Comments to the Centers for Medicare and Medicaid Services for:
Data Collection to Support Eligibility Determinations for Insurance Affordability Programs and Enrollment through Health Benefits Exchanges, Medicaid and CHIP Agencies (CMS-2024-0106-0001)
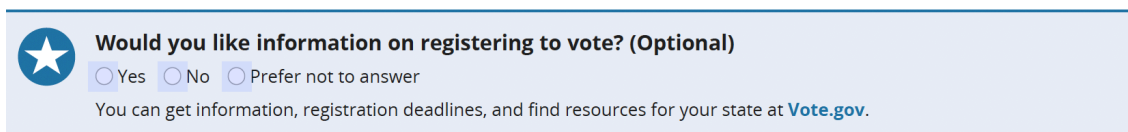
Thank you for the opportunity to comment on plans to include information about voter registration in the Health Insurance Marketplace applications for health coverage. Registering to vote is a critical step in participation in US elections, so we applaud the plans to include information about voting resources in these annual application forms used by millions of Americans.

The Center for Civic Design is a nonprofit organization focused on democracy as a design problem. We work with elections offices and advocates across the county to improve the forms, processes, information, and ballots that are critical parts of the voter experience.

These comments focus on the way the information about registering to vote is presented to make it easy for people to notice in the application, understand what it is saying, and take appropriate action.

In the fillable PDF forms (B-D)
The notice includes 3 fillable PDF forms with the same question, presented in the same way in all of them. It appears immediately before *Step 4: Your agreement & signature* almost at the end of the form, as shown in the image below:

Would you like information on registering to vote? (Optional)
○ Yes   ○ No   ○ Prefer not to answer
You can get information, registration deadlines, and find resources for your state at **Vote.gov**.

Although a good start, the goal is not to simply offer information, but to offer applicants a path to both information and the ability to take action to register.

Center for Civic Design

civicdesign.org | 410-921-6811 | office@civicdesign.org
5443 Tates Bank Road, Cambridge, MD 21613

The question could be asked more directly and offer a clear action, for example:

> **Would you like to register to vote or update your voter registration? (Optional)**
> Go to **Vote.gov** for information about voting and a link to your state's voter registration form.
>
> Or
>
> **Would you like to register to vote or update your voter registration? (Optional)**
> Go to **Vote.gov** for information about voting and to access a voter registration application and other resources.

The way the question is presented, it looks like only applicants who say "Yes" can go to vote.gov. Why not say that information will be emailed to them?

> **Would you like to register to vote or update your voter registration? (Optional)**
> If you select "Yes" we will email you information about voting.
> You can also go to **Vote.gov** for information about voting and to access a voter registration application for your state.
> ( ) Yes   ( ) No   ( ) Prefer not to answer

The voter registration question is formatted to fit into the overall design of the application form. But it is not directly related the health insurance application process. A better design might include a visual indicator from the vote.gov site. This would have several benefits:

- It would be clearer that this is an additional benefit being offered in the application.
- It would make a connection between the name vote.gov and its logo, helping applicants recognize that they have arrived at the correct site.
- If used on all Marketplace print and web materials, the consistency would be reinforcing. For example, an applicant who had seen it on the website might remember it when the encounter it in the application. This would be even stronger if used across all CMS, HHS, or federal websites and apps.

In the online application form (A)
The online application also places the question about voter registration just before the signature. It asks the same question as the PDF form, but does not show the sentence about finding information about voting at Vote.gov unless the applicant selects "Yes."

Because there is so little added information, it would be more effective to show both the question and the answer, similar to the way the question is formatted in the PDF versions.

There is no information about the confirmation screen displayed after the applicant signs and submits the form. This screen might include a list of the next actions needed to complete the process of signing up for health insurance. It is also another opportunity help applicants who answered, "Yes" take the next step to vote.

- Display a notice that reminds the applicant that they wanted to register to vote and display a link to vote.gov - ideally to the vote.gov page for the state where they live - with the same icon or logo used to identify vote.gov in the application.
- If information will be emailed to them automatically, the notice should remind them of that. It might also contain button so that they can ask for an email a reminder to be sent.
- It might also be possible to automatically open a new tab or window (behind the current window), with the Vote.gov page for the state where they live.

In the future
Looking forward, it would be ideal if the system could do more to help applicants take the next step to register to vote.

Even if all you can offer is information and a link, the more specific the details can be, and the more direct the link, the better. Information for their own state about voter registration deadlines, registration requirements (including voter ID), and a link directly to a voter registration form are all examples of how the Marketplace can take applicants farther down the path to being a voter.

With Vote.gov as the main federal resource for resources, individual platforms like the Marketplace do not have to keep track of the details for 55 states, territories, and the District of Columbia.

The Marketplace and Vote.gov can coordinate ways to provide a more robust pathway to voter registration. For example, the Marketplace confirmation screen might:
- Provide a link directly to the Vote.gov page for their state
- Offer a link directly to online voter registration in their state, for states that have an online service.
- Give applicants the option to prefill a national registration form for their state via Vote.gov, which can present it with state-specific instructions for how to complete the registration.
- Give applicants the option to forward their information via Votegov, directly to their state election voter registration service, similar to an automatic voter registration process at a motor vehicle office.