MASSACHUSETTS

STATE PLANNING GRANT REPORT

FOR THE HEALTH RESOURCES AND SERVICES ADMINISTRATION, STATE PLANNING GRANT PROGRAM

To:

TOMMY G. THOMPSON, SECRETARY U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES

MARCH 2002



Jane Swift, Governor Commonwealth of Massachusetts Robert P. Gittens, Secretary Executive Office of Health and Human Services

MASSACHUSETTS

STATE PLANNING GRANT REPORT

FOR THE HEALTH RESOURCES AND SERVICES ADMINISTRATION, STATE PLANNING GRANT PROGRAM

To:

TOMMY G. THOMPSON, SECRETARY U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES

MARCH 2002

This report was prepared by staff from the following Massachusetts agencies:

ivision of Health Care Finance and Policy
wo Boylston Street
oston, Massachusetts 02116
17) 988-3100 (Phone)
17) 727-7662 (Fax)
ivision web site: www.mass.gov/dhcfp rant web site: www.mass.gov/hrsa
v 0

TABLE OF CONTENTS

Executive Summary • 8

Section 1. Summary of Findings: Uninsured Individuals • 12

- 1.1 What is the overall level of uninsurance in your State? 12
- 1.2 What are the characteristics of the uninsured? 12
- 1.3 Summarizing the information provided above, what population groupings were particularly important for your State in developing targeted coverage expansion options? 18
- 1.4 What is affordable coverage? How much are the uninsured willing to pay? 19
- 1.5 Why do uninsured individuals and families not participate in public programs for which they are eligible? 19
- 1.6 Why do uninsured individuals and families disenroll from public programs? 20
- 1.7 Why do uninsured individuals and families not participate in employer sponsored coverage for which they are eligible? **20**
- 1.8 Do workers want their employers to play a role in providing insurance or would some other method be preferable? **20**
- 1.9 How likely are individuals to be influenced by:
 Availability of subsidies? 21
 Tax credits or other incentives? 21
- 1.10 What other barriers besides affordability prevent the purchase of health insurance? 21
- 1.11 How are the uninsured getting their medical needs met? 21
- 1.12 What are the features of an adequate, barebones benefit package? 25
- 1.13 How should underinsured be defined? How many of those defined as "insured" are underinsured? 25

Section 2. Employer-based Coverage • 26

- 2.1 What are the characteristics of firms that do not offer coverage, as compared to firms that do? 27
- 2.2 What influences the employer's decision about whether or not to offer coverage? What are the primary reasons employers give for electing not to provide coverage? 31
- 2.3 What criteria do offering employers use to define benefit and premium participation levels? 32
- 2.4 What would be the likely response of employers to an economic downturn or continued increases in costs? **32**
- 2.5 What employer and employee groups are most susceptible to crowd-out? 32
- 2.6 How likely are employers who do not offer coverage to be influenced by: Expansion/development of purchasing alliances? 33
 Individual or employer subsidies? 33
 Additional tax incentives? 33
- 2.7 What other alternatives might be available to motivate employers not now providing or contributing to coverage? **34**

Section 3. Health Care Marketplace • 35

- 3.1 How adequate are existing insurance products for persons of different income levels or persons with pre-existing conditions? How did you define adequate? 35
- 3.2 What is the variation in benefits among non-group, small group, large group and self-insured plans? 38
- 3.3 How prevalent are self-insured firms in your State? What impact does that have in the State's marketplace? **40**
- 3.4 What impact does your State have as a purchaser of health care (e.g., for Medicaid, SCHIP and State employees)? 41
- 3.5 What impact would current market trends and the current regulatory environment have on various models for universal coverage? What changes would need to be made in current regulations? 41
- 3.6 How would universal coverage affect the financial status of health plans and providers? 41
- 3.7 How did the planning process take safety net providers into account? 42
- 3.8 How would utilization change with universal coverage? 43
- Did you consider the experience of other States with regard to: Expansions of public coverage? 43
 Public/private partnerships? 43
 Incentives for employers to offer coverage? 43
 Regulation of the marketplace? 43

Section 4. Options for Expanding Coverage • 44

- 4.1 Which coverage expansion options were selected by the State (e.g., family coverage through SCHIP, Medicaid Section 1115, Medicaid Section 1931, employer buy-in programs, tax credits for employers or individuals, etc.)? 44
- 4.2-
- 4.17 Answers to these questions are included in each approach description. **46-93**
- 4.18 Which policy options were not selected? What were the major political and policy considerations that worked in favor of, or against, each choice? What were the primary factors that ultimately led to the rejection of each of these approaches (e.g., cost, administrative burden, Federal restrictions, constituency/provider concerns)? 94
- 4.19 How will your State address the eligible but unenrolled in existing programs? Describe your State's efforts to increase enrollment (e.g., outreach and enrollment simplifications). Describe efforts to collaborate with partners at the county and municipal levels. 97

Section 5. Consensus Building Strategies • 98

5.1 What was the governance structure used in the planning process and how effective was it as a decision-making structure? How were key State agencies identified and involved? How were key constituencies (e.g., providers, employers, and advocacy groups) incorporated into the governance design? How were key State officials in the executive and legislative branches involved in the process? 98

- What methods were used to obtain input from the public and key constituencies (e.g., town hall meetings, policy forums, focus groups, or citizen surveys)? 99
- 5.3 What other activities were conducted to build public awareness and support (e.g., advertising, brochures, Web site development)? **99**
- 5.4 How has this planning effort affected the policy environment? Describe the current policy environment in the State and the likelihood that the coverage expansion proposals will be undertaken in full. **99**

Section 6. Lessons Learned and Recommendations to States • 101

- 6.1 How important was State-specific data to the decision-making process? Did more detailed information on uninsurance within specific subgroups of the State population help identify or clarify the most appropriate coverage expansion alternatives? How important was the qualitative research in identifying stakeholder issues and facilitating program design? **101**
- Which of the data collection activities were the most effective relative to resources expended in conducting the work? **102**
- 6.3 What (if any) data collection activities were originally proposed or contemplated that were not conducted? What were the reasons (e.g., excessive cost or methodological difficulties)? 102
- What strategies were effective in improving data collection? How did they make a difference (e.g., increasing response rates)? **102**
- 6.5 What additional data collection activities are needed and why? What questions of significant policy relevance were left unanswered by the research conducted under HRSA grant? Does the State have plans to conduct that research? **103**
- 6.6 What organizational or operational lessons were learned during the course of the grant? Has the State proposed changes in the structure of health care programs or their coordination as a result of the HRSA planning effort? 103
- 6.7 What key lessons about your insurance market and employer community resulted from the HRSA planning effort? How have the health plans responded to the proposed expansion mechanisms? What were your key lessons in how to work most effectively with the employer community in your State? 103
- 6.8 What are the key recommendations that your State can provide other States regarding the policy planning process? **104**
- 6.9 How did your state's political and economic environment change during the course of your grant? **104**
- 6.10 How did your project goals change during the grant period? 104
- 6.11 What will be the next steps of this effort once the grant comes to a close 105

Section 7. Recommendations to the Federal Government • 106

- 7.1 What coverage expansion options selected require Federal waiver authority or other changes in Federal law (e.g., SCHIP regulations, ERISA)? **106**
- 7.2 What coverage expansion options not selected require changes in Federal law? What specific Federal actions would be required to implement those options, and why should the Federal government make those changes? **106**
- 7.3 What additional support should the Federal government provide in terms of surveys or other efforts to identify the uninsured in States? **107**

7.4 What additional research should be conducted (either by the federal government, foundations, or other organizations) to assist in identifying the uninsured or developing coverage expansion programs? 107

Appendix I. Baseline Information for Massachusetts • 108

Appendix II. Links to Research Findings and Methodologies • 116

Appendix III. 1999 Discharge Data Analysis – Ages 19-64 • 117

Appendix IV. Massachusetts Employer Data • 128

Appendix V. Principles and Assumptions (guiding the development of policy options) • 137

Appendix VI. Steering and Advisory Committee Members • 138

Appendix VII. 2001 Nongroup Subscriber Health Insurance Survey • 142

Appendix VIII. Findings from A 2001 Survey of Nongroup Health Insurance Subscribers in Massachusetts • 146

Appendix IX. 2001 Survey of Massachusetts Physicians • 149

Appendix X. Findings from a 2001 Survey of Massachusetts Physicians • 154

Appendix XI. DHCFP 2001 Survey of Massachusetts Employers Regarding Health Insurance – Link to Instrument • 157

Appendix XII. DHCFP 2000 Survey of Health Insurance Status of Massachusetts Residents – Link to Instrument • 158

Appendix XIII. Summary of the Nongroup (Individual) Insurance Market in Massachusetts • 159

Appendix XIV. Summary of the Small Group Health Insurance Market in Massachusetts • 162

Appendix XV. Massachusetts Mandated Health Benefits • 166

Appendix XVI. Massachusetts Insurance Resource Guide • 167

Appendix XVII. DHCFP Community Health Center Report • 168

Appendix XVIII. Chapter 140 Legislation Information • 182

References • 183

Endnotes • 186

EXECUTIVE SUMMARY: MASSACHUSETTS

Massachusetts has been one of the leading states in the country in providing health care and health care coverage to uninsured populations. Through MassHealth (Medicaid) expansions, reforms to small group and nongroup markets, and a strong employer base, Massachusetts now has one of the lowest rates of uninsurance in the country. In addition, Massachusetts has a strong safety net of community health centers and hospitals for the provision of care to low income uninsured individuals who are not eligible for, or choose not to enroll in, public insurance programs.

Massachusetts now faces far different circumstances than when work began on this planning grant eighteen months ago. The state and national economies were still strong at that time. Massachusetts had a low rate of uninsurance (5.9%), and was optimistic about reducing it further. With recent events, most notably the September 11th attacks and the economic downturn, Massachusetts policymakers and others have new challenges facing them. Expanding health insurance coverage is challenging in the best of times, and in the coming months it may be equally challenging to maintain the ground gained over the last several years. Nonetheless, we expect that Massachusetts will retain its position as a leader in maintaining and expanding access to health care services and insurance coverage, even in times of economic uncertainty.

Over the past eighteen months, through HRSA grant funding, Massachusetts has had the opportunity to look more closely at the complex issue of health insurance coverage. The grant work can be summarized in four broad phases: consensus building, data gathering and analysis, development of interim recommendations, and continued analysis of viable options. Each of these is discussed briefly below.

Consensus building around this issue in Massachusetts began long before the grant writing process began. All major stakeholders in Massachusetts have been interested in and have played a role in expanding access to affordable health insurance for many years. They continued to have a voice in this area through this grant process at various phases. Consumers, advocates, payers, providers, legislators, and state agencies participated either through the grant's Steering or Advisory Committees, through surveys or focus groups and/or individual interviews. The breadth of involvement of these stakeholders is not unusual for Massachusetts. Broad-based task forces are frequently convened for discussion of important policy decisions in the state. During the early part of this grant, the steering committee developed principles against which policy options would be judged. The following are the principles upon which we built the options that made the most sense for Massachusetts.

- 1) The state should provide equal access to public insurance assistance to people:
 - With the same level of income (as defined by FPL);
 - Regardless of current insurance status; and
 - Regardless of occupation.
- 2) We should be mindful of the impact of our recommendations on the currently insured and on those who purchase insurance on their behalf (e.g. employers, unions, etc).

- 3) To the extent that we propose an expansion of public insurance programs, assistance should be targeted to the most financially needy.
- 4) Model(s) should foster independence and self-reliance.
- 5) Our recommendations should encourage cost and quality-consciousness throughout the health care system.
- 6) The state has a special responsibility to assure access to affordable health insurance for those people who work under contract to the state or for organizations that are primarily dependent on state funding.
- 7) Options or models that would lead to care that is better managed (i.e. improving/maintaining quality while maintaining/lowering costs) should be encouraged.
- 8) Models should reflect the needs/characteristics of the multiple subgroups of uninsured.
- 9) Approaches should build upon existing public and private health insurance financing mechanisms; however, it may be necessary and/or appropriate to recommend changes to existing programs if doing so furthers the goal of expanding access to affordable health insurance.
- 10) The state should maximize the use of federal dollars.
- 11) "The perfect is the enemy of the good."

The data gathering and analysis phase of this grant continues. Thus far, our research has included literature reviews, survey research, and extensive data analysis. With the principles in mind, the team began by researching the myriad of expansion options considered at both the state and federal level over the years. The team researched the current state of the Commonwealth's health insurance marketplace. We developed a characterization of our uninsured population and the employer market through large surveys. Massachusetts conducted its own household surveys in 1998 and 2000 and another round is currently in the field. Grant funding provided resources to perform extensive analysis of these data and to augment the data with specific analyses from the Urban Institute's National Survey of American Families (NSAF). The grant also provided funding for Massachusetts to conduct its first-ever employer survey. While encouraging employers to participate in the survey proved to be more difficult than anticipated, the survey results have been very useful thus far. In addition, Massachusetts conducted two smaller surveys: one of consumers purchasing health insurance in the nongroup market and the other of Massachusetts physicians on the services they provide on a free or sliding-scale basis to uninsured patients.

Once the potential options were researched and preliminary data analysis was completed, the information was synthesized and preliminary recommendations that met the principles and made the most sense for Massachusetts were proposed. These recommendations are still preliminary

in that we have not finished our data analysis and expect to have more refined recommendations in the upcoming months. The recommendations include:

- Continue, and improve, efforts to attain full enrollment of all currently eligible Massachusetts residents into existing public programs;
- Recommend that the federal government provide tax deductibility for the taxpayer's full cost of health insurance for self employed and those without access to employer sponsored health insurance; and tax credits in amounts that would significantly defray the cost of purchasing health insurance, to lower-income people in the same circumstances¹;
- Recommend that the federal government increase allotments to encourage states to further expand SCHIP to parents of children covered through SCHIP when those parents have access to employer sponsored health insurance;
- Recommend that preference be given, in the bidding process for state contracts, to organizations that both offer health insurance and pay for at least 50% of premiums;
- Encourage commercial development of catastrophic insurance plans when combined with medical savings accounts;
- Develop an educational approach to inform consumers of all of their health insurance coverage options;
- Adopt as a long-term objective the redesign of the administrative system supporting eligibility and enrollment activities for all state² programs that would enable people to apply for all social service programs at once through any of multiple points of entry;

We have contracted with The Access Project to conduct our qualitative data collection, mostly through conducting focus groups of selected populations. In addition, we have contracted with Jonathan Gruber to develop a model that can simulate changes in access to both public and private health insurance and project the impact on state expenditures and rates of uninsurance. The following activities are underway and will enable us to complete the analysis of remaining options before our grant ends in September.

- Complete data analysis in order to recommend programmatic changes to the Insurance Partnership to increase the participation of employers and employees;
- Complete the data analysis necessary to make further recommendations for covering those populations for which, through its contracts, the state has a "special responsibility";

10

¹ The state would consider a complementary measure should the federal government take action in this area.

² This would begin with state programs but would eventually involve all public programs (federal, county, municipal, etc.)

- Complete qualitative analyses to learn more about why people currently eligible for health insurance do not apply or enroll in these programs;
- Develop a model that can project the impact (in dollars and number of people affected) of various changes to the public and private health insurance market.

Although we have done a significant amount of work researching options, conducting surveys and performing data analyses, there is still some work remaining. Over the course of the next six months, we will complete these analyses and refine our recommendations. In addition, we hope to be able to provide some insight into the issue of affordability through an empirical analysis we are conducting with our household survey data.

These activities, funded in large part through generous HRSA funding, will enable Massachusetts to be poised for expansion of access to affordable health insurance coverage for all residents of the state in the years to come.

1. SUMMARY OF FINDINGS: UNINSURED INDIVIDUALS AND FAMILIES

In researching the rate and characteristics of the uninsured in Massachusetts, several sources were used, including the Division of Health Care Finance and Policy (DHCFP) 2000 Survey of Health Insurance Status of Massachusetts Residents (data from the 1998 survey were also used). In addition, the Urban Institute's National Survey of American Families (NSAF) findings for Massachusetts (1999), Massachusetts hospital discharge data from the Uniform Hospital Discharge Data Set (1999), eligibility data from individual applications to the Massachusetts Uncompensated Care Pool (2001), and data from outpatient claims of the Boston Medical Center, the state's highest volume hospital provider to the uninsured, were analyzed. Although more heavily used in Section 2, Section 1 also draws upon the findings of DHCFP's 2001 Survey of Massachusetts Employers Regarding Health Insurance and the Massachusetts findings from the Agency for Health Care Research and Quality's Medical Expenditure Panel Survey (IC: 1996-1999). Please see Appendices II – IV and XI-XII for more detailed information, copies or links to the surveys.

1.1 What is the overall rate of uninsurance in your state?

Per the DHCFP's 2000 Survey of Health Insurance Status of Massachusetts Residents (non-institutionalized), the overall rate of uninsurance in Massachusetts for all ages, including the elderly, is 5.9%. This represents a 28% decline from the overall uninsurance rate per the first survey completed in 1998 of 8.2%.

1.2 What are the characteristics of the uninsured?

Income: (Non-elderly)

Household Income	% of the Uninsured	% Uninsured within
(%FPL)		Income
		Group
0-133%	14.4%	12.5%
134-150%	5.8%	11.9%
151-200%	23.0%	14.3%
201-400%	39.1%	8.0%
>400%	17.8%	2.0%
Total/Overall	100.0%	6.5%

Per the Massachusetts 2000 household survey, most Massachusetts uninsured, about 57%, reside in households with incomes greater than 200% of the federal poverty level (FPL). About 20% of the currently uninsured fall below 150% of the FPL.

People residing in low income households (below 200% FPL) experienced the greatest decline in the uninsurance rate since 1998, illustrating the successful enrollment of those eligible into MassHealth (the name for Massachusetts

Medicaid as expanded in 1997 through a Federal Sec. 1115 waiver). For people living in near-poor households (133-150% FPL), the uninsurance rate declined by over 50%, from 27% to 11.9%; and it dropped by nearly 50%, from 23% to 12.5% for individuals residing in poor households (below 133% FPL).

Uninsured adults are almost three times as likely as insured adults to reside in low income households with incomes at or below 200% of the FPL (42% compared to 14.4%). Nearly 86% of insured adults reported residing in households with income above 200% of the FPL.

Most uninsured children (59.7%) live in households with incomes at or above 200% of the federal poverty level. However, uninsured children are more likely than insured children to reside in low income households with income below 200% of FPL, 40.3% versus 25.0%.

Uninsured black, Hispanic and Asian populations disproportionately reside in low income households. The percentage of uninsured Hispanics living in households with incomes above 200% of the FPL has increased from 3% to 17% from 1998 to 2000. The percentage of uninsured blacks living in households with incomes above 200% FPL has decreased by over 75%, from 9% to 2%, between 1998 and 2000.

Information from Uncompensated Care Pool (UCP) Applications: Data from eligibility applications for the UCP in Massachusetts were available for analysis beginning with the second calendar quarter of 2001. The average family income per the applications for the period April through June 2001, was \$10,329 with an average family size of 1.61. The average household income of these applicants was well below 133% of the FPL; most applications stated that the person was ineligible for MassHealth. This data collection process is new. As a result, the data is preliminary and continues to be verified for accuracy.

Age: (Non-elderly)

Age Group	% Uninsured
	within Age
	Group
0-5 years	3.0%
6-18 years	2.9%
19-39 years	11.3%
40-64 years	4.9%
Total/Overall	6.5%

The highest rate of uninsurance in Massachusetts (8.0%) is found among non-elderly adults, 19 to 64 years old. Among all adults, the largest percentage of uninsured adults falls between the ages of 19 and 34 (56%). Persons between the ages of 19 and 24 have the highest rate of uninsurance overall (17%). The 25 to 34 year old population has the second highest rate of uninsurance (10.5%).

The lowest rate of uninsurance in Massachusetts (3.0%) is found among children 18 years old and younger. Most

uninsured children are between the ages of 6 and 18 (68.0%). Between 1998 and 2000, the largest decreases (almost 50% each) in the uninsured by age group were found among the infant (1 year old or younger) and 6 to 12 year old populations. During this same time period, the uninsured rate for 2 to 5 year olds changed only slightly. This group has the highest rate of uninsurance (3.6%) among all children.

Analysis of the 2001 second calendar quarter of UCP applications revealed age demographics consistent with the household survey. Seventy-eight percent of the applicants were between the ages of 19-64, and well over half of those applicants were age 19 to 39.

<u>Gender</u>: According to the Massachusetts 2000 household survey results, 60% of all uninsured are male. The rate of uninsurance among males is 7.8%, among females 5.2%. Interestingly,

however, substantially more females applied for uncompensated care during the period that was analyzed (55% compared to 45%). This finding is notable given that over 60% of uninsured hospital inpatients during 1999 were male.

<u>Family Composition</u>: About 55% of uninsured adults have never been married. Uninsurance rates are the highest for the never married population (16%) and lowest for those who are married (3%).

<u>Health Status</u>: Uninsured adults are more likely than insured adults to rate their quality of health as fair to poor and are less likely to utilize health care services such as doctor visits. While the majority of uninsured children are reported to have good to excellent health, they are still three times more likely to experience fair to poor health than insured children and are less likely to utilize health care services.

Employment Status: The majority of both uninsured (71.7%) and insured (81.9%) adults are employed. The working uninsured, however, are nearly three times as likely to be self-employed as the working insured (29.4% compared to 10.9%). In fact, the percent of working uninsured that reported being self-employed doubled between 1998 and 2000, from 15% to 30%. Also, the working uninsured are less likely to work for the same employer for more than a year, and are less likely to work full-time. Additionally, over 76% of the working uninsured work for small establishments (fewer than 50 employees) compared to 34% of insured workers.

Availability of Private Coverage: Employers (including the military, unions, and professional associations) provide insurance for over 80% of all Massachusetts residents under the age of 65. However, according to data from the DHCFP's 2001 Survey of Massachusetts Employers Regarding Health Insurance, the percentage of employers who offer insurance to their employees varies by establishment size. As of 2001, 95% of employers with greater than 50 employees offer health insurance (and 98.7% of employers with 250+ employees offer it), but only 67% of employers with between 2 and 50 employees offer coverage. A large percentage of uninsured workers work for small establishments and thus, the likelihood of insurance being available to them is substantially lower. The Massachusetts 2000 household survey revealed that only about 25% of all working uninsured reported being eligible for health insurance through their employers. Of the uninsured who are ineligible for health coverage through their employer, 80% reported working for small employers. Of the uninsured who are eligible for health coverage through their employer, about 70% reported cost as the primary reason for being uninsured.

Availability of Public Coverage: About 12% of all Massachusetts residents receive their health insurance coverage through the Commonwealth's Medicaid program, MassHealth. Between mid-1997 and late 2000 MassHealth's enrollment increased by more than 230,000 residents to reach its current level of nearly 800,000 people under the age of 65. There are several different types of MassHealth coverage plans. Each plan has its own set of eligibility rules and benefits, but in general, due to the generous expansions in eligibility criteria over the past several years, public coverage is available to pregnant women, disabled people and all children up to age 19 in households earning up to 200% of the FPL. Depending on employment and parental status, public coverage is available to adults in households earning up to 133% of the FPL, and

premium assistance is available to those with incomes up to 200% of the FPL who work for qualified employers.

<u>Race/Ethnicity</u>: When data from 1998 and 2000 was compared, the proportion of uninsured declined across all race and ethnic categories. Yet, Hispanic and black populations remain disproportionately uninsured (19% and 11%, respectively).

The Hispanic adult population has the highest rate of uninsurance (24.2%). The white and Asian adult populations have the lowest rates of uninsurance, 6.0% and 3.2% respectively. While the rate of uninsurance among black adults has remained relatively constant (17.1% in 1998, 16.2% in 2000), the uninsured rate for white adults has declined by almost one-third since 1998.

Despite having the highest rate of uninsurance among children (5.5%), Hispanic children exhibited the largest decline in the rate of uninsured, experiencing a 47% decrease between 1998 and 2000. White and black children have nearly equivalent rates of uninsurance, 2.7% and 2.8% respectively. The rate of uninsurance among black children has remained relatively constant, while the uninsured rate for white children has declined by almost half since 1998.

Immigration Status: According to the 1999 National Survey of America's Families (NSAF), 86.9% of Massachusetts residents are U.S.-born, 6.4% are foreign-born naturalized citizens and 6.7% are foreign-born non-citizens. Although the survey estimates for insurance status by citizenship for Massachusetts were too small for valid comparison, the NSAF survey does reveal a difference between the 1999 uninsurance rates of U.S.-born adult Massachusetts residents (7.9%) compared to foreign-born adult Massachusetts residents (11.2%). However, Massachusetts' pattern in this regard is not nearly as dramatic as the national picture, in which 32% of all foreign-born adults are uninsured. There is a 14% uninsurance rate for foreign-born naturalized citizens and a 45% uninsurance rate for foreign-born non-citizens.

The 1999 NSAF data also revealed differences in income between U.S.-born and foreign-born Massachusetts residents. Of the foreign-born residents, 28% have family incomes below 200% of the FPL, compared to 16.3% of U.S.-born residents.

Another revealing finding from the NSAF was the breakdown of Massachusetts Hispanic adults into subgroups: 33% of Massachusetts Hispanics are from Puerto Rico as compared to only 12% nationally. Although survey estimates were too low to determine the insurance status of Massachusetts Puerto Ricans, national data reveals that the uninsurance rate for Puerto Ricans is significantly lower (12%) than the rate for all other non-Puerto Rican Hispanics (37%). The large proportion of Puerto Ricans in Massachusetts coupled with the likelihood that their uninsurance rate is comparatively lower than other Hispanic groups may explain the lower overall Hispanic uninsurance rate in Massachusetts as compared to the national rate. However, Hispanics in Massachusetts still have the highest rate of uninsurance among non-elderly adults (17.0% compared to the overall statewide rate for non-elderly adults of 6.5%).

