



via electronic submission

March 3, 2020

Seema Verma
Administrator
Centers for Medicare and Medicaid Services
U.S. Department of Health and Human Services
7500 Security Boulevard
Baltimore, MD 21244

Re: ACS CAN's Comments on Proposed 1332 Waiver

Dear Administrator Verma:

The American Cancer Society Cancer Action Network (ACS CAN) appreciates the opportunity to comment on Phase I of Georgia's Section 1332 waiver proposal. 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, more than 1.8 million Americans will be diagnosed with cancer this year – an estimated 55,190 in Georgia.² An additional 15.5 million Americans are living with a history of cancer – 446,900 in Georgia.³ For these Americans access to affordable health insurance is a matter of life or death.

Our comments in this letter focus only on Phase I of the proposal. We have serious concerns with the proposed Phase II of the waiver proposal which is not yet complete and we have shared those concerns with the state.⁴ If Georgia decides to pursue the second phase of its

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: 2020*. Atlanta: American Cancer Society, 2020.

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

⁴ <https://medicaid.georgia.gov/patientsfirst>.

1332 waiver, we strongly urge CMS to ensure that stakeholders have a renewed opportunity to provide input on the application before CMS determines the application to be complete.

Phase I: Reinsurance Program

ACS CAN supports Georgia's proposed reinsurance program. A well-designed reinsurance program can help to lower premiums and mitigate the plan risk associated with high-cost enrollees. We note that the waiver application anticipates the reinsurance program will reduce premiums by 10 percent in plan year 2021.⁵ These savings could reduce federal government subsidy payments, and lower premiums for consumers who enroll in coverage through the exchange but are not eligible for subsidies.

Georgia's proposed reinsurance waiver is similar to that adopted in Colorado, which has been shown to reduce premiums. A reinsurance program may encourage insurance carriers to enter the market. A reinsurance program may also encourage plans already in the market to continue offering plans through the exchange. 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 waiver application anticipates increased enrollment of 0.4 percent.⁶

We are pleased that the proposal states that Phase I of the waiver will not impact the comprehensiveness of coverage in Georgia. 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. We strongly urge Georgia to proceed with its Phase I proposed 1332 waiver request for the creation of a reinsurance program.

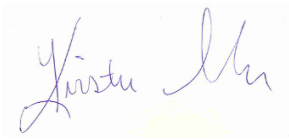
⁵ Office of the Governor. Georgia Section 1332 State Empowerment and Relief Waiver Application. December 23, 2019. <https://medicaid.georgia.gov/document/document/georgia1332draftwaiver11042019pdf/download>.

⁶ *Id.*

Conclusion

On behalf of the American Cancer Society Cancer Action Network, we thank you for the opportunity to comment on Phase I of Georgia's section 1332 waiver application. We strongly support Georgia's proposed reinsurance waiver, which we believe will provide 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,

A handwritten signature in purple ink, appearing to read "Kirsten Sloan", is written over a light yellow rectangular background.

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