

Support for Establishing Virginia's Exchange as a Quasi-Governmental Entity

From written comments submitted to VHRI. See summary at <http://www.hhr.virginia.gov/Initiatives/HealthReform/docs/WrittenPublicComment1ShortSummary.pdf>

Health Plans:

Virginia Premier - "It is recommended that the State create a not for profit, quasi public HBE entity under the direction of a Board of Trustees, with as much flexibility to run as a business enterprise as possible. The exchange will need to be able to recruit and hire individuals with experience and expertise in the insurance market, information technology, sales, marketing, and customer service. In order to attract individuals to effectively run it so that it will be able to sustain itself after the federal funding ends, the exchange will need some flexibility from state procurement and hiring guidelines."

Kaiser Permanente - "...[R]ecommends a governance structure that is an independent public entity or a quasi-public entity with its own governing board. The governance structure in conjunction with an advisory council, should strike a balance between maintaining a high level of accountability to the citizens of Virginia while benefiting from the expertise of knowledgeable stakeholders. The Exchange board should not be housed in the Department of Insurance since the role of the Department of Insurance should rightly be focused on regulation and insuring the solvency of market participants, not on structuring competition in those markets."

United Health – "We believe that establishing the exchange as an independent public authority (non-profit or quasi-governmental) will both promote transparency and limit politicized decision-making, ultimately benefiting consumers and helping to stabilize the health insurance marketplace."

Other Health Providers / Businesses:

PhRMA – "The governance structure of the [health benefit exchange] HBE will play a significant role in the level of competition that is promoted in the HBE. PhRMA believes that the HBE should be housed in an independent public entity . . . to ensure a mode of recourse for participants. It is essential that the HBE not be housed in agencies where either regulatory or purchasing conflicts of interest may exist."

Va. Community Healthcare Association

Va. Association for Hospices and Palliative Care

Va. Association of Community Services Boards

Patient Services Inc.

Consumer Groups:

Voices for Virginia's Children

American Heart Association

NAMI Virginia

Northern Va. Access to Healthcare Consortium

Legal Aid Justice Center

Virginia Poverty Law Center

Va. Rural Health Association

Commonwealth Institute for Fiscal Analysis

Va. Oral Health Coalition

Virginia Providers / Business Interests Supporting an Independent Non-Profit Exchange

Inova Hospital System

Virginia Hospital and Healthcare Association

National Business Group on Health