The 1999 NSAF also asked immigrant adults how long they had lived in the United States: less than 3 years, 3 to 10 years or 10 years or more. Sixty-nine percent of Massachusetts immigrant adults have lived in the United States for ten or more years, another 22% have been in the U.S.

for 3 to 10 years and only 8% have been in the U.S. for less than three years. The survey estimates were too small to determine the insurance status of Massachusetts immigrant adults based on length of time in the country, but it is possible to look at the same variable nationally. National survey results indicate a much higher percentage of uninsurance among immigrant adults who have been here for less than 3 years: 51% at less than 3 years, 44% at 3 to 10 years and 25% at 10 years or more. These national findings coupled with the relatively small percent of Massachusetts immigrants that have been in the U.S. for less than 3 years also may contribute to the state's low uninsurance rate.

Geographic Location:

The Massachusetts 2000 household survey researched geographic differences within the state using two approaches. One was to divide the state into 5 regions: Metro Boston, Northeast, Southeast, West and Worcester (located in Central Massachusetts). The other was to oversample 5 urban areas: Boston, Fall River/New Bedford in the Southeast, Lawrence/Lowell in the Northeast, Springfield in the West and Worcester in the central region of the state. The following presents the findings under each approach.

Regional Analysis: To measure uninsurance trends across the Commonwealth, the state was divided into 5 regions: Metro Boston, Northeast, Southeast, West and Worcester (located in Central Massachusetts). Most of the uninsured live in the Metro Boston (32%) and the Southeast (20%) regions of the state. Another 20% reside in the Northeast sector of the state. The lowest percent of uninsured are found in the Worcester and West regions (12% each). Overall rates of uninsurance have declined in each region with the exception of the Northeast, where the rate remained constant since 1998 at 7%. The West saw the largest decline from 9.5% in 1998 to 5.8% in 2000.

Adults: The largest proportion of uninsured adults resides in the Metro Boston (32.2%) and Southeast (23.9%) regions of Massachusetts. The Southeast has the highest uninsurance rate among adults (10.1%).

Children: The largest proportion of uninsured children is also found in the Metro Boston (29.7%) and Southeastern (27.8%) regions of Massachusetts. The Southeast and Worcester areas have the highest percentages of uninsured children, with 4.1% and 4.0% respectively.

<u>Urban Area Analysis</u>: All of the five oversampled urban areas (Boston, Fall River/New Bedford, Lawrence/Lowell, Springfield and Worcester) had uninsurance rates higher than the overall statewide rate of 5.9%, ranging from 7.2% in Worcester to 10.0% in Lawrence/Lowell. A breakdown by age follows:

Percent Uninsured by Age

	All Ages	0-64	19-64	0-18
Boston	8.0%	8.5%	10.1%	4.2%
Fall River/New	9.2%	10.5%	13.1%	5.0%
Bedford				
Lawrence/Lowell	10.0%	10.5%	13.3%	5.2%
Springfield	8.4%	9.5%	12.7%	3.8%
Worcester	7.2%	8.2%	10.1%	3.9%
Statewide Rates	5.9%	6.5%	8.0%	3.0%

The uninsured had lower incomes in each of the five urban areas than the statewide levels. A much higher percent of the non-elderly adult uninsured had incomes below 200% FPL than the incomes of residents statewide:

Percent Uninsured by Income (Ages 19-64)

	Below 200% FPL	Above 200% FPL
Boston	52.6%	47.4%
Fall River/New	61.5%	38.5%
Bedford		
Lawrence/Lowell	52.7%	47.3%
Springfield	65.4%	34.6%
Worcester	50.0%	50.0%
Statewide Rates	42.0%	58.0%

Analysis of the employment status of non-elderly adult uninsured revealed variations among the urban areas, and between the urban areas and the statewide percentage. In comparison to the statewide percentage of 71.7% of non-elderly uninsured adults being employed, Fall River/New Bedford and Worcester had higher percentages employed at 78.9% and 76.5% respectively and Boston, Lawrence/Lowell, and Springfield had lower percentages employed at 70.9%, 67.1% and 68.5% respectively.

Analysis of the uninsured by race reveals different composites in the urban areas than on a statewide basis. Most of the urban areas have higher percentages of blacks and/or Hispanics making up the uninsured populations than statewide.

<u>Duration of Uninsurance</u>: Per the Massachusetts 2000 household survey, over 32% of all uninsured adults were covered by health insurance at one time within the last year, and another 32% were covered at one time within the last decade. A full 30% have never been covered.

Other:

<u>Reasons for Loss of Insurance</u>: Among the most frequently cited reasons for loss of insurance coverage was a change in job status (55%). Another 7% cited the cost of insurance, and 6% responded that leaving school was the reason for a loss of insurance.

Knowledge of Health Plans: More uninsured adults were aware of specific state health programs in 2000 than in 1998. Nearly 86%, compared with 79% in 1998, had heard of the Commonwealth's Medicaid program, MassHealth. Another 43% had heard of "free care" compared with 30% in 1998. Free care refers to the Massachusetts Uncompensated Care Pool, which reimburses hospitals and community health centers for the medically necessary care they provide to low income uninsured and underinsured people.

According to a May 2001 report by the Urban Institute, 70% of Massachusetts parents of low-income children had heard of the Medicaid/SCHIP program, compared to 47% of parents nationally. These parents were also aware that they did not need to be on welfare to qualify for the program's benefits. Massachusetts had the highest level of "basic awareness and understanding" among the states surveyed. ¹

Housing and Economic Hardship: Not surprisingly, the 1999 NSAF survey indicated significant differences between Massachusetts insured and uninsured adults with regard to economic hardship. Massachusetts uninsured adults were found to be twice as likely as their insured counterparts to worry about running out of food and were three times more likely to have been unable to pay their mortgage or rent within the last 12 months.

1.3 Summarizing the information provided above, what population groupings were particularly important for your State in developing targeted coverage expansion options?

The Massachusetts 2000 household survey, combined with the other data sources reported above, revealed several groups that could be targeted. Consistent with recent expansion efforts in MassHealth, we found that most uninsured people in Massachusetts live in moderate-income households (200-400% FPL) and work. Of the working uninsured, 75% were either not offered or were ineligible for employer-sponsored insurance, and the rest simply could not afford it. As a result, it was reasonable to develop options specific to this group.

In addition, the Massachusetts 2000 household survey revealed that over 40% of the uninsured resided in low-income households. Analysis of our free care application data indicated that the low-income applicants who appear to have been eligible for MassHealth based on income were "characteristically" or "categorically" ineligible for public insurance. That is, they were not pregnant, disabled, HIV positive, children or did not belong to some other "category" that would enable them to qualify. This group presents an opportunity to examine what changes could be

made to the eligibility requirements of public insurance programs to better cover our most financially needy. There may also be some outreach opportunities in this group, particularly targeted at minority populations. However, one must note that the state is still in the early stages of free care application data collection, therefore the results are preliminary and may change.

DHCFP data revealed that minorities were disproportionately uninsured and 1999 NSAF findings indicated that the state's immigrants were as well. Therefore, it was apparent that any option that was developed needed to include an outreach component specifically targeted at minority and immigrant groups in the urban areas in which they most likely live.

1.4 What is affordable coverage? How much are uninsured willing to pay?

A number of methodologies were explored in the process of defining affordability. The average amount Massachusetts residents are paying for health insurance as an indicator of affordability was pursued², as was using state employee premiums as a benchmark.³ A report by The Commonwealth Fund, which suggested that premiums should total no more than 5% of a poor or near poor family's income also was reviewed.⁴ In addition, data gathered in the Massachusetts 2000 household survey was examined to extract information regarding the willingness of the uninsured to pay for coverage.

Per the Massachusetts 2000 household survey, almost 83% of all uninsured adults are willing to pay something for low cost health care coverage. Of those willing to pay, 57% are willing to pay less than \$100 per month for coverage and another 43% would pay \$100 or more per month for coverage. When examining those willing to pay for care by household income, only 24% of the low-income uninsured (below 200% FPL) are willing to pay \$100 or more per month for coverage. In contrast, 50% of uninsured individuals with incomes over 200% FPL are willing to pay \$100 or more per month for coverage. These data are preliminary and based on a relatively small sample size. As a result, follow-up research activities are necessary.

Qualitative research, such as focus groups and comprehensive literature reviews (beyond what has already been completed), of the target population will be performed to further explore the issue of affordability and willingness to pay. The Access Project will provide assistance in this effort. The Access Project is a Robert Wood Johnson funded initiative that operates in partnership with Brandeis University's Heller Graduate School and the Collaborative for Community Health Development. The project seeks to improve access to health care and coverage for the uninsured. It is hoped that these research efforts will provide more information about the amount low-income individuals and families are currently paying for health care and what they believe is affordable.

1.5 Why do uninsured individuals and families not participate in public programs for which they are eligible?

Data collection and qualitative research are currently being performed in coordination with The Access Project.

1.6 Why do uninsured individuals and families disenroll from public programs?

Data collection and qualitative research are currently being performed in coordination with The Access Project.

1.7 Why do uninsured individuals and families not participate in employer sponsored coverage for which they are eligible?

Per the Massachusetts 2000 household survey, of the 25% uninsured that reported being eligible for health insurance through their employer, 70% reported cost as the primary reason for being uninsured.

In addition, the literature overwhelmingly cites cost as the primary reason health care coverage is declined by eligible employees. However, there are other factors that influence an employee's decision to decline coverage. According to a 1996-97 household survey performed by the Center for Studying Health System Change, individual preferences, age, race, level of educational attainment and family composition, in addition to cost, are also potential determinants in the decision to accept or refuse employer-sponsored coverage.⁵

Individuals that identified themselves as strong risk-takers were more likely to decline coverage, as were young adults ages 18 to 24. This may have resulted from the young adults' perception that health care would not be utilized enough at such an age to justify the coverage costs. Blacks and Hispanics were more likely to decline coverage, even when researchers controlled for socioeconomic status. The authors attributed this to possible cultural reasons or lower average educational attainment. It is worth noting that jobs available to those with high school diplomas versus college degrees may offer less generous health care benefits. Finally, when family composition was analyzed, single individuals without children were the most likely to decline employer-sponsored coverage.

A May 2001 report by the Urban Institute explored why children who were Medicaid or SCHIP eligible were not enrolled in these programs. The report revealed that the most common reason these children were not enrolled was due to parents' "knowledge gaps". Parents lacked information and as a result assumed that their children were not eligible for the programs. It is evident that the dissemination of accurate information is necessary to ensure that the greatest number of children are covered.

Data collection and qualitative research are also being performed in coordination with The Access Project.

1.8 Do workers want their employers to play a role in providing insurance or would some other method be preferable?

Data collection and qualitative research are currently being performed in coordination with The Access Project.

1.9 How likely are individuals to be influenced by availability of subsidies? Tax credits or other incentives?

Data collection and qualitative research are currently being performed in coordination with The Access Project.

1.10 What other barriers besides affordability prevent the purchase of health insurance?

A number of barriers that prevent the purchase of health insurance were revealed in the Massachusetts 2001 employer survey. In addition to lack of affordability, offer rates, establishment size, and characteristics of an organization's workforce (employee income and part-time status) were factors that impacted the ability of employees to purchase health insurance. Of the Massachusetts establishments surveyed, 69% offer health insurance, the remaining 31% do not. Therefore, a number of employees may simply not be offered insurance at their place of employment. Also, the size of the establishment where one is employed may determine whether insurance is offered. Smaller employers (50 or fewer employees) are less likely to offer insurance than larger employers (more than 50 employees), 67% versus 95%. In addition, establishments with a large number of low-wage workers (earning less than \$40,000 annually) are less likely to offer health insurance to their employees. Part-time employees are frequently excluded from coverage programs. Of employers offering insurance, 46% stated that part-time employees were not eligible for coverage programs. Affordability remains the greatest barrier to the purchase of health insurance, which was supported by employer survey findings and the literature reviewed.

Data collection and qualitative research are currently being performed in coordination with The Access Project to identify other potential barriers to the purchase of health insurance.

1.11 How are the uninsured getting their medical needs met?

Adults:

According to the results of the Massachusetts 2000 household survey, there remain distinct differences in the utilization of health care services among uninsured and insured adults. While most uninsured adults (58.8%) and insured adults (73.4%) reported needing medical care in the past 12 months, insured adults were 26% more likely to seek this care than were uninsured adults. Almost 60% of uninsured adults paid out-of-pocket for the most recent medical care they sought. Another 21% of uninsured adults received their care through a financing mechanism called the Uncompensated Care Pool (UCP). The UCP reimburses hospitals and community health centers for the medically necessary care they provide to low income uninsured and underinsured people.

Outpatient Visits: Insured adults were almost twice as likely to visit a doctor than uninsured adults (84.6% versus 46.8%, respectively). Nearly 80% of insured adults made between one and ten visits to the doctor in the last year compared with only 43% of uninsured adults. While only a small percentage of all adults visited the emergency room in the last year,

uninsured adults (32.2%) were more likely to make one or more visits than insured adults (25.3%). It is striking that even when the rate of emergency room utilization is comparable for insured and uninsured adults (24% vs. 29% making 1-4 visits/year), insured adults are far more likely to visit a physician in an office setting. Since physician office visits are traditionally less costly than emergency room care, these findings suggest that the uninsured either lack access or opt not to access a continual source of health care due to barriers such as cost.

Dental Visits: Uninsured adults were less likely to visit the dentist than were insured adults (46.1% compared to 83.3%).

Hospitalizations: An analysis of the 1999 Massachusetts Uniform Hospital Discharge Data Set (UHDDS) for non-elderly adults revealed similarities as well as differences between the uninsured and insured populations for hospital inpatient visits. Overall, the proportion of non-elderly hospitalized adults who were uninsured (8%) was consistent with the Massachusetts state survey findings on the percent of non-elderly adults who are uninsured (also 8%).

- The average charge per hospitalization, however, differed between the two groups, with both the mean and median charges for uninsured hospitalizations well below that of the insured (\$10,514 vs. \$13,361 and \$6,415 vs. \$7,653 respectively).
- Of total charges, the uninsured discharges represented only 6.5% of the total dollars, although they represented 8% of the discharges.
- An analysis of length of stay found little difference between the uninsured and the insured (after excluding outliers, a mean of 4.2 days for the uninsured vs. 4.6 days for the insured and a median of 3 days for both).
- The nature of the admissions differed. An examination of the top ten DRGs (diagnosis related codes) for each group, excluding pregnancy related diagnoses and mental hospital discharges, showed both groups' lists being headed by psychoses; the number two and three spots, however, were decidedly different. Where uterine procedures and chest pain took those spots for the insured, opioid abuse and alcohol abuse were second and third for the uninsured (chest pain was fourth).
- The percentage of hospitalizations of the uninsured that were preventable (ambulatory care sensitive conditions) was only slightly higher than for the insured (12% compared to 10%). The preventable hospitalization rate per the population was much lower for the uninsured (7 per 1000 compared to 8.9 per 1000), perhaps substantiating the difference in care-seeking behavior between the two groups.
- As might be expected, the source of admission for the uninsured was more likely to be the emergency room (53% of uninsured hospitalizations compared to 39% of insured hospitalizations).
- The percent of hospitalizations that were categorized as "elective" was much lower for the uninsured than for the insured (13% compared to 24%).
- Also, as might be expected, a greater percentage of the uninsured were "discharged to home" (81% vs. 72% of the insured) than to another health care facility.
- Finally, an interesting difference was detected upon analysis of gender. Sixty-two percent of uninsured hospital inpatients were male, which was similar to the findings

in the Massachusetts 2000 household survey. However, the gender breakdown of insured patients was fairly even with only 49% male.

These utilization trends are significant considering the slightly higher number of uninsured adults with chronic or specific medical conditions or disabilities. About 13% of uninsured adults reported having a medical condition or disability; such as, back or neck problems or eye complications, compared with only 10% of insured adults. Slightly fewer uninsured adults reported a chronic medical condition lasting 3 months or longer that requires monitoring, than did insured adults (23.9% compared with 29.2%, respectively). Insured adults were one and a half times more likely to make visits to the doctor for a particular chronic medical condition than were uninsured adults. Furthermore, only 43% of uninsured adults, compared with 78% of insured adults, have taken a prescription for this condition in the past 3 months. Detailed tables compiled from the analysis of the 1999 UHDDS can be found in Appendix III.

Children:

Per the Massachusetts 2000 household survey, while about the same percentage of uninsured children (73.8%) as insured children (76.1%) reported needing medical care in the past 12 months, uninsured children were twice as likely not to receive this care. For the most recent medical care sought, 27.3% of uninsured children had their care paid for through the Uncompensated Care Pool, suggesting that cost is a likely barrier.

Despite physician recommendations, uninsured children were less likely to visit a doctor than insured children (34.2% versus 11.7%, respectively). Over 80% of insured children made between one and ten visits to the doctor in the last year, compared to only 60% of uninsured children. While only a small percentage of all children visited the emergency room in the last year, the percentage of uninsured children (29.2%) that made one or more visits was similar to that of insured children (27.8%). Since emergency room services are not viewed as a "regular" source of care, it is interesting to note that the percentage of uninsured children visiting emergency rooms is comparable to that of insured children. This is especially striking since the percent of visits made to physicians by uninsured children is dramatically lower than the percent of visits made by their insured counterparts.

Consistent with national findings and similar to uninsured adults, uninsured children, age 3 and older, were also less likely to visit the dentist than were insured children. Almost 20% of uninsured children, compared to 12% of insured children, did not visit the dentist in the past year.

The overall trends in health care utilization by uninsured children, like uninsured adults, are particularly disconcerting considering the slightly higher number of uninsured children with chronic or specific medical conditions or disabilities. About 13% of uninsured children reported having a medical condition or disability, such as asthma or attention deficit disorder, compared to only 7% of insured children. About 16% of uninsured children have a chronic medical condition lasting 3 months or longer that requires monitoring, compared to 14% of insured children. Uninsured children are less likely to receive treatment for the particular

condition than are insured children. Fifteen percent of uninsured children versus only 1% of insured children did not visit a doctor in the past three months for their condition. Similarly, 44% of uninsured children compared with 32% of insured children did not fill a prescription for this condition in the past 3 months.

Analysis of a Local Population's Outpatient Visits:

Boston Medical Center (BMC) is the highest volume hospital provider to the uninsured in Massachusetts. BMC accounted for 26% of the total charges submitted to the Uncompensated Care Pool by hospitals for Pool Year 2000. BMC served on the Advisory Committee of this grant and made their outpatient data available for limited analysis. BMC provided several spreadsheets based on outpatient claims for four payer categories that represented uninsured patients. The four payer categories were "self-pay," "homeless," "CareNet," and "free care." [Free care represents those charges eligible for reimbursement to the hospital by the state's Uncompensated Care Pool; CareNet is a managed care program administered by BMC for uninsured patients ineligible for Medicaid which is funded by the Uncompensated Care Pool.]

BMC outpatient data was analyzed to learn which health services the uninsured sought on an outpatient basis. BMC provided demographic data by payer category and the top ten areas of health service activity by number of visits for the fiscal year October 1, 1999 through September 30, 2000. It should be noted that the data were supplied by one service provider for one year, providing a limited snapshot of activity.

Interestingly, in contrast to the higher percentage of adult males than females without insurance per the Massachusetts 2000 household survey and an even higher percentage being admitted to the hospital per the discharge data, the BMC data revealed a higher percentage of adult females seeking care in an outpatient setting. Consistent with other data sources, most of the patients, 65.8% at BMC, were single. The majority of the patients listed English as their primary language (62.4%), followed by Spanish (12.4%), Haitian (5.4%), Portuguese (2.6%), Port Creole (0.9%), and Arabic at (0.7%). For those reporting their race/ethnicity, 42% were black, 17% were Hispanic and 16% were white.

Total visits for all four payer categories were combined and ranked by most utilized service area:

Most Utilized Ser	vice Areas	Total Visits	% of Total Visits
Primary Care		22,277	8.7%
ER		17,765	6.9%
Urgent Care		14,130	5.5%
Dental		14,116	5.5%
Pediatrics		12,137	4.7%
Women's Clinic		11,333	4.4%
Physical Therapy		7,134	2.8%
Family		6,604	2.6%
E Specialties ⁷		6,461	2.5%
Laboratory		5,307	2.1%
All other		<u>138,354</u>	<u>54.1%</u>
	Total Visits:	255,618	100.0%

A break down of service area ranking by payer category (self-pay, homeless, CareNet, and free care) revealed some differences among the groups. For example, for both the homeless and free care categories, dental visits topped the lists. For the self-pay group, emergency room visits were the highest, making up 11.2% of visits.

Physical therapy had the highest number of visits per patient at 3.2. The Women's Clinic and the Family Clinic had the second largest number of visits per patient at 2.0 each, and the Primary Care Clinic had the third largest number of visits per patient at 1.5.

1.12 What are the features of an adequate, barebones benefit package?

The Commonwealth of Massachusetts does not specifically define which benefits should be in a so-called "adequate" benefit package; however, the state has a number of general laws requiring insurers operating in specified markets to cover certain health care benefits. The laws regulate services and supplies, providers, contracting arrangements, eligibility requirements, and prohibit discriminatory practices against providers and the insured. Please see Appendix XV for the Massachusetts Division of Insurance's complete list of laws pertaining to mandated benefits. In addition, the nongroup health insurance market is regulated by the stipulations outlined in the Massachusetts Nongroup Law of 1996, which requires that a minimum set of standard benefits be covered by insurance carriers offering a nongroup product. Please see Section 3 for more detail on nongroup and small group insurance benefits.

Data collection and qualitative research are also being performed in coordination with The Access Project on this issue.

1.13 How should underinsured be defined? How many of those defined as "insured" are underinsured?

Data collection and qualitative research are currently being performed in coordination with the Access Project on this issue.

SECTION 2. SUMMARY OF FINDINGS: EMPLOYER-BASED COVERAGE

The purpose of this section is to document your state's research activities related to employer-based coverage: (1) what is the state of employer-based coverage? (2) how was the information obtained (surveys, focus groups, etc.)?; and (3) how are the findings reflected in the coverage options that have been selected (or are being considered) by the state?

In an effort to gain an understanding of how the rising cost of health insurance affects the purchasing behavior of employers, employees and their families, the Division of Health Care Finance and Policy (DHCFP) developed an employer health insurance survey of private-sector Massachusetts establishments conducted by the University of Massachusetts Center for Survey Research. 1014 private-sector establishments were surveyed during 2001. The sample, from Dun and Bradstreet, was randomly selected and stratified by size of establishment. All federal and state government agencies and town government offices including legislative offices and direct functional agencies such as police and fire were excluded. All schools were classified as educational, not governmental; therefore, they were included in the sample along with public libraries. The survey was primarily administered by telephone, however if an employer was unavailable after multiple attempts by phone, the survey was mailed to them to try to elicit a response. Please see Appendix XI for a link to the survey instrument.

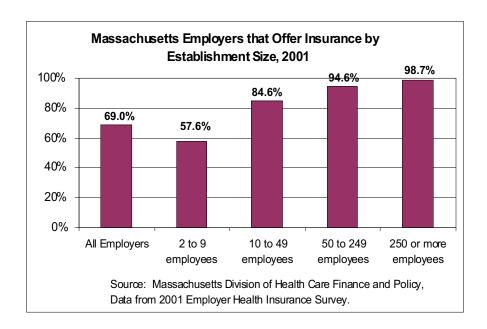
For additional information on the employer market in Massachusetts, the state examined employer-sponsored health insurance data from 1996 through 1999 collected by the Agency for Healthcare Research and Quality's Medical Expenditure Panel Survey (MEPS) of private-sector employers in Massachusetts. MEPS data acts as a supplement as well as a point of comparison to the state's own data. Appendix IV includes much of the analysis from the MEPS data. In addition, Appendix IV provides some information from the Massachusetts Division of Employment and Training regarding the number of establishments in the state by firm size and the number of employees in establishments by firm size.

<u>Note</u>: The data cited in Section 2, unless otherwise indicated, are derived from <u>final</u> results of the DHCFP 2001 Survey of Massachusetts Employers Regarding Health Insurance. Neither the MEPS data nor the Massachusetts 2001 employer survey data include people who are self-employed without any employees. Therefore, the smallest employer size for both surveys is two.

2.1 What are the characteristics of firms that do not offer coverage, as compared to firms that do?

<u>Note:</u> The Massachusetts 2001 employer survey is a survey of private-sector establishments in Massachusetts, therefore all data pertains to a single location as opposed to a firm.

Employer size: 2001 data show that 69% of the private-sector employers in the Commonwealth of Massachusetts offer insurance coverage to their employees. Generally, employers that do not offer insurance coverage have fewer employees. Only 67% of employers with 50 or fewer employees offer insurance, whereas 95% of employers with greater than 50 employees offer it. When employers are placed into even smaller size categories, as in the graph below, the difference in offer rates by employer size is even more pronounced.



The two most common reasons small employers (2 to 50 employees) gave for not offering coverage were that insurance premiums were too high (65%) and that most employees were covered under other plans such as Medicaid, or through a spouse (60%).

MEPS data indicated that in 1998, 63.9% of Massachusetts employers offered coverage and in 1999 that number increased slightly to 65.7% (the same percent as this year's data show).

<u>Industry sector</u>: Coverage rates vary by industry. The 1999 Medical Expenditure Panel Survey (MEPS) found that only 54.5% of Massachusetts employers in the agriculture, fishing, forestry and construction industries offered insurance, while 89.2% of the employers in the manufacturing and mining industries offered it. Sixty-six percent of employers in the retail/other industries offered coverage, while 60.4% of employers in the services industry offered it.

