

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