



March 7, 2017

Centers for Medicare & Medicaid Services,
Department of Health and Human Services,
Attention: CMS-9929-P,
P.O. Box 8016,
Baltimore, MD 21244-8016

To Whom It May Concern:

The following comments on the proposed “Market Stabilization” regulation as published February 9, 2017, are submitted on behalf of the members of the National Association of Insurance Commissioners (NAIC), which represents the chief insurance regulators in the 50 states, the District of Columbia, and the 5 United States territories.

General Comments

The members of the NAIC agree with the Administration that stabilizing the individual market in 2018 should be a top priority. In some states the individual health insurance market is struggling and, in a few, it is near collapse. In these states, premium increases, limited plan options, little or no competition, rising cost-sharing, and narrowing networks have combined to create a health insurance market that fails to meet the needs of consumers and is unsustainable. However, in some other states the individual market is robust with increased enrollment and premiums have stabilized. Insurance markets are local, and the different experiences around the country reinforce the need for increased state flexibility and deference.

While the time to comment on this proposed regulation is limited, state regulators understand the need to move quickly. Carriers are already developing plans and calculating rates for 2018, and considering whether they will participate on

Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
March 7, 2017
Page 2