Employee income brackets: Data from MEPS and the preliminary data from the Massachusetts 2001 employer survey show that in Massachusetts there is a relationship between the wage of employees and whether or not the employer offers coverage. Employers with a large number of low-wage workers are less likely to offer health insurance coverage. Those with a greater percent of high-wage workers (defined as more than \$40,000 per year) are more likely to offer health insurance to employees. Data from the MA employer survey cannot be used to provide more specific results.

In addition, 1999 MEPS data show that 52.3% of employers with 50% or more low-wage employees (defined as employees who make \$6.50 per hour or less) offer health insurance and 65.2% of employers with less than 50% low-wage employees offer insurance.

Percentage of part-time and seasonal workers:

Preliminary data from the Massachusetts 2001 employer survey found that 46% of employers that offer coverage do not offer it to part-time employees. Fifty-seven percent of employers who do not offer insurance to certain types of employees (e.g. part-time, seasonal, temporary, etc) answered that part-time status was the most common reason for an employee not to be offered health coverage.

Type of	Offered	Not	No such
Employee	Coverage	Offered	Employees
		Coverage	
Part-time	30.8%	46%	22.9%
Temporary	3.4%	38.7%	57.6%
Seasonal	3.3%	26.7%	70.5%
Hourly	64.9%	12%	22.5%
Union	70.8%	7.6%	19.9%

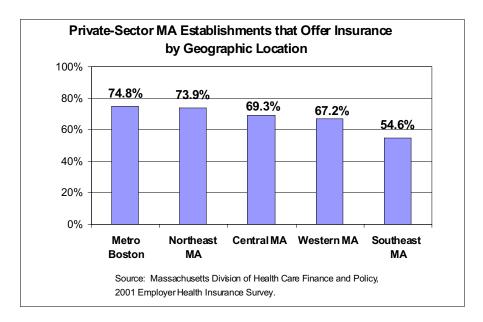
The survey also asked respondents how many hours an employee must work to be eligible for health insurance, and results indicate that employers require employees to work an average of 30 hours per week to be eligible.

The Massachusetts 2001 employer survey did not differentiate between part-time and full-time employees when asking how many workers were employed by the organization (the two were combined). However, MEPS data show that in 1999, 71.1% of Massachusetts employers with 75% or more full-time employees offered health insurance but only 43.3% of employers with 50% or fewer full-time employees offered it. These findings illustrate that it is more likely for an employer with a large percent of full-time employees (and therefore fewer part-time, seasonal or temporary employees) to offer health insurance than an employer with fewer full-time and more part-time staff.

(Please see Appendix IV for MEPS data on the percent of part-time and full-time employees who are offered health coverage in Massachusetts.)

<u>Geographic location</u>: In order to examine employer-sponsored insurance coverage by geographic location, Massachusetts was divided into five regions (Metropolitan Boston, Northeast Massachusetts, Southeast Massachusetts, Western Massachusetts, and Central Massachusetts). It is important to note that the sample of employers for the survey was only stratified by the size of the establishment, not by geographic location. Therefore, since the largest concentration of businesses in Massachusetts is in Metropolitan Boston, there are more employers in the sample from that region.

The Massachusetts 2001 employer survey found that employers in Metropolitan Boston and Northeastern Massachusetts are most likely to offer health insurance coverage to employees and employers in the Southeast region are the least likely. According to the 2000 Massachusetts household survey, the Southeast also has the highest rate of uninsurance of people aged 0 to 64 at 8.2%.



Metropolitan Boston was found to have a slightly higher percent of employers offering insurance than the rest of the state as a whole (74.8% versus 66%).

Age: In general, the Massachusetts 2001 employer survey found that there is virtually no difference in the age of employees working for employers that offer insurance versus employers that do not offer insurance. Approximately the same percent of workers aged 55 and older work for employers that do and those that do not offer insurance.

The data were also examined to determine whether a correlation exists between age of employees and the size of establishment in which they worked. There was no difference found

in age of employees between establishments with fewer than 50 employees and those with 51 or more.

Gender: The Massachusetts 2001 employer survey found that the proportion of males and females working for employers that offer insurance is the same as the proportion of males and females working for employers that do not offer insurance. The data also show that there is no correlation between the gender of employees and the size of the employer where employed.

Cost of policies: Employers reported that the average annual premium cost of single (individual) health insurance coverage for employers' most popular insurance plan (the plan with the most enrollees) increased by 19% from twelve months ago. Last year the average annual premium cost for single coverage under the most popular plan was \$2,985, while this year that annual premium was \$3,545. The survey found that the average premium for family coverage under the employers' most popular plan rose by 15% from twelve months ago, a significant jump from \$6,686 to \$7,716. (For the purposes of this premium cost examination, a family has four members.)

Level of contribution: Generally, the survey found that employees pay a larger portion of family coverage than they do for single (individual) coverage. Employers kept the employee share of the premium for individual coverage constant from the prior year at 19% of the total premium. This year, employees paid an average of \$669 per year for single coverage, while last year employees paid an average of \$578 per year for single coverage. Therefore, those employees with individual coverage only absorbed a small amount of the premium increase.

However, the employee share of the premium for family coverage increased from twelve months ago, from 25% to 27% of the total premium. The employee absorbed more of the premium increase for family coverage. This year, employees paid an average of \$2,074 per year for family coverage, while twelve months ago employees paid an average of \$1,670 per year for family coverage.

According to 1999 MEPS data, 42.5% of all Massachusetts establishments that offered coverage offered at least one plan for single coverage that required no employee contribution, and 31% of establishments offering coverage offer at least one plan for family coverage that requires no employee contribution. It is interesting to note that employers with fewer than 50 employees are more likely to offer a plan with no employee contribution required (55.9% offer one for single coverage and 43.1% offer one for family coverage) than employers with 50 or more employees (only 16.7% offer one for single coverage and 10.7% offer one for family coverage).

MA employer survey data showed similar results. Forty percent of all establishments cover 100% of premium costs for individual coverage while 32% of all establishments cover 100% of premium costs for family coverage. The Massachusetts survey also found that smaller employers (with 2-49 employees) are more likely to cover 100% of insurance premiums (45% for individual and 36% for family). Of employers with 50 or more employees, 11% cover 100% of premium costs for individual coverage and 9% cover 100% of premium costs for family coverage.

Percentage of employees offered coverage who participate: The Massachusetts 2001 employer survey found that 77% of employees who are eligible for employer-sponsored coverage actually enroll in that coverage. Most (85%) of the employers answered that the take-up rate has remained constant over the past three years. Approximately twenty percent of employers offering coverage require an employee to provide proof of coverage from another source before they are allowed to refuse the coverage offered by the employer.

<u>Waiting period</u>: More than half of all employers that offer insurance coverage (58%) have a waiting period before new employees are covered by health insurance. Approximately two-thirds (65%) of employers with a waiting period have one that is greater than one month.

2.2 What influences the employer's decision about whether or not to offer coverage? What are the primary reasons employers give for electing not to provide coverage?

The Massachusetts 2001 employer survey specifically asked employers the reasons that influenced their decision not to offer health insurance. High premiums were the most common reason an employer gave (64.9% of employers called this reason "very important" in the employer's decision to not offer coverage). Employees being covered under other plans (such as through a spouse, union or Medicaid) ranked second in employers' decisions not to offer coverage (60%). The fact that most employees are part-time, temporary or seasonal ranked third (42% of employers named this as very important in making their decision to offer coverage).

The following table lists the possible reasons for not offering insurance and the percent of employers answering how important the reason was in their decision not to offer insurance coverage. The reasons are listed in the order of the highest percent of employers responding "very important" to the lowest.

	Very Important	Somewhat	Not Important
		Important	At All
Premiums are too high	64.9%	13.1%	18.1%
Employees generally covered under	59.8%	17.2%	20.9%
other plans (spouse, Medicaid,			
union, etc)			
Most employees are part-time,	42.3%	11.3%	43.7%
seasonal, temporary, etc.			
Financial status of organization	39.8%	15.5%	42.3%
prohibits it at this time			
Can attract good employees without	16.8%	21.2%	57.6%
offering coverage			
Organization is too newly	15.3%	6.9%	76.2%
established			
Employee turnover too high	16.3%	18.7%	60.6%
Providing coverage is an	13.4%	10.8%	72.9%
administrative hassle			
Either past negative claim or	8.0%	3.1%	84%
catastrophic cost			

2.3 How do employers make decisions about the health insurance they will offer to their employees? What factors go into their decisions regarding premium contributions, benefit package, and other features of the coverage?

Many of the benefit decisions made by employers are influenced by their finances and with the downturn in the economy many businesses are cutting benefit costs. Now, we're seeing more employers increasing co-payments and coinsurance for employee health care since it saves the employer money. Employers also want their benefits to be competitive with other organizations to enable them to attract high-quality employees.

2.4 What would be the likely response of employers to an economic downturn or continued increases in costs?

Currently, the entire country is experiencing an economic downturn and premium costs are on the rise. The state has seen some employers pass on more health insurance and health care costs to employees by raising the employee premium contribution and also increasing co-payments, coinsurance and deductibles that employees pay. The Massachusetts 2001 employer survey asked whether employers have changed the overall design of their most popular health plan over the past twelve months to expand benefits, reduce them, or install certain cost-control measures. The survey found that 28% of all employers offering insurance increased the co-payment for physician services. Of all employers offering insurance, 37% answered that they had introduced a new pharmacy co-payment structure, such as a tiered structure, as a cost control measure (no difference in answer by size of employer). Only 4% of employers answered that they reduced benefits over the past year, while 11% answered that they had increased benefits.

The state has not completed other research in this topic area, although it is anticipated that if the economy continues to decline and costs continue to rise, more employers would pass on at least some of the additional costs to their employees.

2.5 What employer and employee groups are most susceptible to crowd-out?

Employers with a large number of low-wage employees are most susceptible to crowd-out because their employees might become eligible for state and/or federal programs designed for low income residents. The challenge for policymakers is to create an environment that encourages private-market coverage, perhaps by partially subsidizing low-wage employees and employers, while possibly expanding eligibility for some public programs. By doing so, hopefully only those with low incomes and without access to other coverage (such as employer-sponsored insurance) would enroll in a new or expanded program, thereby limiting crowd-out.

Massachusetts already has a program called the Insurance Partnership (IP), which makes health insurance more affordable for qualified small businesses (those with 50 or fewer employees who cover at least 50% of the premium cost) and their employees. Massachusetts is examining this program closely to determine whether changes to this program are warranted. (Please see Section 4.)

Focusing on sustaining and increasing the rate of employer-sponsored coverage while simultaneously widening eligibility requirements for certain public programs would provide a needed balance. By concentrating on both, hopefully low-wage earners will be encouraged to enroll in employer-sponsored insurance with the help of subsidies instead of pursuing coverage through a public program. (For more information on the Insurance Partnership, please see the following website: www.state.ma.us/dma and click on Information for Businesses).

2.6 How likely are employers who do not offer coverage to be influenced by expansion/development of purchasing alliances, individual or employer subsidies, additional tax incentives, etc?

Only 19.1% of employers not currently offering insurance had offered health insurance to employees at some point in the past. Only 11.2% of the employers not currently offering coverage responded that it was "very likely" that they would begin to offer coverage during the next two years, whereas 56.2% responded that it wasn't likely at all (26.9% answered "somewhat likely"). Therefore, one might assume that a fairly significant change in the insurance market or the economy would have to take place for them to start offering coverage.

Expansion/development of purchasing alliances?: Purchasing alliances are not likely in Massachusetts due to a number of reforms to our nongroup and small group markets. Massachusetts reformed its small group insurance market and the state has insurance intermediaries that act as purchasers for member small employers. However, these intermediaries generally only reduce the administrative hassle of providing insurance and do not reduce the cost to the small employer.

Despite the above information, the Massachusetts 2001 employer survey asked employers who do not offer insurance coverage whether the implementation of a small business purchasing alliance would motivate them to offer insurance. Of those responding, 33.2% answered that it was "very likely" to motivate them to offer insurance, 24.1% answered it was "somewhat likely" and 31.9% answered that it was "not likely at all."

<u>Individual or employer subsidies?</u>: As explained in the answer to question 2.5, Massachusetts has a program called the Insurance Partnership (IP) which makes insurance more affordable for employees and employers by providing subsidies to employers for low-wage employees working for qualified employers. Of the employers who were aware of the IP and who had 50 or fewer employees, 34% responded that the IP subsidies were too low.

Additional tax incentives?: 72% of employers not offering coverage answered that tax credits for offering health insurance would be "very likely" (44.7%) or "somewhat likely" (27.2%) to motivate them to offer coverage. Only 26.4% answered that tax credits were "not likely at all" to motivate them to offer insurance.

2.7 What other alternatives might be available to motivate employers not now providing or contributing to coverage?

Currently, a carrier in Massachusetts could choose to require a minimum employee participation rate for small employers which cannot exceed 100% for a group of 5 or fewer and 75% for a group of 6 or more. Employers not offering coverage were asked if eliminating the carrier's option of having minimum participation levels would motivate them to offer coverage. About a third (38.3%) answered that it was "very likely" to motivate them to offer coverage and 25.5% answered that it was "somewhat likely" to motivate them to offer coverage, while 30.5% answered that it was "not likely at all" to motivate them to offer coverage.

Employers not offering coverage were asked whether being able to offer a very basic catastrophic hospital-coverage plan would motivate them to offer coverage and two-thirds answered that this was "very likely" or "somewhat likely" to be a motivator.

Finally, approximately 75% of employers not offering coverage answered that lower premiums would be very likely or somewhat likely to motivate them to offer coverage; however, 24% still responded that lower premiums would not be likely at all to motivate them to offer coverage.

SECTION 3. SUMMARY OF FINDINGS: HEALTH CARE MARKETPLACE

Several sources were used in researching the health care marketplace in Massachusetts. Findings from the Division of Health Care Finance and Policy's (DHCFP) Nongroup Insurance Survey (2001), DHCFP's 2001 Survey of Massachusetts Employers Regarding Health Insurance, DHCFP's Massachusetts Physician Survey (2001) and DHCFP's Massachusetts Community Health Center Survey (2000) were analyzed. In addition, reforms to Massachusetts state laws regarding the small group and nongroup health insurance markets were examined. Please see Appendices VII to XV for additional information regarding the survey instruments and results, and Massachusetts state laws.

3.1 How adequate are existing insurance products for persons of different income levels or persons with pre-existing conditions? How did you define adequate?

Several factors were considered in our definition of adequate, as a result of information gathered in surveys of subscribers and employers, and through a review of minimum coverage requirements stipulated by the Massachusetts Division of Insurance in its regulation of the nongroup insurance market.

Adequacy as defined by regulation: Massachusetts nongroup laws require that carriers of nongroup insurance products offer a minimum set of standard benefits. These benefits include "reasonably comprehensive physician services, inpatient and outpatient hospital services, emergency health services, the full range of effective clinical preventive care, and prescription drugs administered on an outpatient basis." Nongroup products must also include all statemandated benefits.

No minimum set of benefits is required for the small group market or the remainder of the fully insured market in Massachusetts. Yet the passage of the federal Health Insurance Portability and Accountability Act and mandated benefits laws at the state level make it somewhat safe to assume that the coverage offered in those markets is adequate. The survey results described below address issues and concerns regarding adequacy of coverage from the point of view of the subscriber and the employer.

Adequacy as defined by subscribers and employers:

Subscribers

The Division of Health Care Finance and Policy sought to learn more about the demographics and experiences of individuals and families participating in the nongroup health insurance market. Therefore, the Division surveyed 5000 Blue Cross and Blue Shield of Massachusetts (BCBSMA) and Harvard Pilgrim Health Care (HPHC) nongroup policyholders in July of 2001. As of September of 2001, 33.8% (1,691) of the surveys were completed and returned to the Division.

Policyholders were asked to rate their satisfaction with the coverage and price of their plan. In addition, out-of-pocket expenses reported in the household and nongroup surveys were also examined. Large out-of-pocket expenses may indicate a problem with adequacy; however, expenses would have to be considered in relationship to household income and the nature of the

expense, i.e. a large out-of-pocket expense for cosmetic surgery would not necessarily indicate that a plan was inadequate.

There were slightly more females responding to the survey than subscribers (68% versus 61%). Also, respondents to the survey tended to be older than the average age of subscribers illustrated by the fact that 58% of respondents were 50 years of age and older compared with 46% of subscribers. In addition, a response bias may exist if those who responded to the survey were more involved or concerned with issues related to their health insurance coverage at the time of the survey's completion. The effect of this potential bias is unknown.

The majority of respondents were enrolled in a health maintenance organization (89%), followed by a preferred provider organization (9%) and a point of service plan (1%). There was no notable difference in level of satisfaction by plan type. Most policyholders (76%) were "very satisfied" or "somewhat satisfied" with the coverage provided by their plan. Only 9% reported feeling "dissatisfied" or "very dissatisfied." Of that 9% there were no notable differences among income groups.

Almost two-thirds (62%) of the respondents felt that premiums cost "much too much", and 31% believed their premiums cost a "little too much." The median monthly premium paid was \$416; the mean was \$554. In Massachusetts, premiums paid in the nongroup market can be rated by the age of the subscriber (in addition to where the subscriber lives) up to a 2 to 1 rate band. Since the respondents to this survey tended to be slightly older than the nongroup subscriber population as a whole for these two insurers, the premium costs reported could be a little higher than those for a younger population. However, nongroup subscribers do tend to be an older population overall.

Policy Coverage	Median Premium Paid Per Month
Single	\$340
Couple (individual and spouse)	\$768
Family (2 parents and children)	\$751
Family (1 parent and children)	\$500

Median monthly payments were lower for HMOs (\$416) than for PPOs (\$526). POS and indemnity plans had too few subscribers to calculate reliable medians. Two-thirds (67%) estimated that their out-of-pocket medical expenses were under \$1,000, but 16% paid \$1,000 to \$1,999, and 17% paid \$2,000 or more. Three-quarters of those who paid over \$2,000 in out-of-pocket expenses rated their monthly premiums as costing "much too much."

Employers

The Massachusetts 2001 employer survey asks benefits buyers a series of questions designed to explore the "adequacy" of their most popular health plan (the plan with the most enrollees). Of the employers who offer coverage, 58.2% state that their most popular plan is also the least expensive plan for the employee. Almost 30 percent report that the most popular plan is not the least expensive plan for the employee, and 13.5% do not know.

The majority of the most popular self-funded and fully insured plans provide coverage for maternity care, well-child visits, inpatient and outpatient mental health services, substance abuse

treatment, and mammograms. Contraception (covered by 49.3% of the plans) and infertility treatment (covered by 38.3% of the plans) are less likely to be reported as covered under the plans. However, these numbers may be misleading, as the employers, especially those that have fully insured plans, completing the survey may be unaware of specific benefits covered. For example, 37.4% of employers do not know whether contraceptives are covered by the plan and almost half of them, 48.3%, do not know if infertility treatments are covered. An examination of the policies themselves would have been necessary to ensure the most accurate results.

Of the employers surveyed that offered health insurance, 93.8% of the most popular plans included prescription drug coverage. Of those plans, 25.9% had a maximum annual out-of-pocket amount above which insurance paid for all of the costs of prescription drugs. Some of the plans (7.6%) had a maximum annual out-of-pocket amount above which the insurance plan did not cover prescription drugs, but the majority (92.4%) did not.

Co-payment amounts for physician office visits and emergency department visits were also examined to explore the issue of adequacy. According to the employers surveyed, the mean co-payment for a physician office visit was \$10.50. The mean co-payment for a visit to the emergency department was \$36.66. Co-payment amounts for prescription drugs varied; the mean co-payment was \$8.17 for a generic drug, \$14.53 for a preferred plan drug, and \$18.89 for a non-preferred plan drug.

Provider choice often is included in the definition of adequacy. However, in Massachusetts a lack of choice is not considered a significant problem due to each plan's extensive network and the considerable overlap of practitioners among plans. The majority of insured people in Massachusetts have a broad choice of practitioners.

Adequacy of Products for Persons of Different Income Levels: For individuals and families with incomes low enough to be eligible for MassHealth (Massachusetts Medicaid), coverage also may be considered adequate. The MassHealth Standard benefit package covers a wide range of health care services, including dentist visits and prescription drugs. The MassHealth Basic benefit package also covers a broad number of services, although it is not as comprehensive as the Standard package.

Persons with income levels that exceed MassHealth eligibility requirements, but whose incomes are too low to afford private insurance have the biggest problem obtaining coverage, and make up the majority of Massachusetts' uninsured. State law limits the premium rates for nongroup and small group policies to no more than two times the lowest rate in the same geographic area. Therefore, premiums generally are similar for small employers and most subscribers in the nongroup market, although they might be slightly higher in the nongroup market for some subscribers. The reasons that nongroup coverage may be difficult for Massachusetts residents at certain income levels to afford include: 1) subscribers in the nongroup market are paying for the entire premium without a premium contribution from an employer, and 2) since premiums in the nongroup market can be rated by age, older people have to pay higher premiums, which could become unaffordable for some.

Adequacy of Products for Persons with Pre-Existing Conditions: In Massachusetts, nongroup and small group laws address pre-existing conditions, complementing HIPAA. Pre-existing condition limitations or exclusions may not last more than six months and the carrier cannot "look-back" more than six months into the patient's medical history. Credit for immediately prior continuous coverage must be given. Also, a waiting period may not be imposed on a new employee who had coverage under a previous qualifying health plan immediately prior to or until employment in the small business.

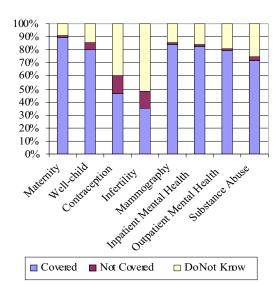
3.2 What is the variation in benefits among nongroup, small group, large group and self-insured plans?

Most of the information on benefit variation among plans was obtained through the Massachusetts 2001 employer survey and the nongroup subscriber survey. The nongroup market, as described in section 3.1, is the only market in which a minimum set of benefits and cost-sharing requirements is specified by Massachusetts law. The benefits mandated by the law are quite broad (please see Appendix XV). Self-funded plans, including MassHealth and some Group Insurance Commission offerings, are the only health plans that are not required to include each of the state mandated benefits in their plans.

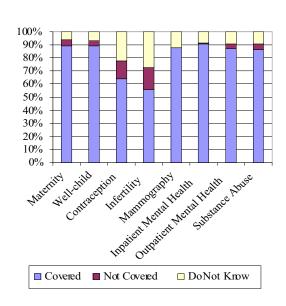
Massachusetts 2001 employer survey results regarding an establishment's most popular health plan were analyzed to determine if there were notable benefit variations between self-funded and fully insured plans. It is important to remember that the information gathered regarding benefit variation relied on the knowledge of the person answering the survey.

Sizable differences were not detected among the plans. The majority of self-funded and fully insured plans provided some type of prescription drug coverage, 93.8% of fully insured and 93.5% of self-funded employers. Most also provided coverage for maternity care, well-child visits, mammograms, and mental health and substance abuse treatment. A sizable number of employers lacked information regarding contraception and infertility treatment coverage for both fully insured and self-funded plans. The following tables provide additional information regarding benefit variation by service or treatment type and plan.

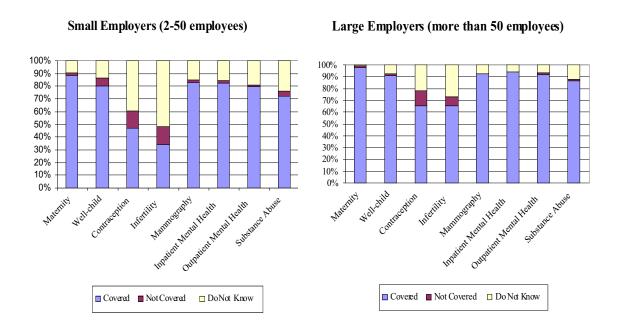
Fully Insured Plans



Self-fundel Plans



Data on the types of benefits covered were also examined by employer size. Establishments with 2 to 50 employees were considered "small employers" and establishments with more than 50 employees were considered "large employers." Employers from small establishments, more frequently than employers from large establishments, did not know if a particular service or treatment was covered. This may be a result of the tendency of small employers not to employ full-time benefit coordinators. Therefore they lack a staff member that is familiar with the particulars of the organization's health care policies. The majority of the most popular plans offered by small and large employers provided some type of prescription drug coverage, 93.4% of small employers and 99.2% of large employers. The majority of large and small employers' most popular plans also included provisions for maternity care, well-child visits, mammograms, and mental health and substance abuse treatments. Both small and large establishments appeared to lack information regarding a policy's provision for contraception and infertility treatments. The following graphs provide additional information on employer size and benefit coverage:



3.3 How prevalent are self-insured firms in your state? What impact does that have in the state's marketplace?

Per the Massachusetts 2001 employer survey, 26.7% of all employees enrolled in an employer-sponsored plan are enrolled in a self-funded plan, even though only 14.3% of the employers surveyed offer at least one self-funded plan. Large employers (with more employees) tend to self-fund, yet there are fewer large employers.

Employers that self-fund also were queried about their purchase of stop loss insurance, a lack of which could be a sign of trouble for employees and health providers if an employer experiences significant financial hardship. Only 48.5% of employers who have at least one self-funded plan purchase stop-loss insurance. However, this may be a result of the small number of employers

offering a self-funded plan that were included in the sample, or a lack of knowledge regarding stop-loss insurance on the part of the individual completing the survey.

Very little data are available on self-funded plans (the Division of Insurance is not required to collect information on these plans). However, given that nearly a third of Massachusetts residents are enrolled in a self-funded plan, it will be important to monitor such plans in the future.

3.4 What impact does your state have as a purchaser of health care?

After the federal government, the Massachusetts Medicaid program and the Group Insurance Commission (GIC) are the largest purchasers of health insurance in Massachusetts. The GIC purchases benefits for all active and retired state employees. These two purchasers combined represent more than 1 million covered lives in a state whose total population is just over 6 million. Therefore, these two purchasers impact the market considerably.

