



via electronic submission

June 7, 2018

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 the Wisconsin Insurance Commissioner's 1332 waiver application. ACS CAN, the nonprofit, nonpartisan advocacy affiliate of the American Cancer Society, supports evidence-based policy and legislative solutions designed to eliminate cancer as a major health problem. As the nation's leading advocate for public policies that are helping to defeat cancer, ACS CAN ensures that cancer patients, survivors, and their families have a voice in public policy matters at all levels of government.

ACS CAN supports a robust marketplace from which consumers can choose a health plan that best meets their needs. Access to health care is paramount for persons with cancer as well as survivors. More than 1.7 million Americans will be diagnosed with cancer this year.¹ An additional 15.5 million Americans are living with a history of cancer.² In Wisconsin alone, an estimated 33,340 people are expected to be diagnosed with cancer this year³ and another 288,410 Wisconsinites are cancer survivors.⁴ For these Americans access to affordable health insurance is a matter of life or death. 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.⁵

¹ American Cancer Society. Cancer Facts & Figures: 2018. Atlanta: American Cancer Society, 2018.

² Id.

³ Id.

⁴ American Cancer Society. Cancer Treatment & Survivorship: Facts & Figures 2016-2017. Atlanta: American Cancer Society, 2016.

⁵ 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>.

ACS CAN supports the state's application for a 1332 waiver which would implement a state reinsurance program. A well-designed reinsurance program can help to lower premiums and mitigate plan risk associated with high-cost enrollees. We note that the Wisconsin Insurance Commissioner's Office estimates that the proposed reinsurance program will reduce premiums by 10.6 percent in 2019.⁶ These savings will not only benefit the federal government through reduced subsidy payments (an estimated \$166 million in 2019 and \$164 million in subsequent years), but will also benefit consumers not eligible for subsidies who enroll in coverage through the exchange.

A reinsurance program may also encourage insurance carriers to continue offering plans through the exchange, or begin to offer plans as applicable. This maintenance or increase in plan competition also may help to keep premiums from rising. 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. The Commissioner estimates that enrollment in non-group insurance will rise .8 percent if this waiver is implemented.

ACS CAN believes that patient protections in current law – like the prohibition on pre-existing condition exclusions, lifetime and annual limits, and Essential Health Benefits requirements – are crucial to making the healthcare system work for cancer patients and survivors. We are pleased that Wisconsin's 1332 waiver application does not propose to alter any key patient protections, and specifically states that “[r]egardless of whether the waiver is granted, all Exchange-compliant plans will be required to provide coverage of essential health benefits.”⁷

Conclusion

On behalf of the American Cancer Society Cancer Action Network we thank you for the opportunity to comment on the proposed section 1332 waiver, which we believe will provide long-term viability of the individual market while not eroding important consumer protections. We strongly encourage CMS to approve this waiver in a timely fashion so the state can

⁶ Office of the Insurance Commissioner. Wisconsin 1332 Waiver Application. April 18, 2018. <https://oci.wi.gov/Documents/Regulation/1332%20Waiver%20WI%20Application.pdf> Accessed May 23, 2018.

⁷ *Ibid.*

implement the program in time for the 2019 plan year. If you have any questions, please feel free to contact me at Kirsten.Sloan@cancer.org or 202-585-3240.

Sincerely,

A handwritten signature in blue ink that reads "Kirsten Sloan". The signature is written in a cursive style and is positioned above a light yellow rectangular highlight.

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