June 12, 2025

The Honorable Susan Collins
United States Senate
413 Dirksen Senate Office Building
Washington, DC 20510

Dear Chairwoman Collins:

On behalf of the Alliance of Community Health Plans (ACHP) Board of Directors, thank you for taking the time to meet with me—and the CEOs of Martin's Point Health Plan and Mass General Brigham Health Plan—to discuss the importance of extending the enhanced premium tax credits. We appreciate the opportunity to share how these credits help 52,000 people in Maine—and millions more across the country—lower their monthly premiums by about 44% and make health coverage more affordable.

I am writing to follow up in light of the House-passed budget reconciliation bill. As currently drafted, the legislation includes several provisions that, according to the Congressional Budget Office, would shrink enrollment by up to a third and jeopardize access to Marketplace coverage for millions of working Americans.

Nearly 23 million people rely on the Marketplace to access preventive care, manage chronic conditions and cover the cost of prescription medications. It provides affordable health insurance to small business owners, young adults, individuals nearing retirement and many others. By failing to extend enhanced tax credits and imposing new enrollment requirements, the House-passed bill would destabilize the Marketplace and leave nearly 9 million uninsured, according to the CBO.

Specifically, the House bill:

- Requires individuals to estimate their income annually—and upon any life-changing event—to remain eligible for tax credits, even though the Marketplace already uses trusted data systems to verify income and reconcile tax credits. This requirement effectively eliminates coverage through excessive administrative red tape.
- Ends provisional eligibility, forcing enrollees to pay the full premium out-of-pocket while eligibility is verified—even during life changes such as the birth of a child or loss of a job. Eligibility verification could take months, leaving many enrollees with no choice but to disenroll until the next annual enrollment period.
- Appropriates cost-sharing reduction payments, ending the practice of "silver-loading," saving the federal government money at the expense of consumers.
- Fails to extend enhanced tax credits, which would result in over 4 million people losing coverage, millions more paying higher premiums and an increase in uncompensated care costs.

As you know, the totality of changes in the Marketplace will have a deleterious impact on consumers' ability to maintain health coverage. New income verification requirements and changes to provisional eligibility represent a stark departure from Medicare and the employer-sponsored market, where automatic re-enrollment and streamlined eligibility are core features. The added red tape will cause eligible individuals to fall through the cracks, worsening health outcomes and driving up costs across the board. While funding cost-sharing reductions aligns with the original intent of the Affordable Care Act, applying the change to plan year 2026 creates significant uncertainty for health plans that have already priced and filed products this year.

After many years of hard work, the individual market is a success, providing affordable coverage and care to hard-working Americans. To ensure we do not go backward to a time of rising uninsured and uncompensated care, ACHP urges the Senate to:

- **Remove Section 112201** of the House-passed bill, allowing federally-facilitated and state-based exchanges to continue relying on trusted data sources to verify applicants' eligibility. If individuals must submit their own information, they should, at a minimum, maintain provisional eligibility while being verified.
- **Delay the implementation date for funding cost-sharing reductions to plan year 2027**, allowing sufficient time for plans to price and file products and minimizing disruption to consumers.
- **Extend enhanced tax credits before the pending expiration this year** to avoid a massive cliff in financial support for consumers, especially lower-income individuals and families that will be most affected.

We urge you to speak with your colleagues and weigh in with Senate leadership on these provisions. Your voice is critical in protecting access to affordable coverage and preserving the Marketplace for the millions of Americans who rely on it. We remain committed to working with you on bipartisan solutions that sustain affordable, high-quality coverage for all Americans.

Sincerely,

Ceci Connolly

Ceci Connolly
President & CEO
Alliance of Community Health Plans