



Dear Commissioner Caride,

I am submitting comments in regards to advance notice of the intended rulemaking action for N.J.A.C. 11:24A, Health Care Quality Act, implementing the Freedom of Reproductive Choice Act, issued by the Department of Banking and Insurance (DOBI) on November 23, 2022.

The Latino Action Network Foundation (LANF) unequivocally supports the rights to reproductive choice and freedom for all, including the right to an abortion. As such, we would like to thank the Murphy Administration and the New Jersey Department of Banking and Insurance (DOBI) for moving to mandate coverage for abortion on all state regulated insurance plans. Abortion Access, regardless of income or economic status, should be a universal right for all New Jerseyans. The Administration's action will help to remove some barriers to abortion care.

However, this mandate is not as comprehensive as it could be. We are disappointed that the regulation is not able to require coverage of abortion without cost-sharing, like all other reproductive health care services. Out-of-pocket expenses are a burden for many low-income people. Even if women have insurance, the cost of co-pays, deductibles and other fees may make an abortion too expensive. For example, Latinas are hardest hit by the gender wage gap, making \$.45 for every \$1 their white male counterparts make, forcing many to negotiate on necessities in order to obtain abortion services. We urge the Administration and legislative leaders to keep working to ensure that the cost of care is not a barrier to accessing reproductive health care.

Please expedite the rulemaking process to ensure that this insurance mandate is enacted ideally for calendar year 2023, so that the many New Jerseyans who will benefit from coverage can get the care they need.

Thank you.