

North Dakota State Innovation Waiver
 Summary of Comments
 July 2019

Commenter	Summary	Department Response
<p>American Cancer Society Action Network (ACS CAN)</p>	<p>ACS CAN supports ND’s 1332 waiver. ACS CAN supports a robust marketplace and access to health care coverage, especially for those with cancer and survivors. ACS points out that many who are uninsured are less likely to screen for cancer and thus catch it when in advanced stage. They noted that in 2018 only one issuer offered plans in all counties. A reinsurance program may attract more issuers to ND’s marketplace and encourage plans to continue to be offered in the marketplace. This increase competition may help keep premiums from rising and the savings could help cancer patients and survivors afford health insurance and also individuals that could not previously afford it.</p>	<p>We appreciate the support and have approved the waiver.</p>
<p>Cystic Fibrosis Foundation (CFF)</p>	<p>CFF supports ND’s 1332 waiver. The reinsurance program will make health plans more affordable and attract more issuers into the marketplace. It will also stabilize the marketplace by helping cover claims for high cost enrollees to keep premium 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 at the temporary reinsurance program under ACA</p>	<p>We appreciate the support and have approved the waiver.</p>

	that reduced premiums by an estimated 10%-14% in its first year.	
<p>Joint letter from Advocacy Groups (American Heart Association, American Liver Foundation, American Lung Foundation, Arthritis Foundation, Epilepsy Foundation, Hemophilia Federation of America, the Leukemia of Lymphoma Society, National Multiple Sclerosis Society, National Organization for Rare Disorders, National Psoriasis Foundation, and Susan G. Komen)</p>	<p>They support ND'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 that was under ACA, which 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>North Dakota'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 20 percent and increase the number of individuals obtaining health insurance through the individual market by one percent. This program will help people with pre-existing conditions obtain affordable and comprehensive coverage.</p>	<p>We appreciate the support and have approved the waiver.</p>