



April 2, 2018

The Honorable Gretel Felton  
Deputy Commissioner, Beneficiary Services  
Alabama Medicaid Agency  
501 Dexter Avenue, P.O. Box 5624  
Montgomery, Alabama 36103-5624

Dear Commissioner Felton:

On behalf of the American Academy of Family Physicians (AAFP), which represents 129,000 physicians and medical students across the country, and our state chapter, the Alabama Academy of Family Physicians, which represents over 1,800 family physicians and medical students, I write in response to Alabama's Medicaid Workforce Initiative Section 1115 Demonstration Application.

Historically, states have requested waivers of statutory Medicaid safeguards to create or test demonstration programs to expand care to new populations, offer new services, and deliver care in innovative and different settings. The AAFP and Alabama AFP stand ready to work with stakeholders and policymakers to identify innovative strategies to strengthen Medicaid and improve the outcomes of the high-quality care it finances.

Several states have recently submitted Medicaid Section 1115 waivers that would harm Medicaid beneficiaries if approved. They would restrict access by conditioning the receipt of care on meeting standards antithetical to the objectives of the Medicaid program which will ultimately harm patient health. In response to these proposals, a group of six front-line physicians organizations (the AAFP, American Academy of Pediatrics, American College of Obstetricians and Gynecologists, American College of Physicians, American Osteopathic Association, and American Psychiatric Association), representing more than 560,000 physicians and medical students, have adopted [principles](#) related to Section 1115 demonstration waivers. Based on the standards set by these principles, the AAFP and Alabama AFP are deeply concerned with the Medicaid reforms Alabama proposes in its waiver.

### Medicaid in Alabama

Medicaid provides health insurance for more than 76 million low-income Americans. In Alabama, Medicaid and the Children's Health Insurance Program (CHIP) provide health and long-term care coverage to more than 889,000 low-income children, pregnant women, parents, and people with disabilities, or approximately 19% of the state's population. Alabama's Medicaid program currently has the most stringent eligibility requirements of any state, with an upper income threshold of 18% federal poverty level (FPL) for adults with children, or \$2,185.20 per year for an individual or \$4,518 for a family of four.

[www.aafp.org](http://www.aafp.org)

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### **Work Requirements**

66% of adult and child Medicaid enrollees in Alabama currently live in families with at least one individual working outside of the home. Pending CMS approval, the Medicaid Workforce Initiative would impose work requirements on parents who make less than 18% FPL. If approved, it's projected that approximately 8,700 of Alabama's poorest residents would lose their Medicaid coverage in the first year alone. The new requirement would also affect workers with Transitional Medical Assistance by cutting benefits from 12 to six months despite eligibility rules that ensure beneficiaries, by definition, are working more.

The AAFP and Alabama AFP do not support establishing barriers to eligibility and coverage through the waiver process. We believe that waivers and other proposed changes to Medicaid should not impose punitive requirements that individuals be employed, be actively seeking a job, or be enrolled in a job training or job recruitment program as a condition of eligibility. Work requirements and lock-outs limit beneficiary access to preventative and primary care services that promote positive health outcomes, maintain patient wellness, and lower health costs. While we support voluntary programs to assist Medicaid enrollees in obtaining a job or gaining job skills, we are concerned that making participation in such programs a mandatory condition of eligibility will create unacceptable barriers to care, especially for the most vulnerable persons.

We appreciate the opportunity to comment on the Alabama's Medicaid Workforce Initiative Section 1115 Demonstration Application. Again, we welcome the opportunity to work with policymakers and stakeholders to identify innovative strategies to strengthen Medicaid. However, we believe that the policy changes proposed by Alabama will harm patients covered by Medicaid. For any questions you may have, please contact Robert Hall, JD, Director, Division of Government Relations for the AAFP, at [rhall@aafp.org](mailto:rhall@aafp.org) or Jeff Arrington, Executive Vice President for the Alabama AFP, at [alafamdoc@charter.net](mailto:alafamdoc@charter.net).

Sincerely,

A handwritten signature in black ink, appearing to read 'John Meigs, Jr.', with a stylized flourish and the initials 'MS' at the end.

John Meigs, Jr., MD, FFAFP  
Board Chair

### **About Family Medicine**

Family physicians conduct approximately one in five of the total medical office visits in the United States per year – more than any other specialty. Family physicians provide comprehensive, evidence-based, and cost-effective care dedicated to improving the health of patients, families and communities. Family medicine's cornerstone is an ongoing and personal patient-physician relationship where the family physician serves as the hub of each patient's integrated care team. More Americans depend on family physicians than on any other medical specialty.