

September 14, 2026

D'Lawren Hicks
c/o the Board of Community Health
Georgia Department of Community Health
Post Office Box 1966
Atlanta, Georgia 30301-1966

Ms. Hicks,

I respectfully submit my written comments regarding Georgia's Department of Community Health's (DCH) proposed State Plan Amendment (SPA) implementing the Medicaid community engagement requirement under H.R. 1 and the CMS Interim Final Rule (CMS-2454-IFC).

While I have concerns with the deeply flawed Georgia Pathways to Coverage ("Pathways") program, I am alarmed by insinuations that the State of Georgia ("the State") will simply end the program without a 90 percent federal match. Such an abrupt termination would pull the rug out from the few Georgians currently covered by the program and cause even more Georgians to lose access to health care. I take issue with the State's embrace of work reporting requirements, which have been shown to wrongfully prevent working adults from accessing care. However, it has always been my core belief that we must expand health coverage to as many Georgians as possible until we fully expand Medicaid and close the coverage gap. That is why the State must do whatever it can to protect and expand Medicaid coverage for Georgians.

When the State launched Pathways in 2023, it limited coverage to individuals who reported completing 80 hours of work, job training, education, or community service each month. At the time of its initial launch, Georgia was the only state in the country with active work reporting requirements in its Medicaid program. The State estimated that as many as 100,000 people would sign up and that up to 345,000 people could be eligible.^{1,2}

In January 2025, the State modestly increased eligibility and exempted parents and guardians of children up to age 6 from the work reporting requirements.³ Even with this change, the most recent estimate of enrollment in Pathways was just over 19,000 people — well short of the 100,000 enrollees predicted.

¹ Ellen Eldridge, *Kemp's Plan to Extend Medicaid to More Georgians Is Rolling Out Slowly and Ineffectively So Far*, GPB (Oct. 23, 2023), <https://www.gpb.org/news/2023/10/23/kemps-plan-extend-medicaid-more-georgians-rolling-out-slowly-and-ineffectively-so>.

² *Response to Rep. Bishop, et al. October 11, 2022*, Office of Governor Brian Kemp (Oct. 11, 2022), <https://gov.georgia.gov/press-releases/2022-10-12/response-rep-bishop-et-al-october-11-2022>.

³ Jill Nolin, *Kemp Plans to Exempt Parents, Guardians of Young Kids from Medicaid Work Requirement*, Georgia Recorder (Jan. 15, 2025), <https://georgiarecorder.com/briefs/kemp-unveils-limited-medicaid-expansion-plan-to-cover-parents-guardians-of-young-kids>.

In July 2025, Congressional Republicans passed H.R. 1 to implement new federal work reporting requirements for the Medicaid expansion population starting after December 31, 2026, pointing to the “success” of Georgia’s Pathways.⁴ The new federal reporting requirements, however, are more generous than Georgia’s current program. According to the SPA, the State is now being “forced to expand the program to 100,000 new individuals in order to maintain the coverage of approximately 20,000 hard-working Georgians.”⁵ “Forced” to provide healthcare to Georgians. That is quite the sentiment, especially when these new individuals are veterans, parents of school-aged children, children formerly in foster care, and other individuals classified as medically frail. These are the people the State does not want to be “forced” to cover.

In 2022, the State initially predicted its program could cover as many as 100,000 people. Now, the State claims it cannot possibly cover this amount—at least, not without a substantially more generous federal match of 90 percent. Had the State simply expanded Medicaid in 2022, they would have received an automatic 90 percent federal match for over a decade. Congressional Democrats even enacted an additional federal incentive for states that newly adopted expansion, which was at one point was estimated to bring in nearly \$2 billion in additional federal funding for Georgia.

Instead, the State spent tens of millions of dollars to launch a bureaucratic program that covered a fraction of the expected population. A report based on Pathways data through June 2025 found that Georgia spent about \$13,597 per active enrollee on program costs.⁶ A U.S. Government Accountability Office (GAO) report from September 2025 found that the State spent over \$54 million on administrative costs for the program. And now, the State is claiming it cannot afford to provide health coverage to as many as 100,000 working Georgia families, despite touting its ability to do just that 4 years ago.

I urge the State to do everything in its power to keep as many people enrolled in affordable coverage. If it does not, make no mistake: it is the State’s mismanagement of funds and poor construction of its “innovative program” that will continue to doom the lowest-income Georgians to a life without health care.

Sincerely,



Raphael Warnock
United States Senator

⁴ Fenit Nirappil, *As Republicans Weigh Medicaid Work Requirements, Georgia Offers a Warning*, Washington Post (May 16, 2025), <https://www.washingtonpost.com/health/2025/05/16/medicaid-work-trumpcuts>.

⁵ *Proposed Amendment to Georgia Pathways to Coverage Section 1115 Demonstration Waiver to Obtain Enhanced Federal Funding*, Georgia Department of Community Health, <https://georgiarecorder.com/wp-content/uploads/2026/08/Proposed-Amendment-to-Georgia-Pathways-to-Coverage-Section-1115-Demonstration-Waiver-Public-Notice-Amendment.pdf>.

⁶ Leah Chan, *Pathways to Coverage: Looking Back Two Years and Into the Future*, Georgia Budget and Policy Institute, (Oct. 13, 2025), <https://gbpi.org/pathways-to-coverage-looking-back-two-years-and-into-the-future>.