

Wisconsin State Innovation Waiver  
 Summary of Comments  
 July 2018

| <b>Commenter</b>   | <b>Summary</b>  | <b>Departments' Response</b>                            |
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| Wisconsin Medical Society                                  | The reinsurance structure proposed by WIHSP addresses the concerns of affordability and access, and will help reduce the financial burden on patients through lowered premiums. Further, the proposal maintains existing patient protections and guarantees that patients will have access to an adequate range of services, which the Society also supports.   | We appreciate the support and have approved the waiver. |
| American Heart Association and American Stroke Association | We are pleased to see that the state estimates WIHSP will reduce premiums by 10.6 percent in 2019. The AHA is also pleased that the state acknowledges that the comprehensiveness and affordability of coverage offered on the individual markets will not be altered by the 1332 waiver proposal.... These guarantees make our healthcare system navigable for CVD patients and we commend the state for ensuring that the waiver proposal does not alter the integrity of these requirements. | We appreciate the support and have approved the waiver. |
| Wisconsin Association of Health Plans                      | Wisconsin's community-based health plans believe a reinsurance program is an important step toward promoting an affordable, stable individual market for WI consumers. Request timely review of waiver.   | We appreciate the support and have approved the waiver. |
| Common Ground Health Cooperative                           | CGHC expresses support for the 1332 Waiver Application submitted by the state of Wisconsin which would establish a reinsurance program to help stabilize Wisconsin's individual insurance market. We believe Wisconsin's 1332 Waiver, if approved, will help protect the interests of our members and other consumers in the state of Wisconsin.  | We appreciate the support and have approved the waiver. |
| American Cancer Society Cancer Action Network              | ACS CAN supports a robust marketplace from which consumers can choose a health plan that best meets their needs. A well-designed reinsurance program can help lower premiums and mitigate plan risk associated with high-cost enrollees. We believe this waiver will provide long-term  | We appreciate the support and have approved the waiver. |

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|                                      | viability of the individual market while not eroding consumer protections   |  |
| ABC for Health                       | While ABC generally recognizes reinsurance programs as a useful tool, especially in risky insurance markets, Wisconsin’s proposed waiver request generates three major concerns: 1) ensure protections for consumers such as EHB etc.; 2) troubling funding mechanisms; and 3) insufficient impact in the context of recent state and federal policy. | We appreciate the concerns raised and have shared them with the state. WIHSP will not affect covered benefits (including EHB) for Wisconsinites and will make the cost of individual coverage lower than it would have been absent the waiver. For those who obtain minimum essential coverage through other means, such as Medicaid, CHIP, employer-sponsored coverage or other types of coverage, will have the same access to coverage as they would have absent the waiver. Total funding for WIHSP cannot exceed \$200 million annually and will be funded with a combination of state general purpose revenue (GPR), which consist of general taxes, miscellaneous receipts and revenues collected by the state, and federal pass through dollars. Act 138 creates a sum sufficient appropriation for WIHSP, which allows the state to appropriate GPR. Please see the state response. |
| Wisconsin Hospital Association, Inc. | We support using the tools available under the ACA to put forward a plan aimed at stabilizing premiums, increasing competition in the insurance market and sustaining coverage gains for the foreseeable future or until the ACA is repaired or replaced. Request timely review of waiver.  | We appreciate the support and have approved the waiver.  |
| American Heart Association, et al.   | Are pleased that Wisconsin has submitted an application that is projected to improve coverage and affordability without compromising access to essential health benefits or jeopardizing other important protections that our patients rely on. Our organizations believe that this Section 1332 State Innovation Waiver will help stabilize          | We appreciate the support and have approved the waiver.  |

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|                            | the individual market in Wisconsin and help patients and consumers   |  |
| Cystic Fibrosis Foundation | We support Wisconsin's efforts to stabilize the insurance market by implementing reinsurance. Reinsurance has been an effective measure to slow premium growth and protect against adverse selection at the federal level, as well as in states.   | We appreciate the support and have approved the waiver.  |
| Quartz                     | Reinsurance program will give Wisconsin health plans the support needed to mitigate the effect of high-cost claims, slow premium growth, and incentivize members to rejoin the market, bringing much-needed stability. Request quick review and approval of waiver.  | We appreciate the support and have approved the waiver.  |
| Sharon Young               | I support the request to add reinsurance to protect Affordable Healthcare in Wisconsin. I work in Cancer Care we have many patients that have affordable healthcare policy's. Without this insurance they would not have the care they need to battle their cancer.  | We appreciate the support and have approved the waiver.  |
| Katie Pope                 | There is no language in the waiver that guarantees savings will be passed on to consumers; I'm concerned where the funding will come from, especially because I understand that if there is Medicaid lapse funding, that could be used; I'm also concerned about prohibiting Medicaid expansion. Medicaid is a necessary program to take care of the poor and disabled population here in Wisconsin. | We appreciate the concerns raised and have shared them with the state. The funding for the state share of the reinsurance program would not negatively impact the coverage provided to state residents under the waiver and, indeed, the actuarial estimates assume some expansion of coverage in terms of the number of enrollees. In other words, the funding source for the state share of the reinsurance program would not impact coverage to residents in the individual, small group, employer or Medicaid populations. With the waiver and reinsurance program, Wisconsin anticipates that individual premiums, including premiums for second lowest cost silver plans, will be lower than they would have been without the waiver and |

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|                    |   | <p>reinsurance program by 10.6 percent in 2019. The state share of the WIHSP is fully funded with GPR (state taxpayer dollars). State funding for WIHSP is not diverted from any other program.</p>  |
| <p>Abby Hammes</p> | <p>I have multiple concerns that need to be clarified regarding the Wisconsin Section 1332 Waiver that was requested: 1). This waiver needs to include clear language about how savings will be passed onto the consumer; 2). What are the funding mechanisms for this program? 3). We need to keep the delegation of authority left with the legislature, and do NOT give such broad delegation to OCI using Emergency Rule Making Procedures however the OCI wants.</p> | <p>We appreciate the concerns raised and have shared them with the state. With the waiver and reinsurance program, Wisconsin anticipates that individual premiums, including premiums for second lowest cost silver plans, will be lower than they would have been without the waiver and reinsurance program by 10.6 percent in 2019.</p> <p>The 2017 WI Act 138 was signed into law on February 27, 2018 and establishes the Wisconsin Healthcare Stability Plan (WIHSP) to be administered by the WI Office of the Commissioner of Insurance, pending waiver approval. Total funding for WIHSP cannot exceed \$200 million annually and will be funded with a combination of state general purpose revenue (GPR), which consist of general taxes, miscellaneous receipts and revenues collected by the state, and federal pass through dollars. Act 138 creates a sum sufficient appropriation for WIHSP, which allows the state to appropriate GPR. Please see the state response.</p> |