



May 14, 2018

Michele S. Eberle, Executive Director  
Maryland Health Benefit Exchange  
750 East Pratt Street, 16<sup>th</sup> Floor  
Baltimore, MD 21202

Re: Maryland Section 1332 State Innovation Waiver

Dear Director Eberle:

The Epilepsy Foundation and the Epilepsy Foundation Maryland appreciate the opportunity to submit comments on Maryland'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. 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 Maryland 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. Epilepsy Foundation and Epilepsy Foundation Metropolitan Washington support Maryland'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.<sup>1</sup>

Maryland'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 30 percent and increase the number of individuals obtaining health insurance through the individual market by 5.8 percent. This would help patients with pre-existing conditions, including patients with epilepsy, obtain affordable, comprehensive coverage.



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

Sincerely,

A handwritten signature in black ink that reads "Mary Wontrop".

Mary Wontrop  
Executive Director  
Epilepsy Foundation Maryland

A handwritten signature in black ink that reads "Philip M. Gattone".

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

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<sup>1</sup> 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](https://www.actuary.org/files/publications/Acad_eval_indiv_mkt_011817.pdf).