

*Transmitted via e-mail*

October 17, 2017

Mr. Randy Pate  
Deputy Administrator, Center for Medicare and Medicaid Services  
Director, Center for Consumer Information and Insurance Oversight  
Department of Health and Human Services  
200 Independence Ave, SW  
Washington, DC 20201

**Re: Tribal Technical Advisory Group Request for Current American Indian and Alaska Native Enrollment Data for Health Insurance Marketplaces**

Dear Director Pate:

On behalf of the Tribal Technical Advisory Group (TTAG)<sup>1</sup> to the Centers for Medicare and Medicaid Services (CMS), we write to you requesting an updated report on American Indians and Alaska Natives (AI/ANs) enrolled in health insurance coverage through Health Insurance Marketplaces established under the Patient Protection and Affordable Care Act (Affordable Care Act or ACA).

First, we would like to express our appreciation for the data previously provided on enrollment in the Federally-Facilitated Marketplaces (FFMs). (See attached reports.) The data covers enrollment at select points of time for the 2015 and 2016 coverage years. These data have proven useful in identifying AI/AN enrollment levels by state, as well as identify problems with enrollment, such as some eligible AI/ANs were identified as not securing the Indian-specific cost-sharing protections. *We are requesting a similar report for enrollment of AI/ANs in 2017.*

In addition, in order to have a broader and more complete understanding of enrollment of AI/ANs in Marketplace-facilitated coverage, we are asking that CMS/CCIIO provide similar data sets for enrollment in the State-Based Marketplaces (SBMs). We understand there might be limitations on the data that are available from the activities of SBMs. As such, we request as many of the data elements contained in the CMS/CCIIO Marketplace report on FFM enrollment be provided for SBM enrollment. *At a minimum, we are requesting CMS/CCIIO provide state-specific data on the number of enrollees determined eligible for the Indian-specific cost-sharing*

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<sup>1</sup> The TTAG advises the Centers for Medicare and Medicaid Services (CMS) on Indian health policy issues involving Medicare, Medicaid, the Children's Health Insurance Program, and any other health care programs funded in whole or part by CMS. In particular, the TTAG focuses on providing policy advice designed to improve the availability of health care services to American Indians and Alaska Natives under these federal health care programs, including through providers operating under the health programs of the Indian Health Service, Indian Tribes, Tribal organizations, and urban Indian organizations.

*protections (i.e., zero cost-sharing variation and limited cost-sharing variation) under SBMs. These data would provide a solid indicator of the level of AI/AN enrollment in Marketplaces.*

For both data sets, we request the most recent data available.

We understand the many demands on the CMS/CCIIO staff, but we would still like to communicate a sense of urgency with accessing as much of these data as possible. Again, being able to base outreach enrollment efforts, as well as policy proposals, on current and comprehensive data is critical to the effectiveness of TTAG.

Thank you for your assistance with the work of TTAG.

Sincerely,



W. Ron Allen  
Chairman and CEO, Jamestown S’Klallam Tribe  
Chairman, Tribal Technical Advisory Group

Cc: Kitty Marx, Director, CMS Division of Tribal Affairs

Lisa Wilson, CCIIO/CMS

Mark LeBeau, Executive Director, California Rural Indian Health Board (CRIHB),  
Chairman, TTAG Data Subcommittee

Attachments:

- CMS/CCIIO, Table 1: American Indian and Alaska Native Applicants and Enrollees in the Federally-Facilitated Marketplace, Coverage Year 2015 and Coverage Year 2016

**Table 1: American Indian and Alaska Native Applicants and Enrollees in the Federally-Facilitated Marketplace**  
**Coverage Year 2015 Data as of 2015-12-31**

