



STOP THE BLEEDING

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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:

The Hemophilia Association of New York, Inc. (HANY) 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. Since 1952 HANY has been providing information, education, advocacy and direct assistance to persons with hemophilia and related blood clotting disorders. 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 persons with bleeding disorders (PwBD). The package that New York decides upon must meet the needs of all diverse segments of the state's population, including those PwBD who require very expensive, often self infused clotting factor. They would not only need coverage for their medication but also access to all the clotting factor products for their specific disorder, as there are no generics available. The care recommendations for PwBDs strongly advise them to be managed at a Hemophilia Treatment Center where their comprehensive care can be coordinated.

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. For example, it is the only benchmark option that covers almost all of New York's individual and small group benefit mandates. This plan also has knowledge of PwBDs and their mediation needs, as I have personally worked with them on understanding the needs of PwBDs. It has more generous service limits on many services that are restricted by the other benchmark options, including mental health, orthotics, chemical dependence, skilled nursing facilities, home health care, physical therapy, rehabilitation therapy, occupational therapy, and speech therapy. It covers adult dental care and women's health services like medically necessary and elective abortions, infertility services, and contraception. Finally, it does not exclude transgender-specific services.

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, we expect that the Exchange will bring down premium costs. And our members need the security that a comprehensive benefit package provides.

Thank you for considering our comments.

Linda E. Mugford,
Executive Director

**A copy of the latest annual report can be obtained from HANY or
New York State, Office of the Attorney General, Charities Bureau,
120 Broadway, New York, New York 10271**

