

July 6, 2017

Seema Verma, Administrator
Centers for Medicare & Medicaid Services,
Department of Health and Human Services
Attention: CMS-9928-NC
P.O. Box 8016
Baltimore, MD 21244-8016
Electronic Submission: <http://www.regulations.gov>

Re: CMS–9928–NC, RIN 0938–ZB39, Reducing Regulatory Burdens Imposed by the Patient Protection and Affordable Care Act & Improving Healthcare Choices To Empower Patients

Dear Ms. Verma:

The National Association of Social Workers (NASW), representing 125,000 social workers, submits comments on Reducing Regulatory Burdens Imposed by the Patient Protection and Affordable Care Act & Improving Healthcare Choices To Empower Patients.

NASW strongly supports the Patient Protection and Affordable Care Act (ACA) that has extended health insurance coverage to 20 million Americans. Social workers encounter the direct impact of the ACA as they work with vulnerable populations including families living in poverty and individuals with serious and chronic health conditions. The ACA has positively affected both client populations that social workers serve, and opportunities for professional social workers. NASW does not wish to see these gains reversed, and any changes to the regulatory landscape should only advance access to and coverage for health care.

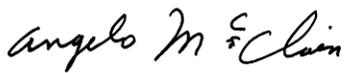
NASW suggests ways in which the U.S. Department of Health and Human Services can “create a more patient-centered health care system that adheres to the key principles of affordability, accessibility, quality, innovation, and empowerment” (RFI CMS-9928-NC, p.1).

- *Continued Guidance on Nondiscrimination Provisions*
The ACA has expanded insurance coverage for individuals across age groups regardless of pre-existing conditions. Regular access to health services is critical for maintenance of chronic physical and mental health conditions. In addition, Section 1557 protects individuals from discrimination on the basis of race, color, national origin, age, disability and sex based on civil rights law. CMS should continue to prioritize issuing guidance to discourage discrimination in all forms that lead to disparate treatment and access to health care.
- *Strengthening Mental Health Parity Provisions*
Mental health and substance use disorder parity provisions have promoted greater access to behavioral health services-- and clinical social workers are the largest group of providers of mental health services in the U.S. States should have opportunities to strengthen these provisions and conduct state level analyses of network adequacy to ensure that providers at the local level can sufficiently meet the demand for services.

- *Strengthening Essential Health Benefits*
The essential health benefits outlined in the ACA contribute greatly to the long-term health of our nation by emphasizing coverage of preventive, routine and common services that can be costly, such as emergency room visits. States should use the essential health benefits as a model and have the option to further enhance the package of benefits.
- *Cost Sharing Subsidies*
As this Request for Information indicates, affordability is a key component of a healthy marketplace. NASW strongly encourages the continuation of cost sharing subsidies based on income so that plans are affordable and individuals and families are able to make use of coverage to access services.
- *State Waivers*
NASW supports the use of waivers to encourage innovative programs and initiatives at the state level, particularly those that enhance long-term services and support and home and community-based services. Through the promotion of innovative integrated care models, social workers have had greater opportunities to contribute to interdisciplinary teams in health care settings and provide appropriate services and supports to patients across the health care continuum.
- *Funding for Navigators and Assisters*
To inform consumers of their health insurance coverage options and increase health insurance literacy, continued funding for navigators and assisters is necessary. Health insurance education, in person and over the phone, helps to disseminate accurate information to families and communities. NASW also supports a longer open enrollment period to maximize opportunities for individuals to learn about their coverage options and register.

Thank you for consideration of these comments. NASW supports regulatory improvements to enhance coverage and access to health care services and would be glad to provide additional feedback to CMS in order to achieve these objectives. Please feel free to contact us at naswceo@socialworkers.org or 202-408-8600, Ext. 200.

Sincerely,



Angelo McClain, Ph.D., LICSW
Chief Executive Officer