

March 3, 2017

Centers for Medicare & Medicaid Services,
Department of Health and Human Services
Attention: CMS-9929-P
P.O. Box 8016
Baltimore, MD 21244-8016
Electronic Submission: <http://www.regulation.gov>

Re: CMS-9929-P, RIN 0938-AT14, Patient Protection and Affordable Care Act Market Stabilization

To Whom It May Concern:

The National Association of Social Workers (NASW), on behalf of 125,000 professional social workers, submits comments regarding the proposed rule, Patient Protection and Affordable Care Act Market Stabilization.

The social work profession promotes the well-being of individuals, families and communities. Social workers are employed in various healthcare and community based settings, and clinical social workers are the largest group of providers of mental health services in the United States. Social workers often serve vulnerable populations with chronic mental and physical conditions.

In order to maximize health insurance coverage and access to health care services, NASW supports the open enrollment period remaining at 3 months from November through January, and does not support reducing the enrollment timeframe to 45 days. It is important to provide adequate opportunity for people to understand their options and then get support to enroll in the right coverage at in-person appointments, online or by phone. NASW is also opposed to added administrative burdens to qualify for Special Enrollment Periods (SEP), without adequate analysis to determine if changes would discourage eligible people from signing up or continuing through the pre-enrollment verification process.

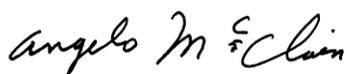
In addition, NASW supports a national standard for network adequacy to ensure reasonable access for consumers and providers. In regards to instances when there has been a lapse in payment or prior loss of coverage, individuals and families should have an opportunity to pay past due fees and a grace period before final termination of coverage.

NASW believes that the changes in this proposed rule will lead to greater instability in marketplace through restricted access. In many settings, social workers inform individuals about their health insurance options and work as navigators to convey accurate information. NASW supports enhanced opportunities for eligible individuals to purchase health insurance coverage and gain timely access to necessary health services. Delays and exclusion from the marketplace can be more costly to health systems in the long run and negatively impact public health objectives.

NASW support efforts to stabilize the health insurance marketplace to ensure its continuation through CMS regulation and federal enforcement of the individual mandate, which serves to foster stable risk pools in the health insurance marketplace.

We appreciate the opportunity to make comments on CMS-9929-P. If you have any questions, please do not hesitate to contact me at naswceo.nasw@socialworkers.org

Thank you.
Sincerely,



Angelo McClain, PhD, LICSW
Chief Executive Officer