towards expanding coverage, not making it harder for people to be covered.” — COMMENTER

5. This commenter is referring to [Gateway.ga.gov](https://gateway.ga.gov), through which Georgians can apply for Medicaid coverage. Since the submission of this comment, the Georgia Department of Family and Child Services has expanded Gateway's hours so that people can apply for coverage every day of the week and at all times of the day (aka 24/7).

“As a design educator, I had conversations with many students about their goals to become self-employed. Fears about lacking health care coverage loomed large in their decisions to start new businesses. I’ve kept up with many after graduation, and have been frustrated how frequently they been unable to overcome this hurdle. One shouldn’t have to inherit from parents to open a small design shop... Small businesses are the growth engine of Georgia’s economy, and it is cut short for too many hard working, talented young people. Insufficient medical coverage undercuts prosperity.” — COMMENTER



*“Insufficient medical
coverage undercuts
prosperity.”*

Caring for the less fortunate.

Many commenters worried that the Governor's plan ignores the needs of its most vulnerable citizens. Commenters articulated their concerns for Georgians living in rural areas, people with low-incomes, and individuals with chronic conditions and disabilities.

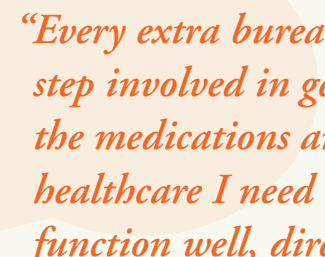


“My father struggled with Multiple sclerosis for twenty years until his death. The medication alone would have bankrupted us, not to mention doctor visits and hospital stays. Medicaid literally saved his life... Allowing more Medicaid to be available to lower income people will not only help the patients, but the entire community.” — COMMENTER



“Medicaid literally saved his life...”

“I have a severe disability that limits my ability to work, so I work part-time from home. Every extra bureaucratic step involved in getting the medications and healthcare I need to function well, directly lowers the number of hours I can work and engage with my community. Delays in receiving this care can impact me for weeks, months, or years, potentially resulting in permanent loss of function. I want all of my neighbors, friends, and family to be able to access the care they need to live fulfilling lives. Instead of opting for the Governor’s expensive Medicaid waiver that will leave hundreds of thousands of Georgians uninsured, please expand Medicare coverage instead. . . Georgians want everyone who needs healthcare to get coverage, not to institute needless and complicated barriers to care. Our generosity in caring for each other is what will make our state great.” — COMMENTER



“Every extra bureaucratic step involved in getting the medications and healthcare I need to function well, directly lowers the number of hours I can work and engage with my community.”

“My family has been in Georgia for generations. Many of them live in rural areas, make low and moderate incomes, and cannot afford access to healthcare. Full expansion of Medicaid is the only way many of them will ever have access to health care. Thousands of low and moderate income people in my area cannot afford access to health care. Not allowing full expansion of Medicaid as allowed by law would be shameful and short sighted.” — COMMENTER

“I am one of 5,000 volunteer caseworkers with St Vincent de Paul Georgia working each day around our state to help low income people in need. We meet working people every day who cannot pay their rent because of unexpected medical bills. We see people going without medical care and needed medications and their numbers are growing...The recent coronavirus outbreak and shocking mass shootings should drive home the fact that denying people access to primary care and mental healthcare makes all of us vulnerable...” — COMMENTER

“Having a Medicaid plan that doesn’t cover all low-income Georgians is asking for more rural hospitals and practices to close as they are not properly compensated for their work. This is a downward cycle that will continue to impact rural GA...” — COMMENTER

Getting the best deal for Georgians.

Some commenters focused on the cost of the Governor's plan to the state. These commenters characterized the waiver as a fiscally irresponsible choice and encouraged the state to instead take advantage of the enhanced funding available with a full Medicaid expansion.

“Governor Kemp’s plan is fiscally and morally irresponsible. This plan will cost more money to cover fewer Georgians than full Medicaid expansion leaving thousands of Georgians who would be eligible for Medicaid without healthcare....This plan is bad for Georgia and bad for our budget.”