The Massachusetts Medicaid program and the GIC are active members of the Massachusetts Healthcare Purchaser Group. Both participate in the initiatives of the Leapfrog Group, which is a national organization comprised of Fortune 500 companies and other large health insurance purchasers. The Leapfrog Group promotes improvements in patient safety and health care quality. Both purchasers also participate in the New England HEDIS Coalition, a group that promotes the use of quality measurements in healthcare purchasing decisions. The Massachusetts Medicaid program and the GIC were early proponents of managed care. Their contractual arrangements have had much to do with the state's extremely high managed care penetration rate.

3.5 What impact would current market trends and the current regulatory environment have on various models for universal coverage? What changes would need to be made in current regulations?

Please see Section 4 for a description of the various options.

3.6 How would universal coverage affect the financial status of health plans and providers?

The effect of universal coverage on our health plans and providers would largely depend on how universal coverage was obtained, i.e. through expansion of public programs, increased private coverage, etc. Massachusetts has very few citizens who remain uninsured. Currently, 365,000 individuals do not have health care coverage. As a result it is unlikely that the addition of these lives to existing publicly and privately insured rolls, spread across health plans and providers, would have a dramatic effect. However, if those 365,000 people were all added to one program or a small number of programs, the impact could be significant.

An examination of the effect on the state's safety net providers is specifically warranted. Massachusetts has an Uncompensated Care Pool (UCP), which is financed by an assessment paid by all Massachusetts acute care hospitals based on their gross patient revenues; a surcharge paid

by every insurer levied on each hospital bill issued by a Massachusetts acute care hospital; and a lump-sum payment made by the Commonwealth. This fund reimburses hospitals and community health centers for the medically necessary care of the uninsured and underinsured who meet certain eligibility criteria.

Differences exist between Massachusetts hospitals regarding the number of uninsured they serve. Hospitals that serve relatively few uninsured patients contribute more funds to the UCP than they receive back in reimbursement. As a result, hospitals that treat a large number of uninsured patients receive a greater proportion of the UCP funds. Universal health insurance would probably not obviate the need for the Pool, but it would certainly lessen the hospitals' dependence on it.

3.7 How did the planning process take safety net providers into account?

Safety net providers played a large role in the planning process of the HRSA state grant. Massachusetts has done a number of things to ensure that safety net providers are included in the planning process of reform efforts. The Commonwealth's community health centers were surveyed in the spring of 2000 by DHCFP to assess the impact of previous state reform efforts on their operations. In addition, Massachusetts physicians were surveyed to gain a better understanding of their role as safety net providers. Finally, the Massachusetts Uncompensated Care Pool (described in section 3.6) is analyzed annually by DHCFP to ensure efficient and effective fund distribution, and to ensure that quality, cost-conscious care is available to the state's uninsured and underinsured residents.

Community health centers are one of the state's most important safety net providers. The number of community health centers in Massachusetts declined from 56 in 1990 to 46 in 1999, despite a 93% increase in the number of visits to these centers in the same time period. DHCFP's 2000 survey of 29 community health centers revealed that their level of debt has almost doubled between FY 1994 and FY 1999. Forty percent of the health centers reported that there had been an increase in the number of uninsured clients they served between 1994 and 1999. Currently, community health centers rely on a limited number of sources for funding. It is evident that the financial stability of community health centers must continue to be monitored. In addition, community health centers must be considered in the formulation and implementation of reform efforts. ¹⁰

DHCFP worked with the Massachusetts Medical Society to develop a survey of practicing physicians to measure the amount and type of free, discounted and self-paid care provided to patients in their offices. The survey was sent to 8000 primary care and specialist physicians, with an over-sampling of the former.

Almost 11% (n=874) of surveys were returned by September, when the study concluded. Physicians, as opposed to office staff, filled out most of the surveys (89%). The top five medical specialties accounted for 67% of respondents and 69% of all physicians sampled. These included internal medicine (23% and 33%), pediatrics (16% and 13%), psychiatry (9% and 9%), obstetrics-gynecology (10% and 7%), and family medicine (8% and 7%).

Most (81%) practices accept new patients regardless of their ability to pay. Almost all (95%) practices currently have patients who do not have health insurance. An estimated 8% (mean) of their patients are uninsured. Almost all (94%) of the practices reduce or waive fees for patients who are uninsured and have financial hardship. However, most (73%) have no formal mechanism for determining a patient's financial hardship.

Most (80%) practices inform patients about the availability of public assistance programs, and 42% assist patients with determining MassHealth eligibility and/or completing a MassHealth application.

Well visits (59%) and sick visits (17%) were the most frequent services practices provided to uninsured patients on a free or discounted basis last year.

3.8 How would utilization change with universal coverage?

Universal coverage would surely influence utilization patterns, which was demonstrated by the effect of the recent Medicaid expansion in Massachusetts on our safety net providers. As a result of the expansion of Medicaid, community health centers saw a downturn in utilization of their services as newly insured individuals accessed a wider range of providers. These health centers, with few reserves and virtually no other payers, would be jeopardized by an exodus of their long-time patients. Finally, overall utilization would probably increase at first due to a "pent-up demand" for services by the previously uninsured. This increase in demand would be expected to level off.

3.9 The experience of other states:

Historically, Massachusetts has looked to other states for guidance in policy and program development for the uninsured population. However due to the great strides the Commonwealth has made in reducing the number of residents who lack health care coverage, the state has emerged as a leader in this area. Expansion of the state's Medicaid program, the development of the Insurance Partnership, and legislative activity surrounding the small and nongroup markets, have contributed to a reduction in the number of Massachusetts' uninsured to only 5.9% of the population. Massachusetts will continue to examine reforms in other states when developing health care policies, as they may provide valuable information and direction, but it worth noting that an increasing number of states have started to look to the Commonwealth for answers.

SECTION 4. OPTIONS FOR EXPANDING COVERAGE

The purpose of this section is to provide specific details about the policy options selected by the state. Those states that have not reached a consensus on a coverage expansion strategy may answer questions 4.1 through 4.15 as applicable, but should focus primarily on questions 4.16, 4.18, and 4.19.

4.1 Which coverage expansion options were selected by the State (e.g., family coverage through SCHIP, Medicaid Section 1115, Medicaid Section 1931, employer buy-in programs, tax credits for employers or individuals, etc.)?

The state researched potential options and completed preliminary data analysis. The recommendations noted below reflect some synthesis of the options. These recommendations are preliminary as we have not finished our data analysis and expect to have more refined recommendations in October. The recommendations include:

- Continue, and improve, efforts to attain full enrollment of all currently eligible Massachusetts residents into existing public programs;
- Recommend that the federal government provide tax deductibility for the taxpayer's full cost of health insurance for the self employed and those without access to employer sponsored health insurance; and tax credits in amounts that would significantly defray the cost of purchasing health insurance to lower-income people in the same circumstances¹¹;
- Recommend that the federal government increase allotments to further encourage states to expand SCHIP to parents of children covered through SCHIP when those parents have access to employer sponsored health insurance;
- Recommend that preference be given, in the bidding process for state contracts, to organizations that both offer health insurance and pay for at least 50% of premiums;
- Encourage commercial development of catastrophic insurance plans when combined with medical savings accounts;
- Develop an educational approach to inform consumers of all of their health insurance coverage options; and
- Adopt as a long-term objective the redesign of the administrative system supporting eligibility and enrollment activities for all state ¹² programs that would enable people to apply for all social service programs at once through any of multiple points of entry.

Continued Analysis of Viable Options: We are still working on our qualitative data collection and analysis of the cost impact of the recommended options. Before the grant ends in September we will:

- Complete data analysis in order to recommend programmatic changes to the Insurance Partnership to increase the participation of employers and employees;
- Complete the data analysis necessary to make further recommendations for covering those populations for which, through its contracts, the state has a "special responsibility;"
- Complete qualitative analyses to learn more about why people currently eligible for publiclysponsored health insurance do not apply or enroll in these programs; and
- Develop a model that can project the impact (in dollars and number of people affected) of various changes to the public and private health insurance market.
- Complete empirical analysis on definition of affordability of health insurance in Massachusetts utilizing data from 3 years of household health insurance data.

For answers to questions 4.2 through 4.17, please refer to the approaches that follow. Each approach overview addresses these questions.

Full Enrollment of Currently Eligible

[This approach, in its entirety, is included in our preliminary recommendations as described in question 4.1.]

Maximize outreach and enrollment activities to enroll all Massachusetts residents that are currently eligible for existing public programs. Target the outreach activities to groups with a high uninsured rate including minority populations.

Target Population

The target populations are all those -- adults, children, insured, uninsured and especially minority populations -- who currently fall within income and categorical guidelines for existing programs.

Mechanism

How will the program be administered?

Focus groups and other research activities would be employed to study the barriers that currently exist to enrollment and develop strategies to more effectively enroll Massachusetts residents. However, there are currently strong DMA and provider initiatives that would continue. One avenue currently underway at both the Division of Medical Assistance and Department of Public Health ensures outreach to those not currently enrolled and retention of those MassHealth members who are currently enrolled. The Project for Health Care Access Mini-grant Program (Mini-grants) is a collaboration between the Department of Public Health and the Division of Medical Assistance. Mini-grants are awarded to community-based organizations throughout Massachusetts to help develop and operate outreach programs. The outreach programs inform at-risk populations about eligibility for MassHealth and CMSP. The programs also provide assistance with the application process and help clients complete redetermination forms in order to maintain coverage in publicly funded programs.

DMA also currently employs outreach workers, who visit such sites as hospitals, doctor's offices and schools to assist residents with applications. Providers often have their own staff that assist residents with completing applications or directing them to assistance. Both of these practices would continue under this option.

Also, the Express Renewal Pilot is a streamlined redetermination process for those currently enrolled in MassHealth and who have had little or no change in their circumstances during their eligibility.

How will outreach and enrollment be conducted?

The mini-grantees use various methods for outreach, including attending health fairs, visiting community centers, visiting door-to-door, and collaborating with schools, charitable organizations, etc. Enrollment processes in place would continue.

How will services be delivered under the expansion?

There would be no change to the delivery system.

What methods for ensuring quality will be used?

Quality would continue to be monitored through evaluations of the mini-grantees as well as through an evaluation of the Express Renewal Pilot.

How will the coverage program interact with existing coverage programs and State insurance reforms (e.g., high-risk pools and insurance market reforms), as well as private sector coverage option (especially employer based coverage)? How will crowd-out be avoided and monitored?

Since the residents enrolled under this option are currently eligible for public programs, private sector options and crowd-out would not be an issue.

What enrollment data and other information will be collected by the program and how will the data be collected and audited? How (and how often) will the program be evaluated?

Mini-grantees are required to submit monthly reports on their activities, which include information on types of outreach conducted that month, approximate number of residents reached, number of referrals to programs other than MassHealth and CMSP, and number of MBRs submitted. A formal evaluation of the program has been completed.

Since Express Renewal is considered a pilot program, an evaluation will be conducted when the program ends. Some items to be reviewed include the number of MassHealth members that used the Express Renewal process and how many members remained enrolled.

Finally, standard member services enrollment reports would continue.

Impact

What impact would the option have on the current healthcare market?

If outreach is successful, more people would be enrolled in public programs. Therefore, the cost to the state would increase. In addition, some crowd-out might occur if newly reached people, that are already insured, transition to less expensive public coverage for which they are eligible.

How would the option affect health plans and providers?

Enrolling additional eligible people in public programs would mean that providers would receive Medicaid reimbursement for more patients. This option would probably not affect health plans.

Would utilization change?

Ideally, if more uninsured people are enrolled in Medicaid, they would use less emergency department and inpatient care, and more primary and outpatient care.

Advantages

- The advantage of this option is that it is intended to reach those that are eligible for existing programs; therefore no systematic changes would be necessary. A change in policy is not required, as these programs are operational. Financially, by enrolling these residents in MassHealth or CMSP the option would decrease the burden on hospitals and non-hospital providers who provide free or discounted care.
- Another advantage of this option is that by reaching out to and retaining enrollees, health status among the enrollees might improve.
- Finally, by enrolling more people who are eligible for public programs, it will be easier to identify those Massachusetts residents that remain uninsured as truly uninsured.

Limitations

• Budgets are developed based on an estimated take-up rate of those eligible for these programs. As a result, full enrollment would place constraints on an already tight budget and may force decision-makers to reduce expansions or the full range of services covered by MassHealth.

Financing

What will enrollee (and/or employer) premium sharing requirements be?

Premium sharing requirement would not change.

What is the projected cost of the coverage expansion? How was this estimate reached? (Include the estimated public and private cost of providing coverage.)

To be determined.

How will the program be financed?

Additional funds will need to be allocated through the budget process. Any changes to the budget would need to remain within the limits of state budget neutrality requirements.

What strategies to contain costs will be used?

Quality and cost control mechanisms currently employed would continue to be used.

Extent to which Principles are Met

This option builds on the following principles: the state should provide equal access to public insurance assistance; and all those currently eligible would be enrolled. We are mindful of the impact of our recommendations on the currently insured and on those who purchase insurance on their behalf. This option only affects those that are eligible for MassHealth and CMSP, therefore does not apply to those who are insured. An effort to enroll all those eligible into existing public programs meets the principal that states that "assistance should be targeted to the most financially needy." This approach also builds upon existing public and private health insurance financing mechanisms, particularly the maximization of federal dollars.

Next Steps and Questions

Data Collection and Analysis: What data and information is available, or being collected, that will be developed if this option is selected for further pursuit i.e., Household survey, employer survey, MEPS analysis, etc.

Enrollment data will be collected by the Division of Medical Assistance. Take-up rates are also being researched to determine a feasible "full enrollment" figure. Also, qualitative analysis regarding the barriers to enrollment is being conducted by The Access Project.

Feasibility and Implementation Issues: Are any steps currently underway to support this option? Describe the actions already taken to move this initiative toward implementation (including legislation proposed, considered or passed), and the remaining challenges. If nothing is currently in place, what will need to be done to support this option? Legislation, regulation, etc.

Additional staff focus and funds may be required if targeted programs such as the mini-grants and Express Renewal continue. New approaches for targeting minority populations may need to be developed.

Tax Incentives: Individual/Family

[This approach, in part, is included in our preliminary recommendations as described in question 4.1.]

Currently 60% of a health insurance premium is federally deductible for those who are self-employed. For the federal tax year beginning in 2002, the deductible will increase to 70%. After tax year 2002, the federal government has authorized another deductibility increase, which will make the full cost of a self-employed taxpayer's health insurance premium deductible (100%).

This option recommends the expansion of the federal government's provision for the deduction of the full cost of health insurance (currently only the self-employed qualify) to include all individuals/families that lack access to employer sponsored health insurance. In addition, tax credits in amounts that would significantly defray the cost of health insurance to low income individuals in similar circumstances are recommended.

Note: A refundable tax credit is given if the credit amount exceeds the taxpayer's tax liability. The taxpayer would be sent a check for the difference. Current Massachusetts tax law limits individual tax to "Not less than 0" (see Form 1 Massachusetts Resident Income Tax Return – line 28).

Target Population

Tax incentives would be available to self-employed individuals, and those individuals and families who lack access to employer-sponsored health insurance and do not qualify for existing public programs.

Mechanism

How will the program be administered?

The program would be administered through the same mechanisms currently used for tax incentives, by the Internal Revenue Service and at the state level by the Massachusetts Department of Revenue.

How will marketing/outreach and enrollment be conducted?

Tax incentives of this magnitude would receive wide press coverage. Tax practitioners would be informed of the incentives through existing channels. If necessary, television and radio public service announcements could be developed and targeted at the populations most eligible for the incentives. Consumer advocacy groups, community health centers, and other relevant providers could also publicize information regarding the incentives.

How will services be delivered under the expansion?

New tax incentives would require no change in the delivery of health services.

What methods for ensuring quality will be used?

Not applicable.

How will the coverage program interact with existing coverage programs and State insurance reforms (e.g., high-risk pools and insurance market reforms), as well as private sector coverage option (especially employer based coverage)?

Tax incentives would enhance the affordability of all existing coverage options for eligible taxpayers. Self-employed taxpayers and taxpayers without access to employer-sponsored insurance would be able to defray the cost or a portion of the cost of the premiums paid for nongroup and small group policies.

How will crowd-out be avoided and monitored?

The possibility that taxpayers already covered in any market would move to a different product/market to take advantage of a tax incentive is highly unlikely. However, if the incentives were available to all taxpayers below, for example, 400% FPL, regardless of insurance status, those taxpayers already purchasing insurance through the small or nongroup market would likely avail themselves of the credit to the maximum allowed. As a result, the incentives would reduce private contributions to health insurance premiums, replacing them with public funds.

Including individuals and families that do not have access to employer-sponsored insurance would be challenging to monitor and would increase the likelihood of crowd-out. In fact, the Commonwealth already decided, with the institution of its Premium Assistance Plan and the Insurance Partnership, that direct subsidies were more efficient and effective than tax incentives, specifically tax credits. (This program is only available for those working for participating small employers who offer health insurance and self-employed people.)

What enrollment data and other information will be collected by the program and how will the data be collected and audited?

No additional data and information gathering activities would be performed. Existing Internal Revenue Service and Massachusetts Department of Revenue procedures for data collection and auditing would be utilized.

How (and how often) will the program be evaluated?

The impact of the tax incentives both on the ranks of the uninsured and on the state budget would be calculated annually at the conclusion of the tax-filing season. The tax return itself would serve as the data collection tool, with a new separate schedule created for filing tax incentives.

The new "Schedule HIC" would include check-off boxes indicating the taxpayers' insurance status prior to paying for the health insurance eligible for the deduction or credit.

What will the benefits structure be (including co-payments and other cost-sharing)?

Not applicable.

Impact

To be determined. It is not known how many previously uninsured taxpayers would be sufficiently enticed to take advantage of the incentives and therefore purchase health insurance in the small group or nongroup markets. According to the Pauly and Herring article noted below, "The strength of risk aversion turns out to be a relatively minor determinant of what proportion of people buy insurance. What is much more important is the expected amount of out-of-pocket expense; this value is reduced considerably by access to free care by the uninsured [italics added]." In Massachusetts the uninsured have access to a variety of safety net providers, and as a result tax incentives may not sufficiently promote the purchase of health insurance.

What impact would the option have on the current healthcare market? How would the option affect health plans and providers? Would utilization change?

Not applicable.

What are the political or policy implications?

Similar to this option, many tax incentive proposals call for a partnership between states and the federal government, requiring policy changes at both the state and federal level. According to these proposals, state and federal revenue would finance tax incentives for the purchase of health insurance. Federal and state cost sharing would make this a more affordable option for Massachusetts. In addition, administration at the federal level would reduce discrepancies in state and federal taxable income guidelines. It would also allow for the uniform regulation of the health insurance products that could be purchased with the credit; "states could chose either to adopt the federal 'default' system of regulation or to agree with the federal government on a functionally similar state-designed rate regulation system." ¹³

However, the size of a tax incentive necessary to make a significant impact on the number of uninsured must be very high, especially with regard to a tax credit. For example, many argue that typical tax credit amounts are insufficient, and as a result premiums remain unaffordable to low income individuals and families. ¹⁴ It is unlikely that the size of the tax incentives necessary to make a large impact on Massachusetts' uninsured, even in conjunction with activity at the federal level, will be politically feasible given the present economic climate.

In addition, a tax policy change of this magnitude at the state level rather than at the federal level, is daunting given the potential overall cost. The lopsided fiscal commitment combined with the uncertainty of its effectiveness in reducing the number of uninsured may seem to some policymakers like an expensive gamble. Attempting to limit the type of taxpayers who are

eligible for the incentives may invoke equity concerns. Finally and most importantly, maintaining the tax incentives during lean federal and state budget years may prove difficult.

Advantages

- Tax incentives are a "simple straightforward tool. They do not require changing the health care regulatory structure, negotiating with providers, reorganizing the delivery system, or altering the philosophy of medical treatment...They do not require enormous investment in fixed administrative structures, which are difficult to change later in the face of experience, and their financial design parameters can be modified easily and quickly." ¹⁵
- Low-income populations would be able to purchase insurance like everyone else. A buy-in to a Medicaid product would not be necessary and there would be no need to complete Medicaid eligibility paperwork.
- Benefits both working and non-working individuals.
- If Congress passes additional federal tax incentives, the combination could make health insurance affordable.

Limitations

- State tax incentives rely on activity at the federal level.
- Loss of state tax revenues would be great.
- Tax incentives may not help very low income.
- Massachusetts has generally believed that direct subsidies are a better way to pay for insurance than tax incentives because of the complexity of the tax system.

Financing

What will enrollee (and/or employer) premium sharing requirements be? What is the projected cost of the coverage expansion? How was this estimate reached? (If it is not possible to estimate actual costs, describe methodology that will be used to make such an estimate when time and data permit. Include the estimated public and private cost of providing coverage.) How will the program be financed? What strategies to contain costs will be used?

Data are currently being gathered to determine the costs and financing mechanisms associated with this option at the state and federal level.

Extent to which Principles and Assumptions are Met

- This approach fits with the principles developed by the Steering Committee, but it may make more sense to make changes to the Insurance Partnership.
- This approach would foster independence and self-reliance.
- This approach would not build upon the systems, structures, etc. that already exist in Massachusetts.

Next Steps and Questions

Data Collection and Analysis: What data and information is available, or being collected, that will be developed if this option is selected for further pursuit i.e., Household survey, employer survey, MEPS analysis, etc. What else do we need to know to further pursue this as an option?

- Cost estimates at the state and federal level associated with the tax incentive will be performed.
- Conduct focus groups to learn whether consumers would take advantage of the incentives.

Feasibility and Implementation Issues: Are any steps currently underway to support this option? Describe the actions already taken to move this initiative toward implementation (including legislation proposed, considered or passed), and the remaining challenges. If nothing is currently in place, what will need to be done to support this option? Legislation, regulation, etc.

President Bush strongly advocated for the inclusion of a tax credit provision in the economic stimulus legislation that recently went before Congress. The tax credit would have been available to unemployed workers to help with the purchase of health insurance (up to 60% of the cost). The provision was included in the economic stimulus bill passed in the House, but was excluded from the Democrat-controlled Senate legislation. It is evident that tax incentives are extremely controversial. The political climate strongly influences the feasibility of this option.

Expand Family Assistance to All Parents of Eligible Children

[Approach B was included in the preliminary recommendations described in question 4.1.]

This option would expand Family Assistance to all parents of eligible children. Two approaches are offered under this option.

Approach A would extend eligibility to all parents, regardless of their access to employersponsored insurance (ESI). Currently, parents of children eligible for MassHealth and who have access to qualified employer sponsored insurance through a small employer are eligible for MassHealth Premium Assistance. Parents with access to qualified employer sponsored insurance through a large employer, however, obtain premium assistance by default, because in order to enroll their children in ESI they must purchase dual or family coverage. Thus, some parents (working for a large employer) gain coverage by default, while others (working for a small employer) are intrinsically eligible for MassHealth. And, parents without access to ESI with income between 134% to 200% FPL, whether working for a large or small employer, are not eligible for MassHealth benefits, though their children are eligible for coverage under Family Assistance Direct Coverage. In order to expand the number of parents eligible for coverage, and to end the inherent inequity in making eligibility for coverage dependent on either access to ESI, or the size of their employer, Approach A would extend coverage to all parents in the 134% to 200% FPL income-range. Under this approach, those who were uninsured when they sought MassHealth eligibility may be eligible under SCHIP rules, while those who were insured at the time of application would be covered under the 1115 waiver. This option would necessitate requesting an amendment to the 1115 waiver, and requesting a waiver under the SCHIP State Plan.

Approach B would limit the expansion to Family Assistance Premium Assistance, and would include all eligible parents with access to ESI regardless of the size of their employer. Currently, only parents who work for small employers and have access to qualified ESI are eligible for MassHealth Family Assistance benefits, while parents who work for larger employers only receive coverage by default because their children are eligible. As a result, MassHealth is limited in its ability to market and outreach to parents in this income range, and is only able to claim FFP for the children of parents with access to ESI through larger employers, though the entire family unit benefits from premium assistance.

Target Population

What is the target eligibility group under the expansion? Describe in terms of findings from household, employer survey, or other source(s) – and cite source of estimate. The Working Group will determine methodology for identifying populations.

The target eligibility group under this option is the parents of eligible MassHealth children. Under *Approach A*, parents between 134% and 200% FPL would be eligible for Family Assistance, either Direct Coverage or Premium Assistance. Under *Approach B* the expansion would be limited to those with income between 150% and 200% FPL who have access to ESI, regardless of the size of their employer's workforce.

Mechanism

How will the program be administered?

MassHealth would administer the program as an expansion of Family Assistance, upon receipt of federal approvals that would be required.

How will marketing/outreach and enrollment be conducted?

Marketing/outreach and enrollment would be conducted through MassHealth member services.

How will services be delivered under the expansion?

Parents would be eligible for Family Assistance Premium Assistance [directly or through contractual arrangements] for enrollment in ESI regardless of the size of their employer under both *Approach A* and *Approach B*, or for Family Assistance Direct Coverage, under *Approach A* only.

What methods for ensuring quality will be used?

MassHealth quality assurance activities would encompass this expansion.

How will the coverage program interact with existing coverage programs and State insurance reforms (e.g., high-risk pools and insurance market reforms), as well as private sector coverage option (especially employer-based coverage)?

The expansion of Family Assistance to parents of eligible children would be commensurate with existing programming.

How will crowd-out be avoided and monitored?

Parents with access to ESI would be required to enroll in their employer's coverage. DMA has developed a process for assessing the adequacy of ESI to ensure it meets DMA and CMS requirements.

What enrollment data and other information will be collected by the program and how will the data be collected and audited?

