

To: Wisconsin Legislators
Date: December 4, 2018
From: Alliance for Health Insurers and America's Health Insurance Plans
Regarding: Senate Substitute Amendment (LRBs 0444/1) to Assembly Bill 365

The Alliance for Health Insurers (AHI) and America's Health Insurance Plans (AHIP) want to bring to your attention the following technical changes to LRB0444/1 to ensure that the bill only applies to those policies currently impacted under the Affordable Care Act. The first set of changes clarify the insurer accepts the group and issues the small group policy. **Without these technical changes, we urge you to oppose LRB 0444/1.**

The definition of disability policy under 632.895(1)(a) covers a broad range of policy types. Similar to how the Legislature has limited the types of disability insurance policies that are subject to certain state mandates under 632.895, we believe a similar clarification is needed in Senate Substitute Amendment to ensure that the requirements related to prohibition of pre-existing conditions, community rating and access to coverage only apply to those policies currently subject to those limitations under the Affordable Care Act. Everyone should have access to comprehensive medical coverage. HIPAA excepted benefits are a voluntary compliment to major medical coverage. As such they are not subject to many state or federal requirements for major medical, including the current federal requirements related to pre-existing condition limitations.

Thank you for the opportunity to comment on these important changes to ensure the proposed substitute amendment does not go beyond the protections of the Affordable Care Act.

For additional information, please contact either:

Mary Haffenbredl, Senior Regional Director, State Affairs
America's Health Insurance Plans
202.413.9817 cell

R.J. Pirlot, Executive Director
Alliance of Health Insurers
608.445.4410 cell