Best AI/AN Category: Categories are mutually exclusive	Tribal Member			IHS Beneficiary			Race AI/AN		
	No Enrollments on Application	At Least 1 Enrollment Detected but Not All	All Members Enrolled on Application	No Enrollments on Application	At Least 1 Enrollment Detected but Not All	All Members Enrolled on Application	No Enrollments on Application	At Least 1 Enrollment Detected but Not All	All Members Enrolled on Application
Sub-Category									
<b>Applications Submitted to the Marketplace</b>									
Total Applications (at least one individual on application meets AI/ AN criteria)	6,195	1,154	25,241	40,052	3,008	39,418	6,421	221	7,627
Individuals on Applications Submitted	8,014	1,731	31,446	52,529	7,020	45,724	7,413	555	8,581
<b>Determinations made by Marketplace</b>									
Individuals determined QHP Eligible without CSR or unknown status	243	12	**	18,562	693	18,411	3,191	75	3,170
Individuals determined QHP eligible with CSR	6,889	1,454	30,231	4,293	1,537	25,079	899	172	4,998
Individuals determined Medicaid/CHIP Eligible	522	242	525	23,208	4,094	870	2,523	261	231
Individuals determined Not Eligible for QHP	882	265	672	29,674	4,790	2,234	3,323	308	413
<b>Qualified Health Plan Selections (Active Only)</b>									
Total Plan Selections	0	912	22,277	0	946	23,528	0	108	4,093
<b>By SEP code</b>									
M-SEP (Indian tribes and Alaska natives specific SEP)	0	161	4,266	0	**	49	0	0	12
All other SEPs	0	200	6,714	0	275	7,150	0	30	1,489
<b>By Gender</b>									
Female	0	546	12,623	0	505	13,072	0	62	2,224
Male	0	366	9,654	0	441	10,456	0	46	1,869
<b>By Age Group</b>									
0-17	0	79	3,635	0	64	2,918	0	**	390
18-34	0	350	6,119	0	348	7,142	0	41	1,274
35-64	0	481	12,451	0	533	13,439	0	60	2,420
65+	0	**	67	0	**	29	0	**	**
Unknown	0	**	**	0	**	0	0	**	0
<b>By Metal Level</b>									
Catastrophic	0	**	**	0	**	171	0	0	**
Bronze	0	647	15,188	0	144	4,485	0	13	774
Silver	0	217	5,461	0	723	15,692	0	88	2,856
Gold	0	37	1,255	0	48	2,123	0	**	286
Platinum	0	**	301	0	23	1,044	0	**	132
<b>By Cost Sharing Reduction (CSR) Type</b>									
01: No CSR	0	**	2,762	0	291	10,738	0	24	1,744
02: Zero CSR for individuals that are AI/AN	0	769	16,150	0	0	**	0	**	**
03: Other CSR for individuals that are AI/AN	0	49	2,867	0	0	**	0	**	**
04 - 06: Standard income based CSR	0	**	498	0	655	12,781	0	83	2,345

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Best AI/AN Category: Categories are mutually exclusive									
Sub-Category	Tribal Member			IHS Beneficiary			Race AI/AN		
	No Enrollments on Application	At Least 1 Enrollment Detected but Not All	All Members Enrolled on Application	No Enrollments on Application	At Least 1 Enrollment Detected but Not All	All Members Enrolled on Application	No Enrollments on Application	At Least 1 Enrollment Detected but Not All	All Members Enrolled on Application
<i>By State</i>									
AK	0	30	696	0	**	128	0	**	33
AL	0	23	262	0	51	856	0	**	91
AR	0	20	388	0	**	277	0	0	43
AZ	0	27	814	0	**	641	0	0	104
DE	0	0	16	0	**	84	0	0	12
FL	0	13	825	0	75	2,519	0	**	430
GA	0	11	265	0	43	1,166	0	12	266
IA	0	0	61	0	**	88	0	0	11
IL	0	13	257	0	20	780	0	**	148
IN	0	**	139	0	14	438	0	**	78
KS	0	33	682	0	22	419	0	**	55
LA	0	**	199	0	13	617	0	0	79
ME	0	**	149	0	**	248	0	**	43
MI	0	35	906	0	32	917	0	**	115
MO	0	40	590	0	61	934	0	**	151
MS	0	**	39	0	11	148	0	0	27
MT	0	73	762	0	11	288	0	**	29
NC	0	24	519	0	139	2,468	0	**	341
ND	0	14	701	0	**	86	0	0	**
NE	0	**	309	0	**	184	0	**	20
NH	0	0	30	0	**	136	0	0	26
NJ	0	**	45	0	24	569	0	**	100
NM	0	33	723	0	**	178	0	**	44
NV	0	11	221	0	**	177	0	0	54
OH	0	**	121	0	13	655	0	0	110
OK	0	261	6,638	0	34	786	0	**	144
OR	0	21	477	0	17	358	0	**	112
PA	0	11	138	0	21	922	0	**	160
SC	0	**	173	0	27	556	0	**	85
SD	0	31	563	0	**	97	0	0	14
TN	0	11	240	0	17	635	0	**	122
TX	0	79	2,459	0	186	3,078	0	31	680
UT	0	31	595	0	**	328	0	**	61
VA	0	**	223	0	27	1,174	0	**	210
WI	0	23	899	0	**	423	0	**	71
WV	0	**	15	0	**	96	0	0	**
WY	0	**	138	0	**	74	0	0	**

**Table 1: American Indian and Alaska Native Applicants and Enrollees in the Federally-Facilitated Marketplace**  
**Coverage Year 2016 Data as of 2016-05-23**

