



The Association of Washington Healthcare Plans

December 2, 2013

Sent By Electronic Mail

To: Washington State Congressional Delegation

The Honorable Maria Cantwell  
U.S. Senator

The Honorable Patty Murray  
U.S. Senator

The Honorable Rick Larsen  
U.S. Representative

The Honorable Jaime Herrera Beutler  
U.S. Representative

The Honorable Derek Kilmer  
U.S. Representative

The Honorable Jim McDermott  
U.S. Representative

The Honorable Doc Hastings  
U.S. Representative

The Honorable David Reichert  
U.S. Representative

The Honorable Cathy McMorris Rogers  
U.S. Representative

The Honorable Adam Smith  
U.S. Representative

The Honorable Suzan DelBene  
U.S. Representative

The Honorable Denny Heck  
U.S. Representative

Re: Impact of Potential Affordable Care Act (ACA) Policy Changes

Dear Representative McDermott:

I am writing on behalf of Association of Washington Healthcare Plan (AWHP) members regarding additional policy changes to the Affordable Care Act (ACA) we understand are being contemplated by the Administration or Congress prior to January 1, 2014.

AWHP is an alliance of Washington State's 15 leading licensed Health Maintenance Organizations (HMO), Health Care Service Contractors (HCSC), and Disability Insurers. Its diverse membership is comprised of local, regional, and national healthcare plans of varying size, serving the needs of consumers, employers, and public purchasers. Together, they provide health care coverage to over 4 million residents of our state.

AWHP member healthcare plans are committed to working together and with other stakeholders to help assure Washington residents meaningful access to affordable quality healthcare coverage choices. Accordingly, we offer the following comments and recommendations.

It is our understanding consideration is being given on a national level to extend the open enrollment period, as well as delay the individual mandate. For Washington State, changing significant health reform requirements at this point in time would result in destabilizing the state's healthcare market and higher premiums for consumers.

Throughout the established ACA open enrollment period our state-based Exchange, with its robust offering of 46 individual health plans, has been continuously enrolling individuals and helping those who are eligible to secure financial assistance to purchase coverage through premium tax credits. In addition, there are 51 individual health plan offerings available to consumers outside the Washington Health Benefits Exchange. As of November 14<sup>th</sup>, nearly 100,000 residents of our state have successfully enrolled through the Exchange, and over 159,000 applications are in process.

Accordingly, if the Administration or Congress chooses to make additional policy changes to the ACA, we ask that you advocate for allowing states with functioning state-based Exchanges, like Washington, to continue with implementation as currently required under the ACA.

Over the past three years, Washington healthcare plans have worked collaboratively with the Washington State Insurance Commissioner to implement the ACA with the specific needs of Washingtonians in mind. Additionally, we have worked with the Commissioner's office to ensure the individual health plan market remains stable and consumers continue to have a variety of health coverage options in 2014. This work has included setting premiums for 2014 health plans based upon, among other things, assumptions that the individual shared responsibility requirement will be in effect in 2014 and that the annual open enrollment period will conclude on March 31, 2014.

A few weeks ago, Commissioner Kreidler decided Washington State should continue to implement the ACA under the original timelines and requirements, and did not allow carriers to extend their 2013 policies --- something the Administration had offered. Extending 2013 policies in Washington State at this late date would have destabilized the market and caused significant consumer confusion. Consistent with other state flexibility allowed in the ACA, this recent opportunity for state flexibility confirms that there is not a one-size-fits all implementation of the ACA.

We believe it is not in the best interest of Washington residents to extend the ACA open enrollment period or delay the individual mandate. It is important that our state be allowed the flexibility to continue with implementation as currently required under the ACA.

Thank you for the opportunity to provide this input for your consideration. Please do not hesitate to contact me with any questions or to discuss.

Sincerely,



Sydney Smith Zvara  
Executive Director

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*AWHP is an alliance of licensed Health Maintenance Organizations (HMO), Health Care Service Contractors (HCSC), & Disability Insurers. Its diverse membership is comprised of local, regional, & national healthcare plans of varying size, serving the needs of consumers, employers, & public purchasers. Together, they provide health care coverage to over 4 million residents of Washington State. AWHP members include Aetna, Amerigroup, Cambia Health Solutions, CIGNA, Columbia United Providers, Community Health Plan of WA, Coordinated Care, Group Health Cooperative, Kaiser Permanente, Molina, HealthNet, Premera Blue Cross, Providence Health Plan, SoundPath, & UnitedHealthcare.*