



Standardizing Health Plan Benefit Design in the Individual Market: Opportunities and Implications

Sabrina Corlette and
Chiquita Brooks-LaSure

November 6, 2019

STATE
Health & Value
STRATEGIES

*Driving Innovation
Across States*

A grantee of the Robert Wood Johnson Foundation

About State Health and Value Strategies

State Health and Value Strategies (SHVS) assists states in their efforts to transform health and health care by providing targeted technical assistance to state officials and agencies. The program is a grantee of the Robert Wood Johnson Foundation, led by staff at Princeton University's Woodrow Wilson School of Public and International Affairs. The program connects states with experts and peers to undertake health care transformation initiatives. By engaging state officials, the program provides lessons learned, highlights successful strategies, and brings together states with experts in the field. Learn more at www.shvs.org.

Questions? Email Heather Howard at heatherh@Princeton.edu.

*Support for this webinar was provided by the Robert Wood Johnson Foundation.
The views expressed here do not necessarily reflect the views of the Foundation.*

About Georgetown's Center on Health Insurance Reforms (CHIR)

- A team of experts on private health insurance and health reform
- Conduct research and policy analysis, provide technical assistance to federal and state policymakers, regulators, and consumer advocates
- Based at Georgetown University's McCourt School of Public Policy
- Learn more at <https://chir.georgetown.edu/>

About Manatt Health

Manatt Health integrates legal and consulting expertise to better serve the complex needs of clients across the healthcare system. Combining legal excellence, first-hand experience in shaping public policy, sophisticated strategy insight, and deep analytic capabilities, we provide uniquely valuable professional services to the full range of health industry players.

Our diverse team of more than 160 attorneys and consultants from Manatt, Phelps & Phillips, LLP and its consulting subsidiary, Manatt Health Strategies, LLC, is passionate about helping our clients advance their business interests, fulfill their missions, and lead healthcare into the future.

For more information, visit <https://www.manatt.com/Health>.

Welcome

All participant lines are muted. If at any time you would like to submit a question, please use the Q&A box at the bottom right of your screen.

After the webinar, the slides and a recording will be available at **www.shvs.org**.

Plan Management: Options for States

- ACA envisioned marketplaces as a place:
 - Consumers could make “apples to apples” plan comparisons
 - Consumers could safely shop for high quality, “certified” coverage
- SBMs must operate website to enable plan selection & enrollment
- States have flexibility to:
 - Require standardized benefit designs
 - Require “meaningful difference” between plans
 - Limit number of plan offerings

Why Standardize? Optimizing Plan Selection & Access to Care

- Several states require standardized plans (SPs)
 - CA, DC, CT, MA, NY, OR, VT and, beginning in 2021, WA
- Reasons to do so include:
 - “Apples to apples” shopping experience
 - Delivering more pre-deductible coverage
 - Reducing discriminatory benefit design
 - Maximizing premium tax credits via actuarial value

Why Standardize? Combining with Public Option/Buy-in Plans to Improve Impact

- States may be interested in pursuing standardized plans alongside a public option to meet additional goals and fill program design gaps:
 - **Addressing cost sharing**, if the public option is focused on premiums
 - **Benefiting subsidized population**, if the public option primarily benefits the unsubsidized population

Why Standardize? Reasons *not* to do it

- Can state do a better job than insurers?
- Will it limit choice?
- Sometimes difficult trade-offs between covered items & services
- Resource intensive. Requires:
 - Staff & actuarial support
 - Stakeholder engagement
 - Revisions every year
 - Changes to website interface
 - Consumer education
- Is juice worth the squeeze? Lack of data on impact

Implementing Standardized Plan Designs: Key Decisions

- WHO?
 - Who decides what design will be?
 - All IM insurers or just marketplace? Or just public option?
- WHAT?
 - Will non-standardized plans be allowed?
 - What should AV be, how will it affect PTCs, enrollment?
- WHERE?
 - Where and how will SPs be displayed on website?
- HOW?
 - How will you know if SPs are achieving their policy goals?

