



National Association of Social Workers

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

On behalf of more than 10,000 members of the National Association of Social Workers New York State (NASW-NYS), we respectfully submit our comments related to the Essential Health Benefits (EHB) benchmark plan.

The National Association of Social Workers – New York State Chapter is the largest statewide membership organization representative of the field of professional social workers. Professional social workers provide services to individuals, families, groups, communities, and organizations. NASW members make up much of the social work labor force in New York and provide a substantial portion of social services and more than half of all mental health services. In addition to direct service, social work practice includes policy development, education, management, and research and as such, we have been closely following the evolution of the Affordable Care Act and its implementation at the state level.

As you are well aware, a major component of ACA implementation is the creation of State Health Insurance Exchanges and the Essential Health Benefits package encompassed within and outside of such exchanges; a task the US Department of Health and Human Services directed states to undertake in December of 2011. As the state examines the full breadth and scope of the potential benchmark plans for New York State, NASW-NYS respectfully requests a high degree of consideration be given to New York's Empire Plan.

As cited in the United Hospital Fund's *Defining Essential Health Benefits: Federal Guidance and New York Options*, the Empire Plan "...is in a class of its own. Its comprehensive benefit package meets or exceeds individual and small group benefit mandates, making it the only benchmark option that does so." In addition, the report identifies the Empire Plan as a mechanism to defray state costs and serve as a "bridge" during the two year transitional period of implementation, reevaluation and future decision making. Of further note is the fact that the Empire Plan serves as the backstop to Timothy's Law, the states mental health parity statute; an area of specific interest to NASW-NYS who served as an active member of the Timothy's Law Campaign.

While we understand numerous variables need to be taken into consideration, some of which have yet to be clarified by HHS regarding mental health benefits, and some of which revolve around costs, we maintain that the Empire Plan's rich benefit package offers the highest degree of certainty and seamlessness and the 3.2 percent higher impact on premiums cited in the Millman analysis will be offset shifts in the marketplace post full implementation.

We thank you for your time and consideration and look forward to the continued opportunity to provide input as implementation progresses.

Sincerely,

A handwritten signature in black ink, appearing to read "Reinaldo Cardona".

Reinaldo Cardona, MSSW, LCSW
Executive Director