



May 3, 2021

Jennifer Stegall, Executive Senior Policy Advisor  
Wisconsin Office of the Commissioner of Insurance  
125 South Webster Street  
Madison, Wisconsin 53703

Sent via email to [OCIWIHSP@wisconsin.gov](mailto:OCIWIHSP@wisconsin.gov)

Dear Jennifer,

Thank you for the invitation to provide comments on the proposed payment parameters for the Wisconsin Healthcare Stability Plan (WIHSP) for 2022.

As one of the state's leading individual market insurers, Common Ground Healthcare Cooperative has long been supportive of WIHSP and its promise to lower health insurance premiums for consumers. Unfortunately, our outside actuary estimates that the changing parameters for 2022 are likely translate into approximately a 1% premium increase over 2021.

We would also suggest improvements to the parameter setting process which will sound familiar to you. In the past, CGHC has asked OCI explore the possibility of moving to a two-phase process for reinsurance program parameter setting. In the first phase, OCI would set the proposed payment parameters by the statutorily required May 15 deadline to inform rate setting. In the second phase, OCI would increase the coinsurance rate proportionately once claims were submitted to pay out any "leftover" funds under the program up to \$200 million each year. This would give mirror the federal reinsurance program where the Department of Health and Human Services (HHS) adjusted the coinsurance rate in years when reinsurance monies exceeded the total amount of payments requested.

We are happy to see WIHSP enjoying bipartisan support from Governor Walker to Governor Evers and from legislators on both sides of the aisle. We renew our call for this change simply to maximize the benefit of this popular program to deliver the deepest rate reductions to consumers year after year, and to ensure that OCI has the flexibility needed in atypical years such as 2020 when a pandemic influenced claims and then again in 2021 when a federal government policy change will cause a re-calculation in the amount of federal pass-through funding. We believe OCI and the Wisconsin market would benefit from this added flexibility.

Thank you for your consideration of this request. Please do not hesitate to contact Melissa Duffy at (608) 334-0624 if we can answer any questions or provide pertinent data or information that may be helpful to you.

Sincerely,

A handwritten signature in cursive script that reads "Cathy Mahaffey".

Cathy Mahaffey, CEO  
Common Ground Healthcare Cooperative