



**BlueCross BlueShield  
Association**

An Association of Independent  
Blue Cross and Blue Shield Plans

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December 11, 2019

The Honorable Brian Patrick Kennedy, Co-Chair  
The Honorable Kevin Petersen, Co-Chair  
Task Force on Insurance, National Conference of State Legislatures  
444 North Capitol St NW Ste 515  
Washington, D.C. 20001-1512

Via email: Heather Morton ([heather.morton@ncsl.org](mailto:heather.morton@ncsl.org)) and Abbie Gruwell  
([abbie.gruwell@ncsl.org](mailto:abbie.gruwell@ncsl.org))

**RE: BCBSA Comments on proposed New Resolution on Health Savings Accounts**

Dear Speaker Pro Tempore Kennedy and Chairman Petersen:

The Blue Cross Blue Shield Association (BCBSA) appreciates the opportunity to provide comments on the New Resolution on Health Savings Accounts (HSA) currently before the National Conference of State Legislatures' (NCSL) Task Force on Insurance, specifically as it relates to preventive benefits and coverage of Medicare beneficiaries.

BCBSA is a national federation of 36 independent, community-based and locally operated Blue Cross and Blue Shield (BCBS) companies that collectively provide healthcare coverage for one in three Americans. For 90 years, BCBS companies have offered quality healthcare coverage in all markets across America – serving those who purchase coverage on their own as well as those who obtain coverage through an employer, Medicare and Medicaid.

BCBSA supports allowing health savings account-eligible high deductible health plans (HDHPs) to cover additional preventive services for the treatment of chronic conditions before the deductible. Allowing for this expanded pre-deductible coverage in HSA-eligible HDHPs will expand access and improve patient compliance by removing preventive care barriers for persons with chronic conditions. This additional flexibility will yield significant benefits to patients, employers and payers alike, including improved health, enhanced workplace productivity and the avoidance of unnecessary emergency care visits and hospitalizations.

We appreciate your consideration of our comments. If you have any questions or want additional information, please contact Mike Lyle at [Michael.Lyle@bcbsa.com](mailto:Michael.Lyle@bcbsa.com).

Sincerely,

A handwritten signature in black ink, appearing to read "John Cerisano".

John Cerisano  
Vice President of Federal and State Affairs