

# **Exhibit A**

### DECLARATION OF SAMUEL PHILBRICK

1. My name is Samuel Philbrick. I am making this declaration on my own behalf in support of my effort to stop the New Hampshire 1115 Medicaid waiver from taking effect. I am also making this declaration on behalf of others who need Medicaid.

2. I am a 26 year old man. I was born in New London, New Hampshire. I live in Henniker, New Hampshire with my mother and my father. Henniker is a bedroom community of Concord, New Hampshire about half an hour drive away. Because of my low income, I share a home with my parents in order to support myself.

3. In 2016, I received a two year associate's degree from a local community college.

4. I work as a cashier at a sporting goods store. I work variable hours, and make \$11.33 per hour. In January and February 2019, one week I worked only 16 hours. The next week I worked 24 hours. My work schedule is up to how my manager chooses to schedule the time of myself and other cashiers. My work hours are variable. There will be weeks when I do not work 25 hours. This week I am scheduled to work 24 ½ hours.

5. I do not have a driver's license, and generally rely on my dad to give me rides. New Hampshire has very limited public transportation options.

6. Before I started my job at the sporting goods store, I worked at a pizza restaurant closer to my home. But I worked fewer hours, and received a lower hourly wage, than at the sporting goods store.

7. I have chronic insomnia and take Clonidine. My Clonidine is covered by Medicaid.

8. Without Clonidine, I would be awake until 4 AM and would then be groggy and cranky throughout the day. Without Clonidine, I would have a hard time keeping a job.

9. I see my primary care physician regularly for both an annual check up and ongoing needs.

10. I have had Medicaid coverage for less than one year, since I turned 26. Before that, I was insured as a dependent through my mother's insurance.

11. I received a letter from the New Hampshire Department of Health and Human Services dated February 26, 2019 telling me that I need to work or do community service if I want to keep my health coverage. The letter says that "**Your Community Engagement Status is Mandatory.**"

12. To keep my Medicaid coverage, I will have to do 100 hours per month of work. Because of the seasonal nature of my work and the variable hours, I will not be able to show that I work 100 hours per month. My schedule at work is variable so I would have a hard time coordinating possible volunteer work with my work schedule. If I attempted to work additional hours for my former employer, the pizza restaurant, those restaurant hours would conflict with my current job.

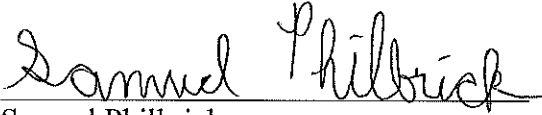
13. If my Medicaid is suspended because of the work rules, I will not be able to afford to pay for private insurance.

14. Had I known about the letter that the federal government issued to state Medicaid directors on January 11, 2018 and that it was allowing the states to start conditioning Medicaid eligibility on a work requirement, I would have wanted to submit comments.

15. I have agreed to be named as a plaintiff and to participate in this lawsuit as a class action representative. I am doing this for many reasons, including because I need Medicaid and because I want to help other people who are in danger of losing Medicaid if this waiver is not stopped.

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

Dated this 6 day of May, 2019.

  
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Samuel Philbrick