

November 6, 2026

The Honorable Robert F. Kennedy
Secretary
U.S. Department of Health and Human Services
200 Independence Ave, SW
Washington, DC 20201

Re: Proposed Amendment to Georgia Pathways to Coverage Demonstration Waiver

Dear Secretary Kennedy:

Thank you for the opportunity to submit comments on the Proposed Amendment to the Georgia Pathways to Coverage Demonstration Waiver.

The undersigned organizations represent millions of individuals facing serious, acute and chronic health conditions, including many individuals who rely on Medicaid coverage. Three in four adults enrolled in Medicaid report one or more chronic conditions.[1] Our organizations therefore have a unique perspective on what individuals and families need to prevent disease, cure illness and manage serious

and chronic health conditions. The diversity of our organizations and the populations we serve enable us to draw upon a wealth of knowledge and expertise that is an invaluable resource regarding any decisions affecting the Medicaid program and the people that it serves. We urge the Centers for Medicare and Medicaid Services (CMS) to make the best use of the recommendations, knowledge and experience our organizations offer here.

Our organizations are committed to ensuring that Georgia's Medicaid program provides quality and affordable healthcare coverage. Unfortunately, the Pathways to Coverage Program has failed, leaving hundreds of thousands of people without healthcare coverage while costing the state millions of dollars to administer.[2] Our organizations strongly oppose Georgia's request for an enhanced federal matching rate for the Pathways to Coverage Demonstration, and we urge CMS to reject this request.

Enhanced Federal Matching Rate Request

The Georgia Pathways to Coverage Program is not eligible for an enhanced federal matching rate of 90% because it has not expanded Medicaid to at least 133% of the Federal Poverty Level (FPL). CMS previously denied Georgia's request for the enhanced federal matching rate, affirming that it will "continue the existing policy of providing the enhanced federal match rate when the state covers the entire adult expansion group, those adults up to 133 percent of the FPL."[3] Under the current Pathways to Coverage Program, the state covers only a fraction (19,397)[4] of the 184,000 individuals who would be eligible for Medicaid if the state fully expanded the program.[5] Georgia could choose to fully expand its Medicaid program to 133% of the FPL to receive the 90% match, and our organizations would strongly support that decision.

Additionally, enrollment in the Georgia Pathways to Coverage Program has largely fallen short of the state's projections. The program's current enrollment of 19,397 individuals is less than half of the projected 49,000 enrollees in the third year of the demonstration.[6] This proposal estimates that enrollment will increase by 100,000 individuals with implementation of Public Law 119-21 requirements. However, it's not clear if the program will have any increased costs relative to the initial projected baseline, and if Georgia does exceed this baseline, it will have ample time to prepare for the adjustment. Our organizations urge CMS to reject this request.

Works Reporting Requirements and Exemptions

Our organizations remain strongly opposed to work reporting requirements, which the Georgia Pathways to Coverage Program implemented in the state years before P.L. 119-21. Work reporting requirements lead to significant coverage losses, and do not further the goals of the Medicaid program or help low-income individuals find work. Most people on Medicaid who can work already do so. According to KFF, 92% of adults 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.[7] And 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).[8] 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 Journal of Medicine* found that Arkansas's work reporting requirement was associated with a significant loss of Medicaid coverage, but no corresponding increase in employment.[9]

Many of our organizations have previously raised concerns that the Pathways to Coverage Program's current qualifying criteria are too narrow and prevent Georgians from accessing care.[10] Our

organizations therefore urge CMS to work with the state to modify coverage requirements to include exemptions aligned with P.L. 119-21.

Conclusion
As currently structured, the Pathways to Coverage Program reaches a small fraction of eligible individuals while increasing red tape for patients. Our organizations urge CMS to reject the request for an enhanced federal matching rate and ensure that Georgia's work reporting requirement exemptions are aligned with P.L. 119-21.

Thank you for the opportunity to provide comments.

Sincerely,

American Cancer Society Cancer Action Network
American Diabetes Association
American Heart Association
American Kidney Fund
American Lung Association
Arthritis Foundation
Blood Cancer United
Cancer Nation
Cancer Support Community
Cancer*Care*
Crohn's & Colitis Foundation
Diabetes Patient Advocacy Coalition
Epilepsy Foundation of America
Hypertrophic Cardiomyopathy Association
Legal Action Center
Lupus Foundation of America
National Bleeding Disorders Foundation
National Kidney Foundation
National Multiple Sclerosis Society
National Organization for Rare Disorders
National Patient Advocate Foundation
Pulmonary Hypertension Association
Susan G. Komen
The AIDS Institute
The Coalition for Hemophilia B
ZERO Prostate Cancer

[1] Saunders, Heather et al. 5 Key Facts About Medicaid Coverage for Adults with Chronic Conditions. KFF. April 10, 2025. Available at: https://www.kff.org/medicaid/5-key-facts-about-medicaid-coverage-for-adults-with-chronic-conditions/

[2] Chan, Leah. Pathways to Coverage: Looking Back Two Years and Into the Future. Georgia Budget & Policy Institute. October 13, 2025. Available at: https://gbpi.org/pathways-to-coverage-looking-back-two-years-and-into-the-future/

[3] Georgia Pathways to Coverage Demonstration Response. Centers for Medicare & Medicaid Services. October 15, 2020. Available at: https://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Waivers/1115/downloads/ga/ga-pathways-to-coverage-ca.pdf#page=8

[4] Current Enrollment, Georgia Pathways Data Tracker. July 31, 2026. Available at: https://www.georgiapathways.org/data-tracker

[5] Medicaid in Georgia. KFF. May 2025. Available at: https://files.kff.org/attachment/fact-sheet-medicaid-state-GA

[6] Georgia "Pathways to Coverage" Section 1115 Demonstration Waiver Application. Georgia Department of Community Health. December 23, 2019. Available at: https://www.medicaid.gov/medicaid/section-1115-demonstrations/downloads/ga-pathways-to-coverage-pa1.pdf#page=15

[7] KFF. Understanding the Intersection of Medicaid & Work: A Look at What the Data Say. April 24, 2023. Available at: https://www.kff.org/medicaid/issue-brief/understanding-the-intersection-of-medicaid-work-a-look-at-what-the-data-say/.

[8] Ohio Department of Medicaid, 2018 Ohio Medicaid Group VII Assessment: Follow-Up to the 2016 Ohio Medicaid Group VIII Assessment, August 2018. Available at: https://medicaid.ohio.gov/wps/wcm/connect/gov/2468a404-5b09-4b85-85cd-4473a1ec8758/Group-VIII-Final-Report.pdf?MOD=AJPERES&CONVERT_TO=url&CACHEID=ROOTWORKSPACE.Z18_K9I401S01H7F40QBNJU3SO1F56-2468a404-5b09-4b85-85cd-4473a1ec8758-nAUQnlt

[9] 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://www.nejm.org/doi/full/10.1056/NEJMsr1901772

[10] Partners to Protect Coverage Comments to CMS re Georgia Pathways to Coverage Demonstration Extension Request. May 30, 2025. Available at: https://www.protectcoverage.org/siteFiles/51161/05%2030%202025%20PPC%20Comments%20re%20GA%20Pathways%20Extension%20Request.pdf