State Experiences with Standardized Plans: DC, Massachusetts, New York



Standard Plans: Policy Development

- **DCHBX INITIAL POLICY:** In 2013, created a working group chaired by an Executive Board Member. Voting members included carriers, consumers, employers, brokers, and health care providers. Consensus recommendation to the Board was to create standard plans (benefits and cost-sharing).
- **DCHBX BOARD ACTION:** The HBX Executive Board adopted the recommendations through a resolution.
- **DCHBX LEGISLATION:** DC Council unanimously passed law with a requirement to offer standard plans and allowing (but not requiring) non-standard plans to be offered. Legislation was supported by broad stakeholders. *(In 2020, 15 of the 25 plans are standard plans)*



Developing Standard Plan Design

- **DCHBX ESTABLISHED A STANDING WORKING GROUP ON STANDARD PLANS:** Initially chaired by an Executive Board Member and now chaired by a Standing Advisory Board member. Voting members include carriers, consumer and patient advocates, brokers. Supported by HBX staff and external actuaries.
 - Developed initial plan design;
 - Updates the design annually, modifying based on AV calculator;
 - Requires tough decisions and tradeoffs.
- DCHBX Executive Board relies heavily on the working group and adopts the recommendations through resolution annually before carriers file their rates and forms with insurance department.



DC Health Link Standard Plans

- ✓ **COMPARE:** Standard plans have the same benefits and same out-of-pocket costs (deductibles, copays, coinsurance) and make it easy for residents to compare plans based on quality & networks.

- ✓ **VALUE:** These plans are also designed to provide value by offering coverage of outpatient services pre-deductible:
 - Primary care visits
 - Specialist visits
 - Mental health services
 - Generic prescriptions drugs
 - Urgent care



EXPERIENCE WITH STANDARD PLANS

- ✓ **Enrollment:** 73% of DC Health Link customers are enrolled in standard plans.
- ✓ **Marketing:** This year for the first time we are making the value of standard plans a major theme for open enrollment.
- ✓ **Website enhancements:** We've updated our website shopping tools to highlight standard plans and their value, as well as promote sorting by standard plan design.

Massachusetts Health Connector Context

The Health Connector has served as Massachusetts' health insurance marketplace for over a decade. The Health Connector views plan standardization as a key policy lever (among others) in ensuring coverage and affordability for Massachusetts residents.



More than 97% of Massachusetts residents are insured



More than a quarter million Massachusetts residents are served by the Health Connector

\$332



The Health Connector has had the second lowest silver benchmark plan in the country from 2017-2019

\$392



The Health Connector has had the lowest average individual premiums of any Exchange in the country from 2017-2019

The Role of Standardized Plans

The Health Connector “standardizes” most plan choices to make it easier for shoppers to compare plans across carriers.

- The Health Connector has offered some form of plan standardization since inception, starting with specified coverage tiers in 2007 and moving to specified benefits and cost-sharing within those tiers by 2010
- Today, the majority of the Health Connector’s plans are considered “standardized” because they adhere to common coverage of 21 benefit categories across carriers
 - The Health Connector’s 9 health plan carriers must each offer between 5 to 7 standard plan designs, ranging from platinum to bronze
 - Standard plan designs limit deductibles and coinsurance to the extent possible
 - The Health Connector tailors standard plan designs to meet different goals for the non-group and small group market segments
 - The Health Connector also maintains separate standard plan designs for enrollees with income up to 300% FPL via our ConnectorCare program
- In addition to standardized plans, carriers may propose up to 3 non-standardized plans for the Health Connector’s consideration, within prescribed AV ranges

