

From: [Koenig, Adam](#)
To: [OCI WIHSP](#)
Subject: RE: OCI Accepting Comments on the Wisconsin Healthcare Stability Plan Proposed 2022 Payment Parameters
Date: Friday, April 23, 2021 10:39:51 AM
Attachments: [arp-reinsurance-letter-cms-treasury.pdf](#)

Hello,

Anthem appreciates the opportunity to provide feedback on the proposed 2022 payment parameters for the Wisconsin Healthcare Stability Plan (WIHSP). The WIHSP was a significant contributor to Anthem's decision to re-enter the Individual ACA marketplace in Southeast Wisconsin in 2021. However, we're concerned that the proposed payment parameter changes will cause higher than anticipated premium increases in 2022. Anthem's preliminary modeling of the proposed changes suggests that we will have to increase marketplace premiums by 1% in 2022 to account for the reduced reimbursement. Anthem is interested in any additional detail that the OCI or its actuarial consulting firm can share in regards to the development of the 2022 payment parameters. In particular:

- What is the assumed market enrollment for 2022?
- What (if any) difference in morbidity of the new enrollment in 2022 was assumed in relation to the existing enrollment and reinsurance eligible claims?

Additionally, will the funding limit of the WIHSP change in 2022 if additional funds are provided from CMS as requested by the commissioner in March (attached letter)?

Thank you for the opportunity to provide commentary around the proposed changes. We look forward to continued partnership in the Individual ACA marketplace.

Anthem, Inc.

Adam Koenig, FSA, Actuarial Director, WI Pricing
233 S Wacker Drive Suite 3700, Chicago, Illinois 60606
☎: (312) 234-7542 | M: (312) 758-1859
adam.koenig@anthem.com

From: OCI WIHSP <OCIWIHSP@wisconsin.gov>
Sent: Wednesday, April 14, 2021 2:16 PM
To: Koenig, Adam <Adam.Koenig@anthem.com>; Amanda Gunasekera (Network) <agunasek@networkhealth.com>; Kaye, Amanda <AKaye2@chw.org>; Angela McKeighan <Angela.McKeighan@QuartzBenefits.com>; Antonio Manuel (Children's) <Amanuel@chw.org>; Barb Johnson (MercyCare) <bjohnson@mhemail.org>; Bobbi Brackenbury (GHC) <bbrackenbury@ghcscw.com>; Bradlee Wienholtz (Quartz) <Bradlee.Wienholtz@quartzbenefits.com>; Bridgett Boucher (WPS & Arise) <bridgett.boucher@wpsic.com>; Carissa Lingenhag (Network) <calingen@networkhealth.com>; Charlotte Hasburgh (Common Ground) <Chasburgh@commongroundhealthcare.org>; Elizabeth

