



## Launching a Rate Review Campaign: Strategies, Opportunities, and Outcomes

### Small-Scale Relationship Building or Story-banking Campaign

- 1. Highlight a newly proposed rate filing to either thank or draw attention to your Department of Insurance and Insurance Commissioner/Superintendent.** Draw media attention to the filing, showcase how close it is to the upper 10% limit, highlight who this increase will impact, and use it to apply pressure on your Department of Insurance (DOI) for further rulings or reconsidering this decision.

  - Begin tracking which insurers are submitting rate increases. Who is a beneficiary of those particular plans? Will such an increase target a particular demographic?
  - Is there a constituent with a story to share as it relates to his/her own family being priced out of insurance coverage?
  - Identify what current rate increases mean today and what they will mean if sustained over five years. Create an infographic to showcase this exponential growth, share it with the media, and encourage your DOI to step forward to support consumers.
  - Publicize past consumer savings that were generated by a rate review process. Use these tools to create a 'hero' opportunity for your DOI/Insurance Commissioner. In 2011, rate review programs [likely saved consumers a total of \\$425 million](#).
- 2. Work with partners—your Insurance Commissioner's office and/or coalition members—to review one current rate filing.** Identify actuaries to support you in this work, or take it on in your organization, determining if the rate increase fits within the ten percent allotment of the Affordable Care Act (ACA) and is otherwise reasonable. Identify a go-to person from your state's agency staff to work with when an increase request is made; ensuring consumer health advocates are kept in the loop for all proposed changes.
- 3. Take advantage of opportunities to begin or build upon a relationship with your DOI and Insurance Commissioner/Superintendent and their staff.** This is an opportunity for your DOI to be a hero to consumers, adding 'teeth' to the ACA's 10% limit on rate increases. Can you offer to support their staff in a review process? Can you highlight the work they've already done to benefit consumers and frame this current campaign as an opportunity to continue building upon this reputation?

4. ***Collect and share the stories of small business owners priced out of their coverage plans because of mounting insurance costs.*** Identify key spokespeople who can share their stories through your organization's action alerts, local media outlets, or social media. Use our attached communication tools to help boil rate review messaging into succinct, digestible sound bites for the media designed to inspire action from other consumers.

## **Moderate-Scale Education or Regulatory Campaign**

1. ***Monitor rate filings, paying particular attention to those that impact a targeted demographic.*** In Pennsylvania, Blue Cross Blue Shield sought to increase the rates for a plan that predominantly covered low-income individuals. Though they claimed to only request an increase of 9.9 %, (barely within the 10% afforded by the ACA) advocates were able to highlight the targeted demographic and the seemingly underhanded effort to 'play by the rules.' They successfully changed the rate increase to a smaller 4.5% due to comprehensive media coverage and coalition actions, generating hundreds of petitions. Check out some of the [materials Pennsylvania advocates](#) used in their successful campaign.
2. ***Launch a website to track rate adjustment claims, offering consumers tools to contact your DOI in response.*** State Departments of Insurance must have a website, offering consumers an opportunity to track and comment on proposed rate increases. Likewise, HHS has created a consumer-friendly disclosure form, which should be made available through insurers' and states' websites. If it is not, this is an opportunity to move forward with such tools to promote transparency. Advocates can use this as an opportunity to remind DOI staff about compliance with the federal rate review regulations. Check out [Oregon's](#) and [Arkansas'](#) websites for some helpful examples.
3. ***Engage in a public education project to target insurers.*** Identify key allies from your coalition and gather online or in person at the targeted insurers' office/Facebook page/Twitter accounts. On Twitter, you can create a hashtag to keep track of the conversation and increase collective impact. Encourage consumers to respond to the proposed rate increase with personal stories highlighting the insurer's detachment from the realities consumers face. Advocates in Texas [launched a petition](#) to engage consumers.
  - ***Enlist the help of the media, such as local editorial boards, to share the story of a proposed increase.*** Spend time cultivating relationships with the media and ensuring they understand the basics of rate review and the consumer perspective. Pitch the idea of an op-ed or promote a targeted "letter to the editor" campaign.
4. ***Identify ways to engage with federal requirements.*** The federal government has already provided [grants to these states](#) to support greater accountability of rate review processes. A good first step is to identify if your state has applied for a Federal grant for rate review work

previously. What was the outcome? For those advocates in states that have received these grants, this is an opportunity for advocates to evaluate their state's performance on projected deliverables. ***Advocates can also review past grant applications to ensure your DOI is participating in consumer engagement, as outlined in their proposal.*** Most states have already received some type of rate review funding, making this transparency and follow-up important.

5. ***Encourage HHS to take up a more aggressive rate review practice in your state.*** The rate review grants offered by HHS to states are intended to strengthen oversight capabilities and allow states without current rate review programs to develop them. However, in some states, there will be insufficient commitment to enact such efforts. If a state lacks the resources or authority to conduct the required rate reviews, HHS will conduct them, resulting in an opportunity to communicate consumer needs to HHS through your regional CMS contact. HHS benefits from hearing the consumer stories and the state-specific needs for such a review process. Consumers' stories once again become a key tool in communicating such needs.

## **Larger-Scale Legislative Campaign**

1. ***Advocate for legislation that will strengthen your state's authority to review rates and make them transparent for consumers. [Check out the National Conference of State Legislature's tracking](#) to determine what regulatory legislative efforts advocates in your state have already attempted. Identify legislative champions and coalition allies to support the endeavor.***
  - Identify what efforts to introduce legislation have occurred in the past. What were their outcomes? Who were the legislative champions and opponents? Where could a coalition boost proposed legislation?
  - Legislation can expand the scope of your state's current rate review: Review the proposed rates for new products to be covered or new markets to include. Where will consumers benefit from an increase? Where will they lose out?
  - Legislation can publicize proposed rate increases, mandating particular initiatives to improve DOI transparency such as websites and postings in plain language.
  - Legislation can improve rate filing requirements, mandating that insurers offer information about current administrative costs like Medical Loss Ratios.