



November 26, 2019

Office of Management and Budget,
Office of Information and Regulatory Affairs
OIRA_submission@omb.eop.gov
Attn: CMS Desk Officer

Re: Agency Information Collection Activities; Proposals, and Approvals – CMS-2019-0113-0002 [Billing Code 4120-01-P]

To Whom It May Concern:

The District of Columbia Health Benefit Exchange Authority (HBX) appreciates your consideration of our comments on the above-cited information collection proposal.

By way of background, HBX is a private-public partnership established by the District of Columbia (District) to develop and operate the District's on-line health insurance *marketplace*, DC Health Link (DCHealthLink.com). DC Health Link fosters competition and transparency in the private health insurance market, enabling individuals and small businesses to compare health insurance prices and benefits and to purchase affordable, quality health insurance. Leveraging the Affordable Care Act (ACA) and DC Health Link, the District has achieved near universal coverage with nearly 97% of District residents now having health coverage.

45 C.F.R §156.280(e)

The October 28, 2019 Federal Register notice on this Paperwork Reduction Act (PRA) package indicates a change or update to the PRA related to the requirement for qualified health plans (QHPs) to segregate funds related to non-Hyde abortion services. The underlying PRA document, including the proposed changes to a form or data collection and the supporting statement is not available on the government website for review by the public. Consequently, it is unknown what specifically is being proposed. HBX is therefore resubmitting our comments from the Patient Protection and Affordable Care Act; Exchange Program Integrity Proposed Rule (CMS-9922-P) in case they are relevant and helpful to your proposal.

Sincerely,

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

Mila Kofman
Executive Director
DC Health Benefit Exchange Authority



1225 Eye Street NW, 4th Floor, Washington, DC 20005