Vogel (Aspirus Health Plan) <Elizabeth.Vogel@AspirusHealthPlan.com>; Emily Jenkins (Quartz) <Emily.Jenkins@quartzbenefits.com>; Florida Levidiotis (Common Ground) <flevidiotis@commongroundhealthcare.org>; Jackie Crist (Security) <crist.jacqueline@securityhealth.org>; Jamie Stock (WPS & Arise) <jamie.stock@wpsic.com>; Jasmine Zhang (Molina) <jasmine.zhang@molinahealthcare.com>; Trochlell, John E. <jtrochlell@mhemail.org>; Julia Kong (Common Ground) <Jkong@commongroundhealthcare.org>; Julie Kopiltz (Security Health Plan) <koplitz.julie@securityhealth.org>; Kenneth Haile (Molina) <Kenneth.Haile@molinahealthcare.com>; Kevin Borchert (Network) <Kborcher@networkhealth.com>; Koranteng, Milly <Mildred.Koranteng@medica.com>; Kristie Meier (Quartz) <Kristie.Meier@QuartzBenefits.com>; Larin Anderson (Health Partners) <Larin.D.Anderson@HealthPartners.com>; Lori Braegelman (Medica) <Lori.Braegelman@medica.com>; Osia, Mark <Mark.Osia@bcbsmo.com>; Matt Streiff (Aspirus Health Plan) <Matt.Streiff@AspirusHealthPlan.com>; Matthew Capps (Dean) <mathew.capps@deancare.com>; Duffy, Melissa <mduffy@dcstrategies.org>; Michael Lorhan (MercyCare) <mlorhan@mhemail.org>; Michelle Rentmeester (Network) <mirentme@networkhealth.com>; Network Compliance <compliance@networkhealth.com>; Peter Kleibor <pkleibor@chw.org>; Peter Morey (Health Partners) <Peter.C.Morey@healthpartners.com>; Rob Plesha (CG) <rplasha@commongroundhealthcare.org>; Rory Donohue (Network) <rdonohue@networkhealth.com>; Stehpen Steinl (Dean) <Stephen.steinl@deancare.com>; Stephen Custis (Medica) <Stephen.Custis@medica.com>; Tammy Neumeister (MercyCare) <tneumeister@mhemail.org>; Swartz, Tara <Tara.Swartz@molinahealthcare.com>; Tiffany Taticek (Molina) <Tiffany.Taticek@molinahealthcare.com>; Tom Carlson (Aspirus) <Tom.Carlson@preferredOne.com>; Tom Lawless (CG) <tlawless@commongroundhealthcare.org>; Trevor Harrison (HealthPartners) <Trevor.M.Harrison@HealthPartners.Com>; Trudell, Valerie <Valerie.Trudell@MolinaHealthCare.Com>; Yu Lun Zhou (MercyCare) <Yulun.Zhou@molinahealthcare.com>; Angela Kissinger (Security) <kissinger.angela@securityhealth.org>; Hays, April <ahays@mhemail.org>; Barbara Van Dam <bvandam@chw.org>; Brett Davis - Aspirus HP <Brett.Davis@AspirusHealthPlan.com>; Meyer, Carol <CMeyer@ghcscw.com>; Cathy Mahaffey (CG) <cmahaffey@commongroundhealthcare.org>; Craig Ardagh <Craig.Ardagh@MolinaHealthCare.Com>; Strachota Benz, Elizabeth <ebenz@networkhealth.com>; Hannah Neylon (Network) <hneylon@networkhealth.com>; Jane Rouse (Molina) <Jane.Rouse@molinahealthcare.com>; Bloch, Jodi <jbloch@chw.org>; Fewer, Joseph C. <joseph.fewer@decare.com>; Moody, Jonathan <jonathan.moody@quartzbenefits.com>; Kelly Skifton (Quartz) <Kelly.Skifton@QuartzBenefits.com>; Kimberly Colestock (Medica) <Kimberly.colestock@medica.com>; Betancourt-Szymanowska, Laura <Laura.Betancourt-Szymanowska@molinahealthcare.com>; Rakowski, Mark <Mrakowski@chw.org>; Anderson, Marty <anderson.marty@securityhealth.org>; Mettner, Michelle <mmettner@chw.org>; Rob Palmer[WPS] <rob.palmer@wpsic.com>; Sara Stewart (Health Partners) <Sara.M.Stewart@healthpartners.com>; Seth Quiggle (Health Partners) <Seth.M.Quiggle@healthpartners.com>; Stephanie Cook <Stephanie.Cook@deancare.com>; Stephanie Frost (HealthPartners) <Stephanie.L.Frost@HealthPartners.com>; Osthelder, Theodore <Theodore.Osthelder@anthem.com>

Subject: {EXTERNAL} FW: OCI Accepting Comments on the Wisconsin Healthcare Stability Plan Proposed 2022 Payment Parameters

This email originated outside the company. Do not click links or attachments unless you recognize the sender.

FYI, below.

From: Grothman, Jeff G - OCI <Jeff.Grothman@wisconsin.gov>

Sent: Wednesday, April 14, 2021 11:35 AM

Subject: OCI Accepting Comments on the Wisconsin Healthcare Stability Plan Proposed 2022 Payment Parameters

The Office of the Commissioner of Insurance (OCI) announces that it will hold a public hearing through a teleconference regarding the Wisconsin Healthcare Stability Plan proposed 2022 payment parameters. Consistent with Wis. Stat. §601.83 (2), the Commissioner adjusted the payment parameters with the goal to stabilize or reduce premium rates, increase participation by health insurers, improve access to health care providers and services, and mitigate the impact of high-risk individuals participating in the individual health insurance market. After considering the data received by insurers and best estimates for 2022 enrollment, it has been determined that a slight modification from the 2021 parameters is necessary to keep WIHSP from exceeding its funding limit of \$200 million. The Commissioner is seeking public input through the preliminary public hearing and comment period regarding the proposed 2022 payment parameters:

Attachment point: \$40,000

Coinsurance rate: 43.75 percent

Reinsurance cap: \$175,000

The Proposed Payment Parameters are located on our website:
<https://oci.wi.gov/Pages/Consumers/HealthcareStabilityPlan.aspx>.

Please send comments to OCIWIHSP@wisconsin.gov. For questions, you may also contact Julie Walsh at Julie.Walsh@wisconsin.gov. The Commissioner is also seeking comments through a public hearing held on Monday, April 26, 2021: <https://oci.wi.gov/Documents/AboutOCI/20200427MtgNot-WIHSPPayParameters.pdf>.

Comments must be received by 4:00 p.m. on Monday, May 3, 2021.

Thank you kindly,

Jeffrey Grothman | Policy Advisor for Legislative Relations & Communications

Wisconsin Office of the Commissioner of Insurance

jeff.grothman@wisconsin.gov | 608-264-6239 | www.oci.wi.gov



CONFIDENTIALITY NOTICE: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information or may otherwise be protected by law. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message and any attachment thereto.