



April 30, 2018

Superintendent Eric Cioppa
Maine Bureau of Insurance
34 State House Station
Augusta, ME 04333

Re: Maine Section 1332 State Innovation Waiver

Dear Superintendent Cioppa:

The Epilepsy Foundation and Epilepsy Foundation New England appreciate the opportunity to submit comments on Maine's Section 1332 State Innovation Waiver.

The Epilepsy Foundation is the leading national voluntary health organization that speaks on behalf of the at least 3.4 million Americans with epilepsy and seizures. We foster the wellbeing of children and adults affected by seizures through research programs, educational activities, advocacy, and direct services. Epilepsy is a medical condition that produces seizures affecting a variety of mental and physical functions. Approximately 1 in 26 American will develop epilepsy at some point in their lifetime, and 1 in 3 individuals with epilepsy rely on Medicaid for their health care needs. For the majority of people living with epilepsy, prescription medications are the most common and cost-effective treatment for controlling and/or reducing seizures, and they must have meaningful and timely access to physician-directed care.

The Epilepsy Foundation and Epilepsy Foundation New England believe everyone should have quality and affordable healthcare coverage. A strong, robust marketplace is essential for people with epilepsy to access the coverage that they need. The Epilepsy Foundation and Epilepsy Foundation New England support Maine's efforts to strengthen its marketplace by submitting this 1332 State Innovation Waiver to implement a reinsurance program.

Reinsurance is an important tool to help stabilize health insurance markets. Reinsurance programs help insurance companies cover the claims of very high cost enrollees, which in turn keeps premiums affordable for other individuals buying insurance on the individual market. Reinsurance programs have been used to stabilize premiums in a number of healthcare programs, such as Medicare Part D. A temporary reinsurance fund for the individual market was also established under the Affordable Care Act and reduced premiums by an estimated 10 to 14 percent in its first year.¹

Maine's proposal will create a reinsurance program starting for the 2019 plan year and continuing for 5 years. This program is projected to reduce premiums by 9 percent and increase the number of individuals obtaining health insurance through the individual market by 1.1 percent. When Maine ran its own reinsurance program in 2012 and 2013, it generated an estimated 20 percent reduction in requested premium rates. This would help patients with pre-existing conditions, including patients with epilepsy, obtain affordable, comprehensive coverage.



The Epilepsy Foundation and Epilepsy Foundation New England believe the 1332 State Innovation Waiver will help stabilize the individual market in Maine and protect patients and consumers. Thank you for the opportunity to provide comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Linn".

Susan Linn
President/CEO
Epilepsy Foundation New England

A handwritten signature in black ink, appearing to read "Philip M. Gattone".

Philip M. Gattone, M.Ed.
President & CEO
Epilepsy Foundation

ⁱ American Academy of Actuaries, Individual and Small Group Markets Committee. *An Evaluation of the Individual Health Insurance Market and Implications of Potential Changes*. January 2017. Retrieved from https://www.actuary.org/files/publications/Acad_eval_indiv_mkt_011817.pdf.