Standard Plans Offer Cost-Sharing Protection

2020 Plan Designs (non-ConnectorCare)

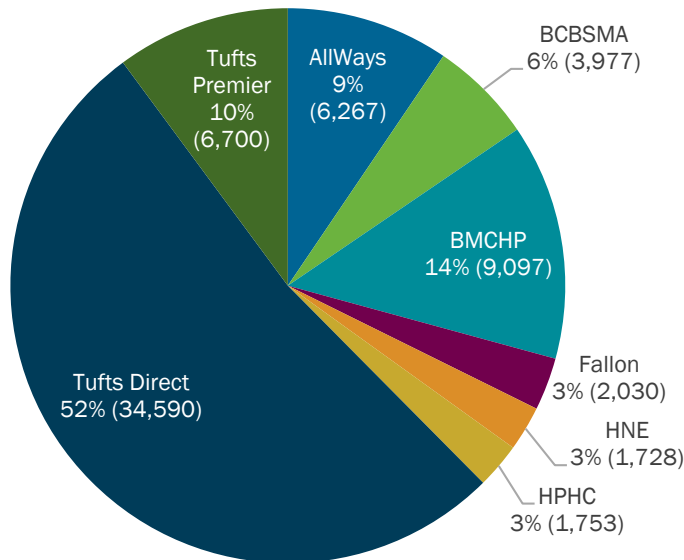
Plan Feature/ Service A check mark (✓) indicates this benefit is subject to the annual deductible	Platinum	High Gold	Low Gold	High Silver	Low Silver (HSA) Small Group Only	Bronze #1	Bronze #2 (HSA)	
Annual Deductible – Combined	\$0	N/A	N/A	\$2,000	\$2,000	\$2,900	\$3,500	
	\$0	N/A	N/A	\$4,000	\$4,000	\$5,800	\$7,000	
Annual Deductible – Medical	N/A	\$1,000	\$2,000	N/A	N/A	N/A	N/A	
	N/A	\$2,000	\$4,000	N/A	N/A	N/A	N/A	
Annual Deductible – Prescription Drugs	N/A	\$0	\$250	N/A	N/A	N/A	N/A	
	N/A	\$0	\$500	N/A	N/A	N/A	N/A	
Annual Out-of-Pocket Maximum	\$3,000	\$5,000	\$5,600	\$8,150	\$6,850	\$8,150	\$6,850	
	\$6,000	\$10,000	\$11,200	\$16,300	\$13,700	\$16,300	\$13,700	
Primary Care Provider (PCP) Office Visits	\$20	\$25	\$30	\$30	\$30 ✓	\$30 ✓	\$45 ✓	
Specialist Office Visits	\$40	\$45	\$55	\$60	\$60 ✓	\$60 ✓	\$75 ✓	
Emergency Room	\$150	\$150 ✓	\$350 ✓	\$350 ✓	\$300 ✓	\$350 ✓	\$300 ✓	
Urgent Care	\$40	\$45	\$55	\$60	\$60 ✓	\$60 ✓	\$75 ✓	
Inpatient Hospitalization	\$500	\$500 ✓	\$750 ✓	\$1,000 ✓	\$750 ✓	\$750 ✓	\$750 ✓	
Skilled Nursing Facility	\$500	\$500 ✓	\$750 ✓	\$1,000 ✓	\$750 ✓	\$750 ✓	\$750 ✓	
Durable Medical Equipment	20%	20% ✓	20% ✓	20% ✓	20% ✓	20% ✓	20% ✓	
Rehabilitative Occupational and Rehabilitative Physical Therapy	\$40	\$45	\$55	\$60	\$60 ✓	\$60 ✓	\$75 ✓	
Laboratory Outpatient and Professional Services	\$0	\$25 ✓	\$50 ✓	\$60 ✓	\$60 ✓	\$60 ✓	\$60 ✓	
X-rays and Diagnostic Imaging	\$0	\$25 ✓	\$75 ✓	\$75 ✓	\$75 ✓	\$75 ✓	\$75 ✓	
High-Cost Imaging	\$150	\$200 ✓	\$300 ✓	\$500 ✓	\$500 ✓	\$500 ✓	\$500 ✓	
Outpatient Surgery: Ambulatory Surgery Center	\$250	\$250 ✓	\$500 ✓	\$500 ✓	\$500 ✓	\$500 ✓	\$500 ✓	
Outpatient Surgery: Physician/Surgical Services	\$0	\$0 ✓	\$0 ✓	\$0 ✓	\$0 ✓	\$0 ✓	\$0 ✓	
Prescription Drug	Retail Tier 1	\$10	\$20	\$25	\$30	\$30 ✓	\$30	\$35 ✓
	Retail Tier 2	\$25	\$40	\$50 ✓	\$60	\$60 ✓	\$60 ✓	\$75 ✓
	Retail Tier 3	\$50	\$60	\$125 ✓	\$100 ✓	\$105 ✓	\$125 ✓	\$150 ✓
	Mail Tier 1	\$20	\$40	\$50	\$60	\$60 ✓	\$60	\$70 ✓
	Mail Tier 2	\$50	\$80	\$100 ✓	\$120	\$120 ✓	\$120 ✓	\$150 ✓
	Mail Tier 3	\$150	\$180	\$375 ✓	\$300 ✓	\$315 ✓	\$375 ✓	\$450 ✓
Federal Actuarial Value Calculator	89.38%	81.30%	76.04%	71.94%	69.42%	64.96%	64.95%	

