

July 23<sup>rd</sup>, 2018

The Honorable Alex Azar  
Secretary  
U.S. Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, DC 20201

The Honorable Seema Verma  
Administrator  
Center for Medicaid and Medicare Services  
200 Independence Avenue, SW  
Washington, DC 20201

Dear Secretary Azar and Administrator Verma:

Our 190 organizations are dedicated to improving the public's health and collectively represent millions of patients, consumers, providers, and healthcare centers across the country. We know that access to comprehensive, affordable health coverage is necessary for individuals and families to address their medical and mental health needs. Resources that help consumers understand and select healthcare coverage are an essential component of any healthcare system.

We are therefore concerned by your department's recent decision to drastically reduce funding for the Navigator program and extend remaining funds to grantees who could steer beneficiaries toward non-ACA compliant insurance products. HHS has cut funding for outreach and enrollment activities by more than 80 percent since 2016<sup>1</sup> leaving advocates and private partners to once again step up to fill the gap left by this administration. We are frustrated by CMS' assertions that the need for these services has decreased as the number of uninsured or underinsured Americans continues to grow.<sup>2</sup>

Navigators and consumer assisters are critical to educating the public about their health insurance options and helping individuals enroll in appropriate coverage. Navigators conduct outreach and must provide fair, accurate, unbiased, and culturally appropriate information to individuals and families regarding eligibility and enrollment requirements for the marketplaces and other state health insurance programs. They are valuable allies to consumers seeking affordable coverage that meets their needs. Many Navigators also provide in-person help to low-income and rural communities, consumers with limited English proficiency, people with disabilities, and other populations for whom such assistance is not often available.

Research has shown that states that devote robust resources to marketing, outreach and enrollment assistance programs experience higher rates of enrollment compared to those who do not.<sup>3</sup> An elimination of such funding will make it harder for many to access coverage, and will further contribute to the destabilization of insurance markets and result in higher premiums for many enrollees.<sup>4</sup> These

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<sup>1</sup> Robert Pear, "Trump Officials Slash Grants That Help Consumers Get Obamacare," NY Times July 10, 2018, available at <https://www.nytimes.com/2018/07/10/us/politics/trump-affordable-care-act.html>.

<sup>2</sup> J Wishner, I. Hill, S. Benatar, et al., Factors that Contributed to High Marketplace Enrollment Rates in Five States in 2015 (Urban Institute, Oct. 2015). Available at <https://www.urban.org/sites/default/files/publication/72431/2000486-Factors-That-Contributed-To-High-Marketplace-Enrollment-Rates-In-Five-States-In-2015.pdf>.

<sup>3</sup> [http://hbex.coveredca.com/data-research/library/CoveredCA\\_2018\\_Individual\\_Market\\_Enrollment\\_4-25-18.pdf](http://hbex.coveredca.com/data-research/library/CoveredCA_2018_Individual_Market_Enrollment_4-25-18.pdf)

<sup>4</sup> LJ Blumberg and J Holahan. Stabilizing and Strengthening ACA Nongroup Markets (Urban Institute, Sept. 2017). Available at [https://www.urban.org/sites/default/files/publication/93576/2001527\\_qs\\_stabilizing\\_and\\_strengthening\\_aca\\_nogroup\\_markets\\_final\\_4.pdf](https://www.urban.org/sites/default/files/publication/93576/2001527_qs_stabilizing_and_strengthening_aca_nogroup_markets_final_4.pdf).

funding cuts could also limit access to care for the millions of patients and consumers with pre-existing conditions.

In a 2017 study, the Commonwealth Fund found that 40 percent of uninsured working-age Americans were not aware of their state's marketplace or of Healthcare.gov. The study further found that two-thirds of adults who received personal assistance when looking for coverage enrolled in plans, versus fewer than half of those who had not received assistance.<sup>5</sup> Access to information about coverage options and costs obtained through outreach and Navigators positively impacts enrollment and helps families select a plan that meets their health care needs.

Making consumers aware of their coverage options can help promote broader participation of healthy individuals to help offset the costs of older, sicker patients. An analysis by Covered California released in September 2017 estimated that the potential impact of reduced federal marketing investment in the exchanges could mean one million fewer Americans enroll in health insurance and a 2.6 percent average increase in premiums for the 2019 plan year due to the smaller consumer pool and less healthy risk profile. If the reduced spending were to lead to a 20 percent decline in enrollment, 2.1 million fewer insured Americans would be covered and premiums could increase by 5.3 percent.<sup>6</sup>

We are also deeply concerned that alternative health insurance products including short-term, limited duration (short-term) plans and association health plans (AHPs) will be promoted alongside comprehensive, ACA-compliant plans, as well as Medicaid and Medicare. AHPs and short-term plans have a long history of leaving enrollees saddled with medical debt while also denying coverage for even basic medical care.<sup>7,8</sup> We believe that increasing access to these products will harm consumers and contribute to higher premiums for the millions of Americans with pre-existing conditions who rely on the marketplaces for comprehensive coverage.

