
Comment
Public Hearing of the Department of Health
on the 1115 Medicaid Waiver
February 28, 2024
Presented by Dr. Jeff Kaczorowski, Senior Advisor

As Chair of the NYS American Academy of Pediatrics (NYS AAP), thank you for the opportunity to comment on the New York State Department of Health Office of Health Insurance Programs' proposed waiver amendment, Continuous Eligibility for Children up to Age Six.¹ I am also speaking in my role as the Senior Health Advisor to The Children's Agenda, the independent, non-partisan advocacy organization located in Rochester NY.

New York State has seen the benefit of its continuous coverage of newborns through the first 12 months of life, and other states have already expanded continuous coverage to age six (6), including Oregon and Washington.

As a pediatrician, I am intimately aware of the challenges families face in maintaining coverage for their children and the consequences that gaps in coverage have for children's health and well-being. We strongly support the proposed waiver amendment to authorize continuous enrollment for Children's Medicaid and Child Health Plus coverage for children during the first six years of their lives.

Continuous enrollment for children until they turn six supports child health and well-being including greater continuity of care, improved preventive and dental care, as well as improved specialty physician access for children with chronic medical conditions. Upon implementation it will have a particular benefit for children with special healthcare needs and help reduce health disparities and advance health equity, a shared goal of NYS and NYS AAP.

The first recommendation we have is for the waiver to specifically state continuous coverage will be for all children less than age 6 years, covered by Medicaid or Child Health Plus. We strongly discourage a system, as has been implemented in other states, which slowly phased in coverage after a certain date for only newborns at birth, leaving out existing children under 6 years of age children who would benefit from continuous coverage.

The second recommendation we have is for the NYS Department of Health to work closely with CMS to track important and mutually agreed-upon data to demonstrate the success of 0 to 6 continuous coverage in order to ensure that this benefit will be permanent in New York and might even be expanded beyond age 6.

Thank you for the proposed 1115 waiver amendment, which will have positive impacts on the health and wellbeing of so many low-income children and their families. Once approved, NYS AAP stands ready to support NYS in implementing this coverage benefit to ensure it reaches all eligible children.

¹ https://www.health.ny.gov/health_care/medicaid/redesign/med_waiver_1115/docs/draft_amend_request.pdf