



March 19, 2020

Seema Verma, Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
7500 Security Boulevard
Baltimore, MD 21244

RE: Special Enrollment Period during COVID-19 National Emergency

Dear Administrator Verma:

We appreciate the Center for Medicare and Medicaid Services (CMS) working with the Alliance of Community Health Plans (ACHP) and our member organizations at this time of national emergency. Our member plans have deep roots in the communities they serve giving them insight into immediate needs and concerns.

Given increasing and urgent demand on our health care infrastructure, ACHP urges the Administration to establish a Special Enrollment Period during the COVID-19 National Emergency to be applicable to all Affordable Care Act Marketplace coverage. The nearly 30 million uninsured Americans and estimated 44 million underinsured should have the ability to enroll in health care coverage during a time of high anxiety and uncertainty. These individuals face two options: go untreated and risk spreading the virus or face unmanageable medical bills. As we see small businesses temporarily – or permanently – shuttering, the need for a health care safety net will be even more necessary in the coming weeks and months. Already, our members are hearing from small businesses contemplating dropping employee coverage as they face drastic reductions in revenue.

ACHP believes that a Special Enrollment Period during the COVID-19 National Emergency is an appropriate next step following the declaration of COVID-19 as a National Emergency on March 13, 2020. Maryland, Washington, New York, Connecticut and Massachusetts have already declared Special Enrollment Periods to address coverage needs within their states. Individuals nationwide should be afforded the same opportunity. There is precedent for HHS declaring a Special Enrollment Period during an emergency: In both 2017 and 2019, HHS established a Special Enrollment Period for affected individuals following devastating hurricanes (Irma, Maria, Nate, Harvey and Dorian).

A Special Enrollment Period would offer much needed coverage to millions of Americans and mitigate the potential impact on providers and hospitals which will be forced to rely on emergency funding, an especially dire scenario for rural providers and hospitals.

MAKING HEALTH CARE BETTER

ACHP appreciates the Administration's recent flexibilities around telehealth benefits and services. Given these flexibilities, increased health care coverage would mean fewer people seeking care in brick and mortar institutions and more people being directed to telehealth services. ACHP strongly recommends the Administration move forward with this proposal to augment the progress already made, continue our national efforts to flatten the curve and ensure all American's have access to care and coverage in this uncertain time. We look forward to closely collaborating with the Administration and responding to this crisis.

If you have questions or require additional information, please contact Michael Bagel, ACHP Director of Public Policy, at mbagel@achp.org or (202) 897-6121.

Sincerely,

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

Ceci Connolly
President and CEO