



The Enrollment Coalition

The Honorable Xavier Becerra
U.S. Department of Health and Human Services
200 Independence Avenue SW
Washington, D.C. 20201

Dear Secretary Becerra:

On behalf of The Enrollment Coalition, we write to request the Department of Health and Human Services utilize all existing authorities and flexibilities to allow states to automatically enroll eligible individuals into Medicaid and other \$0 net-premium plans.

The Enrollment Coalition is a group of organizations across the health care community, including consumer advocates, patient advocates, health plans, health care providers, employers, and technology and data organizations. Our mission is to collaboratively identify, develop, and advance actionable policy recommendations for federal policymakers aimed at improving enrollment data, systems, and processes to foster the enrollment of uninsured Americans under age 65 into existing health coverage plans and programs for which they are otherwise eligible.

Millions of Americans are eligible for subsidized health insurance but are not enrolled in coverage. People of color are disproportionately likely to fall into the enrollment gap, as are working-class families. The Enrollment Coalition believes that it must be a top policy priority to ensure that those who are eligible are enrolled and retained in coverage. In 2022, 22.2 percent of uninsured adults said signing up was too difficult.¹ Autoenrollment policies to enroll individuals into Medicaid and \$0 net-premium plans can bridge the persistent enrollment gap and promote equity and health for those needing care.

A 2021 report from the Assistant Secretary for Planning and Evaluation found that:

- Approximately 90 percent or more of eligible uninsured individuals with incomes between 100 to 150 percent of the federal poverty level (FPL)—between \$13,590 and \$20,385 in 2023—can find a plan for \$0.
- More than half (52 percent) of eligible individuals ages 55-64 can find a zero-premium plan.
- Many eligible young uninsured adults (ages 18-24) can also find a zero-premium (44 percent) or low-premium (62 percent) plan.
- Half (50 percent) of eligible uninsured Hispanic/Latino adults can find a zero-premium plan.
- Among eligible Black uninsured adults, 45 percent likely have available a zero-premium plan.²

More recently, KFF found that 60 percent of all uninsured people in America qualify for Medicaid, CHIP, or advance premium tax credits (APTCs) but are not enrolled.³ Continued lack of health insurance is not a

¹ <https://www.kff.org/uninsured/issue-brief/key-facts-about-the-uninsured-population/>

² <https://aspe.hhs.gov/reports/access-marketplace-plans-low-premiums-federal-platform>

³ <https://www.kff.org/affordable-care-act/state-indicator/distribution-of-eligibility-for-aca-coverage-among-the-remaining-uninsured/?currentTimeframe=0&sortModel=%7B%22colld%22:%22Location%22,%22sort%22:%22asc%22%7D>

sustainable status quo for the millions of Americans affected, and automatic enrollment can reduce the barriers that deter eligible people from enrolling in health coverage. Enabling millions of uninsured Americans to be enrolled in health coverage for which they are already eligible is an efficient and effective strategy that will help improve the health of those Americans, their communities, and our health care system. The Coalition encourages HHS to utilize all existing authorities and flexibilities to allow states automatically enroll eligible individuals in \$0 premium coverage, which could include Medicaid/CHIP or Marketplace plans.

Several states have already implemented forms of automatic enrollment, including automatically enrolling individuals who are no longer eligible for Medicaid into Marketplace plans. For example, in Rhode Island, HealthSource RI, the state's marketplace, is automatically enrolling individuals who no longer qualify for Medicaid and who have incomes at or below 200 percent of the federal poverty level (FPL). If there is a premium charge to enroll, the state is covering that cost as part of the auto-enrollment program for the first two months of coverage.⁴ California has implemented a similar auto-enrollment program and New Jersey is considering implementing similar measures.⁵ Additionally, Maryland and nine other states that include a third of the country's uninsured people who qualify for Medicaid have implemented Easy Enrollment programs which utilize state tax information to support enrollment in Marketplace coverage.⁶ The Enrollment Coalition encourages HHS to work with states to expand on these efforts to support and expand automatic enrollment of eligible individuals. Approving state proposals to eliminate paperwork before enrolling uninsured tax filers into programs for which they qualify is precisely the kind of innovation that the Administration should be prioritizing as the country recovers from unwinding's coverage losses.

The Enrollment Coalition has also developed a framework for an autoenrollment policy that supports the enrollment of eligible individuals and families, promotes state flexibility, protects patient choice, and preserves program integrity. More information on the framework can be found on our [website](#).

We appreciate your focus on reducing barriers to coverage for the eligible uninsured population. Please consider the Enrollment Coalition a resource on these issues. Should you have any questions or wish to discuss our comments further, please contact Laura Pence at Laura.Pence@LeavittPartners.com.

Sincerely,

The Enrollment Coalition

cc:

Chiquita Brooks-LaSure, Administrator, Centers for Medicare & Medicaid Services
Dan Tsai, Deputy Administrator and Director, Center for Medicaid and CHIP Services (CMCS)
Anne Marie Costello, Deputy Director, CMCS
Sarah DeLone, Director of the Children and Adults Health Programs Group, CMCS

⁴ <https://nashp.org/rhode-island-looks-to-auto-enrollment-to-ease-transitions-from-medicaid-to-marketplace/>

⁵ <https://familiesusa.org/wp-content/uploads/2023/04/Redeterminations-Eligibility-Simplification.pdf>

⁶ <https://www.marylandhealthconnection.gov/easyenrollment/>