

**To:** Donna Frescatore, Executive Director, NYS Health Benefit Exchange  
Danielle Holahan, Project Director, Planning and Policy, NYS Health Benefit Exchange

**From:** The New York State Nurses Association

**Date:** September 24, 2012

**RE:** **Benchmark option for Essential Health Benefits**

[Submitted electronically to: [exchangerac@health.state.ny.us](mailto:exchangerac@health.state.ny.us)]

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The New York State Nurses Association (NYSNA) is the oldest and largest professional organization for registered nurses in New York State and serves as the collective bargaining agent for more than 36,000 RNs at 150 healthcare facilities. On behalf of our members and the patients they serve, we thank you for the opportunity to comment on New York's selection of an Essential Health Benefits benchmark plan for use in the individual and small group insurance markets.

The benchmark plan should include coverage that addresses the unique healthcare needs of women and their families and should provide the comprehensive care needed to stay healthy. NYSNA strongly urges adoption of a benchmark plan that includes coverage for the full range of reproductive services, including abortion services.

During the Mid-Hudson/Capital District/North Regional Advisory Committee meeting on September 19, 2012, comments were made by committee participants indicating the Small Group Oxford products were the most logical choice for the benchmark plan. Upon reviewing the Oxford products, it appears the plans are equivocal in covering abortion services.

The Nurses Association has a long standing position to advocate for access to a full range of reproductive services for all persons. We hope that the State will make a commitment to this as well and select a benchmark plan that is unequivocally committed to coverage of abortion services, as well as other elements of comprehensive reproductive services for all persons.

NYSNA urges the Health Benefit Exchange to consider another option, for example, The Empire Plan, when choosing a benchmark plan for the Essential Health Benefits.

Thank you for the opportunity to comment on this important issue.



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