

1332 Public Comment: Topline Talking Points

The Idaho Department of Insurance is taking public comment through June 29, 2019 on its section 1332 waiver application. The legislature has directed the state to apply for this waiver, which would allow newly Medicaid eligible Idahoans that make between 100-138% of the federal poverty level to receive an Advanced Premium Tax Credit to purchase coverage on the Your Health Idaho insurance exchange instead of being automatically enrolled in Medicaid.

Public comments establish an important public record as the federal government reviews Idaho's waiver application. Close the Gap Idaho does not oppose this specific waiver request, but is concerned about ensuring consumers have full information about the impacts of the choice they would make if this waiver is approved.

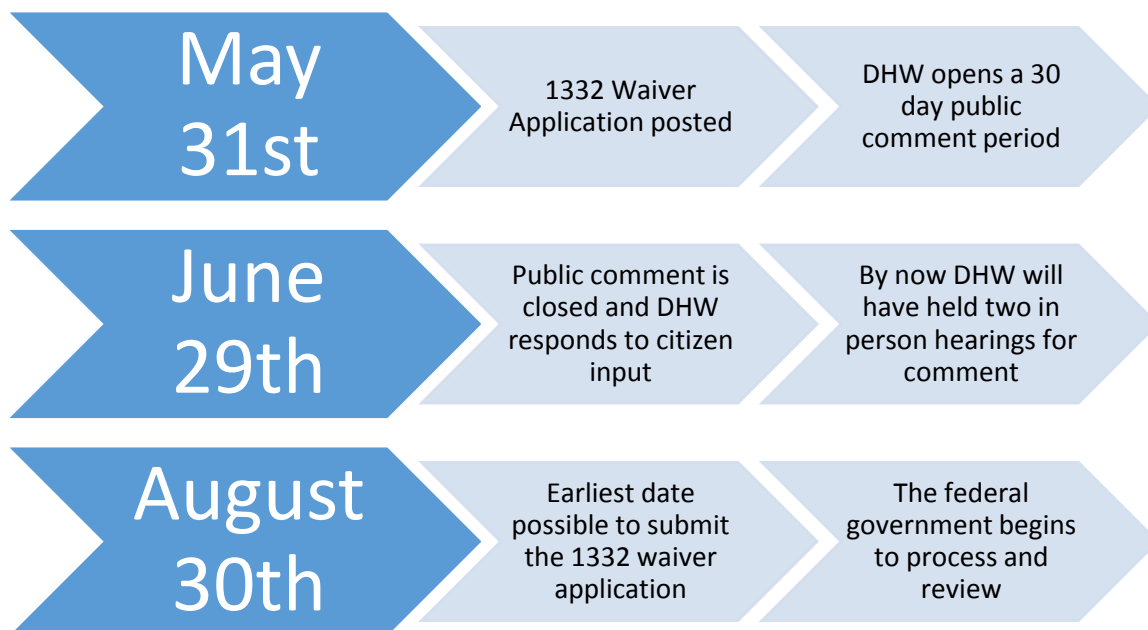
Use the talking points below to help you craft a comment for submission on the waiver.

- **Medicaid provides more comprehensive coverage than private insurance**
 - Medicaid offers better services and benefits to Idahoans with mental illness than private insurance; many people could risk losing out on more comprehensive coverage that they are eligible for because they were steered into a private plan instead.
 - If this waiver is approved, a process must be in place to ensure Idahoans are informed about the benefits they will receive and the out of pocket costs, such as premiums and copays, they may incur depending on what choice they make.
 - Idahoans up to 138% FPL will be eligible for Medicaid and this should be made clear to enrollees up front. They should not have to choose to decline exchange coverage in order to learn more about Medicaid eligibility.

- **Medicaid offers more affordability and stability than plans on the exchange**
 - Even with cost sharing and premium assistance, exchange coverage requires payment of a monthly premium and deductibles. These financial obligations must be clearly explained to this portion of the Medicaid eligible population in Idaho.
 - Idahoans who need the dependability of affordable and inclusive coverage should not have to decline private coverage to access Medicaid.
 - While marketplace plans offer cost-sharing assistance to low-income individuals, these individuals would still face significantly higher out-of-pocket costs than in Medicaid, making it more difficult to afford going to the doctor or filling a prescription.
 - [Research](#) shows that even relatively small levels of cost-sharing on Medicaid beneficiaries, ranging from \$1 to \$5, are associated with reduced use of care, including necessary services.
 - Nearly 10,000 Idahoans today are eligible to purchase a plan on the exchange but don't, most likely due to the cost of health insurance. All eligible Idahoans should be shown a clear choice and pathway towards Medicaid coverage at the time of enrollment.

- **Idahoans need a transparent and unbiased enrollment process and a clear pathway to Medicaid coverage**
- Will Idahoans be informed that if they fail to pay their premiums they could lose their coverage?
 - How will enrollees know the kinds of services and treatments that Medicaid would cover that private insurance might not? Will insurance representatives be trained to accurately counsel people on the differences between private insurance and Medicaid coverage?
 - Safeguards must be in place to ensure consumer choice is not biased by the interests of insurance companies or health care providers. A true choice for consumers is one where they are completely informed of their options.

1332 State Action Period Timeline



Submitting a Comment

To submit a comment on the waiver, use our action tool at <https://www.closesthegapidaho.org/take-action/take-email-action/>.

You can also send by email to: DOI.Reform@doi.idaho.gov, or by letter addressed as follows:

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