
Planned Parenthood of Wisconsin, Inc.

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BY EMAIL

Director Michael Heifetz
Division of Medicaid Services
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Director Heifetz,

Thank you for the opportunity to comment on the Section 1115 waiver proposed by the Department of Health Services.

Planned Parenthood of Wisconsin (PPWI) is the state's oldest and most trusted reproductive health care provider, operating 21 health centers across the state. Every year, Planned Parenthood serves 60,000 women, men and teens, in Wisconsin providing affordable, accessible and non-judgmental health care and education. Planned Parenthood's doors are open to all people, regardless of their insurance status or income.

PPWI urges the Department of Health Services to consider the impact the Section 1115 waiver will have on the low-income communities Planned Parenthood of Wisconsin serves. Two thirds of the 60,000 patients Planned Parenthood serves in Wisconsin every year rely on Medicaid to cover all or part of their services. Thousands of childless adults in Wisconsin who depend on BadgerCare for their health insurance will lose access to health care services if certain proposed changes take effect. We object to these policies that harm the health of Wisconsinites and their families.

PPWI opposes the lifetime limit on eligibility, monthly premiums, work requirement and indiscriminate drug testing proposed in this waiver.

These proposals fail to meet the stated purpose of Section 1115 waivers. Instead of finding innovative ways to increase access to health care for low-income Wisconsinites or cost-saving measures that serve the state while promoting healthy populations, these policies do the opposite. There is no way to square these proposals with the federal requirement that waiver policies are "likely to assist in promoting the objectives of the program."

PPWI is particularly concerned about the impacts of these policies on women, who will be disproportionately impacted, as single women are more likely than their male peers to live in poverty. Access to health care is essential for all women, including child-less adults who wish to

avoid or postpone pregnancy. Consistent access to contraception, cancer screenings and testing for sexually transmitted disease--all services covered by BadgerCare--is essential to the health of Wisconsin women and for public health in our state. PPWI urges the Department to prioritize policies that increase access to health care, instead of limiting that access through cut-offs and lock-outs.

Lifetime Limit on Eligibility

Capping cumulative eligibility for BadgerCare at 48 months puts low-income Wisconsinites at risk. Individuals who suffer from chronic conditions, prolonged illnesses or substance abuse disorders may lose access to health care just when they need it most. An interruption in treatment caused by a loss of insurance could erase any progress made in combatting these serious health problems. Time-based eligibility limits cannot be one-size-fits-all and accomplish the goals of keeping enrollees healthy and able to contribute in the workforce. Individuals who rely on Medicaid almost always have no other access to health insurance. They rely on BadgerCare. Locking these individuals out of this program means their only option to access health care will be costly visits to the emergency room, which puts a financial strain on our entire community. If Wisconsin is committed to a healthy population, we must do better than limiting access to the only safety net we have.

Monthly Premiums

Wisconsinites who rely on BadgerCare for health insurance already face a myriad of barriers to accessing that healthcare, financial and social. An additional monetary burden on these individuals will only put health services further out of reach. Even if participants can afford the premiums, the administrative burden of making these payments each month will inevitably lock some Wisconsinites out of the health care they need. While ten dollars a month may seem manageable to those of us living above the Federal Poverty Level, the impact for an individual surviving on \$981 a month is real. If participants are unable to pay premiums for even a short period of time due to financial crises, the requirement to pay the entire accumulation of fees before accessing insurance again will be insurmountable for those already on the margins financially. A car breaking down, a parking ticket, a slight increase in rent--all of these expenses can break the tenuous budget of an individual barely getting by. Beyond that, a requirement to pay fifty dollars at once to make up for lapsed premiums will be impossible for some. When individuals do not have access to insurance, they do not get the care they need to be healthy and productive members of society.

Work Requirement

The work requirement proposed by this waiver puts the cart before the horse. Access to health care, including mental health treatment and prescription coverage, is essential to being healthy enough to succeed in the workforce. Low-income women in our state often face an additional obstacle to formal employment, as they disproportionately serve as caretakers for family members, even if not for children of their own. Caring for ageing parents or other relatives can make keeping regularly scheduled hours challenging for some women. Forcing them to sacrifice their own health in addition to the financial strain created by the lack of a regular paycheck puts these women further from achieving their goals. We ask that the Department focus on job placement programs and skill development curriculums that empower Wisconsinites to succeed instead of punishing them by jeopardizing their health. Locking individuals out of health insurance does not advance the interests of our state.

Drug Screenings

PPWI applauds the increased access to Substance Use Treatment programs the waiver proposes to create. Mandatory drug screenings undercut this policy, however, and violate the privacy and rights of individuals enrolled in BadgerCare. Indiscriminate screening is not the way to fight substance abuse in our state. While the cost of this screening program is not disclosed in publicly available materials, the supplies and personnel required to conduct such screening must be substantial. The cost of administering this program should instead be invested in making voluntary, high-quality treatment more available in our state, where many facilities already have waitlists. It is unclear how this testing furthers the goals of the Medicaid program: it makes insurance less accessible and is a counterproductive use of government funds. Beyond these policy shortcomings, PPWI believes this blanket screening requirement raises serious Constitutional concerns, allowing the government to violate the privacy rights of citizens.

As a critical member of the safety net serving BadgerCare recipients, PPWI urges the Department to reconsider the proposals discussed above. We believe all Wisconsinites deserve access to affordable, quality health care, no matter their income or insurance provider. The lifetime limit on eligibility, monthly premiums, work requirement and indiscriminate drug testing proposed in this waiver contradict the very purpose of Section 1115 waivers and damage the health of our state.

Thank you for the opportunity to comment on this important proposal.

Sincerely,



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Planned Parenthood of Wisconsin

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