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Submission Via Email

July 27th, 2016

Mr. Dean Cameron
Director
Idaho Department of Insurance
700 W. State Street – 3rd Floor
Boise, ID 83720

RE: Proposed Rule to Implement the Medicare Supplement Insurance Minimum Standards Model Act

Dear Mr. Cameron,

The National Kidney Foundation (NKF) appreciates the opportunity to comment on the proposed “Rule to Implement the NAIC Medicare Supplement Insurance Minimum Standards Model Act.” NKF is the leading organization in the U.S. dedicated to the awareness, prevention and treatment of kidney disease for hundreds of thousands of healthcare professionals, millions of patients and their families, and tens of millions of Americans at risk. In Idaho, there are approximately 2064 patients with permanent kidney failure known as end-stage renal disease (ESRD). NKF supports this proposal to grant Medicare patients under age 65, whether disabled or ESRD beneficiaries, access to Medigap insurance and to prevent premium differences between those older than 65 and those who are under age 65. NKF also appreciates that this proposal allows those who successfully appeal their denial of Medicare Part B benefits to receive the full six month grace period to enroll in Medigap.

Significant costs can be incurred by Medicare patients that make Medigap coverage necessary. For instance, the inpatient hospital deductible for Medicare under Part A is over \$1,000. Immunosuppressive drugs for kidney transplant recipients are covered under Part B at 80%, but the remaining 20% can cost thousands of dollars out of pocket annually. Dialysis treatments, which are typically needed at least three times weekly, are also covered under Part B at 80%, and the cumulative out-of-pocket expenses can well exceed \$7,000 annually. When kidney patients cannot afford the deductibles and co-payments associated with Medicare, it can have a detrimental effect on their health and access to healthcare.

NKF respectfully urges the Idaho Department of Insurance to finalize this proposal to help patients with kidney failure better afford the health care they need to manage their disease.

Thank you for your consideration.

Sincerely,