All MassHealth applicants are required to complete an MBR, with the information collected and audited in a standardized manner. All newly eligible parents would be counted as MassHealth enrollees, where previously some were only receiving Family Assistance Premium Assistance benefits by default.

How (and how often) will the program be evaluated?

There are several mechanisms through which MassHealth programs and activities are evaluated. These include outside evaluations conducted by CMS, as well as a range of other evaluation activities, including collaborative activities conducted with the Center of MassHealth Evaluation and Research, at UMASS Medical School.

What will the benefits structure be (including co-payments and other cost-sharing)?

The benefits structure, including co-payments and other cost-sharing requirements, would be the same as those already defined for Family Assistance.

Impact

What impact would the option have on the current healthcare market?

Expansion of Family Assistance to include parents of eligible children as envisioned under *Approach A* would result in a significant increase in the number of adults receiving MassHealth Family Assistance Direct Coverage benefits and enrolled ESI through Family Assistance Premium Assistance.

Expansion of Family Assistance Premium Assistance to parents of eligible children regardless of employer size, as proposed in *Approach B*, would increase participation in ESI only. Expansion would be expected to result in moving significant numbers of children from Family Assistance /Direct Care to Premium Assistance and enrollment in ESI. This change would result from the ability to include parents as well as children in calculating the cost-effectiveness of ESI, regardless of whether the parent works for large or small employer.

How would the option affect health plans and providers?

Expansion under both *Approach A* and *B* would increase the number of individuals enrolling in health plans through ESI. It would also increase the number of adults with coverage under through MassHealth Family Assistance Direct Care (Approach A), as those without access to ESI also were eligible for coverage.

Would utilization change?

Primary and preventive services are expected to increase under both Approach A and Approach B. In addition, there would be an initial surge in demand for services due to pent up demand from a lack of financial access.

What are the political or policy implications?

Expansion would increase costs for MassHealth expenditures as enrollment and utilization increase. This increase in costs would be greater under *Approach A*, as individuals without access to ESI would be eligible for coverage. Under *Approach B*, cost increases are not expected to be as large, since some of these individuals already receive coverage through ESI by default.

In addition, the state may be able to claim increased FFP under SCHIP for parents who are not currently eligible.

Advantages

- It would be relatively easy administratively to enroll parents at the time their kids are enrolled in MassHealth.
- Children and their parents would be insured under the same program.
- Parents would be more likely to enroll their children if they received health insurance at the same time.
- It would add clarity to outreach and marketing campaigns, eliminating the confusion that often results when only some family members are eligible for MassHealth, but all are covered in ESI.
- Private dollars would remain in the market.

Limitations

- There would be additional state costs (but not as costly as other options)
- There may be a stigma associated with enrolling in MassHealth.
- Impact on state and federal budget neutrality may be very large, particularly under Approach A.

Financing

This approach would require additional funding at both the state and federal levels.

What will enrollee (and/or employer) premium sharing requirements be?

As is currently required, in order to qualify for Premium Assistance, an employer's plan must cover at least 50% of the premium cost. Parents are asked to contribute \$10 per child up to \$30 per month. Cost-sharing and premium contributions under this expansion are expected to remain the same.

What is the projected cost of the coverage expansion? How was this estimate reached? (If it is not possible to estimate actual costs, describe methodology that will be used to make such an estimate when time and data permit.)

To be determined.

How will the program be financed?

The expansion would be financed through state appropriations, through the Federal Financial Participation (FFP) in conjunction with an amendment to the 1115 MassHealth waiver, and through a waiver to the SCHIP State Plan, pending federal approvals.

What strategies to contain costs will be used?

The full range of strategies employed by MassHealth to contain costs would be extended to this expansion group.

Extent to which Principles are Met

This approach moves us forward toward our principle of providing equal access to public assistance within the same level of income because it provides eligibility for parents. It does, however, leave adults without children and at the same income level, without similar access to coverage.

This approach builds upon existing public and private health insurance financing mechanisms by tapping into ESI whenever possible by providing Premium Assistance to those who are eligible.

Next Steps and Questions

Data Collection and Analysis: What data and information is available, or being collected, that will be developed if this option is selected for further pursuit i.e., Household survey, employer survey, MEPS analysis, etc. What else do we need to know to further pursue this as an option?

The number of income-eligible parents with access to ESI must be identified, all of whom would be eligible. Next, we would need to distinguish the uninsured from those who are currently insured (to distinguish between rates of FFP).

Feasibility and Implementation Issues: Are any steps currently underway to support this option? Describe the actions already taken to move this initiative toward implementation (including legislation proposed, considered or passed), and the remaining challenges. If nothing is currently in place, what will need to be done to support this option? Legislation, regulation, etc.

This option would be an expansion of existing programming. It would require federal approval of an 1115 Health Care Demonstration Waiver amendment, and/or a waiver of the SCHIP State Plan.

Special State Responsibility: Contracted Organizations and Industries

[Approach 1, in its entirety, was included in the preliminary recommendations and continued analysis will be performed on Approach 2 as described in question 4.1.]

The Commonwealth of Massachusetts regularly contracts with thousands of organizations, some of which receive the majority of their revenue from the state. We believe that there exists a "special state responsibility" to ensure that those organizations with which the state contracts offer affordable insurance to their employees. This special responsibility extends to both individual organizations that contract with the state and also to a subcategory of certain industries (described below).

We assessed two different approaches, as follows, that could be taken regarding organizations that contract with the state:

Approach 1: The state would require all organizations bidding for a state contract to inform the state as to whether or not they offer health insurance to their employees and the percent of the total premium the employer pays. The state would then give contracting preference to organizations who offer their employees affordable health insurance (those that cover a specified amount/percent of the premium). Employers that offer insurance would get more credit in the bidding process. This approach might only apply to those organizations with state contracts that total a certain dollar amount. In addition, the type and amount of preference given would have to be determined.

Approach 2: The state would require all organizations bidding for a state contract to inform the state as to whether or not they offer health insurance to their employees, the percent of the total insurance premium the employer pays, and detailed employee salary information. The state would contract only with organizations that provide their employees with affordable health insurance (those that cover a specified percent of the premium cost). Therefore, this option would, as a condition of contracting, require organizations bidding for state contracts to offer affordable insurance.

Subcategory of Approach 2: Industries In special cases where an industry is primarily supported by state dollars, such as the nursing home industry and community mental health centers, the state has an even greater responsibility to ensure that those employed by the contracting organizations within that industry have access to affordable insurance. (Note: The state is researching the day care industry and the personal care attendant field to ascertain whether certain employers or locations within those industries are primarily supported by state dollars, whether they provide affordable health insurance, and whether special financial assistance might be necessary.) More research is needed to identify all such industries, but preliminary research indicates that certain types of provider organizations within the human services industries would be affected. A survey of employers within these identified industries may be conducted to identify how many of these employers offer health insurance, as well as how much of the premium those employers cover.

If research shows that most of the employers within these industries offer affordable insurance, then the industry piece of this approach could remain the same as Approach 2. The approach would simply require, as a condition of receiving money from the state, that all employers (including those within identified special responsibility industries) offer affordable insurance to their employees.

However, if research demonstrates that a significant portion of employers within these special responsibility industries: 1) do not offer health insurance, 2) do not offer health insurance at an affordable price, or 3) do not pay their employees enough to enable them to purchase insurance, then under this option the state might need to increase contract payments or reimbursement to the organizations within the industry. This extra money would be earmarked specifically for employee or employer insurance premiums. A preliminary review of studies conducted by various trade associations has found that a large majority of human service providers (the industry on which this option might focus) already provide health insurance. It is argued however, that many of their employees do not earn enough money to afford the coverage.

Target Population

Employees of organizations that have contracts with the state; Employees of organizations in special responsibility industries. During fiscal year 2001, there were approximately 15,000 employers who had state contracts or who received Medicaid reimbursement.

Mechanism

How will this program be administered?

If Approach 1 was implemented, all state agencies that contract with organizations would receive instructions regarding the changes to the bidding process.

If Approach 2 was implemented, the state would require all employers who are bidding for state contracts to turn in a statement regarding whether they provide health insurance and to what extent the employer subsidizes the premiums. The same information must be submitted by all organizations that receive Medicaid reimbursement. If an organization did not provide health insurance at an affordable price, their bid would not be considered.

How will marketing/outreach and enrollment be conducted? How will services be delivered under the expansion? What methods for ensuring quality will be used? How will crowd-out be avoided and monitored? What enrollment data and other information will be collected by the program and how will the data be collected and audited? What will the benefits structure be (including co-payments and other cost-sharing)?

Not applicable.

How will the coverage program interact with existing coverage programs and state insurance reforms (e.g., high-risk pools and insurance market reforms), as well as private sector coverage options (especially employer-based coverage)?

Not applicable.

How (and how often) will the program be evaluated?

The approach would be evaluated on an annual basis to determine its effect on state contract costs and on insurance levels among contractors' workers.

Impact

What impact would the option have on the current healthcare market? How would the option affect health plans and providers? Would utilization change?

The option would not have a significant effect on the healthcare market as a whole because it only directly impacts those employers receiving state dollars. One impact that Approach 2 might have is that if increased payments are not found to be necessary, some employers who can't afford to offer insurance would lose state business. This might force those employers out of business entirely or it could limit the types of patients they accept (by not allowing them to accept Medicaid patients).

What are the political or policy implications?

This option would only assist employers that receive state dollars. Therefore if those companies are given more money to help them provide health insurance, there might be some opposition since other similar employers in Massachusetts (operating without state dollars) would not receive the same assistance. In addition, business groups and trade associations might oppose either approach.

Advantages

- This option might encourage some employers who do not offer health insurance to start offering coverage, thereby increasing the number of employers that offer health insurance
- If additional state payments were not made to these employers, this option would not incur significant cost to the state.
- If premiums were subsidized through additional state contract funds for employees in special responsibility industries, this option would make insurance policies more affordable.

Limitations

- Would not reach employees of employers who sub-contract with a company that contracts with the state.
- Might force some employers who cannot afford to offer insurance out of business if the state chooses not to work with them anymore (without providing additional funds) and they depend on state dollars as a significant part of their revenue
- May be administratively cumbersome and costly because the review of bids would be more complex and might take longer.

• There might be costs to the state if research determines that subsidies for companies within certain industries are necessary.

Financing

What will enrollee (and/or employer) premium sharing requirements be?

To be determined.

What is the projected cost of the coverage expansion? How was this estimate reached? (If it is not possible to estimate actual costs, describe methodology that will be used to make such an estimate when time and data permit. Include the estimated public and private cost of providing coverage.)

To be determined

How will the program be financed?

To be determined.

Extent to which Principles are Met

This option meets the principle stating that "the state has a special responsibility to assure access to affordable health insurance for those people who work under contract to the state or for organizations that are primarily dependent on state funding."

Next Steps and Questions

Data Collection and Analysis: What data and information is available, or being collected, that will be developed if this option is selected for further pursuit i.e., Household survey, employer survey, MEPS analysis, etc. What else do we need to know to further pursue this as an option?

- Establish a specific percent that an employer receiving state dollars must pay of the health insurance premiums for its employees.
- Determine how much credit or preference a contracting employer who offers health insurance should receive.
- Identify all special responsibility industries through thorough research and surveys.
- Survey employers within all special responsibility industries regarding the health insurance coverage they offer and the salary levels of their employees.
- Determine whether additional reimbursement is necessary for the employers within special responsibility industries. Estimate the total cost.

Feasibility and Implementation Issues: Are any steps currently underway to support this option? Describe the actions already taken to move this initiative toward implementation (including legislation proposed, considered or passed), and the remaining challenges. If nothing is currently in place, what will need to be done to support this option? Legislation, regulation, etc.

No current legislation relative to this option exists at this time.

CATASTROPHIC COVERAGE WITH MEDICAL SAVINGS ACCOUNTS

[This approach, in its entirety, is included in the preliminary recommendations described in question 4.1.]

Under this option, insurers would sell high deductible, catastrophic policies combined with Medical Savings Accounts (MSAs) in the individual and group markets. Policyholders would use MSA funds to purchase primary and preventive services.

Target Population

Members of the uninsured population who are knowledgeable about their health care needs and unlikely to buy standard policies.

Mechanism

How will the program be administered?

Insurance carriers and qualified banks would administer the policies and savings accounts.

How will marketing/outreach and enrollment be conducted?

Insurance carriers and designated financial institutions would market this option using their own marketing and enrollment practices. State enrollment and outreach staff could also help educate residents who are not eligible for public programs.

How will services be delivered under the expansion?

Health care services would be delivered through the existing provider system. This option would simply serve as another source of reimbursement for these services.

What methods for ensuring quality will be used?

Insurance carriers would be responsible for ensuring the quality of their catastrophic/MSA policies. In addition, depending on the structure of the policies, the Division of Insurance would monitor the quality and adequacy of these products.

How will the coverage program interact with existing coverage programs and State insurance reforms (e.g., high-risk pools and insurance market reforms), as well as private sector coverage option (especially employer-based coverage)?

Residents who select this option may have access to other sources of health insurance, but have not purchased more comprehensive coverage, due to the costs of the policy and the belief that purchasing the policy would result in overinsurance for their particular health care needs. Residents with income levels that are too high for most publicly sponsored programs may also purchase this option. Catastrophic coverage combined with MSAs would give people more

choice regarding how to allocate their health care insurance dollars to better serve their individual needs. However, if healthier, younger people selected this option in large numbers, their departure from the risk pool could prove costly, as sicker, older people would be left behind, resulting in adverse selection.

How will crowd-out be avoided and monitored?

Crowd-out would not be a large concern as this option would operate in the private market.

What enrollment data and other information will be collected by the program and how will the data be collected and audited?

Data about enrollment, claims paid, and MSA amounts would be maintained by individual insurance carriers and by the Division of Insurance, consistent with current procedures.

How (and how often) will the program be evaluated?

The policies should be evaluated to assess the integrity of the products, and to determine the impact of the option on related public programs such as the Uncompensated Care Pool, as well as its effect on the cost of private coverage. In addition, attention must be paid to indicators of people foregoing care to increase the value of their MSAs.

What will the benefits structure be (including co-payments and other cost sharing)?

There are two distinct components of the benefit structure, the catastrophic policy and the MSA. In addition, the cost sharing arrangement is dependent on whether one is self-employed or works for an organization.

Employed policyholders would be responsible for their share of the monthly catastrophic policy premium, similar to the cost sharing structure of other health plans in the workplace. Self-employed individuals would be responsible for the entire premium payment (as is the case in the Archer MSA federal program). The catastrophic policy would cover costs for services that exceed the deductible, protecting individuals and families from devastating out-of-pocket health care expenses.

A fixed sum of money would be deposited into an MSA by the employer or policyholder, which could be used for the purchase of primary and preventive services. Residents who purchase this option would be responsible for paying for services with their MSA funds up to the deductible, which would be set at a relatively high level. The sum of money placed into the medical savings account should be equal to or closely approach the catastrophic policy deductible amount; resulting in minimal financial risk to the policyholder.

Payments would be made at the time services are rendered. Policyholders would pay-out-of pocket and then receive reimbursement from their MSA or a medical account checkbook/debit card could be used that would be linked directly to the MSA (this method is preferred).

Individuals and families would determine the health services on which to spend MSA funds. Thus these policies provide an incentive for the careful use of health services.

Impact

What impact would the option have on the current healthcare market?

If MSAs were not required in combination with catastrophic plans, residents might opt to purchase the catastrophic option in place of more comprehensive coverage. This might result in inadequate coverage of services, such as primary and preventive care or diagnostic services. Combining catastrophic policies with a requirement to use an MSA would reduce this negative incentive. For residents who have sufficient income, this type of plan might be a viable option. These residents would use the MSA to cover primary and preventive care, and would access the catastrophic coverage in the unlikely situation that they experience a catastrophic health event. If the option was sufficiently attractive, currently uninsured individuals might decide to purchase the policies, thereby reducing the number of residents in the Commonwealth who lack coverage.

How would the option affect health plans and providers?

There would be a reduction in the administrative work for providers with these plans. Since clients would be paying out-of-pocket in a sense, there would be no insurance forms to fill out or pre-authorization requirements. As a result, clients would be in a better position to negotiate charges with their providers, receiving services at a reduced rate. In addition, clients could see their provider of choice; free from the restrictions of plan approved physician and hospital networks.

Would utilization change?

Residents who purchase catastrophic coverage alone may have greater incentives not to use primary care or preventive services. Combining catastrophic policies with MSAs will likely minimize this tendency. Many catastrophic health care costs result from an accident, injury or accumulated health care deficits. Therefore it seems unlikely that residents covered by these policies would significantly alter their health care seeking behavior, as these events are usually unplanned and unexpected.

MSAs may encourage a more thoughtful use of primary care and preventive services. However, this will only result if educational tools and resources are made available to consumers to ensure that well informed health care decision-making occurs.

What are the political or policy implications?

Regulatory changes would be required to implement this option. The Division of Insurance would also need to develop regulatory guidelines to cover these polices. In addition, MSA amounts and criteria outlining what services the dollars could be used for would have to be determined. Finally tax law surrounding MSA deposits would have to be examined.

Advantages

- Provides a new insurance mechanism for residents of the Commonwealth to purchase an insurance policy that meets their individual needs.
- This option is fundamentally more like insurance than a managed care plan, in that residents pay into an insurance pool that is used to cover catastrophic costs, only if they occur.
- This product might be less expensive than other insurance options, and therefore an appropriate and more affordable option for some residents.
- MSAs provide consumers with more control over their health care dollars, allowing them to purchase primary and preventive services at their own discretion.
- Potential to reduces job lock as these plans are more amenable to portability.
- Funds roll over from year to year, which encourages saving behavior and reduces the likelihood that policyholders will be placed at financial risk.

Limitations

- Catastrophic policies and MSAs do not necessarily encourage residents to obtain preventive care.
- Employers may be tempted to provide this coverage option in place of plans that are currently offered which may have richer benefit packages.
- Presently, few insurers offer catastrophic policies.

Financing

What will enrollee (and/or employer) premium sharing requirements be?

The structure of the catastrophic plan with MSA would largely determine enrollee premium sharing requirements. Residents who purchase these policies would be required to absorb a greater level of first dollar coverage if there is a large discrepancy between the maximum allowable MSA deposit and the catastrophic plan deductible. Enrollee cost sharing could therefore increase. Employers would continue to contribute to a health insurance premium, however some of the funds saved from the use of a catastrophic plan would now be deposited into an MSA.

What is the projected cost of the coverage expansion? How was this estimate reached? (If it is not possible to estimate actual costs, describe methodology that will be used to make such an estimate when time and data permit. Include the estimated public and private cost of providing coverage.)

Costs of the option would be absorbed by residents of the Commonwealth, or alternatively by employers.

How will the program be financed?

The program would most likely be financed through private expenditures, either personal expenditures from consumers or from employers.

What strategies to contain costs will be used?

Not applicable.

Extent to which Principles are Met

The catastrophic coverage option is related to several of the principles identified by the Steering Committee. In particular, this option:

- Would promote the availability of multiple insurance coverage options that reflect different consumer needs/preferences: A catastrophic option promotes individual decision making about the best insurance coverage option for residents in the target population
- May be the best option for younger uninsured who are healthy: For individuals who are healthy, a comprehensive insurance policy may result in overinsurance.
- Would be mindful of impact on employers: The catastrophic option may provide a sensible alternative for employers, especially those whose workforce is young and relatively healthy
- Does not include expansion of public coverage.
- May encourage cost and quality consciousness: By increasing individual choice about how health care dollars are spent, the MSA option might promote cost consciousness in health care purchasing

Next Steps and Questions

Data Collection and Analysis: What data and information is available, or being collected, that will be developed if this option is selected for further pursuit i.e., Household survey, employer survey, MEPS analysis, etc. What else do we need to know to further pursue this as an option?

It would be helpful to involve various stakeholders in discussions about the particulars of this option. For example, it would be beneficial to discuss the feasibility of this option with private insurance carriers and financial institutions that operate in the Commonwealth. It would also be useful to determine how this option might intersect with the Insurance Partnership. Moreover, it will be important to determine the most appropriate balance of the costs and benefits of catastrophic policies and MSAs.

Feasibility and Implementation Issues: Are any steps currently underway to support this option? Describe the actions already taken to move this initiative toward implementation (including legislation proposed, considered or passed), and the remaining challenges. If nothing is currently in place, what will need to be done to support this option? Legislation, regulation, etc.

Federal and state laws regarding the administration and taxation of these plans must be examined to determine feasibility issues. A number of states have enacted legislation supporting the exploration and implementation of MSAs. In addition, President Bush supports the elimination

of many of the restrictions of the Archer MSA federal program. The President has proposed that all employees, regardless of the size of their employer, be allowed to open an MSA. In addition he supports the preferential tax treatment of these funds. Finally, he has advocated that all unspent medical savings account funds be permitted to be rolled over to the next year or deposited into a retirement savings account.

Single Process for Applying to all Public Programs

[This approach, in its entirety, was determined to be a long-term objective of the state, as described in question 4.1.]

A single process for individuals to enroll in public programs.

Target Population

All those currently enrolled in public programs in the Commonwealth, as well as additional low income under and uninsured adults and children who are identified as eligible for these programs.

Mechanism

How will the program be administered?

One state agency would be identified to create the system through which the single process is operationalized. Workers from all state agencies would need a method of accessing a central database to determine which programs people are eligible for, and whether they are already enrolled.

How will marketing/outreach and enrollment be conducted?

Marketing/outreach and enrollment would occur through the ongoing eligibility determination process and enrollment activities of each state agency.

How will services be delivered under the expansion?

Health care services would continue to be delivered through ongoing systems, and marketing/outreach and enrollment activities for each program would continue. However, marketing, enrollment and outreach staff as well as providers would have access to a centralized database that confirms eligibility for all public programs within the Commonwealth.

What methods for ensuring quality will be used?

The agency that creates the system through which the single process is operationalized would be responsible for maintaining the database and ensuring that the most accurate and up to date program information is entered into the system.

How will the coverage program interact with existing coverage programs and State insurance reforms (e.g., high-risk pools and insurance market reforms), as well as private sector coverage option (especially employer based coverage)?

If the single process system is effectively administered, then enrollment in public programs would likely increase.

How will crowd-out be avoided and monitored?

Crowd-out would not be a concern. The single process for applying to all public programs would be a mechanism to simplify the application process for clients who already qualify for services, not to expand coverage to a new group.

What enrollment data and other information will be collected by the program and how will the data be collected and audited?

Information about each resident enrolled in any public program would be entered into a centralized database, which would be made available to program workers across state departments. Privacy issues must be explored to determine if there were some programs for which it is not appropriate to share eligibility information. It would be necessary to determine the minimum amount of information that would be requested of applicants for public programs, in order to ensure accuracy and at the same time not overburden them.

How (and how often) will the program be evaluated?

The program should be routinely evaluated to determine whether efficiency and accuracy are maintained, and also to determine the impact of the single process system on enrollment in public programs. The impact of the program on applicants should be monitored.

What will the benefits structure be (including co-payments and other cost-sharing)?

The benefits available would be the same as those already available through other public programs. The single process system would not have any stand-alone benefits.

Impact

What impact would the option have on the current healthcare market?

Publicly sponsored programs, or those that receive public reimbursement, could experience increases in eligible populations as a result of the single process system, because information would be more widely available and more likely to be accurate. Additional research is required to determine the impact on the current healthcare market.

How would the option affect health plans and providers?

Health plans would not be affected by the implementation of a single application process. Providers or workers using the application would require system training, in addition to a review of the confidentiality policies that would be developed alongside the tool.

Would utilization change?

Although utilization on a per capita basis may not increase, it is likely that overall volume of services provided through publicly sponsored systems of care would increase.

What are the political or policy implications?

Careful consideration should be given to the amount of information applicants would be required to provide in order to implement a single process for applying for all public programs. Moreover, policymakers would need to collaborate in the development of standardized definitions for different programs and data elements. The implications of a single process system for people who are not citizens also needs to be considered. People may be hesitant to provide information if it could impact their citizenship possibilities. It would also be expensive and time consuming to develop a centralized data system. However, future savings gained, as a result of the development of a single application process, are likely to offset implementation costs.

Advantages

- Residents of the Commonwealth who are eligible for public programs may be more likely to be enrolled in these programs, and thus more likely to have coverage. The rate of under and uninsurance may thus decrease.
- The development of a data system necessary to implement a single process system, would enable the Commonwealth to have access to accurate and timely information about enrollment for various state programs. Moreover, the data system would provide consistent information about eligibility for various state programs across all outreach and enrollment locations, minimizing errors in enrollment and eligibility.
- The system would be easier for consumers to use, as consumers would only have to interface with state eligibility workers once in order to gain information about the range of programs for which they may be eligible.
- A single process would reduce the amount of duplicated work that currently exists in the application process, resulting in savings to the system.

Limitations

- Each additional resident who is enrolled in a publicly sponsored program and who was not previously enrolled in that program, represents an additional cost to the Commonwealth.
- The data system necessary to implement the single process system would be sophisticated. In order for the system to be implemented appropriately, it would need to be available to all outreach and eligibility workers. Thus the resources required to implement this system would be extensive, even considering the labor expenses that might be reduced if information currently provided by workers was available on-line. Significant resources would need to be directed toward standardizing data elements and identifying the information that must be collected in order to determine eligibility for various programs. Federal funds would be necessary to support this effort.

• The amount of detailed personal information required might act as a disincentive for people to apply for programs, especially those that are not citizens.

Financing

What will enrollee (and/or employer) premium sharing requirements be?

Not applicable.

What is the projected cost of the coverage expansion? How was this estimate reached? (If it is not possible to estimate actual costs, describe methodology that will be used to make such an estimate when time and data permit. Include the estimated public and private cost of providing coverage.)

To be determined.

How will the program be financed?

To be determined.

What strategies to contain costs will be used?

