



Via electronic submission

June 24, 2021

The Honorable Janet Yellen
Secretary
Department of the Treasury
1500 Pennsylvania Avenue, NW
Washington, DC 20220

The Honorable Xavier Becerra
Secretary
Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Re: Colorado's Section 1332 State Innovation Waiver Extension Application

Dear Secretary Yellen and Becerra:

The American Cancer Society Cancer Action Network (ACS CAN) appreciates the opportunity to comment on the State of Colorado's application for a five-year extension of its Section 1332 State Innovation Waiver. ACS CAN is making cancer a top priority for public officials and candidates at the federal, state and local levels. ACS CAN empowers advocates across the country to make their voices heard and influence evidence-based public policy change as well as legislative and regulatory solutions that will reduce the cancer burden. As the American Cancer Society's nonprofit, nonpartisan advocacy affiliate, ACS CAN is critical to the fight for a world without cancer.

ACS CAN supports a robust marketplace from which consumers can choose a health plan that best meets their needs. Access to health care coverage is paramount for persons with cancer and survivors. Research from the American Cancer Society has shown that uninsured Americans are less likely to get screened for cancer and thus are more likely to have their cancer diagnosed at an advanced stage when survival is less likely and the cost of care more expensive.¹ In the United States, almost 1.9 million Americans will be diagnosed with cancer this year – an estimated 28,630 in Colorado.² An additional 16.9 million Americans are living with a history of cancer – 225,470 in Colorado.³ For these Americans access to affordable health insurance is a matter of life or death.

ACS CAN supports Colorado's reinsurance program, and the proposed extension of the program. A well-designed reinsurance program can help to lower premiums and mitigate the plan risk associated with high-cost enrollees. We note that in its first two years of implementation, Colorado's program reduced premiums over 20% on average statewide for individuals who purchased insurance on the individual

¹ E Ward et al, "Association of Insurance with Cancer Care Utilization and Outcomes, CA: *A Cancer Journal for Clinicians* 58:1 (Jan./Feb. 2008), <http://www.cancer.org/cancer/news/report-links-health-insurance-status-with-cancer-care>.

² American Cancer Society. *Cancer Facts & Figures: 2021*. Atlanta: American Cancer Society, 2021.

³ American Cancer Society. *Cancer Treatment & Survivorship: Facts & Figures 2019-2021*. Atlanta: American Cancer Society, 2019.



market.⁴ These savings can reduce federal government subsidy payments, and lower premiums for consumers.

A reinsurance program may encourage insurance carriers to enter the market, bringing stability and more options for consumers. Colorado reports that during the first two years of its program, all insurers remained in the market, and one new insurer entered the market in 2020. Further, the expected maintenance or increase in plan competition due to the reinsurance program may help to keep premiums from rising. These premium savings could help cancer patients and survivors afford health insurance coverage and may enable some individuals to enroll who previously could not afford coverage – the extension application anticipates individual market enrollment will be 2.5% higher in 2022 with the reinsurance program compared to without.⁵

We are pleased that the proposal states that the waiver extension will not impact the comprehensiveness of coverage in Colorado. ACS CAN believes that patient protections in current law – like the prohibition on pre-existing condition exclusions, prohibition on lifetime and annual limits, and Essential Health Benefits requirements – are crucial to making the healthcare system work for cancer patients and survivors.

Conclusion

On behalf of the American Cancer Society Cancer Action Network, we thank you for the opportunity to comment on Colorado's Section 1332 State Innovation Waiver Extension Application. We strongly support Colorado's reinsurance program, which provides long-term viability of the individual market while not eroding important consumer protections. If you have any questions, please feel free to contact Jennifer Hoque, Senior Policy Analyst at Jennifer.Hoque@cancer.org or 202-585-3233.

Sincerely,



Kirsten Sloan
Vice President, Public Policy
American Cancer Society Cancer Action

⁴ Colorado Division of Insurance. Colorado 1332 State Innovation Waiver Five-Year Extension Application State Reinsurance Program. April 30, 2021.

https://drive.google.com/file/d/1niJDFKG6ZtW132_nrMP0LbRu6YNiVSC5/view

⁵ Id.