October 16, 2014

Jolie Matthews  
National Association of Insurance Commissioners  
44 North Capitol Street NW  
Suite 700  
Washington, DC 20001

Dear Ms. Matthews,

Thank you for the opportunity to submit comments on NAIC’s draft insurance models. As the nation’s leading kidney patient advocacy organization providing financial assistance to patients in need, we are focused on ensuring that individuals with chronic illnesses have access to and can afford health insurance.

AKF is concerned that NAIC’s draft insurance model would financially impact patients with chronic illnesses, including those with End Stage Renal Disease. Individuals with kidney disease often have several co-morbidities including hypertension, diabetes, and cardiovascular disease. These patients rely on care from a variety of doctors and specialists and are on multiple medications. Prohibiting patients from including costs for care from out of network providers toward their annual out of pocket maximum poses major financial challenges. It will take much longer for chronically ill patients to reach their maximum and these patients will ultimately end up paying increased costs for health care. Some patients may have to forego needed care as a result of higher out of pocket costs.

AKF urges NAIC not to approve a model that would exclude patient out of pocket costs when they seek care outside of their care networks. At the very least, we urge you to delay the final draft of these models to allow time for more analysis and feedback. We urge your consideration of these requests because the proposed policy would pose financial challenges for individuals with chronic illnesses, including kidney disease.

Thank you for your consideration of these comments.

Sincerely,

LaVarne Burton  
President and CEO