

Rhode Island State Innovation Waiver  
 Summary of Comments  
 August 2019

Commenter	Summary of Comment	Departments' Response
The American Cancer Society Cancer Action Network (ACS CAN)	<p>ACS CAN supports approval of Rhode Island's waiver application. A well-designed reinsurance program can help to lower premiums, mitigate plan risk associated with high-cost enrollees, and maintain or increase plan competition. These premium savings could help cancer patients and survivors afford health insurance coverage and may allow some individuals to enroll who previously could not afford coverage.</p> <p>Uninsured individuals are less likely to get screened for cancer and are therefore more likely to have their cancer diagnosed at an advanced stage when survival is less likely and the cost of care more expensive. ACS CAN is pleased the waiver would not require or encourage issuers to alter cost-sharing designs or network coverage, and it would not alter the requirements of coverage under state benefit mandates or under the ACA's required coverages, including the essential health benefits requirement under section 2707 of the Public Health Service Act.</p>	We appreciate the support and have approved the waiver.
The Cystic Fibrosis Foundation	<p>The Cystic Fibrosis Foundation supports approval of Rhode Island's waiver application. Rhode Island's reinsurance program will make coverage more affordable and expand plan choice by encouraging insurer participation in the marketplace. People with cystic fibrosis benefit from insurance marketplaces that offer affordable health plans that cover their complex health needs.</p>	We appreciate the support and have approved the waiver.
National Multiple Sclerosis Society	<p>The National Multiple Sclerosis Society supports approval of Rhode Island's waiver application.</p> <p>Reinsurance is an important tool to help stabilize health insurance markets by covering a percentage of the claims of very high cost enrollees; it allows health</p>	We appreciate the support and have approved the waiver.

	<p>insurers to remain in the health insurance market when their costs would typically be too high to continue to operate. This will help make premiums more affordable for all individuals who buy insurance on the individual market. Reinsurance programs help insurance companies cover the claims of very high cost enrollees, which in turn keeps premiums affordable for other individuals buying insurance on the individual market. This program will undoubtedly help people who live with MS, an expensive pre-existing condition, to obtain and retain affordable, comprehensive coverage.</p> <p>The National Multiple Sclerosis Society supports Rhode Island’s individual shared responsibility requirement as well as its requirement that all insurance plans in the state cover all essential health benefits.</p>	
<p>Joint letter from Advocacy Groups (American Heart Association, American Lung Association, Arthritis Foundation, Epilepsy Foundation, Hemophilia Federation of America, Leukemia &amp; Lymphoma Society, National Hemophilia Foundation, National Multiple Sclerosis Society, National Organization for Rare Disorders, and National Psoriasis Foundation)</p>	<p>The advocacy groups support approval of Rhode Island’s waiver application. A strong, robust marketplace is essential for individuals with serious, acute, and chronic health conditions to access comprehensive coverage. Rhode Island’s reinsurance program is an important tool to stabilize the marketplace and help issuers cover high-cost claims, which keeps premiums affordable and prevents them from rising. Rhode Island’s reinsurance program will help people with pre-existing conditions obtain affordable and comprehensive coverage without compromising access to essential health benefits or jeopardizing other important protections.</p>	<p>We appreciate the support and have approved the waiver.</p>
<p>New England Hemophilia Association (NEHA), and the New England Bleeding Disorders</p>	<p>NEHA &amp; NEBDAC support approval of Rhode Island’s waiver application. Reinsurance is an important tool to help stabilize health insurance markets. Reinsurance programs help reinsurance companies cover the claims of the very</p>	<p>We appreciate the support and have approved the waiver.</p>

Advocacy Coalition (NEBDAC)	high-cost enrollees, which in turn keeps premiums affordable for other individuals buying insurance on the individual market. Reinsurance programs have been used to stabilize premiums in a number of healthcare programs such as Medicare Part D. The effects of Rhode Island's waiver on premiums and enrollment will help patients with pre-existing conditions, including patients with bleeding disorders, to obtain affordable, comprehensive coverage.	
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