— COMMENTER

“As a veteran, and as a preventive medicine physician, I find the governors proposed changes to Medicaid to be fiscally irresponsible and an insult to the 60,000 Georgia veteran families that would be covered by expanding Medicaid to Georgia. Instead of a fiscally responsible expansion of Medicaid — similar to that proposed by Governor Romney years ago, the current proposal would cost 300% more per covered individual. In addition, it means Georgian taxpayers will continue to send our tax dollars to other states, including Mitch McConnells Kentucky, as opposed to using those dollars on hard-working Georgians.” — COMMENTER

“With Georgia suffering from a budget crisis, I cannot understand why we would establish a program that costs more per person covered than Medicaid expansion would. That sounds like a waste of taxpayers’ money.”

— COMMENTER

Mental health access and support.

Some commenters spoke about the impact of the Governor's plan on those who are mentally ill, in jails, or those with substance use disorders. Others discussed Medicaid's role in enabling their ability to afford their prescriptions or health care costs related to mental health conditions.

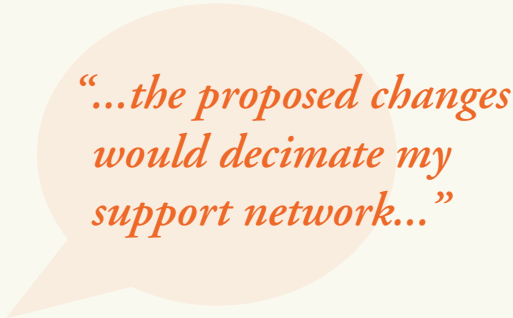
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"I adopted my son when he was 11, he is now 52 years of age diagnosed as bipolar with schizoid affect. Although his biological parents had long histories of mental illness, it was not until he was 23 years of age before we got his true diagnosis and an acceptable medical regimen that has kept him out of the hospital for the past 10 years. Without his Medicaid coverage he would have to be hospitalized or in jail. His paranoia and anxiety is difficult to control, and make it impossible for him to be employed. This new proposed plan would be a disaster for my son. I am 86 years old with a number of health problems, living in an assistive living facility and am finding it very difficult to deal with his health care. Please do not neglect our mentally ill patients." — COMMENTER

"Without his Medicaid coverage he would have to be hospitalized or in jail."

"As a mother battling severe depression recurring with psychosis and PTSD with anxiety, insurance is mandatory... I'm on 4 different medicines. Without insurance I'm unable to get medicine or help. In the last year I've attempted suicide 3 times. So as you can see I need it." — COMMENTER

“These changes would make my healthcare situation impossible. I have a permanent disability in the form of a mental health disorder. I rely on my psychiatrist, therapist, and medication to stay healthy. I cannot afford a premium for my healthcare. I am opposed to reporting requirements that would make my situation more confusing, humiliating, and complicated — forcing me to disclose my healthcare information and income level to organizations where I volunteer. Furthermore, the proposed changes would decimate my support network which consists of many friends who also have preexisting mental health conditions.”⁶ — COMMENTER



“...the proposed changes would decimate my support network...”

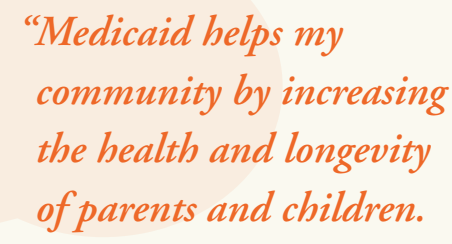
“As a psychologist in Georgia, I’ve worked with individuals who struggle on so many levels — in the workplace, with their mental and physical health, in relationships — and they are good people. But many of them have grown up with so many disadvantages that have stressed them, that have left them unsupported, and that wear them down. Governor Kemp’s plan treats these people as if they are at fault for the circumstances in which they find themselves and doesn’t help most of them... My hope is that he would shift his stance — that he’d move away from what is politically safe and move towards taking care of the citizens in our state who need Medicaid expansion. Please do the right thing for your citizens, Governor Kemp.” — COMMENTER

6. “The Pathways to Coverage provisions (e.g. work reporting requirements, premiums) would not apply to Georgians who are already covered by Medicaid, as seems to be the case for this commenter. However, comment reviewers chose to include some of these comments for two reasons: 1) reports from other states with similar 1115 waivers indicate that exempt state residents are occasionally (and likely unintentionally) subjected to the waivers’ requirements; and 2) these comments fairly represent the situations of many Georgians in similar situations who have not yet or will not be able to qualify for Medicaid or Medicare coverage of their disability.”