Standard Plans Facilitate Comparison-Shopping

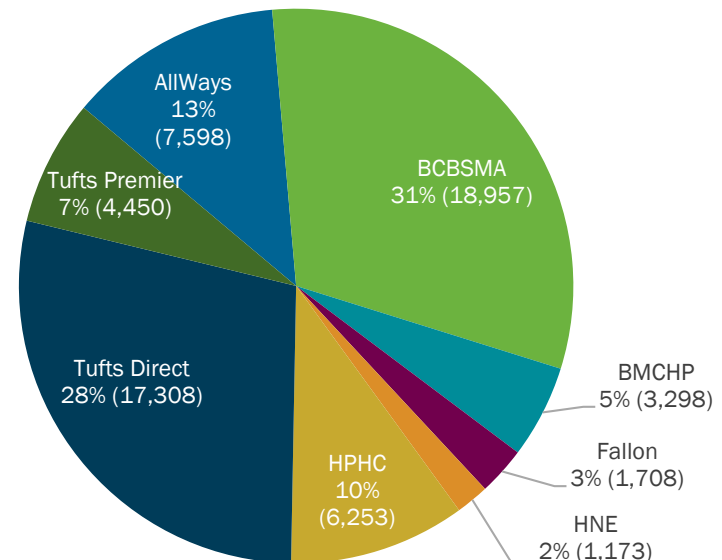
Standard plans facilitate the apples-to-apples comparisons that allow Health Connector members to “shop differently.” The Health Connector has found that its members select different carriers than comparable off-Exchange shoppers.

