

February 2, 2022

Honorable Chairman John Hunt
House Commerce and Consumer Affairs Committee
Legislate Office Building Room 302
North Main St., Concord, NH 03301

RE: NAMI NH Opposition of HB 1028

Dear Chairman and Committee Members:

Thank you for the opportunity to testify today. My name is Holly Stevens, and I am the Director of Public Policy at NAMI New Hampshire, the National Alliance on Mental Illness. NAMI NH is a non-profit, non-partisan, grassroots organization whose mission is to improve the lives of all people impacted by mental illness and suicide through support, education and advocacy. On behalf of NAMI NH, I am here today to speak in opposition to HB 1028, relative to the form of individual health insurance policies.

Current New Hampshire law restricts short-term limited duration (STLD) plans, which typically provide interim coverage for no more than a period of six months. Additionally, these plans are non-renewable. HB 1028 would remove these protective restrictions that are in place for good reason.

For people with mental health conditions, having accessible, affordable, and comprehensive health insurance is critical for getting the mental health care they need. The Affordable Care Act (ACA) established numerous consumer protections which helped halt discriminatory practices and expanded health coverage options for people with mental illness.

In contrast, STLD health plans don't have to follow ACA guidelines and can discriminate against enrollees with mental illness while leaving them few options when they need care. Specifically, STLD plans can:

- Reject applicants based on their mental health condition
- Charge people with mental health conditions more
- Exclude coverage for pre-existing conditions like mental health
- Not cover mental health and substance use benefits
- Not cover prescription medications

Reflecting on 40 Years: Continuing Our Journey to Hope, Help, and Health

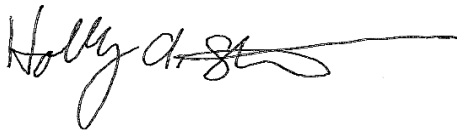
NAMI New Hampshire • 85 North State Street • Concord, NH 03301

InfoLine: 800-242-6264 • Tel. 603-225-5359 • Fax 603-228-8848 • info@naminh.org / www.NAMINH.org

In fact, prior research suggests that nearly 50 percent of STLD plans available nationwide do not cover mental health care.¹ Additionally, many STLD plans are sold using deceptive practices.² This is particularly problematic because STLDs tend to have lower premiums and are often attractive to seemingly healthy young adults. Yet, an STLD plan may not provide the coverage needed if a young person experiences a mental health crisis, which often occurs during adolescence and early adulthood when first symptoms of mental illness typically appear. This can saddle individuals and families with high out-of-pocket costs or keep people from getting the care they need.

In short, STLD plans fail to protect people with mental health conditions. Federal rules issued in 2018 expanded the availability of STLDs, which were previously intentionally limited. This put people with mental health conditions at a greater risk for increased costs, insufficient coverage, financial instability, and unmet health needs. For these reasons, NAMI NH urges the committee vote inexpedient to legislate for HB 1028. I am happy to answer any questions you may have.³

Sincerely,

A handwritten signature in black ink, appearing to read "Holly A. Stevens", with a long horizontal flourish extending to the right.

Holly A. Stevens, Esq.

¹ Understanding Short-Term Limited Duration Health Insurance, Kaiser Family Foundation, April 2018 Issue Brief

² The Marketing of Short-Term Health Plans: An Assessment of Industry Practices and State Regulatory Responses, By Sabrina Corlette, Kevin Lucia, Dania Palanker, and Olivia Hoppe, Urban Institute, January 2019