

Aug. 27, 2018

Methodology and Detail on Categorizing Kentucky's Proposed 1115 Waiver Comments

By Dustin Pugel

After the most recent comment period on Kentucky's proposed Medicaid 1115 waiver ended on August 18, the Kentucky Center for Economic Policy (KCEP), the Kentucky Equal Justice Center (KEJC) and Kentucky Voices for Health (KVH) sorted through and categorized the 11,561 comments submitted to the United States Department of Health and Human Services (HHS). Below are the criteria we used to create these categories and some examples of comments made in each category, as well as background on who contributed to the analysis.

Unsupportive Comments

There were 8,472 comments that did not support the proposed changes. Comments that were unsupportive included any that spoke against provisions in the waiver, spoke favorably of Medicaid in its current form, or shared stories that were specific to how Medicaid has helped someone they know, their community or themselves. These ranged widely from short statements to multi-page reports to links to videos sharing testimony. While most came from individuals in the form of short statements, a number of national organizations submitted comments asking HHS to deny re-approval, such as:

- AARP
- American Academy of Pediatrics
- American Cancer Society Cancer Action Network
- American College of Obstetricians and Gynecologists
- American Diabetes Association
- American Heart Association
- American Lung Association
- American Medical Association
- American Optometric Association
- American Psychiatric Association
- American Psychological Association
- American Society of Addiction Medicine
- Arc of the United States
- Center on Budget and Policy Priorities
- Children's Health Fund
- Community Catalyst
- Families USA
- Medicaid Health Plans of America
- National Alliance on Mental Illness
- National Association of Community Health Centers
- National Health Law Project
- Southern Poverty Law Center
- UnidosUS

Supportive Comments

There were 374 comments that spoke in favor of the changes, spoke unfavorably toward Medicaid or Medicaid enrollees or asked HHS to re-approve the waiver. Most of these were short comments to that effect, but some included longer attachments. The national organizations that wrote to support Kentucky's Medicaid changes were:

- Foundation for Government Accountability
- Independent Women's Forum
- National Taxpayers Union
- Opportunity Solutions Project

Mixed and Unrelated or N/A

There were 167 comments that spoke both in favor of and against the changes (for example, comments in favor of the premiums but against work requirements). And 424 comments were either unrelated to the waiver or Medicaid in general, or held a position that was indeterminable. For example, 80 responses had no content whatsoever and 13 responses were simply "N/A."

Sorting Comments

Duplicative responses were removed so as not to over-weight their impact. Nearly all of the 197 duplicate responses were either unsupportive or unrelated. Most of these were simply comments that had been made twice, but one comment related to cystic fibrosis was repeated 1,463 times, another speaking out against work requirements was repeated 331 times and another relating to people with blood cancer was repeated 248 times.

Four people analyzed the comments after duplicate responses were taken out:

- Angela Koch, Kentucky Voices for Health: 974 comments
- Emily Beauregard, Kentucky Voices for Health: 990 comments
- Dustin Pugel, Kentucky Center for Economic Policy: 3,513 comments
- Cara Stewart, Kentucky Equal Justice Center: 3,960 comments