Health care coverage can be complicated and overwhelming, and outreach and advertising efforts help individuals understand their options. Our organizations urge you to restore funding for outreach and enrollment activities as soon as possible.

Sincerely,

Adult Congenital Heart Association  
Alliance for a Healthy Kansas  
Alpha-1 Foundation  
American Academy of Neurology

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<sup>5</sup> Shanoor Seervai, "Cuts to the ACA's Outreach Budget Will Make it Harder for People to Enroll," The Commonwealth Fund. Oct. 11, 2017. Available at <https://www.commonwealthfund.org/publications/publication/2017/oct/cuts-acas-outreach-budget-will-make-it-harder-people-enroll>.

<sup>6</sup> Peter Lee et al. "Marketing Matters: How Marketing and Outreach Builds Stable Marketplaces and Pays Off for the Federal Government," Covered California. September 2017. Available at [http://hbex.coveredca.com/data-research/library/CoveredCA\\_Marketing\\_Matters\\_Issue\\_Brief.pdf](http://hbex.coveredca.com/data-research/library/CoveredCA_Marketing_Matters_Issue_Brief.pdf)

<sup>7</sup> Himmelstein DU, Throne D, Warren E, Woolhandler S, "Medical bankruptcy in the United States, 2007: results of a national study". Am J Med 2009 Aug; 122(8): 741-6. Doi.

<sup>8</sup> National Women's Law Center. (2012). Turning to Fairness: Insurance Discrimination against Women Today and the Affordable Care Act. [http://www.nwlc.org/sites/default/files/pdfs/nwlc\\_2012\\_turningtofairness\\_report.pdf](http://www.nwlc.org/sites/default/files/pdfs/nwlc_2012_turningtofairness_report.pdf).

American Academy of Pediatrics  
American Association for Geriatric Psychiatry  
American Association for Psychoanalysis in Clinical Social Work  
American Association of Child & Adolescent Psychiatry  
American Association on Health & Disability  
American Cancer Society Cancer Action Network  
American College of Obstetricians and Gynecologists  
American Diabetes Association  
American Federation of Teachers  
American Heart Association  
American Kidney Fund  
American Lung Association  
American Medical Association  
American Medical Student Association  
American Medical Student Association (AMSA)  
American Medical Women's Association  
American Multiple Endocrine Neoplasia Support  
American Muslim Health Professionals  
American Nurses Association  
American Physical Therapy Association  
American Psychological Association  
American Public Health Association  
American Society of Hematology  
Arizona Hemophilia Association  
Arthritis Foundation  
Arthritis Foundation  
Asian & Pacific Islander American Health Forum  
Association of Asthma Educators  
Association of University Centers on Disabilities (AUCD)  
Asthma and Allergy Foundation of America  
Autistic Self Advocacy Network  
Bazelon Center for Mental Health Law  
Black Women's Health Imperative  
Boat People SOS., INC  
Brain Injury Association of America  
Bread for the World - South Dakota  
Bridge the Gap - SYNGAP Education and Research Foundation  
Campaign for Trauma-Informed Policy and Practice  
Cascade Hemophilia Consortium  
Center for Clinical Social Work  
Center for Medicare Advocacy  
Center for Public Policy Priorities  
Center for Public Representation  
Children's Defense Fund  
Chronic Disease Coalition  
Clinical Social Work Association  
CT Hemophilia Society  
Cutaneous Lymphoma Foundation

