

Montana State Innovation Waiver
 Summary of Comments
 August 2019

Commenter	Summary	Department Response
American Cancer Society Action Network (ACS CAN)	ACS CAN supports MT’s 1332 waiver. ACS CAN supports a robust marketplace and access to health care coverage, especially for those with cancer and for survivors. ACS points out that many who are uninsured are less likely to get screened for cancer and thus are more likely to have cancer diagnosed after it reaches an advanced stage when survival is less likely and the cost of care more expensive. A reinsurance program may attract more issuers to MT’s marketplace or encourage plans to continue to be offered in the marketplace. This increased competition may help keep premiums from rising. The savings could help cancer patients and survivors afford health insurance as well as individuals who previously could not afford coverage due to high premiums. This program is projected to reduce premiums by 8 percent and increase the number of individuals obtaining health insurance through the individual market by one percent per year. ACSC CAN is pleased that comprehensiveness and affordability will not be altered by the waiver.	We appreciate the support and have approved the waiver.
Cystic Fibrosis Foundation (CFF)	CFF supports MT’s 1332 waiver. The reinsurance program will make health plans more affordable and attract more issuers into	We appreciate the support and have approved the waiver.

	<p>the marketplace. It will also stabilize the marketplace by helping cover claims for high cost enrollees to keep premiums affordable. CFF cites an analysis by Avalere that showed a reduction of premiums by an average of 19.9% in the first year for states that implemented a reinsurance program through the 1332 waiver. Also they point to the temporary reinsurance program under ACA that reduced premiums by an estimated 10-14% in its first year. They also noted that Minnesota issuers' proposed rates dropped between 3 and 12% after Minnesota received approval for its reinsurance program.</p>	
<p>Joint letter from Advocacy Groups (American Heart Association, American Lung Association, Arthritis Foundation, Epilepsy Foundation, Hemophilia Federation of America, Leukemia and Lymphoma Society, National Hemophilia Foundation, National Multiple Sclerosis Society, National Organization for Rare Disorders, and National Psoriasis Foundation)</p>	<p>They support MT's 1332 waiver. They support a robust marketplace which is essential for those with serious, acute and chronic health conditions to access comprehensive coverage. They note that the reinsurance program is an important tool to stabilize the marketplace and help issuers cover high-cost claims, which keeps premiums from rising and affordable. Also, they mention that reinsurance programs have been used in Medicare Part D, and the temporary reinsurance program under the ACA was found to reduce premiums by an estimated 10-14% in its first year. They also cite the Avalere analysis of seven states that implemented a reinsurance program through the 1332 waiver showed a reduction of premiums by an average of 19.9% in the first year.</p>	<p>We appreciate the support and have approved the waiver.</p>

	<p>MT's proposal will create a reinsurance program starting for the 2020 plan year and continuing for five years. This program is projected to reduce premiums by 8 percent and increase the number of individuals obtaining health insurance through the individual market by one percent per year. This program will help people with pre-existing conditions obtain affordable and comprehensive coverage.</p>	
<p>American Heart Association (AHA) and American Stroke Association (ASA)</p>	<p>They support MT's 1332 waiver. A well-designed reinsurance program can help offset costs of enrollees with expensive health care needs. It also could help alleviate other systemic problems including smaller provider networks and low issuer participation. They point to the temporary reinsurance program under ACA that reduced premiums by an estimated 10-14% in its first year. They also noted that Minnesota issuers' proposed rates dropped between 3 and 12% after Minnesota received approval for its reinsurance program. AHA/ASA is pleased that comprehensiveness and affordability will not be altered by the waiver.</p>	<p>We appreciate the support and have approved the waiver.</p>