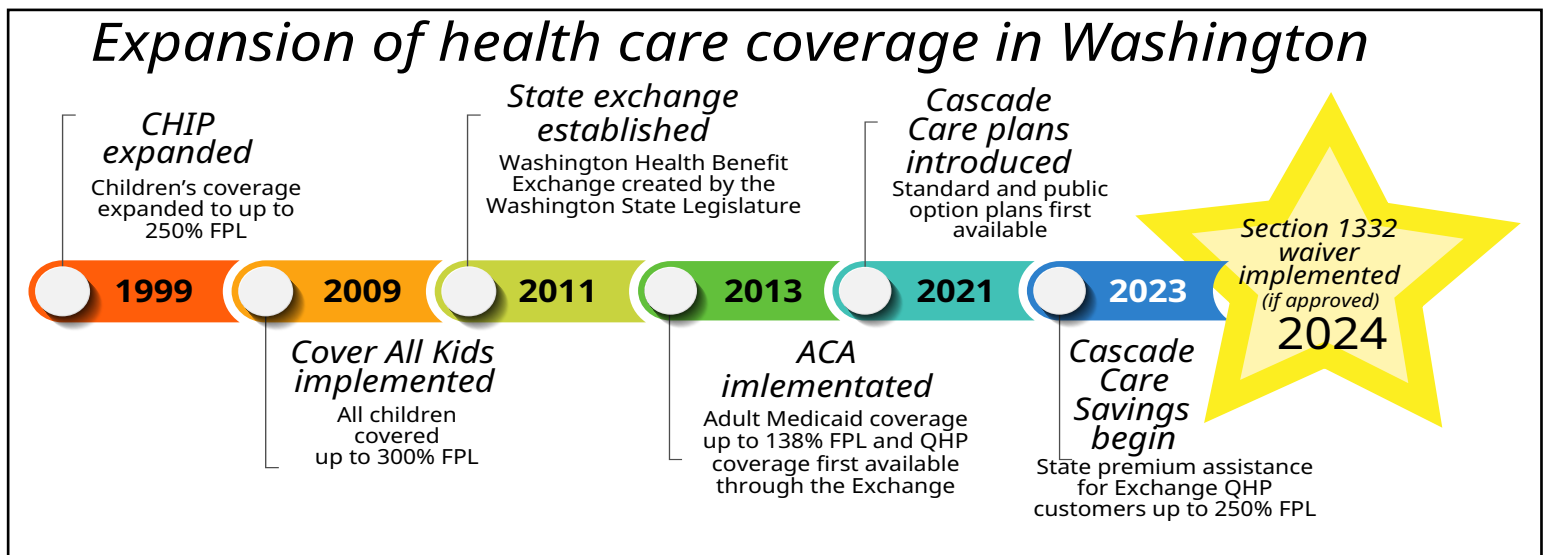




Washington Section 1332 Waiver Application

- The state of Washington has been a leader in exploring innovative ways to increase access, improve quality, and reduce the number of Washington residents who lack coverage.
- On May 13, Washington submitted the Section 1332 State Innovation Waiver that, if approved, will provide access to federally non-subsidized health and dental coverage through *Washington Healthplanfinder* to all Washington residents, regardless of immigration status, starting in plan year 2024.
- The Section 1332 Waiver would also allow newly eligible customers up to 250% FPL to access Cascade Care Savings (state premium assistance starting for plan year 2023).
- The waiver application meets federal waiver requirements by offering comprehensive, affordable coverage to more people without increasing the federal deficit.
- Nearly 25% of Washington’s uninsured population cannot obtain coverage through *Washington Healthplanfinder* due to their immigration status. By decreasing the number of uninsured, addressing health disparities, strengthening the individual market, and improving health care affordability, this waiver takes an important step forward in addressing health equity.

	2024	2025	2026	2027	2028
Premiums	-1.4%	-1.6%	-1.6%	-1.6%	-1.7%
Individual Market Enrollment	1.1%	1.3%	1.3%	1.3%	1.4%
Federal Savings (\$ millions)	\$1.7	\$2.0	\$2.2	\$2.4	\$2.8



More than 105,000 Washington state residents are ineligible for health care coverage due to federal restrictions. Washington's Section 1332 waiver, if approved, will lower that number substantially.

