

**Blue Cross and Blue Shield of Minnesota  
and Blue Plus**

P.O. Box 64560  
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July 26, 2017

Seema Verma, Administrator  
Centers for Medicare and Medicaid Services  
7500 Security Blvd.  
Baltimore, MD 21244  
Submitted via electronic mail to [StateInnovationWaivers@cms.hhs.gov](mailto:StateInnovationWaivers@cms.hhs.gov)

**Re: Minnesota Section 1332 Waiver Comments**

Dear Administrator Verma:

Blue Cross and Blue Shield of Minnesota and Blue Plus (Blue Cross) strongly supports Minnesota's 1332 Waiver Application and seek timely approval of the waiver to permit the Minnesota Premium Security Plan (MPSP) to impact 2018 rate filings currently under review.

The MPSP is a critical to supporting Minnesotans with individual insurance coverage and helping stabilize the market. By tying funding to those Minnesotans with high-cost medical individual (non-group) claims, the reinsurance structure of the MPSP will provide up to \$542 million in funding to mitigate rates for both 2018 and 2019 plan years. If approved, the MPSP is expected to support premium stability year over year, stemming the continued declining enrollment of our individual market. Additionally, given that federal funding for the Basic Health Plan (BHP) is based upon the Advance Premium Tax Credits, this waiver is critical to maintaining current funding for MinnesotaCare, our version of the BHP.

This requested 1332 Waiver – similar to the recently approved Alaska waiver – would permit the federal government's savings in reduced Premium Tax Credits to be passed through to the MPSP. Accordingly, the state would be held harmless from solely providing its own dollars to support the reinsurance program and help stabilize the market for Minnesotans. As you know, time is of the essence given that 2018 rates were filed July 17<sup>th</sup>. Further, under Minnesota state law, must be finale and approved and must be released to the public at least 30 days prior to the start of open enrollment.<sup>1</sup> Thank you for your work to gain timely federal approval in order for the reinsurance program to impact 2018 rate filings.

Blue Cross appreciates the opportunity to provide input and stands ready to assist your team and the state to gain the required approval in time to impact 2018 premium rates. Please do not hesitate to contact me directly at [Scott.Keefer@bluecrossmn.com](mailto:Scott.Keefer@bluecrossmn.com) or 651-662-8786.

Sincerely,

A handwritten signature in black ink that reads "Scott A. Keefer".

Scott Keefer  
Vice President, Public Affairs

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<sup>1</sup> Minnesota Statutes 2016, section 62A.02, subdivision 2, paragraph (c):  
<https://www.revisor.mn.gov/statutes/?id=62A.02#stat.62A.02.2>

Marilyn Tavenner  
President &  
Chief Executive Officer



July 27, 2017

The Honorable Seema Verma  
Administrator  
Centers for Medicare & Medicaid Services  
U.S. Department of Health and Human Services  
Hubert H. Humphrey Building, Room 445-G  
200 Independence Avenue, SW  
Washington, D.C. 20201

Dear Administrator Verma:

America's Health Insurance Plans (AHIP) appreciates the opportunities presented by CMS' recent focus on the 1332 waiver as an approach for states to better address their own market needs. We support the Administration's actions earlier this to increase flexibility for states applying for 1332 waivers.

I write you today on behalf of the 1332 waiver application submitted to you earlier this summer by the State of Minnesota. Minnesota passed the needed legislation in a timely manner, drafted a comprehensive proposal, conducted the required comment period and submitted a complete application earlier this summer. The state's non-profit health plans, which we count among our members, strongly support this waiver. This support is clearly demonstrated by the letter submitted during the state comment period by the Minnesota Council of Health Plans.

Your department has declared the application as officially complete and the public comment period is coming to a close. We urge you to act quickly to approve Minnesota's waiver application. The reinsurance program that would be created is clearly needed to stabilize the individual market in the state. It also provides an opportunity for the Administration to see how innovation and state flexibility can work to address the ongoing challenges of health care access.

We appreciate the Administration's work to create a simpler, more robust, and more affordable individual market. We look forward to working with you to ensure consumers have access to quality, affordable coverage and care for years to come.

Sincerely,

A handwritten signature in blue ink that reads "Marilyn B. Tavenner". The signature is fluid and cursive, with the first name being the most prominent.

Marilyn B. Tavenner  
President and CEO