

April 04, 2023



Dear Commissioner Conway,

Spring Institute for Intercultural Learning is proud to support the Proposed Amendment Regulation [4-2-43: Enrollment Periods Relating to Individual and Group Health Benefits Plans](#).

Spring Institute is a nationally recognized provider of effective intercultural learning programs and services. It is a nonprofit, community-based organization with the mission of empowering people and organizations to succeed across languages and cultures. Spring Institute has established a standard of excellence in policy advocacy regarding issues of significance to the immigrant and refugee community, including increased access to quality early childhood education, child and family well-being, adult education, healthcare career credentialing/pathways, and more.

We strongly support the implementation of a special enrollment period for people who lose their Medicaid or Child Health Plan *Plus* (CHP+) coverage during the unwinding of the continuous coverage mandate put in place during the COVID-19 public health emergency.

Some 325,000 Coloradans are expected to lose Medicaid/CHP+ coverage during this time, according to [data from the Colorado Department of Health Care Policy & Financing \(HCPF\)](#). Children and people of color are particularly likely to be impacted. This special enrollment period is critical to ensuring that Coloradans have the time they need to sign up for subsidized health coverage. It is especially important for people who may not receive their renewal packets due to housing instability or who may for other reasons not realize that their Medicaid/CHP+ coverage has ended until they try to seek medical care.

As the COVID-19 public health emergency unwinds, the more-than-1.7 million Coloradans currently enrolled in Medicaid or CHP+ should feel assured that they will not experience significant losses and/or gaps in healthcare coverage.

We also strongly support the implementation of a special enrollment period for people who are pregnant, as required by HB22-1289. This special enrollment period was negotiated with carriers during the development of the bill. The consideration of pregnancy as a qualifying life event for enrolling in health care coverage outside of the normal open enrollment period will help increase access to critical prenatal care, decrease prenatal uninsurance, and increase marketplace coverage.

Losing health coverage can lead to negative health and economic outcomes. These proposed special enrollment periods will support perinatal health in our state and help reduce or prevent gaps in coverage for thousands of people in our state.

We thank the DOI for these changes and ask that the proposed amended regulation be finalized as soon as possible.

Sincerely,

Khatira Amn,

ECE Policy Advocate

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