



August 5, 2019

Michael Conway
Commissioner of Insurance
Colorado Division of Insurance
1560 Broadway, Suite 850
Denver, CO 80202

RE: Colorado's Proposed 2020 Rate Filings

Dear Commissioner Conway:

On behalf of its more than 100 hospital and health system members, Colorado Hospital Association (CHA) is pleased to comment on Colorado's proposed 2020 ACA individual plans. Colorado hospitals recognize that the cost of health care has become unsustainable for many Coloradans, and CHA is hopeful that the two-year reinsurance program – largely funded by hospitals – is effective in providing needed relief for patients from the high cost of health insurance.

As DOI reviews rate filings for 2020 and future years, CHA urges DOI to hold insurers accountable by taking the following two actions:

1. Evaluate and Report Consumers' Full Out-of-Pocket Costs

The price Coloradans pay for health insurance is more than just premiums, yet this is the main factor published and evaluated each year by DOI. In order to gain a full understanding of the cost of health insurance in Colorado, CHA urges DOI staff to evaluate consumers' full out-of-pocket costs prior to approving the 2020 rates – including changes in monthly premiums, cost sharing and federal advance premium tax credits – and to make this information public during the annual Consumer Forum.

2. Ensure Savings are Fully Passed on to Consumers

CHA trusts that as Colorado's Insurance Commissioner, you and your staff will ensure that insurers follow the law and that savings realized in future years are *fully* passed on to consumers; and not simply shifted to consumers in the form of higher deductibles and co-insurance, or to employers through increases in the small and large groups markets.

Colorado hospitals and health systems continue to focus on actions that will reduce the total cost of care. Starting 2020, hospitals will be the main source of funding for the state's reinsurance program, further indication of the role that hospitals are playing in improving affordability for Coloradans. Driving further change will require others in the industry, including the insurance companies, pharmaceutical companies, device manufacturers and other providers, to join hospitals in this ongoing commitment to reduce health care costs.

Thank you for the opportunity to provide feedback on such an important issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. R. Rennell', with a stylized flourish at the end.

Tom Rennell
Senior VP Financial Policy and Data Analytics