Cystic Fibrosis Foundation  
Dup15q Alliance  
DuPage Health Coalition  
Easterseals Central Texas  
Eating Disorders Coalition  
EPIC Long Island  
Epilepsy Foundation  
Epilepsy Foundation Central & South Texas  
Epilepsy Foundation Eastern PA  
Epilepsy Foundation Maryland  
Epilepsy Foundation Nebraska  
Epilepsy Foundation New England  
Epilepsy Foundation Northwest  
Epilepsy Foundation of Alabama  
Epilepsy Foundation of Arizona  
Epilepsy Foundation of Colorado  
Epilepsy Foundation of Connecticut, Inc.  
Epilepsy Foundation of Delaware  
Epilepsy Foundation of East TN  
Epilepsy Foundation of Greater Chicago  
Epilepsy Foundation of Greater Los Angeles  
Epilepsy Foundation of Greater Southern Illinois  
Epilepsy Foundation of Hawaii  
Epilepsy Foundation of Indiana  
Epilepsy Foundation of Kentuckiana  
Epilepsy Foundation of Michigan  
Epilepsy Foundation of Middle and West Tennessee  
Epilepsy Foundation of Mississippi  
Epilepsy Foundation of Missouri & Kansas  
Epilepsy Foundation of Nevada  
Epilepsy Foundation of Northeastern New York, Inc.  
Epilepsy Foundation of Oklahoma  
Epilepsy Foundation of Southeastern Tennessee  
Epilepsy Foundation of Vermont  
Epilepsy Foundation Southeastern Wisconsin  
Epilepsy Foundation Texas - Houston/Dallas-Fort Worth/West Texas  
Equality Texas  
EverThrive Illinois  
Families USA  
Family TIES of Nevada  
Family Voices  
Family Voices Indiana  
Family Voices Mississippi  
Family Voices of Wisconsin  
Fibrous Dysplasia Foundation  
Foundation Communities  
Futures Without Violence  
Global Alliance for Behavioral Health and Social Justice

Global Healthy Living Foundation  
Great Plains Tribal Chairmen's Health Board  
Hadassah, The Women's Zionist Organization of America, Inc.  
Health Reform Resource Project  
HealthyWomen  
Heartland Alliance  
Hemophilia Alliance of Maine (HAM)  
Hemophilia Association of the Capital Area  
Hemophilia Federation of America  
Hemophilia Foundation of Michigan  
Hemophilia Foundation of Northern California  
Hemophilia Foundation of Oregon  
Hemophilia Foundation of Southern California  
Hemophilia of South Carolina  
Hemophilia Outreach of El Paso  
HIV Medicine Association  
Horizon Health Care, Inc.  
Indian Organization for Rare Diseases  
Institute for Disability Studies, MS Family 2 Family HIEC  
Justice in Aging  
League of Women Voters of the United States  
Louisiana Family to Family Health Information Center  
Lutheran Services in America  
March of Dimes  
Methodist Healthcare Ministries of South Texas, Inc. IS  
MomsRising  
NACBHDD & NARMH  
NAMI, National Alliance on Mental Illness  
National Asian Pacific American Women's Forum (NAPAWF)  
National Association for Children's Behavioral Health  
National Association of Social Workers - Texas Chapter  
National Association of State Head Injury Administrators  
National Center for Transgender Equality  
National Consumers League  
National Council for Behavioral Health  
National Eosinophilia Myalgia Syndrome Network  
National Health Care for the Homeless Council  
National Health Law Program  
National Hemophilia Foundation  
National Hispanic Medical Association  
National Institute for Reproductive Health (NIRH)  
National Multiple Sclerosis Society  
National Organization for Rare Disorders (NORD)  
National Organization for Women  
National Partnership for Women & Families  
National Patient Advocate Foundation  
National Tongan American Society  
National Women's Health Network

NBIA Disorders Association  
NETWORK Lobby for Catholic Social Justice  
New England Bleeding Disorders Advocacy Coalition (NEBDAC)  
New England Hemophilia Association  
New Jersey Association of Mental Health and Addiction Agencies, Inc.  
New Jersey State Nurses Association  
New York City Hemophilia Chapter  
Northern Regional Bleeding Disorder Center  
Oklahoma Policy Institute  
Oklahoma Primary Care Association  
Out2Enroll  
Pennsylvania Health Law Project  
People of Faith for Access to Medicines  
Planned Parenthood Federation of America  
Public Health Solutions  
Regional Asthma Management and Prevention (RAMP)  
Religious Institute  
RI Parent Information Network  
Ryan White Medical Providers Coalition  
SEAMAAC, Inc.  
Snake River Hemophilia & Bleeding Disorders Association  
Society for Public Health Education  
Solve ME/CFS Initiative  
SPAN Parent Advocacy Network  
Susan G Komen  
Texans Care for Children  
Texas Parent to Parent  
The AIDS Institute  
The American Liver Foundation  
The Kotick Network  
The Leukemia & Lymphoma Society  
The Sargent Shriver National Center on Poverty Law  
Trust for America's Health  
UnidosUS  
Union for Reform Judaism  
United Way Worldwide  
Virginia Hemophilia Foundation  
Washington University in St. Louis- Center for Treatment of Bleeding & Blood Clotting Disorders  
West Valley Neighborhoods Coalition  
WI FACETS  
WomenHeart: The National Coalition for Women with Heart Disease  
Young Invincibles