

December 13, 2019



Pennsylvania Insurance Department 1332 Innovation Waiver
Attn: David Buono
1326 Strawberry Square
Harrisburg, PA 17120

Dear Mr. Buono:



The organizations listed at left are Pennsylvania partners in the *Advancing Strategies to Align Programs* (ASAP) multi-state advocacy effort to increase enrollment and retention in work support programs, including Medicaid and SNAP. We write in support of the Pennsylvania's proposed 1332 innovation waiver for a reinsurance program to strengthen the individual health insurance market in Pennsylvania.



Our primary goal with respect to the individual insurance market is to ensure that all Pennsylvanians have health insurance. We supported the bipartisan proposal to create a state-based health insurance exchange, as we believe that a state-based marketplace will be more responsive to Pennsylvania's needs. A Pennsylvania-based marketplace should also do a better job of integrating marketplace applications with Medicaid, CHIP, and other state-administered benefits programs. We hope to see a true "no wrong door" approach, whereby health care applications submitted through either the Department of Human Services or the new state-based exchange are processed smoothly and result in appropriate coverage, without duplicative effort and regardless of the initial door.



We support the reinsurance proposal, both because it will reduce premiums (although mostly for higher-income Pennsylvanians who are not our primary clientele), and because the reinsurance proposal is part of the overall plan to create a state-based exchange. Given the single pool of funding for operations of the state-based exchange and the reinsurance fund (from the 3% user fee imposed on products offered through the state-based exchange), our top funding priority is for exchange operations, including adequate computer systems, high quality customer service, and robust marketing and navigator support. Once those needs are met, we support use of the remaining available funding for reinsurance to reduce premiums.



Thank you for the opportunity to submit these comments.

Sincerely,

Louise Hayes

Louise Hayes
Pennsylvania ASAP Project Director
Supervising Attorney, Community Legal
Services of Philadelphia

