

The Honorable Kathleen Sebelius, Secretary
United States Department of Health and Human Services
Centers for Medicare & Medicaid Services
200 Independence Ave, S.W.
Washington, D.C. 20201

Dear Secretary Sebelius:

Thank you for the opportunity to comment on the final interim federal Exchange regulations. Our comments and recommendations are based on the lessons from Utah's experience.

The design and structure of the health exchanges will determine how easily consumers can find and compare health plans—public and private— and whether they can afford to purchase or use health insurance.

The signatories listed on the following pages endorse these key principles for the success of health insurance exchanges. These principles are the necessary ingredients for Utahns to access decent affordable health insurance. They will make insurance affordable, help people find and compare health plans, and improve the health of children, small business owners and entrepreneurs, people with disabilities, people with chronic and serious illness, and working families without employer-based coverage.

Recommended Principles and Parameters for the Exchange Regulations

- **Consumer protection + brokers:** Protecting the consumer should be the first priority of all Exchange functions and regulations. It should be clear to consumers when on a broker's website that they are not, indeed, on the Exchange, and brokers who sell on the Exchange should be required to arrange their websites in a way that does not bias consumers to plans based on broker compensation.
- **Data security and protection:** Utah's recent security breach resulting in the theft of 750,000 Utahns' personal health and identity information highlights the urgency of making sure that data is secure. People must be confident that their information is safe during the application, eligibility determination, and enrollment process.
- **Seamless application, enrollment, and coverage for Utahns:** Eligibility determination and enrollment must be uninterrupted and non-burdensome for all applicants in and out of Exchanges. If this task is split between the Exchange and Medicaid it becomes more important that rigorous timeliness standards are adopted so that no Utahn is without coverage.

TO SIGN ON, PLEASE SEND EMAIL TO volunteer@healthpolicyproject.org (in the subject line please write: "Sign on to Final Exchange Regs Comments") **by May 22, 5:00 pm**. For more information, contact Shelly Braun at shelly@healthpolicyproject.org or Judi Hilman at judi@healthpolicyproject.org or (801) 433-2299.

**The Utah Community Comments on the Final Interim Federal Exchange Regulations
are Endorsed by the Following:**

Name, Title	Affiliation
Wayne and Dorothy Owen	
Deborah Brown, MS, NCG	Age Connections, Inc./Guardian & Conservator Services, LLC
Linda Cohen	JFSUtah
Sonia Salari, PhD	Dept. Family + Consumer Studies, University of Utah
Kim Schuske	
Kyle Jones, MD	Dept. Family + Preventive Medicine, University of Utah
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Kathleen Hardy	

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