2019 Unsubsidized Non-Group Enrollment On- and Off-Exchange

Non-Group, Unsubsidized On-Exchange



Non-Group, Unsubsidized Off-Exchange

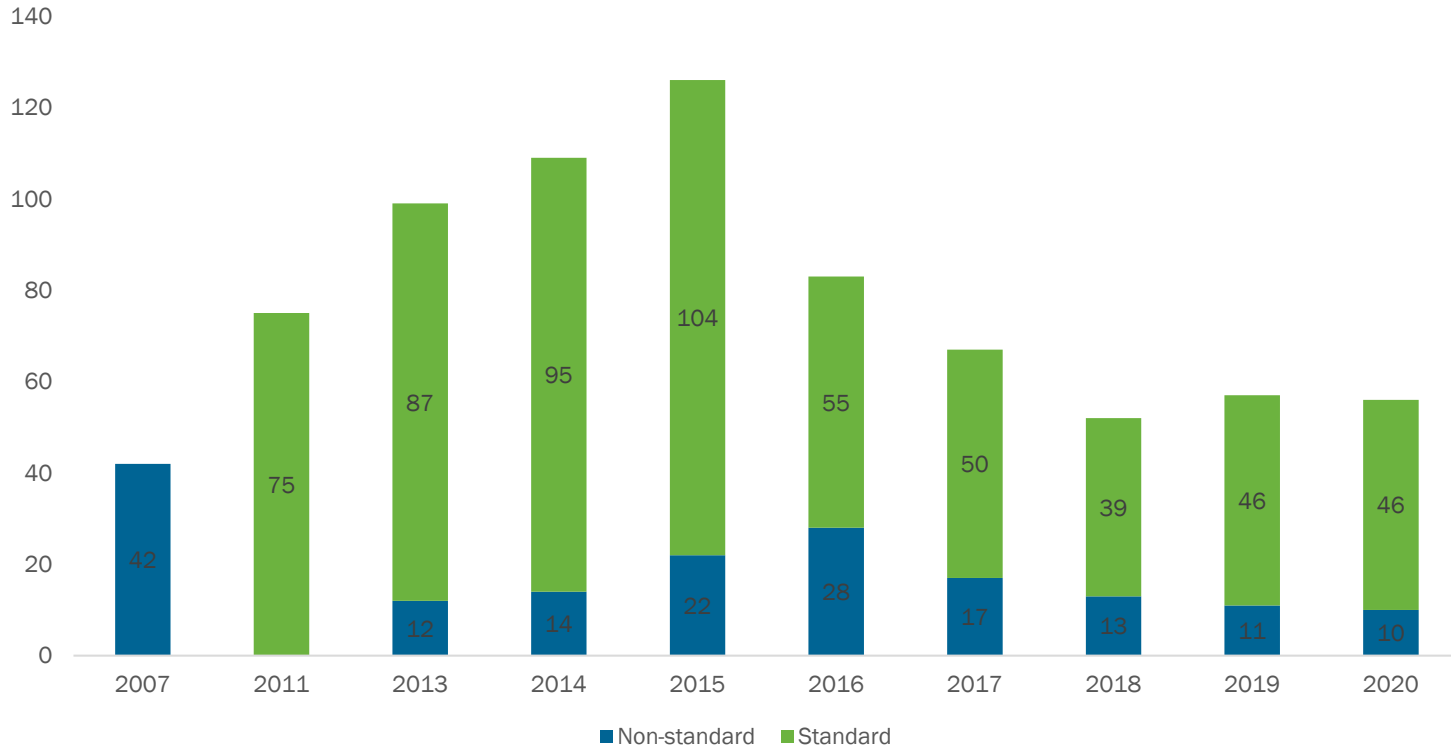


Source: CHIA Enrollment Trends August 2019 Databook. Data from March 2019. <http://www.chiamass.gov/enrollment-in-health-insurance/>. Enrollment totals for On-Exchange Non-Group enrollment do not include ConnectorCare enrollment. Excludes carriers with negligible enrollment.

Standard Plans Can Adapt to Meet Policy Goals

Over the past decade, the Health Connector has varied its standard plan shelf in response to member feedback and a shifting policy landscape.

Number of Non-group Standardized vs. Non-Standardized Plans, 2007 – 2020



The Future of Standard Plan Designs

The Health Connector’s strategy for standard plan designs continues to evolve. Possible directions for the future may include:

- Continuing to emphasize “first dollar coverage” to the greatest extent possible
 - The federal actuarial value calculator constrains standard plan design
 - Within those constraints, the Health Connector has taken steps to minimize cost-sharing for certain benefits and plans, such as medication assisted treatment for opioid use disorder
 - The Health Connector hopes to take additional steps toward “value-based insurance design” in future plan years
- Standardizing cost-sharing for additional benefits
- Refining plan designs aimed at particular market segments, such as:
 - Unsubsidized non-group bronze members, who struggle with affordability
 - Small group members, who seek HSA-compatible options
- Improving web-based decision-support tools to more clearly indicate which plans are standardized

