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June 26, 2019

SUBMITTED ELECTRONICALLY TO: StateInnovationWaivers@cms.hhs.gov

The Honorable Alex M. Azar II
Secretary of Health and Human Services
U.S. Department of Health and Human Services
200 Independence Avenue SW
Washington, DC 20201

Re: Comments on Colorado's Section 1332 State Innovation Waiver Application

Dear Secretary Azar:

On behalf of the consumers we serve, the Board of Directors and staff of Connect for Health Colorado, the state-based health insurance marketplace (SBM) for Colorado, strongly supports Colorado's Section 1332 State Innovation Waiver Application to establish a reinsurance program.

If approved, this program would further our mission and help stabilize the individual market by reducing premiums for consumers in the individual market, particularly the rural areas of our state and for households that are not eligible for subsidies. The premium savings as a result of the reinsurance program will help Coloradans in the individual market to afford health insurance coverage and may allow some individuals to enroll who previously could not afford coverage.

A reinsurance program may also encourage issuers to continue offering plans throughout the state, possibly expand into areas of the state that currently have fewer companies offering individual plans, or even attract new issuers to the state. Maintaining or increasing competition throughout the state will also help to keep premiums down for consumers.

As you are aware, the deadlines related to the Open Enrollment Period (OEP) for plan year 2020 are fast approaching. A speedy review and approval of the waiver application is necessary to permit time for us to load plan rates and allow for issuer review of plan data, conduct our own quality assurance, and process renewals prior to OEP.

Sincerely,

Connect for Health Colorado Staff