January 9, 2026

Kevin N. Patterson, MPA MURP, Chief Executive Officer
Dick Thompson, Board Chair
Connect for Health Colorado
4600 South Ulster Street, Suite 300
Denver, CO 80237

Submitted electronically via: board@connectforhealthco.com

RE: Plan Year 2027 Issuer Fee Recommendation

Dear Mr. Patterson and Mr. Thompson:

Kaiser Permanente, the Colorado Association of Health Plans, and its members appreciate the opportunity to submit public comments to the Connect for Health Colorado (C4HCO) Board of Directors in advance of discussing the PY2027 Issuer Fee Recommendation.

As policymakers and carriers continue to discuss ways to improve affordability, we would like the C4HCO Board and staff to consider a lower PY2027 Issuer Fee during the modeling and development of the Fiscal Year 2027 Budget. Since setting the 3.5% assessment in PY2016 and removing the additional flat-dollar fee the following year, C4HCO replaced its legacy technology platform and brought more services in-house, resulting in steady enrollment growth and a more streamlined consumer experience. We applaud the investments and vision of the Board and staff to build a successful Exchange that continues to reduce barriers to coverage for uninsured Coloradans, especially among underserved populations and in rural areas of the state. Given C4HCO's success over time and continued stabilization of enrollment and premium rates due to state affordability programs, we encourage some additional financial modeling to determine whether a lower PY2027 Issuer Fee can support operations, enhancements, and target reserves while helping to reduce overall premium rates for Coloradans.

Additionally, from Plan Years 2014 to 2026, State-Based Exchanges and the Federally Facilitated Marketplace have gradually lowered assessment fees as enrollment and operations have stabilized over time. While there has been some uptick in fees in 2025-2026, many Exchanges have adopted lower fees for PY2026 than the peak rates set during the early years of the ACA Marketplaces (see table on the next page for more information).

We strongly support federal and state policies that sustain and strengthen Exchange staffing and resources to support core enrollment technology, IT innovations, marketing and outreach, plan management, quality improvement, administration, and operations while working collaboratively to find ways to reduce costs for consumers. Given the affordability challenges in the individual market, we believe it is worth assessing the feasibility of a lower issuer fee.

Carrier Assessment Fees for SBEs, SBE-FPs, and FFM*, 2014-2026

Plan Year	CA	CO	DC	GA	HI	MD**	OR	VA	WA
2014	$13.95	$0.00	1.00%	3.50%	2.00%	N/A	$0.00	3.50%	$0.00
2015	$13.95	1.4% + $1.25	1.00%	3.50%	2.00%	N/A	$9.66	3.50%	$4.19
2016	$13.95	3.5% + $1.80	1.00%	3.50%	N/A	N/A	$9.66	3.50%	$7.46
2017	4.00%	3.50%	1.00%	3.50%	3.50%	N/A	1.50% + $6.00	3.50%	$7.46
2018	4.00%	3.50%	1.00%	3.50%	3.50%	N/A	2.00% + $6.00	3.50%	$7.46
2019	3.75%	3.50%	0.90%	3.50%	3.50%	N/A	3.00% + $5.50	3.50%	$3.36
2020	3.50%	3.50%	0.90%	3.00%	3.00%	N/A	2.50% + $5.50	3.00%	$3.36
2021	3.25%	3.50%	0.90%	3.00%	3.00%	N/A	2.50% + $5.50	2.50%	$3.36
2022	3.25%	3.50%	0.825%	2.75%	2.75%	N/A	2.25% + $5.50	2.25% + 0.50%	$3.00
2023	3.25%	3.50%	0.80%	2.75%	2.75%	N/A	2.25% + $5.50	2.25% + 0.50%	$3.00
2024	3.25%	3.50%	0.825%	2.50%	2.20%	N/A	1.80% + $5.50	2.75%	$3.00
2025	2.25%	3.50%	0.80%	2.50%	1.50%	N/A	1.20% + $5.50	2.50%	$5.11
2026	2.50%	3.50%	0.80%	3.25%	2.50%	N/A	2.00% + $6.85	2.50%	$5.11

*Flat-dollar amounts represent PMPM assessed on premiums

**MD does not have an Exchange user fee but applies a 1% premium tax to fund reinsurance

(dark grey shading)	FFM
(light grey shading)	SBM-FP

Thank you for the opportunity to comment. Please feel free to contact us with any questions.

Sincerely,

Allison Mangiaracino

Allison Mangiaracino
Exchange Policy and Operations Manager
Kaiser Permanente

Kevin M. McFatridge
Executive Director
Colorado Association of Health Plans