



August 7, 2015

Comments on Rate Increases in Missouri for 1-1-2016

To: Department of Health and Human Services

Women's Voices Raised For Social Justice, an education and advocacy organization that reaches 900 women in Missouri, urges you to hold hearings on the excessive rate increases by Coventry.

As an organization Women's Voices has decried the fact that Missouri is the only state in the country that does not require health insurance companies to file and justify their rates. During several legislative sessions we testified unsuccessfully asking our legislature to pass a rate review bill to provide transparency and oversight on rate increases. In 2012 one member told a legislative committee that her family of 4 purchasing insurance on the private market had faced 4 years of double digit increases (including a 24% increase in 2012) and was forced into buying coverage with high deductibles. Now that her family can purchase through the federal exchange it is unconscionable that she could still face unreasonable increases without adequate explanation.

Women's Voices applauds the Consumer Council of Missouri for its work to have HHS reveal the rates in time for consumers to challenge them before they go into effect. We now know that Coventry which insures 137,000 Missourians is proposing rate increases between 18.6 and 28.90%. But we still have no adequate explanation for the increases, only generalities without supporting data or the identity of the actuary. These increases seem illogical given that 1) the least healthy people signed up at the beginning of the ACA in 2014 and a healthier group of people will sign up in 2016; 2) the higher penalties for not buying insurance in 2016 will create a much stronger incentive for young healthy people to sign up and 3) the demand of people who had signed up to have neglected conditions treated has been fulfilled.

With no state rate review process available in Missouri we are counting on you to take an active role in reviewing and challenging excessive increases. Holding hearings would provide consumers the transparency they deserve.

Lise Bernstein, President