



Our Mission: To drive efforts to cure psoriatic disease and improve the lives of those affected.

April 13th, 2020

Commissioner Christopher Nicolopoulos
New Hampshire Insurance Department
21 South Fruit Street, Suite 14
Concord, NH 03301

RE: New Hampshire Section 1332 State Innovation Waiver

Dear Commissioner Nicolopoulos,

The National Psoriasis Foundation (NPF) appreciates the opportunity to submit comments on New Hampshire's Section 1332 State Innovation Waiver. NPF is a non-profit organization with a mission to drive efforts to cure psoriatic disease and improve the lives of those affected. The NPF is the leading patient advocacy group for the more than 8.3 million Americans and 35,000 New Hampshire residents living with psoriasis and psoriatic arthritis.

Adequate, affordable, and accessible care for our patient population is essential. Due to the heterogeneous characteristics of this chronic immune-mediated disease, psoriatic disease requires sophisticated medical care. Treatments that work for one person may not work for others, and many patients cycle through numerous accepted treatment options.ⁱ In addition to managing psoriatic diseases, our patient community experiences a higher incidence of comorbid conditions that, without proper diagnosis and care, negatively impacts their quality of life and the efficacy of treatment. A strong, robust marketplace is essential to access comprehensive coverage that includes all of the treatments and services that our patients need to stay healthy at an affordable cost.

Reinsurance is an important tool to help stabilize health insurance markets. By covering the claims of very high cost enrollees, reinsurance programs help keep 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.ⁱⁱ Of the seven states that have already created their own reinsurance programs through Section 1332 waivers, individual market premiums were reduced by an average of 19.9 percent in their first year.ⁱⁱⁱ

New Hampshire's proposal will create a reinsurance program starting for the 2021 plan year and continuing for 5 years. This program is projected to lower issuer costs in the individual market by approximately 16 percent on average and increase enrollment in the individual market's unsubsidized population by approximately 6 percent. This would help patients with pre-existing conditions, including patients with psoriatic disease, obtain affordable, comprehensive coverage.

With high out-of-pocket costs already impeding access to care, it is critical patients' premiums remain affordable. People with psoriasis have significantly higher health care costs than the general population. High out-of-pocket costs impact, and often restrict, patients' access to care. A 2019 study of data collected from NPF surveys found that about 1 in 5 patients with psoriatic disease who take a biologic medication report spending more than \$100 per month toward cost-sharing obligations.

NPF believes the 1332 State Innovation Waiver will help stabilize the individual market in New Hampshire and protect patients and consumers.

Sincerely,

A handwritten signature in black ink, appearing to read "Brittany Duffy-Goche".

Brittany Duffy-Goche
State Government Relations Manager

ⁱ Stern RS, Nijsten T, Feldman SR, Margolis DJ, Rolstad T. Psoriasis is common, carries a substantial burden even when not extensive, and is associated with widespread treatment dissatisfaction. *Journal of Investigative Dermatology Symposium Proceedings*. 2004 Mar; 9(2):136-9

ⁱⁱ 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.

ⁱⁱⁱ Avalere. *State-Run Reinsurance Programs Reduce ACA Premiums by 19.9% on Average*. March 2019. Retrieved from <https://avalere.com/press-releases/state-run-reinsurance-programs-reduce-aca-premiums-by-19-9-on-average>.