The strategies that would be used to contain costs include those that are currently used to limit crowd-out. Eligibility and enrollment workers would be responsible for exploring whether residents have access to private coverage, and helping residents access those sources of coverage.

Extent to which Principles are Met

The single application process encompasses several of the principles identified by the Steering Committee. In particular, the single process system would help promote:

- Efforts to provide equal access to coverage: A centralized database would ensure that applicants are provided with one system that provides equal access to coverage.
- Targeting of outreach and enrollment efforts to those who are most financially needy. Eligibility workers would target outreach and enrollment efforts to those who are determined eligible for various programs.
- Improved care management: Eligibility and enrollment determined by one worker would help insure that people are triaged to all programs for which they are eligible, and promote communication among various state programs.
- Full enrollment in current models/programs: Outreach and eligibility workers will be able to direct applicants to the programs for which they are eligible, thus promoting full enrollment.
- Maximization of programs for which there are available federal dollars: Priority in enrollment could be given to programs for which there are available federal dollars.
- Reflect needs of multiple subgroups: The needs of multiple subgroups could be met through one system that contained information about various public assistance programs.

Next Steps and Questions

Data Collection and Analysis: What data and information is available, or being collected, that will be developed if this option is selected for further pursuit i.e., Household survey, employer survey, MEPS analysis, etc. What else do we need to know to further pursue this as an option?

It would be helpful to have data related to the number of residents who are eligible for but not currently enrolled in public programs. Estimates of the additional enrollment that would result from this option might be determined through an analysis of take-up rates. Information should also be gathered about computer systems that other states have developed for this purpose, in order to estimate the costs associated with this option.

Feasibility and Implementation Issues: Are any steps currently underway to support this option? Describe the actions already taken to move this initiative toward implementation (including legislation proposed, considered or passed), and the remaining challenges. If nothing is currently in place, what will need to be done to support this option? Legislation, regulation, etc.

The Commonwealth has made significant strides toward increasing the availability of information about various state programs. For example, applicants to the Uncompensated Care Pool are triaged through a system that directs them to MassHealth if it appears that they are eligible for this program. The strengths and weaknesses of this system should be assessed to determine the feasibility of the proposed single process system.

In addition, the Executive Office of Health and Human Services has developed the Eligibility Wizard; a simple, on-line tool that helps consumers determine whether they qualify for MassHealth, the Massachusetts Medicaid program. The single application process for enrolling in all public programs could build on this initiative to create a more sophisticated and comprehensive tool.

Privacy issues must be considered in the implementation of a single process system. For example, should information contained in a central database be made available to all state workers? Can an applicant request that certain information be protected if he or she does not want it disclosed to other government agencies?

Modifications to the Insurance Partnership

[Continued analysis will be performed on this approach as stated in question 4.1.]

This option consists of one or more of three types of modifications to the Insurance Partnership (IP):

- raising the maximum employer size from 50 to 100;
- raising the maximum income for an eligible employee from 200% to 250% FPL; and
- increasing the subsidy amount for employers.

Target Population

Low-income employees and their families, who work for employers with fewer than 100 employees. Many of these individuals either are not offered health insurance through work or find premiums and cost-sharing arrangements to be prohibitive, and are not eligible for other state-sponsored insurance programs.

Mechanism

How will the program be administered?

The program will continue to be administered by the Division of Medical Assistance

How will marketing/outreach and enrollment be conducted?

Marketing/outreach will continue to be conducted through outreach efforts currently underway.

What methods for ensuring quality will be used?

Market forces and state mandates will determine the quality of the insurance product offered to employers and employees.

How will crowd-out be avoided and monitored?

Crowd-out describes the substitution of public for private insurance. The IP is a partial state subsidy for the purchase of private insurance. As such, employers and employees who purchase insurance with the help of the IP subsidies are not "crowded-out" of the private insurance market.

A. Effect of Increasing Income and Employer Size Eligibility Criteria

Based on the 2000 DHCFP Survey of Health Insurance Status of Massachusetts Residents, about 1.2% of the working insured (or 29,700 individuals) are ineligible for the IP because their firm employs from 50 to 99 employees. About 9.2% (or 228,387 individuals) work for small employers (less than 50), but earn from 201 to 400% FPL. Another 2.3% (or 56,971) work for employers with 50 to 99 employees and earn from 201 to 400% FPL. Based on 1999 March Supplement CPS data, the number of working insured earning 201 to 300% FPL is relatively

close to those earning 301-400% (306,000 and 351,000 respectively). If we assume that the distribution of working insured is equally uniform within the 200%-300% FPL income group as it is between the 201%-300% and 301-400% FPL groups, than approximately one quarter of those who are ineligible for the IP because they earn 201-400% FPL will be newly eligible if income eligibility is raised to 250% FPL. As such, of those who currently have employer-sponsored insurance, approximately 57,000 would be newly eligible for the IP due to a change in income eligibility, about 29,700 due to a change in employer-size eligibility, and 14,000 due to a combination of both changes. Thus, approximately 100,700 individuals who currently have employer-sponsored insurance would become eligible for the IP.

B. Effect of Increased Employee Subsidy

Because the employee premium contribution is fixed (\$25 for individual coverage; \$50 for couple coverage; \$10 per child), those who earn less must pay a greater percentage of their income toward the premium. An employee earning 85% FPL contributes 4.1% of his/her gross earnings towards the premium, while an employee earning 200% FPL contributes 1.75%. However, those earning less than 133% FPL constitute a disproportionately high number of policy holders via the IP. According to the Massachusetts 2000 household survey 25.3% of the under 200% FPL working uninsured earn less than 133% FPL, but 62.5% of the policy holders (representing 65.8% of covered lives) under plans purchased via the IP are employees earning less than 133% FPL. Conversely, 61.8% of the under 200% FPL working uninsured earn 151-200% FPL, but only purchase 28.2% of the policies (representing 24% of covered lives) via the IP. The inverse relationship between percent of income contribution and take-up rate suggests that reducing the employee premium contribution would not have a significant effect on IP participation.

C. Effect of Increased Employer Subsidy

The IP makes payments of \$400, \$800 or \$1000 per year depending on coverage type, (individual, couple or family) for each qualified employee. The employer subsidies have not been subject to an inflationary adjustment, nor have they been increased since the amounts were established seven years ago. Thus, the relative value of the employer subsidy has significantly decreased. In order to regain the level of incentive that existed when the IP was first established, an increase in the employer contribution would need to reflect private insurance premium inflation over the past seven years. An inflation-adjusted employer subsidy would create a stronger incentive for employers to purchase insurance through the IP.

D. Projected Take-Up Rate Effect

Current IP enrollment shows that only 31.6% of policies (and lives covered) are for individuals and families who were insured prior to purchasing insurance through the IP. Based on preliminary results from the Massachusetts 2001 employer survey, only 36% of employees with employer-sponsored insurance from employers with 50 to 99 employees would have a lower premium contribution if their employer participated in the IP. These numbers suggest that if income and employer-size eligibility is changed, far fewer than the 100,700 newly eligible employees will purchase insurance through the IP.

IP enrollment can be monitored by analyzing data collected via the Medical Benefit Request. Using estimates of how many individuals are newly eligible, we can determine take-up rates using income and employer-size information necessary to make an IP eligibility determination.

What enrollment data and other information will be collected by the program and how will the data be collected and audited?

Eligibility and enrollment data is currently collected and analyzed by the Division of Medical Assistance (DMA) and this would continue.

How (and how often) will the program be evaluated?

The program would be monitored annually by DMA. The evaluation would compare actual to projected enrollment and costs, and participation by employer-size and income.

What will the benefits structure be (including co-payments and other cost-sharing)?

The IP requires monthly premium contributions by the employer and employee. The amount of employee contribution ranges from \$10 to \$50, depending on the number of beneficiaries covered under the given policy. Premium contributions would be based on a sliding-scale (a percentage of income) for those earning 200-250% FPL. The benefits offered by each plan are determined by the market and state mandates.

Impact

What impact would the option have on the current healthcare market? How would the option affect health plans and providers? Would utilization change?

Insurance is purchased in the private market, and the IP population is small relative to the employer-sponsored market. Thus, the IP expansion should have little effect on the current healthcare market.

What are the political or policy implications?

Expanding IP eligibility criteria would require an increase in state funding for the program. For each newly purchased plan, Massachusetts would contribute approximately half of the non-employer contribution. Expanding the IP would provide working individuals with a viable option, because nongroup premiums are unaffordable for many of the working uninsured.

Advantages

- The cost associated with starting and establishing the IP is already realized, so there would only be marginal increases in administrative costs.
- Takes advantage of employer contributions and federal reimbursement.
- Providing subsidies to employers and employees encourages the purchase of health insurance as most working uninsured report cost as the primary reason they do not purchase health it.

- Data necessary to monitor enrollment and cost are collected as part of the administration of the program. No further data collection needs to be done in order to make timely and accurate assessments.
- Expansion of employer-sponsored family coverage may decrease the number of children enrolled in other (and potentially more costly) state-sponsored programs.
- Health insurance status is strongly correlated with health status and preventative care utilization. An increase in the percent of low-income people who are uninsured may alleviate some of the burden on Massachusetts hospitals and providers.
- The IP is consistent with the implicit understanding in our healthcare system that insurance is provided through the workplace.

Limitations

- "Medicaid stigma" may be a disincentive for people that fall in the upper range of income eligibility.
- Participating employers must offer insurance to all employees regardless of the employees' income, but receive a subsidy only for the income-eligible employees.
- Even minimal premium contributions may make health insurance cost-prohibitive for some income levels.
- Substitution of some public for private contribution.
- For those employers not currently offering health insurance to their employees, the IP contribution may not be sufficient to encourage employers to pay for 50% of their employees' premium.

Financing

What will enrollee (and/or employer) premium sharing requirements be?

Income Eligibility Raised to 250% FPL

The IP requires employees to contribute from \$10 to \$50 towards the premium, depending on the number of people covered under the policy. For those earning 200% FPL, the premium contribution ranges from 1% to 2.6% of gross earnings. For an employee earning 100% FPL the premium contribution ranges from 3.5% to 7% FPL.

For those earning 200-250% FPL, a sliding scale premium contribution, equal to the percent of gross income contributed by those earning 100% FPL would be equitable and would provide an incentive to purchase insurance. For those in the 200-250% FPL range, nongroup insurance is the most viable (if not only) private health insurance option. For a family earning 250% FPL, nongroup premium rates require a family to pay 11% to 28% gross income for an HMO plan, 16% to 41% for a PPO plan, and 19% to 57% for an indemnity plan. (DOI Consumer Information Guide; Non-Group Health Insurance Plans as of 8/30/00). Clearly, nongroup premiums are not affordable for the majority of working adults in this income group. The sliding scale premium would provide those earning 200-250% FPL with a legitimate option, while maintaining equitable premium contribution amounts between middle and lower income groups. Furthermore, because the employee dollar contribution would be greater, the state contribution

per covered person would be less for those earning 200-250% than for those currently eligible for the IP.

Increased Employee Subsidy

As discussed above (see 'crowd-out'), increasing the employee subsidy would have little effect on IP participation. The IP requires a minimal employee premium contribution, and is comparable (as a percent of gross income) to the contribution required by other state-sponsored premium assistance programs (i.e.TennCare (0-7.8% gross income contribution); MinnesotaCare (1.5-8.8%); Arizona Premium Sharing Program (6%)).

Increased Employer Subsidy

The IP requires an employer to contribute at least 50% of the cost of the premium to be eligible for the IP employer subsidy. As of July 31, 2001, 3,140 employers participate in the IP. About two-thirds of those employers (or 2,050) did not previously offer insurance.

What is the projected cost of the coverage expansion? How was this estimate reached? (If it is not possible to estimate actual costs, describe methodology that will be used to make such an estimate when time and data permit. Include the estimated public and private cost of providing coverage.)

Based on IP enrollment and payment trend data, DMA projects the average state contribution per policy (includes employer and employee subsidy) will increase from \$191 in July 2001, to \$219 per month in June 2002 (this reflects the faster growth in family and couple policies than in individual policies). The following projected costs are based on this mean state premium subsidy.

A. Projected Crowd-Out Cost

Based on the crowd-out projections (see 'crowd-out' above), 100,700 employees who currently have employer-sponsored insurance would become eligible for the IP due to increase in the employer size and income eligibility standards. Approximately thirty-one percent of are for individuals previously insured, or about 1,402 policies. Based on the 2000 Massachusetts household survey, 92,047 working insured were eligible for the IP. Thus the current 'crowd-out rate' is 1,402 / 92,047, or 1.5%. If we assume that the take-up rate for those currently insured is equal to the current crowd-out rate then approximately 1,510 employed will participate in the IP. The total state subsidy per month due to the increase in employer size and income eligibility would be approximately \$288,505 to \$330,690.

As discussed above, the projected increase in take-up rate due to an increase in the employer subsidy (short of a full subsidy with no cost to the employee) would probably be negligible. Similarly, increasing the employer subsidy for employers who already offer insurance would also probably be negligible. One would expect that requiring an employer to pay only 50% of the health insurance premium would be a sufficient incentive for an employer who currently offers insurance to participate in the IP.

B. Projected Newly Eligible Cost

According to the 2000 Massachusetts household survey, approximately 238,000 working adults are uninsured. Of those, approximately 96,000 earn 201-400% FPL. If we again assume that the number of individuals is equally distributed throughout this income group (see 'Crowd Out' part A), approximately 24,000 working uninsured earn from 201-250% FPL. In addition, about 6.5% of the working uninsured earning 201-400% FPL work in establishments with 50 to 99 employees. Thus, about 1,560 working uninsured would become eligible due to in increase in both income and employer size eligibility. A number of working uninsured would become newly eligible due solely to an increase in income eligibility (those working for small employers (less than 51 employees) and earning 201-250%). If we again assume uniformity with the 201-400% FPL group, approximately 15,600 working uninsured would become eligible due to an increase in income eligibility. Similarly, some working uninsured would become eligible due to establishment size alone. Approximately 8,300 working uninsured earn less than 200% FPL and work in establishments with 50 to 99 employees. Summing the three newly eligible population groups, 25,460 working uninsured would become eligible.

The current take-up rate for those who were previously uninsured is approximately 3.7% (2,900 policy holders previously uninsured/79,250 working uninsured working at small establishments (<50 employees) and earning less than 200% FPL). If we assume the same take-up rate for the newly eligible population, then 942 newly eligible working uninsured would participate in the IP, at a monthly state subsidy of \$180,000 to \$206,000.

As discussed above, the projected increase in take-up rate due to an increase in the employer subsidy (short of a full subsidy with no cost to the employee) would probably be negligible. However, an increase in the employer subsidy would provide a greater incentive for those employers who currently don't offer insurance but would be newly eligible. Approximately 42% of 2 to 9 employee establishments, and 9.2% of 10 to 50 employee establishments do not offer health insurance. Virtually all of these firms report cost as a primary factor in their decision not to provide health insurance. The impact of an increased employer subsidy would probably have a negligible effect on employers with 51 to 100 employees, as the vast majority of those establishments currently offer insurance to their employees.

Next Steps and Questions

Data Collection and Analysis: What data and information is available, or being collected, that will be developed if this option is selected for further pursuit i.e., Household survey, employer survey, MEPS analysis, etc. What else do we need to know to further pursue this as an option?

A number of survey instruments can be used to continue assessing the IP. The Massachusetts 2001 employer survey, the Massachusetts 2000 household survey, and data collected by DMA for IP eligibility determinations provide valuable income, employer size, and insurance status information about the Massachusetts working population.

Feasibility and Implementation Issues: Are any steps currently underway to support this option? Describe the actions already taken to move this initiative toward implementation (including legislation proposed, considered or passed), and the remaining challenges. If nothing is currently in place, what will need to be done to support this option? Legislation, regulation, etc.

The proposed options would require legislation and a commitment to increase IP funding.

Individual Responsibility

[Continued analysis will be performed on this approach as stated in question 4.1.]

In addition to the state's special responsibility to ensure that all employees working for contracted employers have access to affordable insurance, individuals who work directly for the state under contract should have similar access. This option would allow individuals who have a contract with the state lasting 12 months or longer and who work at least 18.75 hours per week to have access to health insurance. The simplest way, administratively, to provide access would be by allowing contracted individuals to participate in Group Insurance Commission plans that are available to state employees. However, staff are examining other possibilities. If contracted individuals had the same opportunity to participate in GIC plans as state employees, they would be able to enroll at the start of their contract or at any time during open enrollment. However, there would be a 2-calendar month waiting period before GIC coverage would begin and the individual must contribute 15% of the total premium cost (both requirements apply to state employees).

Currently, individuals with a state contract often are paid an add-on of up to 25% of their salary in lieu of benefits. Therefore, those who make a higher contracted salary receive a larger benefit (since the benefit is a percent of salary) and would be more financially able to pay for health insurance coverage on their own. The add-on is meant to compensate for benefits not received such as sick or vacation time and health insurance; however, the individual may spend the money as he or she wishes and is not required to purchase health insurance.

This option would remove the portion of the 25% add-on that is meant for health insurance (even if the contracted individual chose not to take the GIC coverage.) This portion of the add-on would only be removed from the salaries of contracted individuals who are eligible for GIC coverage. The portion would be converted and used to offset the state's cost of providing insurance to these additional people (each agency would be responsible for budgeting and paying for the state's portion of the premium cost for its own contracted employees). If the contracted individual chose not to participate in an available GIC plan, that person would simply forfeit the benefit. The same benefit forfeit exists for state employees. It is possible that the benefit add-on could transition into a straight dollar amount which would total 2 or 3 weeks (for example) of that person's pay to compensate for the lack of vacation or sick time. The details for this option are being examined further.

Target Population

Those individuals (and their families as beneficiaries) who have state contracts lasting 12 months or longer and who work at least 18.75 hours per week. During FY2001 there were approximately 43,000 of these individuals with approximately 47,500 contracts. Only approximately 3,000 of these contractors were paid more than \$20,000 annually; therefore, one could assume that many contracted individuals work on a part-time basis. The total dollar amount paid to contracted individuals was \$268,131,034, with an average contract size of \$5,651 and with the average contracted individual making \$6,236. The average contract size ranges

significantly from an average of \$102,361 for a highway/lateral construction contractor to \$120 per contract for weather reporting services.

Mechanism

How will the program be administered?

Each agency would be responsible for its own contracted employees and for the state's share of the insurance premium. All newly contracted individuals would have the opportunity, at the time of the contract signing, to participate in an approved GIC plan (or another plan). All currently contracted individuals would have a special two-month open enrollment period when this new program begins. If contracted individuals were permitted to participate in approved GIC plans or another type of plan, they could enroll in a health insurance plan at their contract's start date or during open enrollment.

How will marketing/outreach and enrollment be conducted?

All currently contracted individuals and those applying for jobs for 12 months or longer and who work at least 18.75 hours per week would be informed by the state when they are hired of the availability of insurance to them.

How will services be delivered under the expansion?

Services would be the same for contracted individuals as they are for state employees.

What methods for ensuring quality will be used?

If coverage were provided through the Group Insurance Commission (GIC) plans, GIC would monitor quality, just as for state employees.

How will the coverage program interact with existing coverage programs and state insurance reforms (e.g., high-risk pools and insurance market reforms), as well as private sector coverage option (especially employer-based coverage)?

This option does not entail starting a new program; it would simply open up the state employee coverage program to state contracted individuals. By allowing long-term contracted employees to participate in health insurance plans, more people paid directly by the state would have access to affordable health insurance.

How will crowd-out be avoided and monitored?

Crowd-out would not be a factor in this option because the contracted individuals would transition from either their own private or public coverage to private coverage (GIC or other private plans).

What enrollment data and other information will be collected by the program and how will the data be collected and audited?

The state would monitor contracted employees in a more efficient way (how many, what salaries, how long are their contracts, etc) and would collect data on the number that are participating in GIC/other plans as well as which plans they choose.

How (and how often) will the program be evaluated?

The program would be evaluated every six months.

What will the benefits structure be (including co-payments and other cost sharing)?

The benefits structure would be the same for contracted individuals as it is for state employees.

Impact

What impact would the option have on the current healthcare market? How would the option affect health plans and providers? Would utilization change?

Offering certain contracted employees access to affordable health insurance could shift some of those employees already covered under other private plans into GIC/or other coverage made available by the state; however this would not impact the market negatively. On a positive note, the option would provide affordable access to health insurance for those without coverage or with expensive nongroup coverage.

Since some state contracted employees are long-term contracted individuals, the state has a special responsibility to provide them with affordable health insurance just as it is provided to state employees.

What are the political or policy implications?

Politically this option is not very objectionable since individuals contracted for a year or longer generally perform the same jobs as state employees; therefore, many believe that they deserve the same benefits. The only political hurdle would be that of finding more money in the state budget for the additional benefits. However, this amount of money would be partially or fully offset by lowering the salary add-on for contracted individuals. This is being studied in further detail.

Advantages

- Since the state contracts directly with these individuals for work, this option would satisfy the state's special responsibility of making sure its contracted employees have access to affordable health insurance.
- This option would be administratively simple if GIC plans were used because GIC coverage is already in place for state employees.
- This option would help contracted employees better afford health insurance coverage.

- This option would level the playing field for contracted employees and state employees by providing the same affordable access to health insurance for both.
- Since a portion (as yet undefined) of all contracted individuals' add-on would be removed and used to offset the state's cost of providing health insurance to contracted individuals, this option might not require any additional state funds.

Limitations

- This approach will likely cover only a very small number of uninsured individuals, depending on how many contracted individuals were uninsured before the coverage became available.
- Depending on how many uninsured contracted employees already have coverage or actively choose not to have coverage, this option may not reduce the uninsured rate at all. There would be no change in the insured rate if contracted employees simply drop current coverage to join GIC plans available to them.

Financing

What will enrollee (and/or employer) premium sharing requirements be?

Premium sharing requirements would be the same as for state employees.

What is the projected cost of the coverage expansion? How was this estimate reached? (If it is not possible to estimate actual costs, describe methodology that will be used to make such an estimate when time and data permit. Include the estimated public and private cost of providing coverage.)

Part of the cost would be covered through reducing the employee's benefit add-on and using that money toward the program. If more money were needed, the state would have to determine its source.

How will the program be financed?

Through reducing the employee's benefit add-on and other to be determined.

What strategies to contain costs will be used?

Reducing the salary add-on received by the eligible contracted individuals will contain costs significantly.

Extent to which Principles are Met

This option meets the principle stating that "the state has a special responsibility to assure access to affordable health insurance for those people who work under contract to the state or for organizations that are primarily dependent on state funding."

Next Steps and Questions

Data Collection and Analysis: What data and information is available, or being collected, that will be developed if this option is selected for further pursuit i.e., Household survey, employer survey, MEPS analysis, etc. What else do we need to know to further pursue this as an option?

It might be necessary to survey contracted employees to find out how many already have health insurance through a spouse, Medicaid, or other means. The take-up rate must be estimated as well, which could be accomplished by asking in the survey whether the contracted individual would take the GIC coverage if it were offered. Ideally, staff would want to arrive at a number/percent of contractors with insurance, the type of insurance it is (private, public), and the estimated take-up rate of GIC coverage (including an estimation of crowd-out.) This would help to determine approximately how many people would shift from being uninsured to having access to affordable insurance and enrolling in it.

Feasibility and Implementation Issues: Are any steps currently underway to support this option? Describe the actions already taken to move this initiative toward implementation (including legislation proposed, considered or passed), and the remaining challenges. If nothing is currently in place, what will need to be done to support this option? Legislation, regulation, etc.

There is no legislation currently pending that is similar to this proposed option. It has not been determined whether legislation or new regulations would be necessary.

Extend Medicaid Eligibility Using Only Income Requirements

[Continued analysis will be performed on this approach as stated in question 4.1.]

Eliminate categorical eligibility below a certain income level (not yet determined) and allow all people below that income level to enroll in MassHealth (Medicaid). Categorical eligibility requirements above that income level would remain.

Massachusetts expanded Medicaid coverage under a Section 1115 Medicaid Research and Demonstration waiver. This waiver established MassHealth, which expanded coverage to children (through 18 years of age), pregnant women and their newborns, and "categorically eligible adults up to a certain household income level." To be categorically eligible, one must meet income requirements, as well as other requirements set by federal and state guidelines. Categorical eligibility is granted if a person is determined disabled, HIV positive, employed by an Insurance Partnership participating employer, unemployed for a certain period of time, or a parent or adult caretaker of children under age 19. MassHealth does not cover residents who do not fall into any of the above categories. The state's surveys of the uninsured have revealed that the greatest portion of uninsured adults are between the ages of 19 and 39, many of whom are without children and thus do not meet categorical eligibility requirements for MassHealth. This option would directly assist the poorest of these people.

Target Population

Low-income uninsured adults without children who currently do not meet categorical eligibility requirements for MassHealth.

Mechanism

How will the program be administered?

DMA would continue to serve as the state agency responsible for MassHealth and would administer the program using the new eligibility rules.

How will marketing/outreach and enrollment be conducted?

MassHealth would sustain the ongoing outreach and eligibility determination activities.

How will services be delivered under the expansion?

Services would be delivered under the current infrastructure for health services delivery, eligibility determination and Medicaid enrollment.

What methods for ensuring quality will be used?

DMA would be responsible for monitoring quality of care using its ongoing systems for ensuring quality. Other public agencies that monitor quality of health care in the Commonwealth would continue these programs.

How will the coverage program interact with existing coverage programs and State insurance reforms (e.g., high-risk pools and insurance market reforms), as well as private sector coverage options (especially employer-sponsored coverage)?

