

DECLARATION OF TREDA ROBINSON

1. My name is Treda Robinson. 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 42 years old and live in Searcy, Arkansas. I am not married, and I live alone in my home. I do not have any children.

3. From early 2014 to December 2015, I worked as a Data Entry Clerk at SourceHOV in Brinkley. At the end of 2015, I had to leave my job at SourceHOV due to complications from iron deficiency anemia. I needed to find something that would allow me to work from home. In April 2016, I began working for the Educational Testing Service (“ETS”) as a Scoring Assessment Rater. This job has allowed me to work from home and still earn income even when I am too weak to leave my home.

4. The amount of work that ETS assigns me is based on the volume of work that it has available. Sometimes, even though I am scheduled to work on a particular day, my work hours for that day get reduced or canceled at the last minute. ETS often gives me only 24 hours’ notice that it is reducing or canceling my work hours. So, while I have recently worked an average of 80 hours per month, my work hours fluctuate a lot, and there is no guarantee that I will get 80 hours of work every single month.

5. When I am able to work, I make \$15 per hour. Currently, my income ranges from \$150 to \$300 per week. My rent, utilities, and other living expenses usually cost around \$725 per month.

6. On September 10, I had to have surgery to have some tumors removed. As a result of my surgery, I have not been able to work at all in September or October as I do not expect to be recovered fully until the first of November. I have put in to receive work assignments for the month

of November. I do not know if it will be a slow month, or if I will receive assignments for every day that I am available since I have been off work for two months. I will have an idea of how many hours I will be able to work at the end of October when the November schedule is sent out. As I stated earlier, the work schedule is always subject to change.

7. I have an ongoing medical condition that needs to be treated and monitored. As noted above, I have iron deficiency anemia, which is caused by my inability to absorb iron. The side effects of my condition include fatigue, weakness, and heavy menstrual bleeding. I am prescribed ferrous sulfate, polyethylene glycol, and a vitamin C tablet to help treat my anemia. I also see a hematologist for the treatment of my condition. Medicaid covers all of my treatments and my annual check-ups.

8. Prior to enrolling in Medicaid coverage in 2014, 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 anemia and for doctor visits when I was sick. I did not have regular visits to monitor my anemia,, go for an annual physical, get any tests or blood work done, or receive other care.

9. I received a notice on August 8, 2018, from the State letting me know that I would have to meet the work requirement starting in September 2018.

10. Even though my job is computer-based and I have computer skills, I still experienced difficulty with the Access Arkansas website. I could not get my account to work on my own at home. I had to drive to my local Arkansas Department of Workforce Services to get help reporting my work activities for the first two months. I had to seek help from DWS once again in September to get assistance with reporting my upcoming surgery despite being ill.

11. I have confirmed with DHS that I must meet the work requirement and that I qualify for the short-term incapacity exemption in September and October due to my surgery. This

exemption is expected to end on October 31, 2018. Once I recover from my surgery, I will no longer meet any exemption to the work requirements.

11. Since the amount of work I receive each month fluctuates unpredictably, I worry that I might lose my Medicaid coverage. I am not yet sure that I will be able to maintain 80 hours of work per month. I have a job that works for my condition by allowing me to work from home on a flexible schedule. I am often too weak to leave my home, so it is nice to have an option that still allows me to work some. Due to my Anemia, it would be difficult for me to find other work or volunteer activities that could accommodate my condition. If I lose Medicaid, I will not be able to get the care I need for my health conditions.

12. The uncertainty around work requirements causes me stress. The medication and treatment that I receive helps control my condition and prevent it from reaching a life-threatening state. If I were to lose this medication, it could prevent me from working at all. I have to take my medication daily to keep my condition under control.

13. 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. Losing coverage could cause someone to be afraid to visit the doctor when he or she has a life-threatening condition like mine. I am worried that many people will lose coverage because of these work requirements and suffer as a result.

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

Dated: October 5th, 2018


Treda Robinson