



1700 Bent Creek Boulevard
Suite 200
Mechanicsburg, PA 17050

August 31, 2023

Ms. Katie Merritt
Director of Policy and Planning
Office of the Insurance Commissioner
1326 Strawberry Square
Harrisburg, PA 17120

VIA E-MAIL ONLY
ra-in-policyoffice@pa.gov

RE: Commonwealth of Pennsylvania Essential Health Benefits Benchmark Plan

Dear Ms. Merritt:

Ambetter from PA Health & Wellness (“Ambetter”), appreciates the opportunity to submit comments regarding Pennsylvania Bulletin 53, Number 30, Notice 2023-14 which explores updating the Commonwealth’s Essential Health Benefits benchmark plan (“EHB-benchmark plan”).

Ambetter is committed to providing quality, health care benefits at affordable price points for the Commonwealth’s citizens. This mission is best accomplished by offering affordable, EHB products and plans. We understand the importance of consumer choice and the value to consistently provide accessible, quality healthcare services. Any updates to the EHB-benchmark plan should be considered with consumer affordability in mind.

From a national perspective, we recommend updates to EHB-benchmark plans be done minimally and with consumer cost consideration. Adding too many new benefits could compromise plan affordability resulting in coverage becoming less attainable for individuals and families in the individual market.

For further consideration, use of empirical data and clear criteria to evaluate potential updates to the EHB-benchmark plan should be employed. Assessing updates that have been vetted against objective medical evidence will ensure quality healthcare services are being offered. Once a list of proposed EHB-benchmark plan changes is available, we request a draft proposal be sent to issuers so that proposed revisions can be fully



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assessed, actuarial impacts can be evaluated, and more meaningful feedback can be provided. We thank you for the opportunity to provide our recommendations and to continue to serve our Commonwealth members with quality, affordable health care services.

Sincerely,

Justin M. Davis
Plan President and CEO
PA Health & Wellness