

April 23, 2018

The Honorable Alex Azar
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

The Honorable Alexander Acosta
Secretary
U.S. Department of Labor
200 Independence Ave, NW
Washington DC 20210

The Honorable Steven Mnuchin
Secretary
U.S. Treasury
1500 Pennsylvania Avenue, NW
Washington, DC 20220

Dear Secretary Azar, Secretary Acosta, and Secretary Mnuchin:

Our 106 organizations represent millions of people with serious, acute, and chronic diseases and disabilities, as well as their caregivers. These individuals, and all Americans, need access to comprehensive, affordable health coverage in order to meet their medical needs.

We write to express our concerns about the impact the proposed rule regarding short-term limited duration plans (STLDs) (CMS-9924-P) will have both on the health insurance marketplaces and the individuals we represent. While short term plans can offer less expensive coverage, they are not required to adhere to important standards, including the ten essential health benefit categories, guaranteed issue, out-of-pocket maximums, and many other critical consumer protections. These policies are also allowed to charge much higher premiums, deny coverage altogether for consumers who cannot meet medical underwriting standards, and impose lifetime and annual limits on services. If the proposed rule put forward by your departments is finalized in its current form, it will limit access to quality and affordable health insurance coverage for all Americans, and disproportionately harm individuals with pre-existing conditions and disabilities.

Expanding access to these policies will likely cause premiums in the individual insurance marketplace to increase dramatically, as younger and healthier individuals choose to enroll in cheap short-term plans. Allowing STLDs to proliferate would force individuals, including those with serious or chronic diseases and disabilities, into a smaller, sicker market to obtain the coverage they need to manage their health. Premiums for comprehensive plans that meet federal standards could skyrocket, and plans would likely exit the market. This will make insurance either unavailable or unaffordable for those who rely on the marketplace to get coverage.

Our organizations are dedicated to identifying and promoting improvements to our health insurance markets that control costs, stabilize the market, and positively impact coverage and care for millions of Americans. Expanding access to STLDs will move us away from – not towards – achieving these goals. As advocates for our communities, we implore you to protect patients and consumers, including individuals with pre-existing conditions and persons with disabilities. We urge you to withdraw this proposed rule until it adequately protects consumers in addition to any rules that do not increase stability, improve affordability, and secure access to quality coverage in our insurance markets.

Sincerely,

AARP
Adrenal Insufficiency United
Adult Congenital Heart Association
Adult Polyglucosan Body Disease Research Foundation
Alliance for Aging Research
Alpha-1 Foundation
American Association of People with Disabilities
American Association on Health & Disability
American Brain Tumor Association
American Cancer Society Cancer Action Network
American Heart Association
American Kidney Fund
American Liver Foundation
American Lung Association
American Multiple Endocrine Neoplasia Support
American Physical Therapy Association
American Therapeutic Recreation Association
Arthritis Foundation
Association of Oncology Social Work
Autism Society
Autism Speaks
Autistic Self Advocacy Network
Bazelon Center for Mental Health Law
Benign Essential Blepharospasm Research Foundation
Beyond Celiac
Brain Injury Association of America
CancerCare
Caregiver Action Network
Celiac Disease Foundation
Children's PKU Network
Consortium of MS Centers
Crohn's & Colitis Foundation
Cutaneous Lymphoma Foundation
Cystic Fibrosis Foundation
Diabetes Patient Advocacy Coalition
Disability Rights Legal Center
Dystonia Advocacy Network
Dystonia Medical Research Foundation
Epilepsy Foundation
Family Voices
Fight Colorectal Cancer
FORCE: Facing Our Risk of Cancer Empowered
GBS|CIDP Foundation International
Global Colon Cancer Alliance
Hemophilia Federation of America
Hyper IgM Foundation
Immune Deficiency Foundation
Indian Organization for Rare Diseases
International Myeloma Foundation
International Pemphigus and Pemphigoid Foundation
International Waldenstrom's
Macroglobulinemia Foundation
Interstitial Cystitis Association
Jack McGovern Coats' Disease Foundation
Justice in Aging
LAL Solace
Lung Cancer Alliance
Lupus Foundation of America
Lutheran Services in America
Lymphatic Education & Research Network
Malecare Cancer Support
March of Dimes
Mended Little Hearts
METAvivor
MLD Foundation
Moebius Syndrome Foundation
National Alopecia Areata Foundation
National Association of State Head Injury Administrators
National Blood Clot Alliance
National Comprehensive Cancer Network
National Consumers League
National Eosinophilia Myalgia Syndrome Network
National Hemophilia Foundation
National LGBT Cancer Project
National Multiple Sclerosis Society
National Organization for Rare Disorders (NORD)
National Patient Advocate Foundation
National PKU Alliance, Inc.
National Spasmodic Dysphonia Association
National Alliance on Mental Illness
NBIA Disorders Association
NephCure Kidney International
Oncology Nursing Society
Paralyzed Veterans of America
Parent Project Muscular Dystrophy (PPMD)

PKD Foundation
Platelet Disorder Support Association
Prevent Blindness
Prevent Cancer Foundation
Pulmonary Hypertension Association
Rare and Undiagnosed Network (RUN)
Restless Legs Syndrome Foundation
Scleroderma Foundation
Susan G. Komen
TASH
The American Liver Foundation
The APS Type 1 Foundation, Inc.
The Desmoid Tumor Research Foundation
The Global Foundation for Peroxisomal
Disorders
The Leukemia & Lymphoma Society
The Lymphatic Malformation Institute
The Marfan Foundation
United Ostomy Associations of America
US Hereditary Angioedema Association
Vasculitis Foundation
Vestibular Disorders Association
Worldwide Syringomyelia & Chiari Task Force