Uninsured Washingtonians			
County	Total Uninsured	Denied Access to Health Coverage Due to Federal Restrictions	
ADAMS	1,402	430	31%
ASOTIN	619	29	5%
BENTON	11,338	3,143	28%
CHELAN	8,123	3,258	40%
CLALLAM	7,025	102	1%
CLARK	26,696	7,925	30%
COLUMBIA	125	-	-
COWLITZ	5,645	835	15%
DOUGLAS	4,957	2,054	41%
FERRY	544	14	3%
FRANKLIN	22,664	6,937	31%
GARFIELD	42	-	-
GRANT	13,557	6,563	48%
GRAYS HARBOR	3,354	1,037	31%
ISLAND	4,583	461	10%
JEFFERSON	2,227	40	2%
KING	111,544	35,801	32%
KITSAP	10,603	869	8%
KITTITAS	3,517	487	14%
KLICKITAT	1,340	193	14%
LEWIS	4,949	539	11%
LINCOLN	337	13	4%
MASON	2,676	804	30%
OKANOGAN	3,528	715	20%
PACIFIC	886	140	16%
PEND OREILLE	904	22	2%
PIERCE	48,226	3,959	8%
SAN JUAN	835	96	11%
SKAGIT	8,737	2,152	25%
SKAMANIA	717	35	5%
SNOHOMISH	54,378	9,840	18%
SPOKANE	30,965	847	3%
STEVENS	3,212	116	4%
THURSTON	16,571	3,108	19%
WAHKIAKUM	147	13	9%
WALLA WALLA	4,609	800	17%
WHATCOM	14,794	351	2%
WHITMAN	2,201	118	5%
YAKIMA	26,621	11,401	43%
Statewide	465,198	105,254*	23%

Source: American Community Survey 2019 1-Year PUMS and Washington State Office of Financial Management adjustment for Medicaid undercount.
*68,625 (65%) of those denied coverage are income-eligible for Cascade Care Savings (state premium assistance).

Broad support for WA's Section 1332 Waiver

A total of **410 comments** were received from: 134 organizations representing health plans, providers, consumer advocates, and others; state and local elected officials; and 365 individuals. More than 400 of the total comments submitted stated strong support.

Advocates

- Economic Opportunity Institute
- Northwest Health Law Advocates
- Northwest Immigrant Rights Project
- American Civil Liberties Union of Washington
- Pacific Islander Health Board
- Colectivo Sin Fronteras de Seattle
- Firelands Workers Action
- The Hispanic Business/Professional Association
- Jefferson County Immigrant Rights Advocates
- Jewish Community Relations Council of the Jewish Federation of Greater Seattle
- Kitsap Immigrant Assistance Center
- Partners for Social Change
- Tri-Cities Immigrant Coalition
- Planned Parenthood Alliance Advocates Washington
- Asian Pacific Islander Coalition
- Asian Counseling and Referral Services
- American Lung Association
- Arthritis Foundation
- Epilepsy Foundation
- Hemophilia Federation of America
- National Multiple Sclerosis Society
- The AIDS Institute
- The Leukemia & Lymphoma Society

Providers

- Washington State Hospital Association
- Washington State Medical Association
- American College of Obstetricians and Gynecologists Washington Chapter
- Washington Association for Community Health

Health insurance carriers

- Association of Washington Healthcare Plans
- America's Health Insurance Plans
- Community Health Plan of Washington
- Kaiser Permanente
- LifeWise/Premera Blue Cross
- Molina Healthcare of Washington
- Regence BlueShield

Labor organizations

- Service Employees International Union 1199NW
- Washington State Nurses Association
- American Federation of Teachers Washington
- Washington State Labor Council
- United Food and Commercial Workers 3000

Broad support for WA's Section 1332 Waiver

Unanimous support from health industry partners

America's Health Insurance Plans (AHIP) writes today to express support for Washington's waiver to allow all Washington residents to purchase qualified health and dental plans (QHPs and QDPs) through the Exchange, regardless of immigration status... AHIP strongly supports this expansion, which will improve the sustainability and affordability for all members of the individual market.

