



Ohio Department of Medicaid 1115 Waiver  
Comments Submitted to CMS by Philanthropy Ohio  
May 2018

Philanthropy Ohio is a statewide membership association serving private and community foundations, corporate giving programs, government agencies, United Ways and other public charity grantmakers as well as individual philanthropists. Our mission is to be the leading voice and premier resource for philanthropy across the state, particularly serving our over 220 members who collectively awarded more than \$4 billion in grants last year. As you know, we have been engaged with the department as well as the Office of Health Transformation in recent years, through our member-driven Health Initiative that focuses on the state's health policy reform efforts. We hope that our comments expressing our deep concerns about the waiver provide helpful insight into philanthropy's perspectives on the waiver being submitted.

Philanthropy Ohio has supported Medicaid expansion over the last few years and remains committed to ensuring access to health insurance that is critical to improved health outcomes for Ohioans. Given the great strides forward the state has made, we are concerned about any proposals that would take us back instead of further ahead, which we believe is likely to occur should the 1115 Waiver with its work requirements moves forward.

We have three primary concerns about the Medicaid waiver. First, Medicaid in itself serves as an incentive to work, as demonstrated by the Ohio Department of Medicaid's report and data as well as by national data. Second, we question whether a work requirement is an effective policy for the expressed goal of getting more Medicaid recipients into the labor market. Third, and most importantly, where is the research that demonstrates its efficacy, especially as related to other policies such as job creation programs? Our members remain strongly committed to policy development that is research-driven and shown to be effective. We encourage CMS and the Ohio Department of Medicaid to do the same.

Finally, if the waiver is approved and implemented – and thousands of Ohioans lose access to medical care – philanthropy will be called on to fill the gap, which it cannot possibly do as its resources pale in comparison to what would be needed to assure continued access to cost-effective care. And, after the implementation of the expansion, many foundations redirected their limited but important resources to addressing other critical issues, notably reducing infant mortality and addressing the state's opioid crisis, and leaving little room for reallocation to address access to care needs.

It is for these reasons that we cannot support the waiver going forward and do not believe that the waiver advances the best interest of Ohio and its most-at-risk populations.

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