



December 9, 2025

The Honorable Rick Scott  
110 Senate Hart Office  
Washington, DC 20510

Dear Senator Scott,

On behalf of the Council for Affordable Health Coverage (CAHC), thank you for working to fix our broken health care system and make it more affordable. Our health care system is seriously off track, and the number one problem is affordability.

ACA premiums have more than doubled - rising 129 percent - since the law took effect, far outpacing employer-sponsored coverage, and the general rate of inflation. Even after paying record-high premiums, families face substantial out-of-pocket costs before most insurance benefits begin. For the Silver plans that cover most ACA enrollees, deductibles have nearly doubled, now approaching \$5,000 - almost twice the HSA average and three times the typical employer plan.

Likewise, small businesses now face some of the highest premiums and the fewest insurance options in the entire system. Average small-firm family premiums climbed from \$14,400 in 2013 to more than \$21,000 in 2023, while offer rates have fallen to around 50 percent, pushing 12 million workers into more expensive and more restrictive individual-market plans.

The combination of remarkably high deductibles and highly restrictive networks means many ACA enrollees lack access to care they need to get or stay healthy. The problem is not simply that families pay too much - it is that they are paying more for less.

This is why we support key provisions in your legislation, the *More Affordable Care Act* (S. 3264). CAHC shares your commitment to drive down costs, expand coverage options and transparency, and empower consumers and small businesses with control over their health care dollars. We are encouraged by several provisions in the bill that align closely with CAHC's longstanding mission to promote affordability and consumer-driven coverage options:

## **1. Advancing account-based coverage and consumer control of premium dollars**

Your legislation creates flexibility for states to design market rules that work for their patients while driving down costs by increasing choices for consumers. Under these waivers, premium tax credits and cost-sharing reductions would be deposited directly into Trump Health Freedom Accounts- ensuring that federal support flows to consumers, not insurance companies. Expanding access to HSAs that patients own is a CAHC priority, and we strongly support efforts that give consumers direct control over their premiums.

## **2. Support for small employers**

The legislation includes enhanced small employer tax credit provisions for qualifying small employers located in waiver states. Small businesses increasingly cannot afford to offer coverage because of inflexible and costly ACA mandates that force workers into the individual market where premiums are high and deductibles routinely exceed several thousand dollars.

Your legislation would help reverse this trend by making it more financially feasible for small employers to offer coverage directly to their employees. Enabling small businesses to reenter the health insurance market is critical: employer-sponsored coverage is typically more affordable, more comprehensive, and more stable than exchange plans. Importantly, the tax credit would expand coverage at lower cost of ACA subsidies.

### **3. Expanded choice and increased competition**

The Health Freedom Waiver Program would allow states to waive many of the federal requirements under the current burdensome system, so long as the state maintains a high-risk pool or another risk-mitigation program. Importantly, the bill maintains federal protections that prohibit discrimination based on health status, guaranteeing that people with preexisting conditions will continue to have access to coverage.

In waiver states, plans approved by state regulators- whether offered on an exchange or through private platforms - could be sold across state lines and in both exchange and non-exchange markets. This approach broadens consumer choice and invites new entrants into the market while keeping essential consumer protections in place. This could lower barriers to entry for non-traditional plans and stimulate competition. CAHC has long maintained that competition and innovation - supported by a strong risk-protection framework - are essential to creating a more affordable, consumer-responsive health care system. Your legislation reflects that balance.

### **4. Advancing price transparency to lower costs for consumers**

CAHC also strongly supports the bill's price transparency provisions. Research shows 89 percent of consumers want to shop for care, and up to half would switch providers for a better price. Transparency is the foundation for a functional market and is one of the most effective tools for driving down prices, improving competition, and holding all actors in the health care system accountable. By reinforcing and expanding these requirements, your legislation takes a major step toward giving consumers the information they need and deserve.

Given CAHC's commitment to policies that increase access, expand real choice, encourage competition, and lower costs, we view these provisions as meaningful steps toward a more consumer-driven, affordable health care system. We welcome the opportunity to work with you to help ensure this legislation advances through Congress.

Thank you for your leadership on this critically important issue.

Sincerely,



Joel White  
President