



April 13, 2020

The Honorable Mitch McConnell
Senate Majority Leader
United States Senate
Washington, DC 20510

The Honorable Chuck Schumer
Senate Minority Leader
United States Senate
Washington, DC 20510

The Honorable Nancy Pelosi
Speaker of the House
U.S. House of Representatives
Washington, DC 20515

The Honorable Kevin McCarthy
Minority Leader
U.S. House of Representatives
Washington, DC 20515

Dear Leader McConnell, Speaker Pelosi, Leader Schumer and Leader McCarthy:

On behalf of the Alliance of Community Health Plans (ACHP), thank you for your continued leadership in response to the COVID-19 public health emergency. The consequences of this pandemic are extraordinary and the steps that Congress has already taken have been critical to the ability of our health care system to respond.

As we work together to address this crisis, ACHP members are on the frontlines of coordinating care, and committing workforce and financial resources to combat this crisis. In the earliest days of this crisis the ACHP Board of Directors voted to include coronavirus testing as a covered benefit and member companies have continued to expand coverage to treatment of the novel virus. Our members have risen to the challenge to swiftly address the needs of their communities. A few examples:

- Launching the first COVID-19 vaccine trial;
- Developing one of the first COVID-19 tests;
- Reducing the risk of infection and protecting staff by developing a desktop droplet barrier;
- Producing a prototype emergency ventilator;
- Developing protective equipment for medical facility staff and rapid deployment of intubation shields for hospitals and ambulances;
- Waiving cost sharing for all telehealth visits, including non-COVID 19 related visits;
- Waiving out-of-network cost sharing for all visits; and
- Donating millions of dollars to community foundations addressing unmet needs.

ACHP welcomes the opportunity to work with Congress to first and foremost provide access to coverage for millions of uninsured and underinsured individuals and families. As you know, significant changes to an individual's coverage can have as much impact as not having it at all. That is why we urge Congress to focus on maintaining continuity of coverage and care. Having access to the same providers and consistency in cost-sharing and benefit design are critically important during these uncertain times—especially if an individual has a chronic illness. Finally, we must protect our most vulnerable in Medicaid and Medicare Advantage and ask that Congress take steps to stabilize the health insurance market in the face of this unprecedented disruption.

Private insurers, especially community health plans, play a central role in the nation's health system. More than 262 million Americans access medical care through a private plan, either provided by an employer or through Exchanges, Medicaid and Medicare Advantage managed by carriers. Our non-profit, provider-aligned member organizations have deep roots in the communities and many are the largest employer, contributing to the economic, physical and emotional well-being of our country. With this insight, ACHP identified the following policy priorities for Congress to consider in the next legislative package.

Continuity of Coverage and Care

Helping Those Who Need Coverage

Special Enrollment Period (SEP) for Federal Exchanges : Congress should require the Administration to immediately open a Federal Exchange Special Enrollment Period to provide access and urgently needed coverage to the more than 28 million uninsured Americans, specifically those who do not qualify under a "triggering event," such as loss of job-based coverage. Opening enrollment would flatten the coronavirus curve by providing access to testing and treatment and would mitigate the mounting impact on providers and hospitals, especially those in rural communities.

Helping Employers Maintain Employee Health Coverage

Health Premium Grace Period Protection: Many states are requiring health plans to offer grace periods of up to 90 days. During this grace period, health plans must provide coverage without collecting premiums. If at the end of the grace period an employer cannot pay the owed premiums, the federal government should offer protection to prevent either the provider or the health plan from being left with large uncompensated care bills. Requiring funds to be used specifically for health premiums will help these employees keep existing coverage and maintain access to their regular providers.

Premium Protection: We applaud Congress for creating the Paycheck Protection Program in the Coronavirus Aid, Relief and Economic Stimulus (CARES) Act. However, we ask Congress to provide temporary direct premium assistance to help employers maintain health insurance coverage. Congress should expand the eligibility class for these small business loans to those with up to 1,000 employees. This will ensure these employees maintain access to their current health coverage and eliminate churn between private insurance and government programs. The peace of mind of health insurance will help the nation rapidly re-open the economy.

