



Family Planning Advocates of New York State

Danielle Holahan
Project Director
New York State Health Insurance Exchange Planning

VIA ELECTRONIC SUBMISSION

August 9, 2012

Dear Ms. Holahan;

Family Planning Advocates of New York State (FPA) is pleased to be able to submit these comments concerning the State's selection of an Essential Health Benefit Benchmark Plan. FPA represents the state's family planning provider network in New York. Our provider members include eleven Planned Parenthood affiliates, hospital-based and freestanding family planning centers, and a wide range of health, community and social service organizations that collectively represent an integral part of New York's health care safety net for uninsured and underinsured women and men. Family planning providers offer preventive health care services to more than 350,000 patients at more than 200 sites across the state and are cognizant of the critical need for adequate health insurance coverage.

After analysis of the options available, FPA strongly encourages the State to select the Empire Plan as we feel it would best meet the needs of the State and, most importantly, the many New Yorkers our members serve.

Of particular importance to FPA and our members is coverage for comprehensive reproductive health services, including abortion. The three state employee plans as well as the three small group options all cover abortion care, however, all federal employee health benefit (FEHB) plans exclude coverage for abortion even when a woman's health is endangered. FEHB plans cover abortion only in cases of rape, incest or to preserve the woman's life. Because of the limits on abortion coverage, FPA cannot support using a FEHB plan as the State's benchmark plan. Also of importance to the reproductive rights field is the fact that the Empire Plan offers the most robust coverage for assisted reproductive technologies. New York has a long and proud tradition of respecting women's decisions concerning reproductive health care, and that tradition must be continued as the State selects its benchmark plan.

An additional point in favor of the Empire Plan is that it offers the most robust coverage to meet the varied needs of New York families. Its benefits meet or exceed individual and small group requirements, and it includes domestic partners as eligible dependents. The Empire Plan, along with the state plans and small group options offer families the additional benefit of extending COBRA-like coverage in family policies to children up to the age of 29; an option that is not included in FEHB.

Choosing the Empire plan also has distinct advantages for the State as discussed in the United Hospital Fund Report titled “Defining Essential Health Benefits: Federal Guidance and New York Options.” As noted in the report, the Empire Plan “would bring more certainty as a benchmark in terms of identifiable benefits, would avoid state defrayal costs, and also would have value as a bridge during a transition period when New York will be implementing the Exchange and federal reforms...” These benefits to the State will be significant.

Although the Empire Plan has costs that are somewhat higher than the other options the State has available, we feel the benefits of this plan more than outweigh the slight cost difference. When patients do not have coverage for the care they need, they frequently delay or forego entirely needed care which can result in higher medical costs.

For all of these reasons, we feel the Empire Plan is the best option as a benchmark plan and strongly encourage the State to select this option.

Thank you for the opportunity to provide input on this important decision.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Tracey Brooks', with a stylized flourish at the end.

M. Tracey Brooks
President and CEO
Family Planning Advocates of New York State