



300 Corporate Center Drive
Suite 600
Camp Hill, PA 17011

December 13, 2019

VIA ELECTRONIC MAIL

David Buono
Pennsylvania Insurance Department
1326 Strawberry Square
Harrisburg, PA 17120

Re: 1332 State Innovation Waiver Application

Dear Mr. Buono:

Thank you for the opportunity to comment on Pennsylvania's 1332 waiver proposal. Ambetter from PA Health & Wellness (PHW) supports the Commonwealth of Pennsylvania's efforts to address health care affordability and individual market stability. We recognize that consumers face barriers to purchasing health insurance coverage due to premium costs and some of these individuals may even choose to remain uninsured due to the cost of premiums.

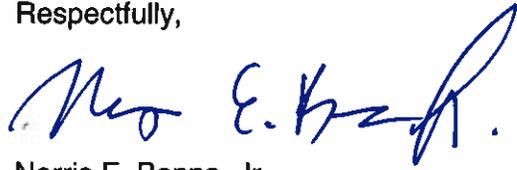
Pennsylvania's 1332 reinsurance waiver takes steps to address premium affordability and we applaud the Commonwealth for its collaborative efforts with stakeholders to develop a program that best serves the Commonwealth and its residents. We would like to work with the Commonwealth in future years on other reinsurance approaches that could effectively address premium affordability at a lower cost.

Premium costs are not the only affordability issue consumers are facing. Rising out-of-pocket costs (i.e., cost-sharing, deductibles) make obtaining health care services unattainable for many consumers who cannot afford the cost of care, regardless of their coverage status. Recent surveys of our nationwide Marketplace membership have shown that consumers view health care affordability as not only being able to pay premiums, but also being able to afford the out-of-pocket costs required to obtain quality health care services. We encourage the Commonwealth to continue to build upon this effort by considering additional policies and programs to achieve affordability beyond premiums. These issues are complex, multi-faceted, and should take into account local market needs and dynamics. PHW is a willing partner to work with the Commonwealth and other stakeholders to develop strategies to address premiums and out-of-pocket costs that also achieve state policy goals in the most cost-effective manner and generate savings that may be used for other priorities.

We believe this 1332 waiver proposal will increase Pennsylvanians' access to comprehensive and affordable health insurance coverage. This is one additional way that we can transform the health of the community one person at a time.

If you have any questions or concerns regarding the contents of this letter of this matter in general, please feel free to contact me at the above address or telephone me at (717) 551-8005.

Respectfully,

A handwritten signature in blue ink, appearing to read "Norris E. Bennis, Jr.", with a stylized flourish at the end.

Norris E. Bennis, Jr.
Vice President, Government Affairs