

February 15, 2019

Senator David Wilson, Chair – Senate Health & Social Services Committee Alaska Capitol Juneau, AK 99801

RE: Letter of opposition to SB7 – Medical Assistance Work Requirement

Dear Senator Wilson and Committee Members:

The Alaska Primary Care Association (APCA) supports the operations and development of Alaska's 27 Federally Qualified Health Centers (FQHCs). We urge members of the Senate Health & Social Services Committee to oppose Senate Bill 7 – Medical Assistance Work Requirement.

APCA and Alaska's Community Health Centers (FQHCs) are mission-driven to support wellness that leads to independence and fulfilled lives by supporting and providing data-informed, efficient comprehensive primary care services. As community-owned and patient governed practices, Community Health Centers also seek to maximize coverage for their patients. Federal waivers that restrict eligibility and decrease access to care result in poorer health outcomes, decreased opportunities for independence, and increased use of emergency rooms.

APCA's opposition to SB7 focuses on:

Work requirements are the wrong approach to encouraging Medicaid beneficiaries to find and keep jobs. There are successful programs in other states to consider that offer career counseling and job training that support Medicaid recipients in their employment goals. Montana's Health and Livelihood Partnership is one example. The program increases the employment and earnings of Medicaid recipients, without threatening their coverage.

Loss of Medicaid coverage and corresponding access to treatment is dangerous for Medicaid beneficiaries and will be expensive for the Alaska health system. Medicaid enrollees rely on coverage to manage chronic health conditions, obtain substance use disorder treatment, treat behavioral health conditions and seek care for serious health conditions and in emergencies. While the State of Alaska is required to provide exemptions for Alaskans who are "medically frail," many Alaskans with disabilities and serious illnesses either won't qualify for these exemptions or will have difficulty providing physician testimony, medical records or other documentation required to prove they do. Patients unable to manage chronic conditions, obtain treatment and behavioral health services will cost the system more as their needs become urgent and must be addressed in higher cost settings including emergency departments and via the legal and corrections systems.

The State of Alaska is ill-equipped to administer a Work Requirements program. The Division of Public Assistance (DPA) continues to be incumbered by a substantial backlog of applications under the current eligibility criteria. Over 16,000 Medicaid applicants have waited months to receive an eligibility determination. DPA and other departments are ill-equipped to implement and assess the additional requirements and exemption procedures outlined in this legislation.

This legislation will only add more red tape and strain to the lives of vulnerable Alaskans. While the exemptions outlined seem reasonable on the surface, experiences in other states that have implemented such requirements have demonstrated that individuals who qualify for the proposed exemption categories will face challenges successfully demonstrating they qualify. They won't meet the exemption rules due to system constraints, lack of awareness, paperwork submission barriers and other technical issues.

Eligibility determination is a complex process as it stands today. Every day, Community Health Center enrollment professionals work with patients to secure and maintain eligibility for a range of private and public health coverage. They are acutely aware of the procedures and steps required to support patients with their applications.

We strongly urge you to devote time and resources to strengthen the current eligibility determination system, work through the current backlog, and take steps to bolster Alaska's vocational programs instead of imposing additional burdens on the DPA and Alaskans who are seeking to remain well and contributing to the Alaska economy.

Coverage opens doors to treatment, preventative care, behavioral health, addressing chronic health needs and ultimately – limits emergency room visits, high health care costs and other expenditures and ramifications that later on get passed to the public-at-large.

We urge Committee members to oppose this bill.	Please contact me with any questions.

Sincerely,

Nancy Merriman Executive Director