

## **Premier comments on insurance exchanges proposal**

In [comments](http://www.premierinc.com/about/advocacy/issues/11/Premier-comments-ExchangesNPRM.pdf) (<http://www.premierinc.com/about/advocacy/issues/11/Premier-comments-ExchangesNPRM.pdf>) on the [proposed rule](http://www.gpo.gov/fdsys/pkg/FR-2011-07-15/pdf/2011-17610.pdf) (<http://www.gpo.gov/fdsys/pkg/FR-2011-07-15/pdf/2011-17610.pdf>) establishing insurance exchanges, Premier expressed support for CMS's general policy direction, while at the same time offered suggestions for ensuring that the policy meets the coverage and care needs of hospitals' communities. Premier's full letter can be viewed here:

<http://www.premierinc.com/out/advocacy/issues/11/Premier-comments-ExchangesNPRM.pdf>

The proposed rule would establish insurance exchanges for qualified health plans (QHPs) serving the individual and small group market. In its comments, Premier supported CMS moving beyond the broad network adequacy standards to adoption of a further set of standards for exchanges, while also recognizing that exchanges may define the criteria in these areas according to local needs.

"These standards will be a strong determinant of whether the enrollees getting insurance coverage through the Exchanges can actually get access to the care they need when they need it," Premier wrote.

Because of the implications for access to care for these populations, Premier said it supports CMS' consideration of a stronger standard for defining a "sufficient number" of essential community providers with which a QHP must contract. Premier agreed to the approach to permit issuers to negotiate mutually-agreed on payment rates for these providers, so long as those rates meet the statutory minimum of being at least equal to the plan's generally applicable payment rate.

Addressing funding, Premier expressed support for broad-based sources, but emphasized the funds should not come from imposing an assessment on provider taxes. Since QHPs are the entities that are expected to benefit through access to markets and reduced sales and marketing costs, Premier suggested that financing the exchange through a tax on providers is not the reasonable approach.

Premier also offered strong support for the anti-discrimination provisions as guiding policy for establishing service areas, but asked CMS to ensure that exchanges not adopt policies that have the effect of limiting the potential participation of local plans which have served the community for years, but whose service area may not cover the entire exchange service area. Premier also offered recommendations on the requirements of structuring the governing board for exchanges and the certification standards for QHPs.

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