



September 19, 2019

Matt Wimmer  
Administrator  
State of Idaho, Department of Health and Welfare  
450 West State Street PTC Building, 10th Floor  
Boise, ID 83705

Attention: Cindy Brock  
Medicaid Program Policy Analyst  
Idaho Division of Medicaid  
P.O. Box 83720  
Boise, Idaho 83720

RE: Idaho Medicaid Reform Waiver Section 1115 Medicaid Waiver Demonstration Project Application

Mr. Wimmer and Ms. Brock,

Thank you for the opportunity to comment on the Idaho Medicaid Reform Waiver. On behalf of people with cystic fibrosis (CF), we write to express our serious concern that work and community engagement requirements are barriers to accessing the high-quality care that people with CF need. As such, we ask the state to specifically and automatically exempt people with cystic fibrosis from these requirements.

Cystic fibrosis is a life-threatening genetic disease that affects approximately 120 adults in Idaho, more than 20 percent of whom rely on Medicaid for all or some of their health care coverage. CF causes the body to produce thick, sticky mucus that clogs the lungs and digestive system, which can lead to life-threatening infections. For those with CF, health care coverage is a necessity and interruptions in coverage can lead to lapses in care, irreversible lung damage, and costly hospitalizations—compromising the health and well-being of those with the disease. Removing an individual from or denying Medicaid coverage because of inability to comply with work requirements, even as a temporary penalty, will leave these patients without the coverage they depend upon to maintain their health.

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. However, we have serious concerns about the proposal to add work and community engagement requirements as a condition of eligibility and ask that you explicitly exempt people with cystic fibrosis to minimize the number of individuals who lose coverage due to these new requirements.

***Work and Community Engagement Requirements***

Continuous access to high-quality, specialized CF care is essential to the health and well-being of people with cystic fibrosis. While we appreciate the state's decision to expand Medicaid, making work a condition of

Medicaid eligibility threatens access to care for people with CF, as their ability to work can vary with changes in health status. Idaho's decision to exempt from community engagement and work requirements individuals who are physically unable to work reflects the important reality that health status can significantly affect an individual's ability to search for and sustain employment. As the state works to define exemption categories, we strongly urge you to specify cystic fibrosis as an automatic exemption to the requirements.

Nonetheless, even considering exemptions listed above, we still have serious concerns about the administrative challenges someone with CF could face in understanding and navigating these requirements and the exemption process. Arkansas' program is a prime example of how administrative burdens can jeopardize coverage. The November 2018 Arkansas Works program report showed an overwhelming majority – nearly 80 percent – of those required to log-in and report compliance with the work requirements failed to do so, putting these individuals at risk for loss of coverage.<sup>1</sup> And ultimately, within six months of Arkansas implementing work requirements, more than 18,000 people lost Medicaid coverage in the state. By Idaho's own estimates, more than 16,000 individuals may lose Medicaid eligibility in just the first year due to inability to comply with these requirements.<sup>2</sup>

Additionally, we believe that denying coverage because an individual is unable to satisfy work requirements is excessively punitive for people with a life-threatening condition like cystic fibrosis. As described above, Medicaid provides crucial coverage for people with complex conditions like CF. Removing coverage as penalty for inability to comply with work requirements can create serious challenges for people with CF who rely on Medicaid coverage for access to life-saving care. Based on this information, we urge you to reconsider the work requirements and two month penalty for just one month of noncompliance, particularly for Idahoans with chronic and severe health conditions, and exempt people with CF from these requirements.

The Cystic Fibrosis Foundation appreciates the opportunity to provide input on these important policy changes. As the health care landscape continues to evolve, we look forward to working with Idaho to ensure access to high-quality, specialized CF care and improve the lives of all people with cystic fibrosis. Please consider us a resource moving forward.

Sincerely,



**Mary B. Dwight**  
Senior Vice President of Policy & Advocacy  
Cystic Fibrosis Foundation



**Lisa Feng, DrPH**  
Senior Director of Policy & Advocacy  
Cystic Fibrosis Foundation

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<sup>1</sup>[https://humanservices.arkansas.gov/images/uploads/newsroom/181217\\_AWreport.pdf](https://humanservices.arkansas.gov/images/uploads/newsroom/181217_AWreport.pdf)

<sup>2</sup><https://medicaidexpansion.idaho.gov/LinkClick.aspx?fileticket=dKnKV-NOaV0%3d&portalid=118>