

6/12/2025

Leslie H. Hoffman
Deputy Commissioner
Kentucky Department for Medicaid Services
275 East Main Street
Frankfort, Kentucky 40601

Re: Kentucky Community Engagement Demonstration

Dear Deputy Commissioner Hoffman:

The American Kidney Fund (AKF) appreciates the opportunity to submit comments on the Kentucky Community Engagement Demonstration.

AKF is the nation's leading nonprofit organization working on behalf of the 1 in 7 Americans living with kidney disease, and the millions more at risk, with an unmatched scope of programs that support people wherever they are in their fight against kidney disease, from prevention through transplant. With programs that address early detection, disease management, financial assistance, clinical research, innovation and advocacy, no kidney organization directly impacts more lives than AKF. We are also one of the nation's top-rated nonprofits, investing 97 cents of every donated dollar in programs.

The American Kidney Fund is committed to ensuring that Kentucky's Medicaid program provides quality and affordable healthcare coverage. AKF appreciates that Kentucky's proposed demonstration would not jeopardize healthcare coverage for people with kidney disease and other serious and chronic conditions. AKF offers the following comments on the Kentucky Community Engagement Demonstration:

Kentucky's Demonstration seeks to implement a Community Engagement Waiver Program for adults under 60 without dependents who have been enrolled in Medicaid for more than 12 months. Eligible adults would be automatically referred to the Department of Workforce Development (DWD) for voluntary job placement assistance. The state estimates that 75,000 individuals would be subject to this referral requirement.

AKF appreciates the voluntary nature of the proposed work support program. The vast majority of those with Medicaid who can work already do so; nationally, 92% of individuals with Medicaid coverage under age 65 who do not receive Social Security disability benefits are either workers, caregivers, students, or unable to work due to illness.¹ Continuous Medicaid coverage can actually help people find and sustain employment. In a report looking at the impact of Medicaid expansion in Ohio, the majority of enrollees reported that being enrolled in Medicaid made it easier to work or look for work (83.5% and 60%, respectively).² That report also found that many enrollees were able to get treatment for previously untreated health conditions, which made finding work easier. Additionally, a study in The New England

¹ Tolbert, Jennifer et al. Understanding the Intersection of Medicaid & Work: An Update. KFF. February 4, 2025. Available at: <https://www.kff.org/medicaid/issue-brief/understanding-the-intersection-of-medicaid-and-work-an-update/>

² Ohio Department of Medicaid, 2018 Ohio Medicaid Group VII Assessment: Follow-Up to the 2016 Ohio Medicaid Group VIII Assessment, August 2018. Accessed at: <http://medicaid.ohio.gov/Portals/0/Resources/Reports/Annual/Group-VIII-Final-Report.pdf>.

Journal of Medicine found that Arkansas's work requirement was associated with a significant loss of Medicaid coverage, but no corresponding increase in employment.³ By providing supportive job placement assistance while maintaining coverage, Kentucky's proposal promotes employment while protecting access to care for thousands, including people with kidney disease. For people with end-stage renal disease (ESRD), even a short lapse in Medicaid can interrupt the three-times-a-week, four-hour dialysis treatments that keep them alive; missing just one session can trigger fluid overload, life-threatening electrolyte imbalances, and costly emergency hospitalizations.

The American Kidney Fund urges the state to continue pursuing voluntary work supports programs to improve employment among Kentuckians. Additionally, we urge Kentucky to ensure that it is clear in all processes that there is no obligation to reply to contacts from DWD, and that there is no impact on peoples' coverage for not replying.

Participation in the Community Engagement Waiver Program is expected to apply to 'individuals who are physically and mentally able to work as defined by the Cabinet.' AKF is concerned that the current exemption criteria may not capture all individuals with, at risk of, or in the process of being diagnosed with, serious and chronic health conditions that prevent them from working. The state does not have a clear evaluation process for identifying qualifying health conditions, which could leave many patients with kidney disease unable to get the exemption. Many Kentuckians with kidney disease, including those on home dialysis, may appear "employable" under the Cabinet's criteria, yet frequent treatment schedules and severe fatigue prevent them from engaging in the required job placement assistance activities. Without an explicit exemption for people with ESRD, these patients risk losing the very coverage that keeps them alive. AKF urges Kentucky to establish a clear definition for ability to work.

Finally, we urge Kentucky to further clarify additional aspects of the program's implementation. The state should address whether non-exempt individuals are required to authorize transfer of their information to DWD, whether individuals may opt into the Community Engagement Program at a later date, and outline how frequently individuals will be contacted.

The American Kidney Fund urges the state to continue with voluntary employment assistance and to provide further clarity on this proposal's implementation.

Thank you for the opportunity to provide comments.

Sincerely,



Holly Bode
Vice President of Government Affairs
(240) 292-7068 direct | (202) 361-8275 cell
HBode@kidneyfund.org

³ Benjamin D. Sommers, MD, et al. "Medicaid Work Requirements—Results from the First Year in Arkansas," *New England Journal of Medicine*. Published online June 18, 2019. Available at: https://cdf.nejm.org/register/reg_multistep.aspx?promo=ONFGMM02&cpc=FMAAALLV0818B