

August 28, 2012

Ms. Danielle Holahan
New York State Health Benefit Exchange
New York State Department of Health

[Submitted electronically to exchange@health.state.ny.us]

RE: Benchmark Options for Essential Health Benefits

Dear Ms. Holahan:

SHARE submits these comments on New York's selection of an Essential Health Benefits (EHB) benchmark plan for use in the individual and small group insurance markets. SHARE is a 36 year old nonprofit organization that provides support for women with breast or ovarian cancer. We thank you for the opportunity to provide our comments on this fundamental step in implementing the Affordable Care Act in New York State.

The EHB decision is critically important for individuals who have had their lives impacted by breast or ovarian cancer. The package that New York decides upon must meet the needs of all diverse segments of the state's population, including individuals who are living with cancer. Cancer patients may need access to a range of treatments and tests from diagnostic tests, to surgery, to chemotherapy, to radiation and physical therapy. The package must include access to oral chemotherapy without any special requirements in the policy. Care for lymphedema including practitioners trained in lymphedema treatment and the necessary products for lymphedema care are all a critical part of the package as a high percentage of individuals treated for cancer unfortunately also have lymphedema as their lymphatic systems have been compromised from cancer treatment.

We strongly urge adoption of the New York State Employee Plans' Empire Plan as the best benchmark option for EHB in New York. The Empire Plan is the most comprehensive of the ten benchmark plan options. It is the only benchmark option that covers almost all of New York's individual and small group benefit mandates. Full coverage is a necessity for cancer patients as their bodies are impacted in many ways and treatment is extensive.

New York should not reject the Empire plan as the EHB benchmark merely because of the slightly higher predicted effect on premium cost. While affordability of coverage is important to our members, it is expected that the Exchange will bring down premium costs. And our members need the security that a comprehensive benefit package provides.

Thank you for your consideration.

Sincerely,

Jacqueline Reinhard