Equity for marginalized communities.

Some commenters wrote that they were concerned about the plan's impact on Georgians of color and other marginalized populations. Commenters expressed the need to protect all Georgians, especially those in communities that are disadvantaged as a result of structural racism and its resultant outcomes.

“Medicaid helps my community by increasing the health and longevity of parents and children. especially in communities of color, in order to be able to provide increase parenting skills and empowerment for adults, and healthier growth and development for the children. It also decreases the equity gaps produced by centuries of inequities in all areas of our state institutions. This is turn contributes to better educational attainment and decreased crime—a direct correlation with better and preventative healthcare provided by Medicaid—which benefits all of us!” — COMMENTER



“Medicaid helps my community by increasing the health and longevity of parents and children. especially in communities of color...”

“My concern is for the Native American population in Georgia. Our population is vastly undercounted for various reasons. However counties that are places with Native Americans (American Aborigines) sometimes known as Indians of Color, Native Black Americans and by other classifications, are places that should be and must be fully funded as we rebuild ourselves, communities and cultures.” — COMMENTER

“Most of the Georgia counties that are health transportation shortage areas are rural counties, and so the elimination of (Medicaid’s transportation benefit) would add a barrier to care and likely end up costing Georgia more since those folks would have a much harder time getting to healthcare services, especially those that are preventative. In addition, people of color in Georgia are three times more likely to be without a vehicle as compared to white Georgians, and so the elimination of transportation as a benefit would likely exacerbate racial inequities in health outcomes.” — COMMENTER

Concerns about specific provisions within the waiver.

Commenters expressed deep concerns about the hardships that would be created for Georgians by specific provisions in Georgia's proposed plan. Many commenters focused on the work requirements as a hinderance to accessing care and wondered how it might impact the health and well-being of vulnerable Georgians.

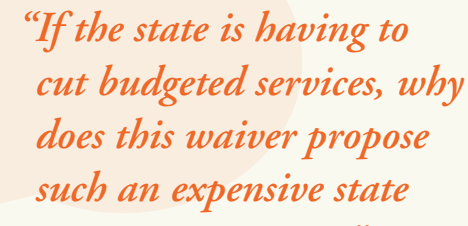
“I work with both young and old who are defined as chronically homeless due to mental, physical, life threatening, or a combination of these conditions who can ill afford not to receive proper medical treatment. The reality is that without Medicaid, these same individuals cannot afford the cost of their medicine. To require them to work and or volunteer, recertify every month, plus pay to be insured is undue pressure, unnecessary, and can lead to many of them losing what little monetary income they receive. Additionally, I have clients whose current health conditions prevent them from working let alone volunteering. Your Medicaid plan as planned would essentially put them in the grave and would leave many of their young children without parents.” — COMMENTER

“My 18 year old daughter is disabled due to a chronic medical condition. She is unable to work at all in poor health and only up to 9 hours per week at max health (never enough to earn employer sponsored health care). Without Regular Medical Treatment she will die. It’s not her fault. We pay taxes so that individuals like our daughter get equitable lives. Just because someone is disabled doesn’t mean their lives are less valuable.” — COMMENTER

“This Medicaid waiver bill will harm those of us living with a chronic illness. 20% people living with lupus are on disability and receive benefits from the government. 60% are physically unable to work, but have not received disability benefits from the government. Those individuals who do not receive benefits from the government and cannot work are out of luck and uninsured. They receive medical treatment from public hospitals that are compensated by the tax payers. They are treated at private hospitals which increases the cost of medical care. The more people who qualify for medical insurance the better. By imposing restrictions unattainable requirements on people who are disabled, you are making those individuals sicker and poorer. The only option is full Medicaid expansion.” — COMMENTER

“How does this plan help small town and rural hospitals stay afloat to provide care for those living in small communities far from major metro hospitals? Where is the plan for addressing the needs of those struggling with addiction and those working to care for them and help them recover and start actively contributing to their communities again? How do you plan to aid people who have temporary difficulties like treatment for cancer, kidney disorders, diabetes, or other chronic conditions.” — COMMENTER

“How does this waiver offer help to people with chronic conditions find affordable transportation to access care? If the state is having to cut budgeted services, then why does this waiver propose such an expensive state monitoring system? This waiver does little to address many major concerns, like providing access to Georgians who fall in the coverage gap.” Just expand Medicaid for goodness sake! That will provide more access” — COMMENTER



“If the state is having to cut budgeted services, why does this waiver propose such an expensive state monitoring system?”

