



August 4, 2017

Director Jennifer Hammer
Illinois Department of Insurance
320 W. Washington St.
Springfield, IL 62701

SENT VIA EMAIL

Dear Director Hammer,

Thank you for the opportunity to comment on the 2018 proposed Illinois Individual Marketplace ACA-Compliant rates, as posted on August 1st at <https://ratereview.healthcare.gov>. When reviewing proposed insurance rates, we acknowledge that the Department of Insurance (DOI) plays a critical role in weighing the needs of the Illinois consumers with those of insurance carriers who seek to do business in the state and provide healthcare security to Illinois residents.

We were extremely alarmed by the proposed increases – some up to 43% -- of the 2018 Marketplace plans, currently serving over 300,000 residents in Illinois. In their filings, insurance companies in Illinois were quite clear that they are, in part, raising rates because of the continued uncertainty in the private marketplaces, caused by the federal government's threats to withhold Cost-Sharing Reduction (CSR) subsidies and the uncertainty over the enforcement of the Individual Mandate.

- **Cigna** (which reported a 38% increase) states: “The federal government has not yet confirmed it will fund cost-sharing reduction (CSR) subsidies in 2018. This rate filing assumes that CSRs are not funded and this assumption contributes to the average increase noted above.”
- **Blue Cross Blue Shield of Illinois** (which reported a 16% increase) says: “Changes in anticipated costs associated with the uncertainty regarding continued federal reimbursement for members’ access to, eligibility for, and enrollment in Cost-Sharing Reduction (CSR) plans.”
- **Health Alliance** (which reported a 43% increase) says: “Uncertainty with the legislative status of the 2018 ACA marketplace including changes in morbidity due to the potential elimination of the individual mandate and the impact on costs due to the potential elimination of Cost Sharing Reduction (CSR) payments.”

We respectfully request that before the rates are finalized on August 16th, the DOI take additional steps to protect Illinois Marketplace consumers from the harm caused by the uncertainty and threats to end CSRs:

1. Request that insurers resubmit their QHP filings with two sets of rates: one that includes continued payment of the CSRs and one without CSRs.
2. Require insurers to load the cost of CSRs into their silver plans (not across metal levels) so that premium tax credits will grow with the premium increases and shield Illinois consumers.
3. Offer silver plans off-marketplace that don't reflect CSR premium increases for unsubsidized enrollees.
4. Work to ensure all counties in the state remain competitive should a carrier exit the Marketplace as a result of the CSR payments ending.

We would be happy to meet with you in person to discuss these requests. Thank you, in advance, for your consideration.

Sincerely,

Stephani Becker, The Sargent Shriver National Center on Poverty Law

Kathy Waligora, EverThrive Illinois

Carrie Chapman, Legal Council for Health Justice

Mary Dixon, ACLU of Illinois

Ramon Gardenhire, AIDS Foundation of Chicago

Heather O'Donnell, Thresholds

Dan Rabbitt, Heartland Alliance

Cc: Senator Richard Durbin, Senator Tammy Duckworth