

July 12, 2017

Centers for Medicare & Medicaid Services Department of Health and Human Services Attention: CMS-9928-NC P.O. Box 8016 Baltimore, MD 21244-8016

To Whom It May Concern:

The following recommendations in response to the Request for Information regarding "Reducing Regulatory Burdens Imposed by the Patient Protection and Affordable Care Act & Improving Healthcare Choices to Empower Patients" published in the Federal Regance needs? Choice includes the freedom to choose how re, which insurer to use, and which provider to use.

Amend 45 CFR 155.210(c)(1)(iii)(C) and (D), 45 CFR 155.215(f)(3), and 45 CFR 155.225(d)(8)(iii), to allow navigators to "provide advice" without becoming licensed only if allowed to do so under state law. This regulation violates licensing statutes in some states.

- Repeal 45 CFR §155.20, the Standardized Plan Options (Simple Choice Plans). While insurers can choose
  whether to offer standardized plan options, the federal government offering prescribed plan options attempts to
  limit consumer choice forcing them into a one size fits all federally designed marketplace.
- Repeal the section of 45 CFR 144.103 Definitions, which defines Short-term, limited-duration insurance plans as having an expiration date of 3 month from the original effective

Fully fund the cost-sharing reduction payments and improve upon the Qualified Health Plan (QHP) agreement to provide clear safeguards for mid-year changes to include termination provisions and modifications to address the loss of Cost Sharing Reduction (CSR) funding.

- Generally, allow flexibility for states to enforce continuous coverage requirements, develop high risk pools to separately manage high risk individuals and develop state reinsurance programs. Defer to state mandated benefit laws and other plan design parameters states choose to use in defining their markets. State level regulation is necessary to balance consumer and insurer needs for a strong market that offers competition, affordable options and significant consumer choice. To accomplish this under the law, significantly reduce the requirements tied to 1332 waivers to allow more states to pursue this option and implement their state-based solutions more quickly.
  - o Amend 31 CFR 33.108(c) and (d); 31 SEERREPORTORE (3.020c) Tc 04 0 Tubo ()20-0.003 112000.0 Ta