




February 3, 2015

The Honorable Don White  
286 Main Capitol Senate Box 203041  
Harrisburg, PA 17120

Dear Chairman White:

As you know, the Pennsylvania Association of Community Health Centers (PACHC) is the state primary care association, representing and supporting the largest network of primary health care providers in the Commonwealth. Our network of health centers includes Community Health Centers , Rural Health Clinics and other like-mission providers serving more than 700,000 vulnerable Pennsylvanians annually in underserved rural and urban areas. PACHC is also one of Pennsylvania's navigator entities, providing enrollment assistance and training in the Affordable Care Act's (ACA) Health Insurance Marketplace, along with our 50 health center members. In the 2013-14, enrollment period, our network of 201 enrollment assisters (certified application counselors and Navigators) provided Marketplace, Medical Assistance and CHIP enrollment assistance in 170 sites across 43 counties to more than 30,000 consumers.

PACHC is appreciative of the opportunity to work with your office in regard to Senator Eichelberger's Senate Bill 293 to provide input regarding our experiences with enrollment assistance. Our network of enrollment assistance providers have put in place strict best management practices and protocols to meet similar standards that you are seeking to place in statute. As you're aware, health center-based enrollment assisters strictly provide assistance with enrollment in Marketplace, CHIP and Medical Assistance plans, and no commercial plans sold outside of the Marketplace. We and our members share your commitment to consumer protection and appropriate credentialing of "exchange assisters" – as the term is defined in the legislation.

We applaud that the legislation recognizes the value that exchange assisters provide consumers who are unfamiliar with insurance and/or the Marketplace and appreciate the caution to avoid impairing the ability of Navigators and certified application counselors (CACs) to act in their official capacity as certified by the Centers for Medicare and Medicaid Services (CMS) and to avoid interfering with the 2015-16 open enrollment period. These provisions are critical to ensure consumer protections without sacrificing access to quality enrollment assistance in Pennsylvania.

We look forward to working with the General Assembly and the Department of Insurance as SB 293 progresses. If we can provide you with additional information or answer any questions, please feel free to contact us at [jim@pachc.org](mailto:jim@pachc.org) or (717) 761-6443, ext. 206. Thank you.

Sincerely,



Cheri Rinehart  
President & CEO

Cc: The Honorable Matt Smith  
The Honorable John Eichelberger