

March 5, 2020

The Honorable Alex M. Azar  
Secretary, U.S. Department of Health and  
Human Services  
200 Independence Avenue, SW  
Washington, DC 20201

The Honorable Steven Mnuchin  
Secretary, U.S. Department of the Treasury  
1500 Pennsylvania Avenue, NW  
Washington, DC 20200

The Honorable Seema Verma  
Administrator, Centers for Medicare &  
Medicaid Services  
7500 Security Blvd.  
Baltimore, MD 21244

The Honorable David J. Kautter  
Assistant Secretary for Tax Policy  
1500 Pennsylvania Avenue NW  
Washington, DC 20220

Submitted via [stateinnovationwaivers@cms.hhs.gov](mailto:stateinnovationwaivers@cms.hhs.gov)

Dear Secretary Azar, Secretary Mnuchin, Administrator Verma, and Assistant Secretary Kautter,

Thank you for the opportunity to comment on the reinsurance phase of Georgia's 1332 waiver application. The undersigned organizations work collaboratively to ensure all Georgia consumers and patients have affordable, quality health coverage. We represent Georgia families and individuals, people with chronic and acute illnesses, Georgians with mental health and substance use conditions, and health care providers.

While we have considerable concerns about the Georgia Access phase of Georgia's waiver proposal, we are pleased to support the approval of the reinsurance phase of the application. A strong, robust marketplace benefits all of the Georgians we represent and facilitates access to affordable, comprehensive coverage. Georgia's reinsurance program is an important tool to stabilize the state's marketplace and help issuers cover high cost claims, which keeps premiums affordable for Georgia consumers. The proposed reinsurance program will help people with pre-existing conditions purchase affordable and comprehensive coverage, may allow some individuals to enroll who previously could not afford coverage, and will offer critical premium assistance to areas of the state with the highest costs. Our organizations are pleased that this phase of the waiver would not alter important consumer protections, including the essential health benefits requirement under section 2707 of the Public Health Service Act.

Thank you in advance for your consideration of our comments on the reinsurance phase of Georgia's 1332 waiver application.

Sincerely,

Advocates for Responsible Care  
Georgia Budget & Policy Institute  
Georgia Equality  
Georgia Watch  
Georgians for a Healthy Future  
Indivisible Georgia Coalition  
Jewish Community Relations Council  
Jewish Democratic Women's Salon  
Mental Health America of Georgia  
Mercy Care  
National Association on Mental Illness, Georgia chapter  
Planned Parenthood Southeast  
Protect Our Care Georgia  
Rx in Reach Georgia Coalition  
The Health Initiative  
Voices for Georgia's Children  
159 Georgia Together