



January 15, 2019

Randy Pate
Deputy Administrator and Director
Center for Consumer Information and Insurance Oversight
Centers for Medicare and Medicaid Services
Baltimore, MD 21244

Dear Deputy Administrator and Director Pate:

The Association for Community Affiliated Plans (ACAP) and the Alliance of Community Health Plans (ACHP) write to urge the release of information regarding 2020 standards for Exchanges and the issuers that participate across the country. ACAP and ACHP are leading national organizations representing community-based health plans serving consumers who purchase coverage through the Exchanges.

Owing to the partial government shutdown, the Notice of Benefit and Payment Parameters (NBPP) for 2020 is stalled at the Office of Management and Budget. The NBPP is critical for qualified health plans (QHPs) that prepare to offer coverage through the Exchanges in the coming year because it announces not only proposed regulatory and operational updates but also timelines for QHP certification in the Federally-facilitated Exchanges, rate review and risk adjustment.

We encourage CCIIO to issue informal guidance with parameters of what to expect or information on systems changes affecting QHP operations or templates and timelines for 2020 applications. Long-standing players in the Exchanges and newcomers alike rely on such information to design products and plan for implementation, which directly impacts Exchange consumers. Based on the 2018 QHP application timeline, issuers will likely need to submit QHP applications beginning in early May 2019. Building in a minimum 30-day comment period in addition to department review, revision, and final release would allow *at most* two months for issuers to operationalize and implement necessary updates. This timeframe will not allow issuers sufficient time to prepare products and operations for Benefit Year 2020.

Insurer participation in the individual market is robust: the average number of issuers per state participating in the QHP market has increased from 3.5 per state in 2018 to 4 per state in 2019.¹ We are proud that community-based health plans have remained committed to this challenging market. Yet with each passing day, the uncertainty driven by lack of regulatory guidance for

¹ The Kaiser Family Foundation. 2019. *State Health Facts: Number of Issuers Participating in the Individual Health Insurance Marketplaces*. Retrieved from <https://www.kff.org/other/state-indicator/number-of-issuers-participating-in-the-individual-health-insurance-marketplace/>.

QHPs threatens the newfound stability. We urge CCIIO to move forward with informal guidance in the face of federal stagnation.

Sincerely,



Margaret A. Murray
CEO
Association for Community Affiliated Plans



Ceci Connolly
President & CEO
Alliance for Community Health Plans

Cc: Jeff Wu, Deputy Director, CCIIO