July 23rd, 2018

The Honorable Alex Azar  
The Honorable Seema Verma  
Secretary  
Administrator  
U.S. Department of Health and Human Services  
Center for Medicaid and Medicare Services  
200 Independence Avenue, SW  
200 Independence Avenue, SW  
Washington, DC 20201  
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 2016¹ 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.²

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.³ 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.⁴ These

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.\(^5\) 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.\(^6\)

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.\(^7,8\) 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

---


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.
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