



Risk Equalisation Scheme Consultation
Health Insurance Authority
Beaux Lane House
Mercer Street Lower
Saint Peter's
Dublin 2

22nd January 2021

Reference: Risk Equalisation Scheme Public Consultation Process
Exclusion of ESB Medical Provident Fund from the Risk Equalisation Scheme.

Dear Sir / Madam,

Thank you for the opportunity to make a submission as part of this consultation process.

Risk equalisation is a process that aims to equitably neutralise differences in insurers' claim costs that arise due to variations in the health status of their members. It involves transfer payments between health insurers to spread some of the claim's costs of high-risk members amongst all the private health insurers in the market. Yet our Fund and its 20,000 members are excluded from the process.

ESB Medical Provident Fund abides by the principles of health insurance in Ireland of providing Minimum Benefits, of not setting premiums based on the risk from claims of individuals, providing lifetime cover and offering enrolment to all applicants allowable by our license. Consequently, we cannot understand why our Fund is excluded from this process.

It is our request that ESB Staff Medical Provident Fund's exclusion be reversed as part of this consultation process with a view to ensuring equity for all insurers in the private health insurance market in the Republic of Ireland.

Yours sincerely,

James O'Loughlin
ESB Staff Medical Provident Fund Manager