



May 31, 2016

The Honorable Shaun Donovan  
Director, The Office of Management and Budget  
725 17th Street, NW  
Washington, DC 20503

Re: *Form Number:* CMS-10572; *OMB control number:* 0938-NEW

Submitted Electronically Via *OIRA\_submission@omb.eop.gov*

Dear Director Donovan:

I am writing on behalf of the National Association of Health Underwriters (NAHU), a professional association representing more than 100,000 licensed health insurance agents, brokers, general agents, consultants and employee benefit specialists nationally. The members of NAHU work on a daily basis to help individuals and employers purchase, administer and utilize health insurance coverage. NAHU believes that health insurance is expensive because healthcare is expensive and, through the principle of transparency, we can engage, educate and empower consumers to make informed choices, which will help them lower cost and improve overall health and wellbeing.

Accordingly, we are in support of the CMS proposal exposed for public comment as per the Paperwork Reduction Act regarding the proposed collection of information for transparency in coverage reporting by qualified health plan (QHP) issuers. NAHU believes that the collection and release of this information will not only enhance the performance of the federal health insurance marketplace (Marketplace), but that it will also provide great value to Marketplace consumers and the professionally licensed health insurance agents and brokers who assist Marketplace purchasers.

One-sixth of our economy is driven by the purchase of healthcare, yet it is one of the only purchases consumers make on a regular basis with very little regard to cost. Since insurers pay the vast majority of healthcare expenses, most consumers have no idea what the healthcare they receive costs, and they have been conditioned not to ask. The ability for consumers to compare costs and quality when making decisions about their healthcare has been virtually eliminated. This paradigm needs to shift.

NAHU believes the principle of transparency is the cornerstone of meaningful cost reform for consumers. Rising healthcare costs are the greatest barrier to health insurance coverage in America. Bending the cost curve of skyrocketing medical costs is the most critical—and vexing—aspect of healthcare reform. Even with new federal programs to assist lower-income Americans to access private health insurance, such as the premium tax credits offered to qualified QHP purchasers through the Health Insurance Marketplaces,



the cost of coverage will remain out of reach for many Americans unless medical costs are reined in.

The American healthcare consumer is poised to change the rules of the game by demanding transparency of healthcare cost and quality information. Higher QHP deductibles are forcing them to shop for care and technology of this proposed data-collection effort would help Marketplace purchasers gain access to more information so they can make more informed decisions. Consumers need access to information on quality and cost in advance of treatment so they can determine overall value. Look no further than Lasik eye surgery for proof of this concept. The surgery isn't covered by insurance and the cost is disclosed upfront and paid for directly by the consumer. Ten years ago, Lasik cost \$5,000 per eye. Today, it costs \$500 per eye and quality has improved dramatically.

Making informed healthcare decisions helps us understand that healthcare can be expensive but not necessarily better in value. Encouraging the principles of transparency, consumerism, health and wellbeing by exposing more quality and price information for the 2017 plan, including requiring quality star ratings for five high-volume federally facilitated marketplace states--Michigan, Ohio, Pennsylvania, Virginia and Wisconsin--this year will help Marketplace consumers and is a realistic start that will allow for a full display of quality information for the 2018 plan year. We look forward to the release of additional guidance to allow state marketplace consumers and other QHP purchasers access to additional quality and price-transparency data. Giving all consumers the ability to compare health services will encourage more educated and informed purchasing decisions, lowering cost without sacrificing care. We appreciate your commitment to providing Americans with more informative, consumer-friendly healthcare cost and quality data and tools.

NAHU sincerely appreciates the opportunity to provide comments on this information request. If you have any questions or need more information, please do not hesitate to contact me at either (202) 595-0787 or [jtrautwein@nahu.org](mailto:jtrautwein@nahu.org).

Sincerely,

Janet Stokes Trautwein  
Executive Vice President and CEO  
National Association of Health Underwriters