NY State of Health Standard Products

**Danielle Holahan
Deputy Director
NY State of Health**

**RWJF State Network Webinar
November 6, 2019**

Standard Products Overview



- Since 2014, New York has **required** that every insurer offer a Standard Product at each metal level and in every county of its Marketplace service area
 - Standard products must include the Essential Health Benefits (except pediatric dental, which is optional if otherwise available)
 - Cost sharing is the same across insurers within a metal tier
 - Policy rationale was to ease comparison shopping and manage the number of plan choices
 - Links to Standard and Standard 3 PCP products are found here:
<https://info.nystateofhealth.ny.gov/sites/default/files/Attachment%20B%20-%20Standard%20Products%202020%20042419%28Cost%20Sharing%20Chart%29%20%28002%29.pdf>
<https://info.nystateofhealth.ny.gov/sites/default/files/Attachment%20C%20-%20Standard%20Products%202020%20%28Cost%20Sharing%20Chart%29.pdf>
- New York **permits** insurers to offer up to three Non-Standard products in each metal level, which allows insurers to innovate and gives consumers more choice

2020 Standard Products: Policy Goals



- Keep deductibles as low as possible, within permissible actuarial value (AV) limits:
 - In 2020, the Silver and Silver CSR deductible levels were **lowered**; outpatient facility fee co-payment and maximum out-of-pocket increased
 - Deductible levels affect most consumers, while few consumers reach their MOOP each year
- Coverage before the deductible:
 - Prescription drugs are covered before the deductible (except Bronze)
 - 3 primary care / “sick visits” are covered in all standard Bronze products and some Gold and Silver Non-Standard products
- Silver product (standard and non-standard) permissible AV variation is between 70% and 72%

2020 Standard Products: Overview of Changes from 2019



<u>Metal Level</u>	<u>Deductible 2019</u>	<u>Deductible 2020</u>	<u>Max Out of Pocket 2019</u>	<u>Max Out of Pocket 2020</u>
Platinum	\$0	\$0	\$2,000	\$2,000
Gold	\$600	\$600	\$4,000	\$4,000
Silver	\$1,700	\$1,300	\$7,500	\$7,900
Silver (>200 -<250 FPL)	\$1,350	\$1,100	\$6,075	\$6,500
Silver (>150 -<200 FPL)	\$250	\$250	\$2,100	\$2,100
Silver (>100 -<150 FPL)	\$0	\$0	\$1,000	\$1,000
Bronze	\$4,000	\$4,425	\$7,600	\$8,150
Catastrophic	\$7,900	\$8,150	\$7,900	\$8,150

HOW MUCH DOES A QUALIFIED HEALTH PLAN (QHP) COST?

MONTHLY PREMIUMS: The price you pay each month will depend on the plan you pick. Many people are eligible for tax credits which lower your monthly cost. Individuals earning up to \$49,960 a year and a family of 4 earning up to \$103,000 may be eligible for tax credits.

COST SHARING: Cost sharing is the amount you pay when you get a health care service. Some people are also eligible to get help paying for these costs, based on their income. Below are examples of the QHP cost sharing level for standard plans offered at four levels. Other plans are available with different cost sharing and additional covered services.

COST SHARING FOR HEALTH CARE SERVICES	PLATINUM	GOLD	SILVER	BRONZE
Annual Deductible	\$0	\$600	\$1,300	\$4,425
Preventive Care	Free	Free	Free	Free
Primary Care Physician Visit	\$15	\$25	\$30	First 3 Visits Free; then 50% cost sharing
Specialist Visit	\$35	\$40	\$50	50% cost sharing
Inpatient Hospital Stay per admission	\$500	\$1,000	\$1,500	50% cost sharing
Behavioral Health Outpatient Visit	\$15	\$25	\$30	50% cost sharing
Behavioral Health Inpatient Visit per admission	\$500	\$1,000	\$1,500	50% cost sharing
Emergency Room	\$100	\$150	\$250	50% cost sharing
Urgent Care	\$55	\$60	\$70	50% cost sharing
Physical Therapy, Speech Therapy, Occupational Therapy	\$25	\$30	\$30	50% cost sharing