This option would not create a new coverage program; it will simply adjust the eligibility requirements of a current public program, MassHealth. Hence, removing categorical eligibility requirements for MassHealth below a certain income level will not change or disrupt other public programs and will have a minimal influence on private sector coverage. Some residents in low-wage jobs who have employer-based coverage may find the MassHealth coverage to be more comprehensive, therefore they might move from the private to the public market. However, the number of people transferring from private to public coverage probably will be small because many people in very low-wage jobs are not offered coverage. Crowd-out will be discussed further in the answer to the following question.

In addition, the burden on physicians and community health centers throughout Massachusetts of providing free care might be reduced somewhat because MassHealth would cover more of the state's very poor people.

How will crowd-out be avoided and monitored?

Crowd-out would occur if some low-wage residents who have private market coverage become eligible and enroll in MassHealth due to the expansion of eligibility requirements. Crowd-out can be monitored if outreach, program and enrollment staff inquire about other sources of coverage when beneficiaries encounter the system. The workers would need to be knowledgeable about various benefit packages, or have a desk-top computer program that lays out the various programs for which each resident is eligible based on income and other eligibility information. Overall, crowd-out probably would be minimal since many very low-wage workers do not have coverage. There would be a requirement to utilize employer coverage if it proves cost effective for the state.

What enrollment data and other information will be collected by the program and how will the data be collected and audited?

The state would continue current enrollment data collection including gathering demographic, income and asset information. The data is gathered by DMA eligibility workers and would be audited by ongoing DMA mechanisms for ensuring data quality.

How (and how often) will the program be evaluated?

The cost and utilization experience of the residents enrolled under new eligibility guidelines should be monitored to help determine whether utilization is within budget expectations. The program should be routinely evaluated, especially to determine the impact of expanding eligibility to all people below a certain income on public programs including the Uncompensated Care Pool. By monitoring the number of people moving from private insurance coverage to MassHealth specifically due to the removal of categorical eligibility requirements for certain low-income people, trends in private coverage will be established.

What will the benefits structure be (including co-payments and other cost-sharing)?

The benefit structure, including co-payments and other cost sharing would be determined by the Division of Medical Assistance (which administers Medicaid), consistent with overall program goals and policies. However, maintaining the current structure and standard is most likely because it would be costly and unnecessarily complex to establish a new benefit plan for a certain category of people under MassHealth.

Impact

What impact would the option have on the current healthcare market?

Enrollment in MassHealth would increase if categorical eligibility requirements below a certain income level were eliminated. Residents aged 19 to 64 who currently utilize the Uncompensated Care Pool are, for the most part uninsured, and nearly half of these are not eligible for MassHealth because they do not meet categorical eligibility requirements. An additional 16% of Pool users declined to apply for MassHealth. Some of these residents might be eligible for MassHealth if categorical eligibility requirements below a certain income level were removed. Overall, the number of uninsured in the state would probably drop somewhat due to this expansion of eligibility.

How would the option affect health plans and providers?

The residents who would become eligible for MassHealth due to this option would receive services through the network of health plans and providers that currently provide health care to residents eligible for MassHealth. Health plans and providers would serve a larger MassHealth patient population if categorical eligibility requirements below a certain income level were eliminated. The advantages and disadvantages for health plans and providers of serving Medicaid clients would thus be enhanced, in terms of, for example, desirability to the plan or provider of increasing patient populations, reimbursement levels and complexity of cases.

Would utilization change?

Although utilization on a per capita basis would likely not increase for those already covered by MassHealth, the overall volume of services provided through MassHealth would increase due to the additional lives covered under MassHealth.

What are the political or policy implications?

Extending MassHealth coverage to a new group of residents would require approval by the federal government through the waiver process. In addition, state funds would need to be appropriated by the state legislature to support the cost associated with extending coverage to more people. The amount of state funds available for this effort would determine the federal poverty level below which categorical requirements would be eliminated.

Advantages

- Extending MassHealth coverage by basing eligibility income requirements below a certain level would be a relatively straightforward way to expand health insurance coverage.
- The program under which these residents would be entitled is already operational; therefore, it would not require significant resources to develop the organizational capacity to implement this option. In addition, more federal funds would become available to the Commonwealth to help support the expansions due to federal financial participation in the Medicaid program.
- By offering MassHealth coverage to residents who are currently uninsured, newly entitled
 enrollees would have access to a greater range of health care services including primary and
 preventive care. These enrollees might be more apt to use health care services for routine
 care before health problems become exacerbated, and the need for more costly health care
 services might be avoided.

Limitations

- The removal of categorical eligibility requirements for MassHealth would be a costly option. However, the cost could be limited by carefully evaluating the income level (FPL) at which one would become eligible.
- Both regulatory and legislative approval would be required. For example, the federal government would need to approve the expansion of the 1115 waiver under which the current MassHealth program operates.
- The Massachusetts legislature would also need to appropriate more funds for the program and approve the expansions.

Financing

What will enrollee (and/or employer) premium sharing requirements be?

The benefit structure, including co-payments and other cost sharing would be determined by the Division of Medical Assistance, consistent with overall program goals and policies. However, maintaining the current structure and standard is most likely because it would be costly and unnecessarily complex to establish a new premium sharing requirement for a certain group of people under MassHealth. Also, since all the residents newly entitled under the expansion would be poor, it is not feasible to require extensive enrollee cost sharing.

What is the projected cost of the coverage expansion? How was this estimate reached? (If it is not possible to estimate actual costs, describe methodology that will be used to make such an estimate when time and data permit. Include the estimated public and private cost of providing coverage.)

In order to estimate costs of the expansion, various data sources might be utilized. Health care expenditures for the target population under the Uncompensated Care Pool could be analyzed, and the size of the target population could be estimated using data from the Massachusetts 2000 household survey. These analyses would provide useful data to estimate the costs of the expansion.

How will the program be financed?

The program would be financed by appropriations from the state legislature and federal financial participation. Tobacco settlement funds could also be used.

What strategies to contain costs will be used?

The strategies that would be used to contain costs would be those that DMA currently uses, such as enrollment in managed care plans, utilization review, and so on. In addition, limiting crowd-out would reduce costs. Eligibility and enrollment workers would be responsible for determining whether residents have access to coverage in the private market, and helping these residents access these sources of coverage.

Extent to which Principles are Met

By extending Medicaid eligibility to a group of residents using income as the only criteria several principles would be met:

- Equal access to public insurance would be provided to people (a) with the same level of income, (b) regardless of current insurance status, and (c) regardless of occupation. This option would provide a relatively straightforward way of ensuring equal access to health care coverage for residents who do not fit into typical MassHealth eligibility categories.
- Assistance would be targeted to the most financially needy: the income limit that would be used to determine eligibility would be set at a level which stakeholders agree targets those who are most financially needy, for example those with incomes less than 100% of the FPL.
- Utilizes existing public insurance financial mechanisms: this option would be developed through the existing DMA infrastructure, and would not require significant additions of staffing
- Quality of care and costs are more likely to be managed: By enrolling low income residents into MassHealth, there is a greater likelihood that these residents would receive higher quality and better managed health care.
- Creates an additional health coverage model that meets the needs of a specific subgroup of Massachusetts residents: The target population for this option is currently uninsured, and utilizes the Uncompensated Care Pool. By extending MassHealth to this group, the specific needs of the target population can be met.

- Requires additional state spending that otherwise is not supported legislatively: A concern in developing this option would be the additional cost involved. (Although this could be limited by setting a low FPL under which everyone would be covered).
- The proposed option does not necessarily foster independence, since people who would enroll in this option would receive public assistance.

Next Steps and Questions

Data Collection and Analysis: What data and information is available, or being collected, that will be developed if this option is selected for further pursuit i.e., Household survey, employer survey, MEPS analysis, etc. What else do we need to know to further pursue this as an option?

See below.

Feasibility and Implementation Issues: Are any steps currently underway to support this option? Describe the actions already taken to move this initiative toward implementation (including legislation proposed, considered or passed), and the remaining challenges. If nothing is currently in place, what will need to be done to support this option? Legislation, regulation, etc.

In order to determine the feasibility of this option, the following steps could be taken:

- Determine the federal policy implications and barriers to this option;
- Analyze the uninsured survey further to identify how many additional residents would be eligible;
- Conduct focus groups to understand the type of insurance "package" needed to assist these residents;
- Commission a cost-benefit analysis to assess how much additional funding would be needed to expand MassHealth;
- Determine estimates of take up rates; and
- Determine feasibility of additional legislative appropriations for this model.

4.18 Which policy options were not selected? What were the major political and policy considerations that worked in favor of, or against, each choice? What were the primary factors that ultimately led to the rejection of each of these approaches (e.g., cost, administrative burden, federal restrictions, constituency/provider concerns)?

Preliminary research was conducted for a few options that were subsequently dismissed by the Steering Committee. These options included: buy-in to Group Insurance Commission (GIC) plans for state employees, buy-in to the Federal Employee Benefit Program (FEHBP), buy-in to MassHealth (Medicaid), development of an adult medical security plan, availability of limited benefit insurance for primary care, expansion of MassHealth to children above 200% of the federal poverty level, tax incentives for employers, an individual mandate, an employer mandate, creation of an unsubsidized small employer health insurance purchasing cooperative and creation of a state-level "single-payer" system. A brief description of each approach, the policy considerations surrounding the approach, and the primary factors leading to the rejection of the approach follows.

Buy-in to Group Insurance Commission (GIC) Plans (plans currently available to state employees only): This approach would have allowed specified low income individuals and families without access to employer health insurance to buy-in to GIC plans. The benefits of this approach would have been that it required little new administrative structure, it took advantage of current systems and risk pooling, it removed the stigma of participating in a welfare program and gave the state the ability to control costs and influence the system.

However, there were significant limitations to this approach. It probably would have created adverse selection and would have provided relatively little cost savings to the uninsured. Since those near-retirement and those with large families would have seen a cost savings by buying into GIC plans rather than buying in the nongroup market, they would have be more likely to buy-in to the GIC plans than would young single adults who are traditionally less expensive to insure. In addition, without a subsidy for premium assistance, uninsured people in lower-income brackets would probably not have been able to afford GIC coverage. Creating a buy-in program also may have caused significant crowd-out of people migrating from nongroup plans (most likely the higher-risk people as described above) to GIC coverage. Finally, politically, state employees and their unions might have objected to a buy-in to GIC plans for fear that rates would have increased due to the inclusion of a potentially higher-risk population. All of these factors led to the Steering Committee's decision to reject this option.

Buy-in to Federal Employees Health Benefits Program (FEHBP): This approach would have allowed all individuals and families who were not covered by employee sponsored plans or public programs and who were eligible for tax credits to buy-in to FEHBP. The benefits of this approach were the same as those described in the GIC plan buy-in option. The primary factors leading to the rejection of this approach were the same as those described in the GIC plan buy-in option.

<u>Buy-in to MassHealth (Medicaid)</u>: This approach would have extended MassHealth on a buy-in basis to individuals and families who met certain income guidelines. The benefits of this option included that additional administrative costs would have been minimal, it took advantage of

federal reimbursement, and that data were already collected as part of the administration of the program hence further data collection would not be needed. The main factors that lead to the rejection of this approach included: 1) crowd-out was likely (people will move from private coverage to the relatively inexpensive MassHealth public coverage), 2) there would have been a significant cost to the state, 3) new enrollees buying-in might utilize more services than current enrollees thereby increasing the average cost per member/per month, and 4) the minimal premium contributions that would have been required to buy-in may still have been be cost-prohibitive for people at lower income levels.

Development of an Adult Medical Security Plan: This approach would have created a limited insurance plan that would have covered preventive and primary health care services for uninsured adults (without access to employer-sponsored insurance or eligibility for public programs) with household incomes below a certain level. The primary advantage of this approach was that it would have made primary and preventive care more accessible and could have improved the health status of some people while possibly reducing the demand for emergency care and hospital services. However, this approach was not pursued for many reasons, most notably: 1) it would have fostered continuing coverage gaps (by only covering primary and preventive care), 2) there was a strong possibility of crowd-out because those with access to more expensive comprehensive coverage could have chosen this less comprehensive plan, 3) creating the plan would have duplicated services offered by the state's Center Care program, and 4) the design of this program imitated the Children's Medical Security Plan which has high operating and administrative costs and is less desirable than MassHealth.

Limited Benefit Insurance—Primary Care: This approach would have permitted and encouraged insurers to sell "bare-bones" policies in the individual and group markets that only would cover primary and preventive services. The approach would have required the legislature to pass a bill waiving mandated benefit requirements. The benefits of this option are that it might have encouraged people to seek out primary and preventive care and the coverage would be less expensive than full-benefit insurance plans. Many limitations led to the rejection of this approach including: 1) a primary care insurance plan was determined not to be "insurance" since it lacked coverage for catastrophic events, 2) the plan might have increased the burden on the state's Uncompensated Care Pool which covers hospital visits for the uninsured because some people currently with full insurance coverage might have switched into this type of primary care only plan, 3) waiving mandated benefits might have been politically problematic, and 4) the price might still not have been low enough to reach low income individuals.

Expand MassHealth to Children above 200% of FPL: This approach would have increased the income cap for eligibility above 200% of the federal poverty level. The benefit of this option was that more children would have been covered by insurance, under MassHealth. However, this option was limited in that it required significant additional state funds and children above 200% of the FPL already have access to the Children's Medical Security Plan. In addition, the approach contradicted some of the principles adopted by the Steering Committee (see Appendix V). These factors led to the rejection of the approach.

<u>Tax Incentives—Employers</u>: This approach would have required the state to provide a tax credit to employers that offer health coverage to employees. The incentive would have been created

for employers with low-wage workers. The employer would have been required to pay for part of the premium. This option builds on an employer-based insurance model. However, employers already have a tax incentive to offer health insurance and small employers in Massachusetts have access to the Insurance Partnership (IP). Steering Committee members believed that we should focus on improving the IP instead of creating a competing approach. In addition, small employers may not benefit enough from these incentives to induce them to begin offering insurance.

<u>Individual Mandate</u>: This approach would have required that everyone in the state acquire health insurance; people who failed to purchase coverage would have been taxed. The state would probably have had to provide subsidies for people with low incomes. Assuming a high compliance rate, this mandate would probably have captured some people who chose not to purchase health insurance and would have therefore increased the number of people covered. Also, if this option were chosen, there would have been less reliance on providers for free or discounted care. The major factors that led to the Steering Committee's decision not to pursue the approach were that providing subsidies would be very expensive, enforcement would be difficult and the option would have faced very strong political opposition.

Employer Mandate: This approach would have required all employers to offer coverage to their employees and pay a minimum proportion of the premium or pay a tax approximately equal to the employer's portion of the insurance premium. The approach built on the existing employer-based insurance system and would have leveled the playing field for all employers. However, there were many limitations to this approach which led to its rejection, including: 1) it would not have been politically feasible; 2) it could have been challenged under ERISA; 3) low-wage workers might still not have been able to afford the coverage; 4) it could have discouraged employers from locating their business in Massachusetts; 5) the option would have assisted only those people in the labor force; and 6) it would have been very expensive if subsidies to certain employers were found to be necessary.

Unsubsidized Small Employer Health Insurance Purchasing Cooperative: This approach would have created a health insurance purchasing cooperative for small employers which would have shopped for, selected and monitored the health insurance plans it made available to its members. Workers would have been able to select from all plans available to the cooperative instead of only the plans that their employer offered. The major advantage of this approach was that it would have increased consumer (employee) choice by allowing a selection from all plans available to the cooperative. In addition, premiums might have been reduced since there would have been a larger group purchasing the coverage, thus creating more buying power. However, the primary factors leading to the rejection of this approach included: 1) the state had already reformed the small group market and has insurance intermediaries that level the playing field for small employers; 2) there may have been adverse selection; 3) research suggested that purchasing cooperatives generally appeal to employers who might already offer coverage and who simply want to reduce the administrative hassle of having their own plans. Therefore the ability of cooperatives to penetrate the uninsured population in small groups would probably have been low.

State-Level "Single Payer": This approach would have guaranteed all Massachusetts' residents coverage for a defined set of health care benefits and the coverage would have been publicly financed. The advantages of this option were obvious, including that it guaranteed universal coverage, created no stigma since everyone would be in the same system, eliminated the need for safety-net providers, and it may have simplified quality of care monitoring. However, this approach was precluded under the HRSA planning grant stipulations. In addition, there would have been great potential for an influx of sick residents from border states, there would potentially have been a loss of federal funds tied to current law, and setting up the system for administration would have been daunting. Finally, an examination of the feasibility of a single-payer system in Massachusetts is underway, made possible by funds appropriated by the state legislature. Results are forthcoming.

4.19 How will your State address the eligible but unenrolled in existing programs? Describe your State's efforts to increase enrollment (e.g., outreach and enrollment simplifications). Describe efforts to collaborate with partners at the county and municipal levels.

Please see the option to enroll all those eligible for public programs (Full Enrollment of Currently Eligible). Please note that qualitative research is currently being performed to determine the barriers to enrollment in public programs and also to determine how most people (whether or not they are eligible for public programs) learn about the public and private coverage options available to them.

SECTION 5. CONSENSUS BUILDING STRATEGY

5.1 What was the governance structure used in the planning process and how effective was it as a decision-making structure? How were key State agencies identified and involved? How were key constituencies (e.g., providers, employers, and advocacy groups) incorporated into the governance design? How were key State officials in the executive and legislative branches involved in the process?

A Steering Committee has served as the primary decision-making body for the planning process, while an Advisory Committee has provided important input on all aspects of the project. The Steering Committee includes senior level representatives of agencies/executive branches that are involved in some aspect of the health care or insurance market, including: Division of Medical Assistance, Division of Health Care Finance and Policy, Division of Employment and Training, Department of Public Health, Department of Mental Health, Department of Revenue and the Division of Insurance. In addition, the Steering Committee has senior level representation from the Group Insurance Commission, which purchases health insurance for all state workers, the Executive Office of Elder Affairs, The Executive Office of Health and Human Services and the Governor's office. The core work team (comprised of staff from the Division of Medical Assistance, and the Division of Health Care Finance and Policy) serves as staff for the Steering Committee. Members of the work team have provided the Steering Committee with data, background information on the policy options Massachusetts considered, and much of the information needed by the Steering Committee to make informed decisions. Steering Committee representatives have supplied the core work team with useful information, offered their expertise and have served as the decision-makers throughout the planning process. The collaborative and inclusive nature of the Steering Committee has made it an extremely effective decision-making structure.

The grant's Advisory Committee is composed of key representatives from the Massachusetts health care, health insurance, and business industries, in addition to academic experts and representatives from consumer advocacy groups. State legislators also attended some Advisory Committee meetings and have been approached individually to provide input and political guidance on the policy options being considered. (See Appendix VI for the complete lists of Advisory and Steering Committee members.)

Overall, the governance structure for the planning process has worked well. The process ran smoothly with the assistance of core work team members regarding both logistical aspects of meeting arrangement and in gathering and organizing the data and information needed by the Steering Committee for decision-making. The most difficult aspect of sustaining the governance structure proved to be simply finding suitable times when committee members could meet.

Both the Steering and Advisory Committees met separately on multiple occasions throughout the grant process. They both assisted with the development of the grant's guiding principles and assumptions (attached as Appendix V) as well as the potential policy options. Advisory Committee members participated in brainstorming sessions to develop and edit possible options, while Steering Committee members made decisions regarding which options to remove from consideration, which to continue to research and which to recommend.

5.2 What methods were used to obtain input from the public and key constituencies (e.g., town hall meetings, policy forums, focus groups, or citizen surveys)?

Thus far, surveys have been the primary information gathering method used in Massachusetts to add public input into the planning process. Massachusetts has conducted separate surveys of the state's nongroup subscribers, physicians and employers. Massachusetts fielded a 2000 Survey of Health Insurance Status of Massachusetts Residents prior to the grant award that contained several questions seeking more qualitative input from the public. The nongroup survey was mailed by the nongroup market's two primary carriers to 5000 of their subscribers in an effort to learn why they are purchasing nongroup plans, how much they are paying for coverage, as well as to gauge their satisfaction with the plans. There was a 34% response rate for this survey, higher than was expected. With assistance from the Massachusetts Medical Society, a survey about free care and self-pay services provided was mailed to 8000 of the state's primary care and specialty physicians. There was an 11% response rate for this survey. The state also conducted a 2001 Survey of Massachusetts Employers Regarding Health Insurance, which was described in more depth in Section 2 of this report. (See appendixes XI and XII for weblinks to the survey instruments.)

During the grant extension period, Massachusetts will continue to involve the public in the planning process. Consumer focus groups may be convened to learn more about the motivations and opinions of people buying insurance and those that either choose not to buy or cannot afford coverage. Separate focus groups may be conducted with the employers to learn more about their views regarding offering employees health insurance. Depending on the final options the state decides to pursue, we may seek input from the broader public.

5.3 What other activities were conducted to build public awareness and support (e.g., advertising, brochures, Web site development)?

In June 2001, Massachusetts created a HRSA grant website (www.state.ma.us/hrsa) that has been used as an information warehouse for Advisory and Steering Committee members, as well as a vital link to the public. The existence of the site as well as its contents has been advertised on the Division of Health Care Finance and Policy's website and on the Commonwealth of Massachusetts' homepage. Employer survey results and results of other surveys have been posted consistently. Subscribers to the Division of Health Care Finance and Policy's monthly electronic newsletter (including legislators, providers, advocacy groups and others) have been notified of new postings to the HRSA website.

5.4 How has this planning effort affected the policy environment? Describe the current policy environment in the State and the likelihood that the coverage expansion proposals will be undertaken in full.

The planning effort undertaken upon the award of this grant has allowed the state to bring together key state agencies and staff to work toward one goal: determining how to provide access to affordable health insurance to all Massachusetts residents. In addition, the planning process has encouraged state agencies to reach out to private sector representatives and advocacy groups to continue the dialogue around improving access to affordable health insurance coverage for all

Massachusetts residents. Organizations such as the Massachusetts Medical Society and insurers including Blue Cross and Blue Shield of Massachusetts (BCBSMA) and Harvard Pilgrim Health Care (HPHC) have directly assisted Massachusetts in completing surveys in exchange for the use of survey results.

The events of September 11th and the downturn of the economy since then have had a dramatic effect on the state's budget. Although some of the options being pursued do not require a large output of money from the state or federal government, some do, and they will likely be postponed until the state is once again on firm financial ground. Massachusetts' biggest challenge moving forward is how to maintain the coverage successes we have experienced despite a declining economy. Massachusetts is somewhat unique because it already has a low uninsured rate, largely due to efforts that expanded MassHealth (Medicaid) coverage a few years ago. To maintain current coverage levels through an economic slowdown would be a significant achievement. The grant extension period has provided us with additional time to explore other possibilities regarding this maintenance of coverage goal.

SECTION 6. LESSONS LEARNED AND RECOMMENDATIONS TO STATES

6.1 How important was state-specific data to the decision-making process?

Regarding the health care and insurance markets, Massachusetts is quite different from many other states; therefore the use of state-specific data is especially crucial. The state already performs extensive routine data collection, which, in addition to supplemental data collection activities performed specifically for the planning grant, allowed us to rely mostly on state data while filling in some gaps with national statistics. These state-level data enabled the design of options specific to the health care marketplace in the Commonwealth.

Did more detailed information on uninsurance within specific subgroups of the State population help identify or clarify the most appropriate coverage expansion alternatives?

The Division of Health Care Finance and Policy's 2000 Survey of Health Insurance Status of Massachusetts Residents found that nearly 60% of all uninsured are between the ages of 19 and 39 and nearly 60% of all uninsured are males. Approximately 70% of the uninsured between the ages of 19 to 64 work, and many are self-employed. A significant percent of the state's uninsured live in households with incomes between 200% and 400% of the federal poverty level (FPL) and a large percent of the uninsured have an even lower income but are categorically ineligible for MassHealth (Medicaid). This type of information allowed Massachusetts to focus on these people when designing some of the possible policy options. Examples of options the state is still researching and considering which directly assist these people include removing categorical eligibility for MassHealth below a certain income level, recommending the federal government provide full tax deductibility for the self-employed and those without access to employer-sponsored insurance, and making programmatic changes to the Insurance Partnership to increase the participation of employers and employees.

How important was the qualitative research in identifying stakeholder issues and facilitating program design?

Massachusetts has primarily used quantitative data in researching its policy options to date. We have contracted with The Access Project to conduct focus groups and/or interviews that will assess barriers to gaining coverage. We did perform a number of interviews with members of the Advisory Committee early on in the grant process to assess the feasibility of several options. In addition, several of the surveys conducted by the state had some qualitative questions. The responses to these questions helped us understand the problems many Massachusetts residents face when they attempt to purchase coverage. The state did not generate policy options specifically based on the qualitative information; however, proposed options were adjusted to incorporate some of the qualitative data.

6.2 Which of the data collection activities were the most effective relative to resources expended in conducting the work?

Massachusetts household surveys completed in 1998 and 2000 (and to be conducted again in 2002) were essential to policymaking surrounding coverage of the uninsured. The value of the information gleaned from these surveys certainly outweighed the cost. The 2001 Survey of Massachusetts Employers Regarding Health Insurance has also yielded important information, however it was challenging and difficult to contact some employers due to the inherent difficulties in reaching and speaking with busy employers. Massachusetts nongroup subscribers proved to be especially responsive to a mail survey which was not very resource intensive to distribute or analyze. Thirty-four percent of respondents returned their surveys, which included useful information on subscribers' motivations for purchasing nongroup insurance, the cost of premiums, and demographic data. Many respondents also expressed interest in participating in focus groups.

Massachusetts has ongoing data collection efforts that have proved to be useful for this project, while adding little cost. The DHCFP regularly collects hospital discharge data, observation stay data, and free care application and claims data. These data sources were analyzed specifically for the grant (to compare uninsured and insured populations and study those seeking free care), and only required staff time for the additional analyses.

6.3 What (if any) data collection activities were originally proposed or contemplated that were not conducted? What were the reasons (e.g., excessive cost or methodological difficulties)?