Helping Employees Maintain Health Coverage

Expand the Health Care Tax Credits (HCTC) Program to Cover Workers Displaced by COVID-19: The HCTC assists Americans certified as displaced workers by covering a significant portion of a participants' health insurance premiums. Eligibility for the existing program should be expanded to cover workers displaced by COVID-19 as a result of either losing their job or being furloughed. Expanding this program will ensure that these employees maintain access to their current health coverage, mitigate the need to transition between private insurance and government programs and protect health plans and providers.

COBRA Subsidies: Congress should provide new funding to increase the availability and coverage of COBRA premiums for those who lose their jobs due to COVID-19. COBRA subsidies would provide

continuity of coverage and care by allowing individuals to maintain their current health coverage and lessen the anticipated burden on government programs such as Medicaid.

Protecting America's Most Vulnerable

Medicaid Stabilization Fund: Medicaid programs across the country are experiencing increased enrollment and spending as a result of COVID-19. Each state will experience a different impact on its Medicaid program depending on the severity of COVID-19 and the economic toll of the pandemic. Congress should create a Medicaid Stabilization Fund to provide additional payments to states based on increased Medicaid expenditures and enrollment as a result of COVID-19. This approach would more equitably distribute money across state Medicaid programs and provide direct support for already cash-strapped state budgets. With experts forecasting Medicaid growth of 11 million to 23 million due to job loss, this funding will be a lifeline.

Protecting Seniors: Congress should continue parity for our seniors and people with disabilities by ensuring that all future flexibilities and funding increases provided to traditional Medicare fee-for-service are also provided to the Medicare Advantage (MA) program. Medicare Advantage covers nearly 40 percent of all eligible Medicare beneficiaries and is continuing to provide high-quality, affordable and coordinated care through this ongoing crisis.

Market Stabilization

Risk corridors: Congress should institute a retroactive risk corridor for Exchange and Medicare Advantage plan insurers that protects health plans for COVID-19 testing and treatment costs that were not factored into plan benefit packages and rates. These risk corridors would help consumers by keeping premiums and other cost-sharing low by mitigating the significant and unanticipated cost of COVID-19 testing and treatment.

Federal Reinsurance Pool for COVID-19 Treatment: Congress should create a federal reinsurance pool for treating individuals battling COVID-19. The pool would cover the significant cost of treatment without passing cost-sharing burdens onto patients, their families and other health plan members through future premium increases. With large geographic discrepancies disproportionately impacting consumers and insurers, a reinsurance pool protects communities and consumers regardless of where they are located and creates stability in the health care market this year and in the future.

We recognize there is no easy fix to this crisis. The recommendations provided above are vital to assuring continuity of coverage and care for individuals, employers, employees and government programs, as well as ensuring a stable market for providers and plans through this ongoing crisis. Please consider ACHP a resource as you continue to look for ways to address the effects of the pandemic in the short- and longer-terms. We continue to hear daily from our members about the severe toll COVID-19 is having on their communities and their businesses. We must continue to work together to protect Americans as they face significant obstacles to the continuity of coverage and care.

Thank you for the opportunity to continue to work with each of you to address this unprecedented national emergency. If you have any questions or need additional information, please contact Tricia Barrentine Guay, ACHP's Director of Legislative Affairs at tguay@achp.org or (202) 897-6030.

Sincerely,

A handwritten signature in cursive script that reads "Ceci Connolly".

Ceci Connolly
President & CEO

cc:

The Honorable Chuck Grassley
The Honorable Ron Wyden
The Honorable Lamar Alexander
The Honorable Patty Murray
The Honorable Richard Neal
The Honorable Kevin Brady
The Honorable Frank Pallone
The Honorable Greg Walden