COST SHARING FOR PRESCRIPTION DRUGS	PLATINUM	GOLD	SILVER	BRONZE
Generic	\$10	\$10	\$10	\$10
Preferred Brand	\$30	\$35	\$35	\$35
Non-Preferred Brand	\$60	\$70	\$70	\$70

New York's Essential Plan

- New York's Basic Health Program, the Essential Plan, offers standardized benefits across insurers
- Same comprehensive benefits as Qualified Health Plans
- Vision and Dental coverage is:
 - Included for lower-income enrollees
 - Optional for additional premium for higher income enrollees
- Very low cost:
 - Premium is \$20 or \$0
 - **No** deductible
 - Low cost sharing

HOW MUCH DOES THE ESSENTIAL PLAN COST?

PREMIUMS: The monthly premium is \$20 per person or \$0, depending on income.

COST SHARING: There is **NO DEDUCTIBLE**. Below are some examples of Essential Plan cost sharing levels.

COST SHARING FOR HEALTH CARE SERVICES	Annual individual income: below \$12,490-\$18,735	Annual individual income: \$18,736-\$24,980
Monthly Premium	\$0	\$20
Annual Deductible	None	None
Preventive Care	Free	Free
Primary Care Physician Visit	\$0	\$15
Specialist Visit	\$0	\$25
Inpatient Hospital Stay per admission	\$0	\$150
Behavioral Health Outpatient Visit	\$0	\$15
Behavioral Health Inpatient Visit per admission	\$0	\$150
Emergency Room	\$0	\$75
Urgent Care	\$0	\$25
Physical Therapy, Speech Therapy, Occupational Therapy	\$0	\$15
COST SHARING FOR PRESCRIPTION DRUGS	Annual individual income: below \$12,490-\$18,735*	Annual individual income: \$18,736-\$24,980
Generic	\$1	\$6
Preferred Brand	\$3	\$15
Non-Preferred Brand	\$3	\$30
* \$0 for individuals with income below \$12,490.		
COST SHARING FOR DENTAL AND VISION BENEFITS	Annual individual income: below \$12,490-\$18,735	Annual individual income: \$18,736-\$24,980
Dental and Vision	\$0 (lower income enrollees) Can be purchased for an additional premium (higher income enrollees)	Can be purchased for an additional premium

Lessons Learned



Qualified Health Plans:

- In 2019, nearly 7 in 10 of QHP enrollees selected Standard product options
- Non-Standard product enrollment is concentrated in plans that offered additional benefits (e.g., adult dental and vision, sick visits not subject to deductible)
- Consumers consistently buy on price. Standard product changes – lower deductibles, services before deductible – improve the value of these products

Essential Plan:

- Tremendously successful program – 790,000 enrolled as of January 31, 2019
- Comprehensive benefits and very low cost
- EP costs consumers \$1,485 less per year, on average, than QHP
- Participation rates among eligibles are significantly higher for EP versus QHP

Discussion

The slides and a recording of the webinar will be available at www.shvs.org after the webinar

Thank You

Heather Howard

Director

State Health and Value Strategies

heatherh@Princeton.edu

609-258-9709

www.shvs.org

Dan Meuse

Deputy Director

State Health and Value Strategies

dmeuse@Princeton.edu

609-258-7389

www.shvs.org

Chiquita Brooks-LaSure

Managing Director

Manatt Health

Cbrooks-lasure@Manatt.com

202-585-6636

www.manatt.com

Sabrina Corlette

Georgetown's Center on Health and
Insurance Reform

sabrina.corlette@georgetown.edu

202-687-3003

<https://chir.georgetown.edu/>