Conclusion

“Any plan that does not address the coverage gap is insufficient and ultimately fails Georgians. Refusing to address coverage on the front end means that our friends and family lead less productive lives and end up (with) bills they cannot afford that get left with the state at the end of the day. This is our problem one way or the other and the Governor’s Medicaid plan does not address the fundamental problem facing Georgians, which is the lack of basic health care.” — COMMENTER

The purpose of the public comment periods for Medicaid waiver plans, like the Governor's, is to allow consumers to have "meaningful input" into the changes being proposed by decision makers. Georgians made it clear in their comments that Governor Kemp's plan falls short in extending coverage to low-income residents, ignores the lived experiences of Georgia individuals and families, and makes poor use of state resources by forgoing available federal funds to cover more people.

Federal health officials, led by the Secretary of the US Department of Health and Human Services, are now considering whether or not to approve the state's plan. Based on the legal proceedings related to similar waivers in other states and federal courts' conclusions that Medicaid's primary purpose is to furnish medical assistance, federal officials would be well-served to heed the clear guidance of Georgia commenters, reject the harmful ideas put forward in Georgia's plan, and work with state leaders to expand coverage to as many Georgians as possible. These comments should also prompt state leaders to re-visit the waiver's authorizing legislation and make changes to allow for a Medicaid expansion that facilitates access to quality health care for all low-income Georgians.

Appendix

Methodology

Staff at Georgians for a Healthy Future conducted a quantitative and qualitative analysis of the comments received during the state and federal comment periods on Georgia's proposed 1115 Medicaid waiver, *Georgia Pathways to Coverage*.

Comments submitted during the state public comment period

Georgians for a Healthy Future staff and graduate intern reviewed all publicly available comments as posted on the Georgia Department of Community Health's Patients First Act webpage (<https://medicaid.georgia.gov/patientsfirst>). The review included an examination of transcripts of the in-person, public comment meetings and all linked pdf documents on the page. Two of the transcripts from in-person public comment meetings were missing (Savannah and Bainbridge morning sessions related to the 1115 waiver). The GHF team cross-referenced verbal and written comments to check for duplicated responses and removed those in our review so as not to over-weight their impact.

Once duplicated comments were removed, the following criteria were used to determine the position of each comment:

- **Opposed the waiver proposal and/or supported full Medicaid expansion**
Comments in this category included any that spoke against provisions in the waiver, spoke favorably of Medicaid expansion as envisioned by the

Affordable Care Act, and/or shared stories that were specific to how Medicaid has helped someone they know, their community or themselves. These ranged widely from short phrases and sentences to multi-paragraph anecdotes.

- **Supported Gov. Kemp’s proposal or supported it with some amendments**

Comments in this category included any that spoke in favor of the proposal as a whole, spoke unfavorably toward Medicaid or Medicaid enrollees, or TKTK. Most of these were short comments to that effect, but some included longer statements.

- **Neither support nor oppose**

Comments in this category spoke both in favor of and against the proposed waiver (for example, comments in favor of the premiums but against work requirements), held a position that was indeterminable, or were unrelated to the waiver proposal.

Comments submitted during the federal public comment period

Georgians for a Healthy Future staff and graduate interns reviewed all publicly available comments as posted on CMS’s Medicaid waiver website (https://1115publiccomments.medicaid.gov/jfe/form/SV_cBVd0lwa1Z-PAADP > Click “View the summary of responses”). The review included an examination of all comments directly available in the summary table and all linked pdf documents.

Comment reviewers cross-referenced comments to check for duplicated responses to the best of their ability and removed those in the review so as not to over-weight their impact. Reviewers used the same criteria detailed above to evaluate the position of each comment.

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