



April 20, 2012

Colorado Health Benefits Exchange Board

Re: Premium Aggregation in the Individual Exchange

Dear Ladies and Gentlemen of the Board:

The Colorado Consumer Health Initiative is submitting these comments concerning whether the Colorado Health Benefits Exchange should allow premium aggregation in the individual exchange. As discussed below, we believe providing such an option would improve the consumer experience.

From the perspective of individuals and families, there are benefits to premium aggregation. First, it will make premium payment much easier for families that might have different coverage for different family members. Second, the option of paying premiums to the exchange will allow billing continuity for individuals should they switch plans. For the exchange itself, the aggregation option provides greater flexibility in terms of financing the exchange and navigator programs.

The technology for aggregation will exist for the SHOP and is, we understand, included in the design documents for the individual exchange. We do, however, appreciate the concerns about the complexities of the reconciliation process. If premium aggregation is not possible when the exchange becomes operational in 2014 because of time and technology constraints, we nevertheless urge the Board to work toward implementing such an option as soon as practicable.

Sincerely,

A handwritten signature in black ink, appearing to read "Deborah Kelly".

Debra Judy
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