October 22, 2014


Submitted via email to: Jolie Matthews (jmatthews@naic.org)

Ms. Matthews:

The Coalition of State Rheumatology Organizations (CSRO) is a national organization composed of 26 state and regional professional rheumatology societies formed in order to advocate for excellence in rheumatologic care and to ensure access to the highest quality care for patients with rheumatologic and musculoskeletal disease.

Our patients often have ongoing, serious healthcare needs that may require long-term utilization of expensive medicine. Biologic response modifying agents are available for the treatment of rheumatoid arthritis and other autoimmune diseases and have a significant impact on improving our patients’ quality of life, preventing disability, decreasing morbidity and lowering mortality. However, these treatments can be very expensive.

We are concerned that the recently released Model Regulations by the National Association of Insurance Commissioners (NAIC) would undermine a critical consumer protection provision contained in the Affordable Care Act (ACA). Specifically, the Model Regulations would permit health insurers to exclude from the annual limit “benefits provided out-of-network.”

In light of the well-documented concerns with narrow networks, this language may render meaningless the ACA’s out-of-pocket protection. For those with conditions that require specialty care, it may not be an option to stay in network to obtain the needed medical treatment, especially as networks are predicted to become narrower.

We urge you to rewrite the language on out-of-network cost-sharing so that cost-sharing incurred by a patient who seeks needed care outside of his or her network is applied toward the annual limit on cost-sharing.

Sincerely,

Michael Schweitz, M.D.
President, Coalition of State Rheumatology Organizations