



May 2, 2022

Pam MacEwan  
Chief Executive Officer  
Washington Health Benefit Exchange  
810 Jefferson St SE  
Olympia, WA 98501

**Re: Washington Section 1332 Waiver Application**

Dear Chief Executive Officer MacEwan:

Thank you for the opportunity to submit comments on Washington's section 1332 waiver application.

The undersigned organizations represent millions of individuals facing serious, acute and chronic health conditions in Washington. We have a unique perspective on what individuals and families need to prevent disease, cure illness and manage chronic health conditions. The diversity of our organizations and the populations we serve enable us to draw upon a wealth of knowledge and expertise that is an invaluable resource as we work to find solutions to expand access to high-quality coverage.

Our organizations are committed to ensuring that any changes to the healthcare system achieve coverage that is adequate, affordable and accessible for patients and consumers. We support Washington's proposal to improve coverage for consumers via the Cascade Care program.

Our organizations are pleased to see that Washington's waiver would moderately expand the number of people with coverage in the state as well as improve the affordability of that coverage. The state estimates that individual market enrollment would increase by 1.5% and individual market premiums would decrease by more than 1.6% by 2028. These changes will benefit many patients and consumers directly, while fulfilling the statutory guardrails for scope of coverage and affordability.

Our organizations strongly support Washington's efforts to improve health equity by making affordable coverage available to all Washingtonians, regardless of immigration status. Waiving Section 1312(f)(c) of the Affordable Care Act removes a crucial barrier to coverage and allows more Washingtonians to access the care they need. This will enable more families with mixed immigration status to enroll in coverage together, and for uninsured individuals with no other options for health coverage to enroll in coverage as well. The state estimates these groups currently make up 29% of the uninsured population in Washington under 250% of the federal poverty level (FPL), meaning that this policy change has the

potential to significantly improve access to coverage. The uninsured rate in Washington is higher for people of color, with Hispanic and Black residents disproportionately represented compared to white, non-Hispanic Washingtonians. By increasing enrollment in coverage among these underserved populations, the state expects to improve health equity and reduce racial disparities in coverage.

Our organizations support the use of pass-through funding to support Cascade Care Savings, the state subsidy program. The implementation of the Cascade Care Savings program is expected to expand financial assistance for Cascade Care plans for individuals with income below 250% of the FPL. This program will improve the affordability of coverage for individuals who already receive federal financial assistance as well as those newly eligible for coverage due to the eligibility changes discussed above who meet this income criteria. Individuals in the family glitch, who cannot afford the employer-sponsored coverage offered to them but do not qualify for subsidies, could also be able to get assistance through the subsidy program. Our organizations support Washington's plans to expand financial assistance through the Cascade Care Savings program.

Our organizations support Washington's waiver application to expand access to quality, affordable coverage and urge the state to approve this proposal. Thank you for the opportunity to provide comments.

Sincerely,

American Lung Association  
Arthritis Foundation  
Epilepsy Foundation  
Hemophilia Federation of America  
National Multiple Sclerosis Society  
The AIDS Institute  
The Leukemia & Lymphoma Society