



SPAN Parent Advocacy Network & Family Voices-New Jersey comments to the Division of Medical Assistance and Health Services on the proposed NJ Workability changes

Jan. 17, 2024

Thank you for the opportunity to comment on the DMAHS proposed changes to NJ Workability. The SPAN Parent Advocacy Network (SPAN) is NJ's federally designated Parent Training and Information Center, Family-to-Family Health Information Center, NJ State Affiliate Organization (SAO) of Family Voices, and the NJ affiliate of Parent-to-Parent USA. We also house a Military Family 360 Support program and national RAISE (Resources for Access, Independence, Self-Determination, and Employment). Our staff serves on the Boards of CILs (Centers for Independent Living) and NJSILC (NJ Statewide Independent Living Council). Our comments today are based on our years of work supporting diverse families and youth/young adults in advocacy as well as in systems improvement activities across education, employment, and health, including Medicaid.

We *strongly support* the submission of an SPA (State Plan Amendment) to CMS to remove income limits of NJ Workability eligibility.

However, we are *concerned* with the elimination of Ticket-to-Work/Work Incentives and solely using the Balance Budget Act for Workability. This will raise the eligibility age from 16 to age 18.

Further, we *strongly oppose* the proposal for premiums. Some individuals with disabilities may be low income or even in poverty. Home/vehicle modifications for people with disabilities are costly. Individuals with disabilities need continuity of Medicaid eligibility to ensure access to care. There will be no additional Medicaid costs for the state if people are switching from other Medicaid programs to Workability. Premiums should not be based on parental employment and states can subsidize premiums. In fact, preliminary data showed the state would incur more cost in collecting premiums than it would benefit. Finally, premiums would be a barrier and defeat the purpose of Workability which allows individuals with disabilities to work and be productive members of society, without penalties.

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Thank you again for the opportunity to provide input on NJ Workability.

Sincerely,



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To empower families and inform and involve professionals and other individuals interested in the healthy development and education of children, to enable all children to become fully participating and contributing members of our communities and society.