On behalf of the **Association of Washington Healthcare Plans (AWHP)**, representing 13 companies offering health insurance coverage to over 7 million Washington residents, we are writing to offer our enthusiastic support. ... Expedient federal approval ... is needed to ensure system updates and community engagement and outreach efforts can be completed in advance of Plan Year 2024 Open Enrollment...

Hospitals are particularly pleased that this waiver is projected to increase access to primary and preventive care, as well as treatment for chronic disease, reducing preventable hospitalizations. Coverage will also reduce the amount of uncompensated care in Washington by allowing those without another coverage pathway to enroll in a QHP or QDP. Robust health insurance coverage is a crucial component of access to high quality health care.

-Washington State Hospital Association (WSHA)

The Section 1332 Waiver is another step toward expanding access to care, particularly among communities who have been historically excluded... Without affordable health care coverage options, these Washington residents are more likely to have a poor health status from worsened health conditions and forgo care until it becomes an emergency, leading to hospitalization for preventable conditions and more acute illnesses.

-Washington State Medical Association (WSMA)

Advancing equity for Washington residents

Community Health Plan of Washington was formed by Washington's community health centers 30 years ago, specifically to serve individuals who were traditionally denied access to quality health coverage... We support the State's 1332 Waiver application for several reasons, but primarily because it creates equity for our state's residents and helps reduce health disparities across communities.

The **Washington State Nurses Association (WSNA)** appreciates this opportunity to comment in strong support of Washington's Section 1332 Waiver Application draft to improve access to affordable health coverage for more Washington residents... WSNA is a strong supporter of improving equity in our health care system. We believe that this waiver is an important step towards that goal.

On behalf of the **Washington Association for Community Health** [We] write in strong support of the waiver as one of the most promising opportunities to expand health coverage for Washington residents since the passage of the Affordable Care Act. ... Our health centers value innovation, and it is especially crucial now as the pandemic exacerbates already existing disparities.

Local support from across the state

The **Tri-Cities Immigrant Coalition (TCIC)** is a non-partisan community based group working to build trust and understand within our community about the issues facing our Tri-Cities immigrants. ... Many in our community are structurally excluded from affordable health coverage. Left with no recourse, many of these community members currently forego needed care until it becomes an emergency. As you know, without insurance, people are more likely to have poor health status, be hospitalized for preventable conditions and acute illnesses.

We need a health insurance option for all members of our communities, regardless of immigration status. In Washington today, over 100,000 immigrants go without critical health care because they are structurally excluded from affordable health coverage.

-Kitsap Immigrant Assistance Center (KIAC)

Through the waiver and other state policy solutions, Washington will make significant progress toward meeting the basic health care needs of all Washingtonians, which will make every community healthier and our economy stronger.

-Jefferson County Immigrant Rights Advocates

Strengthening Washington's economy

The **Economic Opportunity Institute** is a non-profit, non-partisan think tank that has been advocating for family economic security and affordable health coverage for over 20 years. Expanding immigrant health coverage through pathways such as this waiver is one of our top priorities because we understand that affordable access to health care is a vital component of a well-functioning health care system and a strong economy.

[We] write in strong support of WA Health Benefit Exchange's Section 1322 Waiver Application... When our patients lack coverage, they put off preventative care, decompensate and ultimately enter our health care system sicker with preventable conditions. The costs to our State and our healthcare system are immense, and the costs to patients and families is immeasurable.

-SEIU 1199NW

NoHLA (Northwest Health Law Advocates) has advocated to expand health coverage for all Washingtonians for over two decades:

- The waiver would allow our state to remove federal barriers to health coverage, offering all Washington residents the same opportunity to purchase Qualified Health Plans and Qualified Dental Plans.
- The waiver would also permit our state to invest state funds toward more affordable coverage for low-income residents, with no impact to the federal deficit.
- The waiver would improve health equity, addressing one of the root causes of the disproportionate uninsurance rates and poorer health outcomes many of Washington's communities of color face today.
- The waiver would improve the broader individual insurance market by lowering premiums and reducing application barriers that prevent families from applying for coverage together.