Best AI/AN Category: Categories are Mutually Exclusive	Tribal Member			IHS Beneficiaries			Race AI/AN		
	No Enrollments on Application	At Least 1 Enrollment Detected but Not All	All Members Enrolled on Application	No Enrollments on Application	At Least 1 Enrollment Detected but Not All	All Members Enrolled on Application	No Enrollments on Application	At Least 1 Enrollment Detected but Not All	All Members Enrolled on Application
Sub-Category									
<b>Applications Submitted to the Marketplace</b>									
Total Applications (at least one individual on application meets AI/ AN criteria)	9,465	1,212	28,958	32,137	2,609	37,025	5,332	190	8,919
Individuals on Applications Submitted	11,859	1,823	36,687	41,335	6,130	43,621	6,051	482	9,976
<b>Determinations made by Marketplace</b>									
Individuals determined QHP Eligible without CSR or CSR status unknown	160	**	**	15,552	659	16,982	2,764	58	3,287
Individuals determined QHP eligible with CSR	10,991	1,510	35,359	4,058	1,372	25,477	931	161	6,382
Individuals determined Medicaid/CHIP Eligible	502	**	649	17,877	3,631	784	1,966	227	225
Individuals determined Not Eligible for QHP	708	311	775	21,727	4,099	1,170	2,357	263	307
<b>Qualified Health Plan Selections (Active Only)</b>									
Total Plan Selections	0	936	26,222	0	1,061	27,566	0	115	5,502
<b>By SEP code</b>									
M-SEP (Indian tribes and Alaska natives specific SEP)	0	61	1,581	0	0	26	0	0	**
All other SEPs	0	59	2,019	0	61	1,809	0	**	490
<b>By Gender</b>									
Female	0	568	14,702	0	591	15,185	0	63	3,008
Male	0	368	11,520	0	470	12,381	0	52	2,494
<b>By Age Group</b>									
0-17	0	**	4,434	0	47	3,692	0	**	464
18-34	0	363	7,312	0	420	8,798	0	41	1,903
35-64	0	512	14,384	0	593	15,023	0	70	3,120
65+	0	**	92	0	**	53	0	**	15
<b>By Metal Level</b>									
Catastrophic	0	**	100	0	**	366	0	0	81
Bronze	0	688	18,455	0	188	5,547	0	16	1,068
Silver	0	217	6,365	0	831	19,117	0	92	3,958
Gold	0	26	1,208	0	31	2,197	0	7	356
Platinum	0	**	94	0	**	339	0	0	39
<b>By Cost Sharing Reduction (CSR) Type</b>									
01: No CSR	0	62	2,649	0	291	12,049	0	25	2,106
02: Zero CSR for individuals that are AI/AN	0	790	19,338	0	0	**	0	0	0
03: Other CSR for individuals that are AI/AN	0	33	2,992	0	0	**	0	0	0
04 - 06: Standard income based CSR	0	51	1,243	0	770	15,504	0	90	3,396
<b>By State</b>									

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Best AI/AN Category: Categories are Mutually Exclusive		Tribal Member			IHS Beneficiaries			Race AI/AN		
Sub-Category	No Enrollments on Application	At Least 1 Enrollment Detected but Not All	All Members Enrolled on Application	No Enrollments on Application	At Least 1 Enrollment Detected but Not All	All Members Enrolled on Application	No Enrollments on Application	At Least 1 Enrollment Detected but Not All	All Members Enrolled on Application	
AK	0	30	608	0	**	146	0	**	27	
AL	0	21	414	0	41	1,012	0	**	153	
AR	0	19	461	0	**	306	0	**	62	
AZ	0	13	933	0	7	759	0	**	136	
DE	0	0	17	0	**	102	0	0	19	
FL	0	11	952	0	75	2,848	0	14	644	
GA	0	7	289	0	58	1,411	0	**	336	
HI	0	**	26	0	**	83	0	0	24	
IA	0	**	86	0	**	119	0	0	19	
IL	0	**	295	0	26	958	0	**	184	
IN	0	**	147	0	18	503	0	0	94	
KS	0	31	709	0	29	500	0	**	91	
LA	0	7	285	0	24	749	0	**	113	
ME	0	**	177	0	**	254	0	0	54	
MI	0	25	988	0	38	912	0	**	151	
MO	0	42	670	0	65	1,031	0	**	185	
MS	0	**	47	0	**	136	0	0	40	
MT	0	46	751	0	14	277	0	0	42	
NC	0	21	618	0	123	2,730	0	**	407	
ND	0	7	646	0	**	95	0	**	16	
NE	0	14	348	0	11	207	0	**	55	
NH	0	0	34	0	**	157	0	0	24	
NJ	0	0	52	0	16	683	0	0	115	
NM	0	30	701	0	**	254	0	**	48	
NV	0	**	289	0	**	270	0	0	63	
OH	0	**	146	0	15	765	0	**	155	
OK	0	343	8,643	0	44	923	0	**	166	
OR	0	19	627	0	27	565	0	**	172	
PA	0	**	167	0	28	1,035	0	**	191	
SC	0	7	164	0	28	566	0	**	120	
SD	0	30	612	0	**	105	0	**	12	
TN	0	14	282	0	24	715	0	**	151	
TX	0	92	2,732	0	194	3,817	0	25	901	
UT	0	30	779	0	15	423	0	**	97	
VA	0	7	271	0	48	1,451	0	**	310	
WI	0	29	1,024	0	12	491	0	0	96	
WV	0	**	21	0	**	99	0	0	13	
WY	0	**	211	0	7	109	0	0	16	