



UNIVERSAL HEALTH CARE
FOUNDATION OF CONNECTICUT

**Testimony in Support of
Senate Bill 9: An Act Concerning the Rate Approval Process for certain Health Insurance
Policies
& Senate Bill 413: An Act Requiring a Public Hearing for Certain Health Insurance Rate
Increase Requests
Submitted by Lynne Ide, Director of Program & Policy
Universal Health Care Foundation of Connecticut
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Universal Health Care Foundation of Connecticut (UHCF) is an independent, nonprofit foundation working to shape our state's health care system to provide quality, affordable care and promote good health for all state residents. We work with a diverse array of partner organizations, as well as with individual consumers from throughout Connecticut.

In alignment of this mission, we support Senate Bills 9 and 413, particularly Sections 6 and 7, with the caveat that opportunities for consumer participation in the process be strengthened and communications with consumers be clear and easy to understand (Specific suggestions are included in this testimony).

We support Section 7a, which ensures that “each symposium held pursuant to Section 6 of this act shall include an opportunity for public participation,” though, again, want to stress the need to more fully define these opportunities. As stakeholders in their own health, consumers of health insurance plans must have a critical voice in the regulation and implementation of rate increases. By including the public in these symposia, consumers have an avenue to be heard—but only if symposia are structured in such a way as to promote inclusion of consumer voice, rather than create barriers for participation. As written, the proposal does not truly facilitate consumer or policyholder participation, relegating most of the responsibility to call for symposia to the Attorney General and the Healthcare Advocate. While these important consumer advocate positions hold essential roles in the rate increase review process, it should by no means be the only or primary way that action occur in response to rate increase announcements.

In our experience last year, the Anthem rate increase hearing was not truly open and accessible to the people who would have been directly impacted by the rate increase. We contacted thousands of individuals in our network, many of whom are Anthem policyholders. Despite receiving notice of the rate request from Anthem, many had no confidence that they could do anything to impact the process. And, more importantly, few if any, were available to show up to testify in Hartford at 9 a.m. on a Friday morning. This has a chilling effect on the consumer voice.

We believe that there should be extra measures taken to schedule hearings when policyholders can participate. Allowing for written comments submitted online is not enough. That is, at best, one-way communication.

We propose that these symposia:

1. Be renamed to communicate more clearly with consumers (such as “Public input hearing” or “Policyholder input hearing”)
2. Occur in a central location accessible via public transit that includes free parking
3. Be held at a time that accommodates the working schedules of the average consumer (i.e. Hold hearings in the evenings, on weekends, etc.)

While we concur that policyholders must be notified of the proposed rate increase by the insurance company (as is stipulated in Section 6, Part 2a), and that it is valuable to direct policyholders to the appropriate avenue to submit public comment, the notice should *also* include:

1. Contact information for the Attorney General’s office
2. Contact information for the Office of the Healthcare Advocate
3. Instructions that these two offices
 - a. Are responsible for asking for a public hearing and/or a symposium
 - b. Should be contacted in the event a policyholder believes they should request a public hearing and/or symposium
 - c. Allow for direct policyholder comment on the proposed rate increase

The residents of this state deserve the most rigorous consideration from legislators and the strongest vigilance on the part of regulators. If the public, particularly policyholders, are to truly be a part of the process of reviewing rate increases, it is essential that the process be open, accessible, clear and allow for a variety of avenues for consumer input.