



May 20, 2021

Jeff Grant
Acting Deputy Administrator & Director and Deputy Director
Center for Consumer Information & Insurance Oversight
7500 Security Boulevard
Baltimore, MD 21244

Re: Request for State Assistance in Providing Enhanced Direct Enrollment

Dear Acting Director Grant,

The Council for Affordable Health Coverage (CAHC) writes in support of increased consumer access to health insurance through the enhanced direct enrollment process in state-based exchanges. CAHC (www.cahc.net) is a broad-based alliance with a primary focus: bringing down the cost of health care for all Americans. Our members include medical providers, patient groups, insurers, pharmaceutical manufacturers, pharmacy benefit managers, and employers.

Increasingly, consumers in states that use the federal exchange are enrolling through an online brokerage platform. These technologies allow consumers an easier and better shopping and enrollment experience than the federal exchange and have expanded both outreach and enrollment in ACA coverage. While we strongly support the expansion of state-based marketplaces, most state-based marketplaces have fallen behind in offering access to this consumer-friendly technological innovation. We urge you to take steps to assist state-based exchanges in offering this technological advancement to their consumers.

Better known as enhanced direct enrollment (EDE), the online brokerage community offers consumers streamlined approaches coupled with direct assistance. . Because consumers prefer these pathways to better assist them in shopping and choosing an ACA health insurance plan, we are seeing significant growth in enrollment through this pathway. For many consumers, it a better alternative than the state-based or federal exchange.

From CMS.gov:

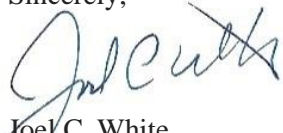
EDE is a version of direct enrollment that allows consumers to apply for and enroll in individual health insurance coverage through the Federally-facilitated Marketplace (FFM) and State-based Marketplaces that use the Federal Platform (SBM-FPs) without visiting HealthCare.gov. This pathway improves the user experience in shopping for, applying for, and enrolling in Marketplace coverage through third parties by allowing users to interact directly with approved EDE Entities, which include QHP issuers and web-brokers, and complete all steps in the eligibility and enrollment process on a single website. The EDE pathway uses application programming interfaces (APIs) to transfer data between the Marketplace and approved EDE Entity websites.

While EDE provides consumers with a better experience, the technology has proven expensive for individual state exchanges. CAHC supports providing states federal assistance to develop and require an EDE in state exchanges to improve the consumer experience. We believe this will result in significant improvements in enrollment, while helping to reduce the strain on exchange infrastructure. CCIIO should:

1. Ensure that states have access to the same technology platform the federal exchange uses to provide access to EDE and provide technical assistance in developing a similar platform.
2. Allow existing state-based exchanges to use grant money to cover the costs necessary to implement EDE in the state.
3. Permit any new exchanges accessing federal grant money to use grant funds to cover the cost of developing EDE.
4. Require any new exchanges to facilitate consumer access to EDE.

EDE will provide states with same advantages as the federal government including better consumer experience, increased access to ACA coverage, a more stable technology platform, and lower operational costs. We urge you to take steps to ensure consumers have the same access to EDE in state-based exchanges as they do in the federal exchange. If you have any other questions, please feel free to contact me at joel.white@cahc.net or 202-559-0192.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joel White", is written over a faint, larger version of the same signature.

Joel C. White
President, CAHC