

DECLARATION OF VERONICA WATSON

1. My name is Veronica Watson. I am competent and making this declaration on my own behalf. If called as a witness, I would testify consistent with the following:

2. I am 36 years old and live in Moro, Arkansas. I am not married, and I live alone in my home. I have three adult children. They do not live with me.

3. From 2013 to 2015, I worked at the Motel 6 in Brinkley. At that job, I worked in housekeeping, making sure that rooms were kept clean. In 2015, I left my job at Motel 6, began cleaning homes on my own to get by, and continued doing this until November 2017. In November 2017, I got a job working on an assembly line in the Lennox factory in Stuttgart. I did not have the physical strength to perform all the job duties of this position, and I only worked there a month. In December 2017, I again started cleaning homes to support myself. I continued this until June 2018. This work was not consistent. The most I worked in a week was about 3 hours. In June 2018, I returned to the Lennox factory to work as a janitor. I only worked there for a about two months because I could not afford the 90-mile roundtrip drive to and from the factory in Stuttgart. It is very difficult to find jobs around Moro, and it costs too much to drive to some of the larger cities for a job. On August 27, 2018, I was hired to work 40 hours per week at a shirt factory in Brinkley.

4. In August 2018, I worked fewer than 80 hours and had very little income. On my new job at the shirt factory, I am supposed to make about \$340 per week before taxes. I just received my first paycheck on September 14. I am under a three-month probationary period that lasts until about the start of December 2018. I inherited my home, and it is paid for. The utilities on my home usually cost around \$100 per month.

5. I have been covered by Medicaid through Arkansas Works for a few years, probably since about 2014. I believe I enrolled at the DHS office in Lee County, where I always go to renew my coverage or when I have questions about my insurance.

6. I have a medical condition that needs to be treated and monitored. I have gastroesophageal reflux disease, which causes me burning and sharp pains in my chest if not treated properly. I am prescribed a generic version of Prilosec and see a gastrointestinal specialist. Medicaid covers all of my treatment and my annual check-ups.

7. Prior to being on Medicaid, I had no health insurance. As a result, I often didn't get medical care when I needed it. I paid out of my own pocket for medication to treat my acid reflux and for doctor visits when I was sick. I did not have regular check-ups, go for an annual physical, get any tests or blood work, or receive other care.

8. I do not have a computer or home internet access, and I was not able to create my account to report my work hours on the Access Arkansas website. My cell phone can access the internet, but I often have no or unreliable reception. And, I only have a pre-paid plan with a limited amount of data, which runs out. I would have to drive at least forty miles round trip to the nearest library or DHS office to access a computer.

9. I have confirmed with DHS that I have to meet the work requirement and that I do not meet any exemptions. I was unable to setup an account to report my work or job searching activities in August. Even if I was able to, I still would not have met the 80 hour requirement for the month.

10. Since I have already been unable to meet the work requirement for one month, I worry that I might lose my Medicaid coverage. I am not yet sure that I will be able to maintain

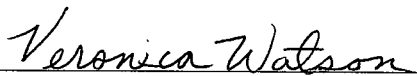
the new job I just started working. If I lose Medicaid, I won't be able to get the care I need for my health conditions.

11. The uncertainty around work requirements causes me stress. The medication that helps control my condition allows me to live a normal life. If I were to lose this medication, it could get in the way of my ability to work. I have to take my medication daily to keep my condition under control.

12. Medicaid is important because it allows me and others to get the treatments that we need even though we do not have the money to pay for it. I am worried that many people will lose coverage because of these work requirements. It is frustrating because of how difficult it is for someone in my position to report and now I may lose my coverage. I am really worried that people will suffer just because they don't know computers.

I declare under penalty of perjury that the above information is true and correct.

Dated: September 20th, 2018


Veronica Watson