



June 24, 2024

Devon Trolley
Executive Director
Pennsylvania Health Insurance Exchange Authority
312-318 Market St. 3rd Fl
Harrisburg, PA 17102

Sent electronically to PennieRegulations@pennie.com

RE: Proposed Regulation for Health Equity Accreditation: Request for Public Comments

Dear Director Trolley,

Thank you for the opportunity to provide public comments on the proposed regulations for Health Equity Accreditation (HEA) requirements within the Pennsylvania Insurance Exchange. The Pennsylvania Health Access Network (PHAN) is Pennsylvania's only statewide consumer-driven organization working to expand and protect access to high-quality, equitable, affordable healthcare for all Pennsylvanians. The Pennsylvania Health Law Project (PHLP) is a statewide nonprofit organization that has been providing free legal services to Pennsylvanians with limited incomes seeking access to health coverage and services for over thirty years. It is with great pleasure that PHAN and PHLP welcome these measures that will help improve health outcomes for communities disproportionately impacted by barriers to care.

We are excited to see that the newly proposed HEA regulation was unanimously voted for approval by Pennie board members, as it will improve access to healthcare coverage, especially for historically disadvantaged communities that face significant barriers to care.

Through our work as healthcare advocates and assisters navigating the marketplace, we frequently engage with healthcare consumers from many diverse backgrounds. For example, people with disabilities who often have higher health needs and, as a result, require access to clear, accurate, and accessible information to select the plan that best meets their needs. For this population, information and services often must be provided in alternate formats such as braille, audio, or large print. In addition, people may need additional accessibility supports for using healthcare services such as scheduling appointments with providers. The HEA regulation will help establish minimum standards for insurers to provide services in a more equitable manner.

Other examples include consumers with limited English proficiency and immigrants who rely on additional support such as access to interpreters, translated documents, and culturally

competent services and information. HEA will help better identify and connect with communities where these extra supports are needed. Other ways that health equity plays a role when accessing healthcare can be tied to race, religion, gender identity, and/or sexual orientation. Consumers should not be discriminated against based on these or other factors and they should be given fair and unbiased access to healthcare services and information to help them when making decisions about coverage or services.

The HEA requirement will help all of the above populations and more in ensuring that Pennsylvania residents have improved access to health coverage and, by proxy, healthcare services. It will also help insurers on the exchange better identify populations disproportionately impacted by barriers to care, and work towards solutions to improve access to coverage and care. We are pleased to see that one of the insurers on Pennie has already taken steps to implement these measures as HEA becomes the norm in other states and look forward to others following suit. We are confident the HEA will assist with educating and engaging historically marginalized communities and help to make sure people get and stay connected to coverage. This is especially important now that the rate of uninsured has increased as a result of the Medicaid unwinding.

Thank you again for this opportunity to provide feedback on this important measure which will be a great step forward to improving access and helping Pennsylvanians have more equitable healthcare. Please contact Jessica Foster with any questions at jessica@pahealthaccess.org.

Sincerely,

Jessica Foster
Deputy Director of Policy and Partnerships
Pennsylvania Health Access Network

Erin Guay
Co-Executive Director
Pennsylvania Health Law Project