A few qualitative data collection activities that were planned have not taken place yet due to staff turnover, time constraints and the enormity of the project. As mentioned in the answer to 6.2, we have contracted with The Access Project to conduct some of this work.

6.4 What strategies were effective in improving data collection? How did they make a difference (e.g., increasing response rates)?

To improve response rates for both the physician and nongroup subscriber surveys, cover letters explaining the survey and the grant were included along with self-addressed and postage paid envelopes. The response rate for the physician survey was about what the Massachusetts Medical Society expected (11%), while the response rate for the nongroup survey exceeded the health plans' expectations. (We received 34% of the surveys).

We contracted with The Center for Survey Research (CSR) at the University of Massachusetts Medical School, to conduct the 2001 Massachusetts employer survey. They had some difficulty obtaining responses, especially from very large multi-state companies and very small single location organizations. CSR felt that it was important to continue pursuing as many of the employers in the initial sample for as long as possible in order to reduce response bias. Although primarily a phone survey, they are allowing businesses that prefer not to answer the survey by phone to answer it on paper by mail. The vendor began mailing surveys with \$10, which has helped to improve the response rate.

6.5 What additional data collection activities are needed and why? What questions of significant policy relevance were left unanswered by the research conducted under HRSA grant? Does the State have plans to conduct that research?

As explained in the answer to question 6.3, there are a few data collection activities that will soon be underway due to the grant extension awarded to Massachusetts. The most important questions remaining revolve around qualitative issues including the motivations and situations of people and employers. These issues will be addressed through focus groups and qualitative research.

Surveys of state contracted employers and of individuals who have contracts with the state may be conducted to further inform policy options related to these "special responsibility" groups.

In addition, the state must accurately estimate the financial impact of the policy options being pursued, including the size of the population that will be impacted and the estimated crowd-out effect. This work will be completed in the upcoming months with the help of Dr. Jonathan Gruber, a renowned health economist at the Sloan School of the Massachusetts Institute of Technology.

6.6 What organizational or operational lessons were learned during the course of the grant? Has the State proposed changes in the structure of health care programs or their coordination as a result of the HRSA planning effort?

After examining the various eligibility and enrollment requirements for all of the state programs, we were struck by the complexity of the current system. Therefore, one long-term proposal that the state has continued to research is a redesign of the administrative system that creates a single process with multiple points of entry to support eligibility and enrollment activities for all state programs. The state will not propose other structural changes in any health care programs at this time.

Our collaborative process has again affirmed the importance of including a broad range of stakeholders in planning for insurance options, in order to have the greatest likelihood of success. We have also affirmed the importance of using data to make informed decisions, and support the appropriateness of using data that are specific to Massachusetts in our collaborative work.

6.7 What key lessons about your insurance market and employer community resulted from the HRSA planning effort? How have the health plans responded to the proposed expansion mechanisms? What were your key lessons in how to work most effectively with the employer community in your State?

Generally, we learned from the employer community (and especially small employers) that because premiums are rising rapidly, it is becoming increasingly difficult to provide health insurance to employees. In the current economy, many businesses are straining to sustain themselves financially and thus cannot afford to expand or increase benefits. The data from our employer survey has just recently become available and we have not had the opportunity to fully

investigate how the results will inform our options moving forward. This will certainly be an area to focus on with a declining economy. We also learned that people are generally unaware of the insurance options available to them. While awareness of public programs is very good in this state, people not eligible for public programs and without access to employer sponsored insurance are less aware of their options in the nongroup and small group markets. One of our biggest challenges will be to educate people about their health insurance options.

6.8 What are the key recommendations that your State can provide other States regarding the policy planning process?

- Involve a broad-based Advisory Committee early on in the process. It is essential that their input is heard and that they are kept informed and aware of the planning process.
- Try to reach agreement (which will not always be unanimous) among state agencies, legislators and the governor's office on the process, as well as on the final decisions made by the group.
- Involve members in the planning process that have different political backgrounds, which encourages thought-provoking discussions and keeps everyone on a realistic, non-partisan track
- Recognize that each state is different, know your state's health care market history, and take that into account when deciding which options to pursue. A method for expanding affordable insurance coverage in one state might not work in another.
- Finally, don't underestimate the work that must be done during the planning process or the cost and buy-in necessary to implement any recommendations!

6.9 How did your state's political and economic environment change during the course of your grant?

Massachusetts experienced many changes during the course of our HRSA grant. In addition to shifts in policy and programs due to belt-tightening in a tough economic time, some key offices in state government changed hands. Our Governor, Argeo Paul Celucci, left his post to become the U.S. Ambassador to Canada at which time the Lieutenant Governor, Jane Swift, took over as Governor (she has announced that she will not be running for Governor in the 2002 race). In addition, the Secretary of Health and Human Services, William D. O'Leary, left his post and Robert P. Gittens was named Secretary.

Also, the state budget faces looming deficits on the order of 1 billion for FY2003. Thus far, the Medicaid program has removed adult dental benefits for non-emergency care and is looking at other options for further budget reductions for this and next fiscal year.

6.9 How did your project goals change during the grant period?

Since Massachusetts has a relatively low percent of uninsured (5.9% of the total population in 2000), the state initially wanted to examine ways to tweak different programs or create small, relatively inexpensive ways to insure more of the remaining uninsured. The HRSA grant was the perfect opportunity to explore these avenues. The grant team then set out to develop creative policy options to continue to reduce the number of uninsured in the state.

However, during 2001 the economy began to slide and then the terrorist attacks occurred in September, causing the economy to slip further downhill. Massachusetts has had significant budget deficits. Therefore, the grant's focus shifted to determining how to maintain our health insurance coverage levels as well as continuing research on policy options that will be useful once the economy recovers.

6.10 What will be the next steps of this effort once the grant comes to a close?

There is strong interest across constituencies to keep this issue alive. We will continue working on our qualitative and quantitative analyses through the summer months and we will revise our policy recommendations accordingly. In addition, a commission will be reconvened to study the uncompensated care pool; the Division is in the field with its third household survey; and contractors were hired for the legislators to assess various models of a consolidated health care system.

With the upcoming changes that will occur under a new governor, it is difficult to predict at this time how our future efforts will be focused. However, no matter who is governor, it is clear that the issue of health insurance is one that will remain in the forefront and one in which Massachusetts will continue to be a leader in years to come. We believe the work supported by this grant provides an extraordinary base that will continue to shape and benefit policy discussion.

SECTION 7. RECOMMENDATIONS TO THE FEDERAL GOVERNMENT

7.1 What coverage expansion options selected require federal waiver authority or other changes in federal law (e.g., SCHIP regulations, ERISA)?

Massachusetts' preliminary recommendations do not include any further waiver authority. Our recommendation that the federal government provide tax deductibility for the taxpayer's full cost of health insurance for self employed and those without access to employer sponsored health insurance; and tax credits in amounts that would significantly defray the cost of purchasing health insurance to lower-income people in the same circumstances, would require changes in federal income tax law. One option that Massachusetts is still considering involves removing categorical eligibility requirements for MassHealth's enrollment at various income levels. This would require federal waivers.

There are several other recommendations we are making to the federal government, which would not necessarily require changes to federal law or waiver authority. We recommend that the federal government increase allotments to further encourage states to expand SCHIP to parents of children covered through SCHIP when those parents have access to employer sponsored health insurance. Massachusetts does this in many cases where cost neutrality calculations are met, but is not able to do this for all parents of kids covered by SCHIP who have access to employer sponsored health insurance.

Another longer-term recommendation that Massachusetts is making which would involve cooperation from the federal government is the redesign of the administrative system supporting eligibility and enrollment activities for all state programs to achieve a simple, single process for which to determine eligibility. It will be critical to have federal participation in defining the criteria used, so that we are consistent in our treatment of people across programs regardless of funding streams. Eventually Massachusetts would like to have one enrollment system for all federal, state and local programs.

The Steering Committee also suggested that there are many opportunities for administrative and operational efficiencies in state-run, federally-funded programs that are impeded by federal inflexibility. These efficiencies could save large sums of money that could, in turn, be used to fund further expansions.

7.2 What coverage expansion options not selected require changes in federal law? What specific federal actions would be required to implement those options, and why should the federal government make those changes?

Massachusetts considered several buy-in options, one of which was a buy-in to the Federal Employee Health Benefit Program (FEHBP). While this seemed appealing to us on several fronts, the risk-pooling problems it would create seemed to out-weigh any benefits incurred. This option would have required federal action to allow buy-in to a benefit offered at this time to federal employees only. We do not recommend action on this option by the federal government at this time.

7.3 What additional support should the federal government provide in terms of surveys or other efforts to identify the uninsured in States?

While it may be useful to have a uniform health insurance survey conducted at the federal level, Massachusetts has been effective at collecting data regarding the state's uninsured through biannual household surveys. We do not feel it makes sense to collect these data at a national level for our purposes of identifying and targeting programs at the uninsured. Although most would argue that the recent changes made to the CPS are good, they still do not accurately portray the level of insurance coverage in our state. The survey remains a labor survey and the sampling, data collection, and timing remain out of the control of states. We see it as useful only for looking at trends and even then, because of sample size issues, it is not very useful. It might make sense for the federal government to subsidize state data collection efforts, instead.

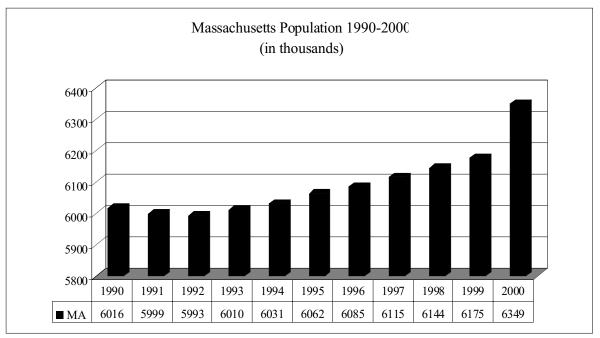
7.4 What additional research should be conducted (either by the federal government, foundations, or other organizations) to assist in identifying the uninsured or developing coverage expansion programs?

The insurance markets, uninsured residents, and health care systems vary significantly by state. Massachusetts has traditionally found data at the state-level to be more useful than national data and research. In addition, due to Massachusetts' low uninsurance rate, it is unlikely that national approaches will be effective and useful. While we do see some benefit from more flexibility from the federal government and, of course, more funds, Massachusetts must learn why those residents who are eligible for programs or employer-sponsored insurance, do not participate, which we hope to learn during the second phase of the grant period.

APPENDIX I: BASELINE INFORMATION FOR MASSACHUSETTS

Massachusetts Population

Massachusetts experienced a 5.5% increase in resident population from 1990 to 2000 (6,016,425 to 6,349,097). There was a slight decrease in the state's population in 1991 and 1992.



Source: "State Population Data: Annual Time Series, July 1, 1990 to July 1, 1999," U.S. Census Bureau, www.census.gov/population /estimates/state/st-99-3.txt and "Resident Population of the 50 States, the District of Columbia, and Puerto Rico: April 1, 2000 (Census 2000) and April 1, 1990 (1990 Census)," U.S. Census Bureau, www.census.gov.

Average Age of the Massachusetts Population

The median age of the Massachusetts population is 36.5 years. The percent of the state's population that is over age 65 exceeds the national average, 13.5% versus 12.4%.

	Massachusetts				
Age Group	Under 18 years	18 to 24 years	25 to 44 years	45 to 64 years	65 years and over
Percent of Total Population	23.6	9.1	31.3	22.4	13.5

Source: "Profile of General Demographic Characteristics for Massachusetts: 2000," U.S. Census Bureau, and "Profile of General Demographic Characteristics for the United States: 2000," U.S. Census Bureau, www.census.gov/Pres-Release/www/2001/demoprofile/html.

Race/Ethnicity of the Massachusetts Population

The proportion of the Massachusetts population that is white is much higher than the national average. However, there has been an increase in the state's minority population over the last decade.

Race*	Percent
White	84.5
Black or African American	5.4
American Indian and Alaska	0.2
Native	
Asian	3.8
Persons Reporting Other	3.7
Persons Reporting 2 or More	2.3
Races	

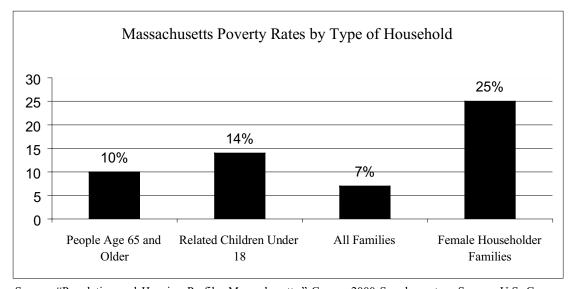
^{*}Hispanics are included in the above figures as they may be of any race.

Hispanic or Latino	Percent
Hispanic or Latino of Any	6.8
Race	
Not Hispanic or Latino	93.2

Source: "Race and Hispanic or Latino: 2000", Census 2000 Summary File, U.S. Census Bureau, www.census.gov.

Percent of the Massachusetts Population Living in Poverty (<100% FPL)

Approximately 10% of the state's population live in poverty, with the greatest number residing in female householder families (no spouse present).



Source: "Population and Housing Profile: Massachusetts," Census 2000 Supplementary Survey, U.S. Census Bureau, www.census.gov/c2ss/www/Products/Profiles/2000/Narrative/NP04000US25.htm.

Number and Percentage of Uninsured

5.9% of Massachusetts residents are uninsured, a 28% decrease from 1998's rate of 8.2%. The rate of uninsurance, excluding the elderly, decreased 34% from 9.9% to 6.5%. The greatest numbers of uninsured reside in households with incomes between 200-400% of the FPL. Since 1998, the largest reduction in the number of uninsured has occurred in individuals with incomes below 200% of the FPL as a result of the expansion and increased enrollment efforts of the state's Medicaid program.

Household	% of the	% Uninsured within
Income	Uninsured	Income Group
(%FPL)		
0-133%	14.4%	12.5%
134-150%	5.8%	11.9%
151-200%	23.0%	14.3%
201-400%	39.1%	8.0%
>400%	17.8%	2.0%
Total/Overall	100.0%	6.5%

Source: Survey of Health Insurance Status of Massachusetts Residents, Massachusetts Division of Health Care Finance and Policy, 1998 & 2000.

Primary Industries in Massachusetts

Industry	Number of Firms (Employees)	
Professional, Scientific, & Technical Services	19,957 (214,495)	
Retail Trade	18,172 (349,741)	
Construction	15,786 (111,489)	
Other Services (except public administration)	15,680 (116,772)	
Health Care and Social Assistance	12,241 (444,092)	
Accommodation and Food Service	11,739 (233,332)	
Wholesale Trade	9,150 (148,348)	
Manufacturing	8,851 (404,495)	
Administrative & support & waste management	8,351 (188,040)	
& remediation services		

Source: United States Census Bureau, Statistics of US Business: 1999: All Industries, Massachusetts, www.census.gov/epcd/susb/1999/ma/MA--htm.

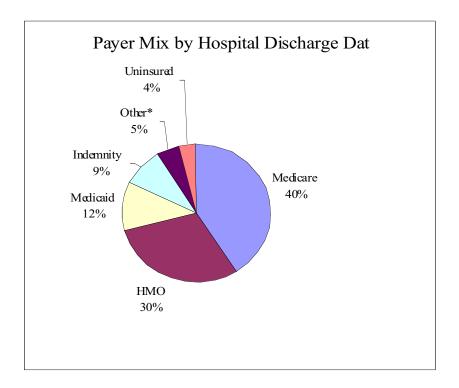
Percent of Massachusetts Employers Offering Coverage

Per DHCFP's 2001 Survey of Massachusetts Employers Regarding Health Insurance, 69% of Massachusetts employers offer health insurance. The percent of employers offering coverage varies by establishment size. 95% of establishments with more than 50 employees offer insurance versus only 67% of establishments with 2-50 employees.

Percent of Self-Insured (self-funded) Firms in Massachusetts

Per the Massachusetts 2001 employer survey, 14.3% of the employers that offer coverage have at least one self-insured health plan. Of all people participating in an employer sponsored health plan, 26.7% are enrolled in a self-insured plan.

Payer Mix

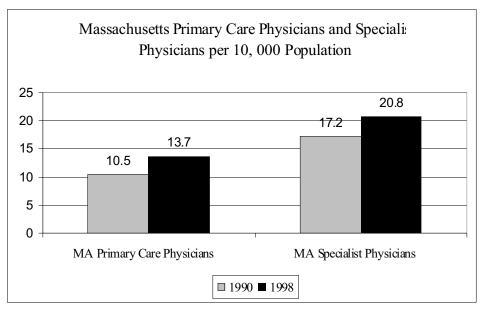


^{*}Other—Includes payments made by the Civilian Health and Medical Program of the Uniformed Services (CHAMPUS).

Source: Hospital Discharge Data, Massachusetts Division of Health Care Finance and Policy, 1999.

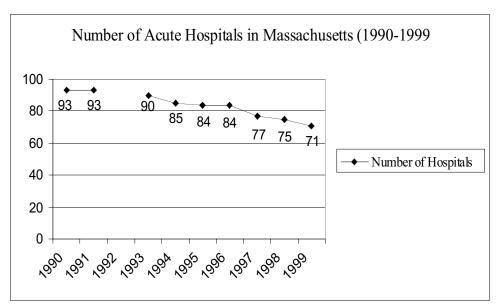
Provider Competition

Over the past decade Massachusetts experienced a growth in the number of primary care and specialist physicians practicing medicine in the state. Massachusetts has a greater number of primary care and specialist physicians per 10,000 population than the United States. In 1998, the U.S. had 9.9 primary care physicians per 10,000 population versus Massachusetts' 13.7. The same year, the U.S. had 13.3 specialists per 10,000 population versus Massachusetts' 20.8.



Source: "Physician Characteristics and Distribution in the U.S." (1992 and 2000-2001 edition), American Medical Association; "State Population Estimates: Annual Time Series, July 1, 1990 to July 1, 1999", U.S. Census Bureau, www.census.gov/population/estimates/state/st-99-3.txt.

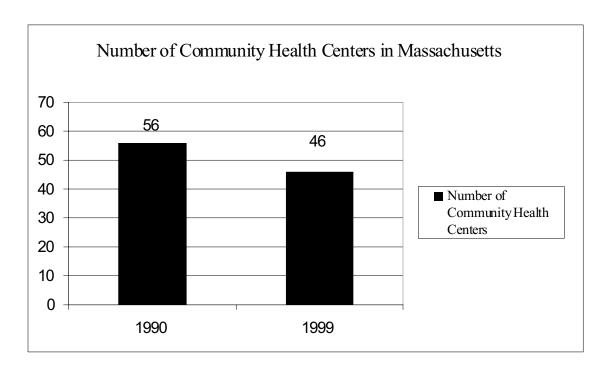
Due to closings, conversions, and mergers, there has been a significant decrease in the number of acute care hospitals in Massachusetts from 1990 to 1999. In addition, the number of operating beds fell 26%.



Source: "Hospital Statement for Reimbursement, DHCFP 403", Massachusetts Division of Health Care Finance and Policy.

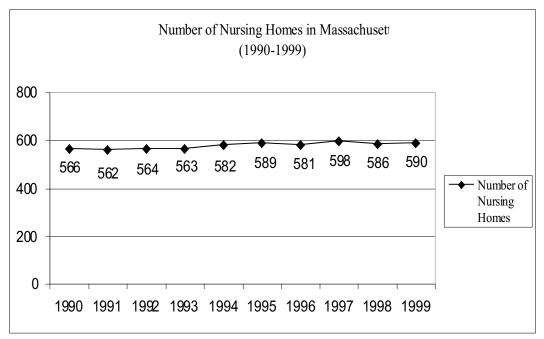
Note: Complete data was not available for 1992.

The number of community health centers in the state decreased 18% from 1990 to 1999. However, during the same time period, the number of visits to community health centers increased 93% from 1.5 to 2.9 million visits.



Source: "Massachusetts Community Health Centers in Crisis: Facts, Trends and Strategic Solutions for Investing in the Safety Net, 2000 and Transitional Issues Report", Massachusetts League of Community Health Centers, January 1991.

There was a slight increase in the number of nursing home facilities over the past decade. The number of nursing home beds increased 16%.



Source: Massachusetts Department of Public Health, Division of Health Care Quality.

Massachusetts Insurance Market Reforms

There have been a number of significant reforms made to the Massachusetts insurance market over the past decade. Most notably were the changes that occurred in the small group health insurance market and the nongroup (individual) market. The reforms sought to improve access to health care insurance.

Prior to 1991, few carriers offered coverage to small groups, coverage was medically underwritten, and it tended to have long waiting periods and pre-existing condition limitations or exclusions.

In 1991 and 1996, Massachusetts legislators and the governor approved significant reforms for regulating the small group market. In many regards, the laws go beyond the national protections established by the federal Health Insurance Portability and Accountability Act of 1996 (HIPAA). The Massachusetts insurance reforms expanded the definition of a small group to include businesses with between 1 (self-employed) and 50 employees and required all carriers who elected to remain in the market to offer products on an equal basis, to all small groups, without medical underwriting. After the 1991 reform, 38 carriers decided to write small group business and today 27 carriers are participating in the small group insurance market. The number has decreased following the departure of several smaller carriers from the market and the consolidation of other companies.

The passage of Chapter 297 of the Acts of 1996 created "the nongroup law" (M.G.L. c. 176M), significantly reforming the nongroup market in Massachusetts. Subsequent amendments to the law were recently enacted with the passage of Chapter 140 of the Acts of 2000. Carriers who

participate in the *small* group market (1-50 employees) must offer a guaranteed issue nongroup product on an equal basis to all eligible individuals. As of December 31, 2000, there were 26 carriers in Massachusetts offering guaranteed issue nongroup products, covering 24,000 subscribers and representing 34,000 covered lives.

For a more detailed description of nongroup and small group insurance market reforms please see Appendix XIII and XIV.

Eligibility for Existing Coverage Programs

The Massachusetts Medicaid program, MassHealth, managed by the Division of Medical Assistance, pays or subsidizes the health insurance premiums for certain low- and medium-income residents of the Commonwealth who are, "under the age of 65 and who are not living in nursing homes or other long-term care facilities. These include: families with children under the age of 19, children under the age of 19, pregnant women, people out of work for a long time, disabled people, adults who work for a qualified employer, and people who are HIV positive". Other individuals and families may qualify for benefits based on income and life situation. Please see Appendix XVI for a detailed description of eligibility requirements.

Use of Federal Waivers

Massachusetts implemented its 1115 demonstration waiver in July of 1997. The 1115 waiver in combination with the State Children's Health Insurance Program (SCHIP), has enabled Massachusetts to simplify and streamline its eligibility process. In addition, the Commonwealth has been able to expand coverage to the following populations: children with incomes up to 200% of the FPL, parents with incomes up to 133% of the FPL, and long-term unemployed adults with incomes up to 133% of the FPL. Disabled individuals, regardless of income (based on a sliding scale premium), adults with incomes up to 200% of the FPL working for participating small employers through the Insurance Partnership, and HIV-positive individuals with income up to 200% of FPL also qualify under the 1115 demonstration waiver.

ENDNOTES

1

www.newfederalism.urban.or/html/series b/b34/b34.html.

www.newfederalism.urban.org/html/series b/b35/b35.html.

¹ Kenney, G., Haley, J. & Dubay, L. (May 2001). "How familiar are low income parents with Medicaid and S-CHIP?" The Urban Institute.

² Agency for Healthcare Research and Quality. Center for Cost and Financing Studies, 1998 Medical Expenditure Panel Survey-Insurance Component, Table II.C.1, www.meps.ahrq.gov/MEPSDATA/ic/1998/TIIC1.pdf.

³ Group Insurance Commission. "2001-2002 Group Insurance Commission: Monthly premiums for employees and non-Medicare retirees (effective July 1, 2001)", www.state.ma.us/gic/pdf/Aratescontact.pdf.

⁴ Gabel, J. & Kim, K., (April 1998). "The Financial Burden of Self-Paid Health Insurance on the Poor and Near Poor". The Commonwealth Fund, www.cmwf.org/programs/insurance/gable/251.asp.

⁵ Cunningham, P. (October 1999). "Choosing to be Uninsured: determinants and consequences of the decision to decline employer-sponsored health insurance." Center for Studying Health System Change, www.hschange.org/CONTENT/266/index.html.

⁶ Kenney, G. & Haley, J. (May 2001). "Why aren't more uninsured children enrolled in Medicaid or SCHIP?" The Urban Institute.

⁷ E Specialties includes the following departments: Cardiology, Endocrinology, Gastroenterology, Internal Medicine, Geriatrics, Hematology/Oncology, Hypertension, Infectious Disease, Nephrology/Renal Medicine, Occupational & Environmental Medicine, Pulmonary, Rheumatology, and Vascular Health.

⁸ Massachusetts Division of Insurance, "Consumer information guide: Nongroup health insurance plans in Massachusetts", revised April 2001.

⁹ Massachusetts Division of Health Care Finance and Policy, "Massachusetts health care trends: 1990-1999", October 2000.

¹⁰ Massachusetts Division of Health Care Finance and Policy, "Financial stability of community health centers" Analysis in Brief, Number 2, August 2001.

¹¹ The state would consider a complementary measure should the federal government take action in this area.

¹² This would begin with state programs but would eventually involve all public programs (federal, county, municipal, etc.)

Butler, Stuart, "Reforming the Tax Treatment of Health Care to Achieve Universal Coverage", Covering America: Real Remedies for the Uninsured, 2001.

¹⁴ Families USA, "Individual Tax Credits Will not Expand Coverage for America's Uninsured", September 12, 2001.

¹⁵ Pauly, Mark and Herring, Bradley, "Expanding Coverage Via Tax Credits: Trade-Offs and Outcomes", <u>Health Affairs</u>, January/February 2001.