



Dec. 13, 2020

Ms. Seema Verma, Administrator
Centers for Medicare and Medicaid Services
200 Independence Avenue, SW
Washington, D.C. 20201

Re: Recommendation for the Federally Facilitated Exchange to Extend Open-Enrollment During Pandemic

Dear Administrator Verma:

The COVID-19 pandemic continues to surge across the nation, endangering Americans and filling our hospitals from coast to coast. In the middle of this rising crisis, nearly 80 percent of the health insurance marketplaces, including all of those supported by the federally facilitated exchange (FFE) and a small number of state-based exchanges, are set to close their open-enrollment periods on December 15th.

We are writing to recommend that the Centers for Medicare and Medicaid Services (CMS) extend the Healthcare.gov open-enrollment period through January 31st or, at a minimum through December 30th, to allow Americans more time to sign up for health care coverage during this pandemic.

We recognize that the current federal administration has differed from Covered California in our interpretation of the critical role of marketing and outreach in promoting more enrollment and making a direct impact on lowering premiums by improving the health of the consumer risk pool. The data shows that the FFE has suffered a significant drop in new enrollment since 2016 and is likely on pace for approximately 1.8 million fewer new consumers this year.

Regardless of the approach to marketing, these extraordinary times call for leadership and action in the face of the pandemic. We know that there are an estimated 16 million Americans who are uninsured right now, even though they are eligible for subsidized marketplace coverage or Medicaid. Large numbers of Americans who have lost their jobs and insurance coverage – and may not be aware of Healthcare.gov. Keeping the doors open as long as possible to meet consumers' needs is the right policy for Americans in these difficult times.

There is still time for the federal government to keep the doors open so that eligible Americans have more time to sign up for coverage in the many states served by Healthcare.gov during this pandemic.

While Covered California and other states maintain an open enrollment period through the end of January, which we believe would be an appropriate action – extending the FFE open-enrollment deadline through December 30th would surely boost enrollment over what it would have been otherwise and demonstrate leadership by the administration at a very critical time. Increased enrollment would not only help people get covered but would help lower costs for the federal government by improving the overall health of the consumer pool.

An extension of open enrollment through December 30th – as [Covered California has just done to provide consumers with coverage effective January 1](#) – could and should be tied to that coverage being effective on January 1, 2021. Across the FFE and state-based marketplaces health plans have demonstrated they can and are, in many cases, required to provide coverage on the first of the month even when consumers sign up at the end of the prior month. Therefore, extending the open-enrollment deadline for January 1 coverage through December 30 is neither new or extraordinary.

The evidence is clear that Americans are strained and stressed right now, and we encourage CMS to take this opportunity to provide some of those Americans the relief they need by giving them more time and awareness of the financial help and coverage options that are available to them.

Please know that we stand ready to provide any technical assistance to CMS to implement this policy and will be reaching out to the state-based marketplaces who are set to end their open-enrollment periods this month to provide technical assistance on how they can continue to be there for their consumers when they need it most.

Sincerely,



Peter V. Lee
Executive Director

CC: Alex Azar, Secretary of Health and Human Services
Jeff Wu, Acting Director, CCIIO
Executive Directors, State Based Marketplaces

Attachment: Covered California Dec. 11 press release on open-enrollment extension