



August 30, 2016

Internal Revenue Service  
P.O. Box 7604  
Ben Franklin Station  
Washington, DC 20044

Re: Premium Tax Credit NPRM VI – REG-109086-15

To Whom It May Concern:

The District of Columbia Health Benefit Exchange Authority (DC HBX) appreciates your consideration of our comment on a specific proposed provision, Information Reporting - § 1-36B-5. DCHBX is responsible for implementing a state-based on-line health insurance marketplace under the ACA in the District of Columbia.

The District's marketplace, called DC Health Link, is the sole distribution channel for health insurance sold in the individual market and the District's Medicaid program covers single adults up to 215% FPL. Of the individual covered lives in QHPs, 7% receive APTC and less than 2% receive cost sharing reductions (CSR).

The IRS proposed a change where some marketplace reporting would be grouped by tax household. DCHBX interprets this provision to only apply to reporting related to consumers applying for financial assistance through APTC, CSR, or Medicaid for the following reasons. It is only in these cases where a marketplace can legally request tax filing information or tax household composition information.<sup>1</sup> Collecting this information would require additional significant operational and IT marketplace resources. Most importantly, collecting tax filing information from consumers choosing not to seek APTC, CSR, or Medicaid would be a deterrent to families seeking health insurance.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to be "Mila Kofman", written over a horizontal line.

Mila Kofman  
Executive Director  
DC Health Benefit Exchange Authority

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<sup>1</sup> See 45 C.F.R. §155.405 (exchanges may not collect more than "minimum information necessary"); 45 C.F.R. §155.305(a) (tax information not necessary for non-IAP application).

