

April 17, 2018

The Honorable Paul Ryan  
Speaker  
U.S. House of Representatives  
Washington, DC 20515

The Honorable Mitch McConnell  
Majority Leader  
U.S. Senate  
Washington, DC 20510

The Honorable Kevin McCarthy  
Majority Leader  
U.S. House of Representatives  
Washington, DC 20515

The Honorable Chuck Schumer  
Minority Leader  
U.S. Senate  
Washington, DC 20510

The Honorable Nancy Pelosi  
Minority Leader  
U.S. House of Representatives  
Washington, DC 20515

Dear Speaker Ryan, Leader McConnell, Leader McCarthy, Leader Schumer and Leader Pelosi:

Our 113 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, age-rating protections, 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 the Administration 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 people with 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 would likely 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, by asking the Administration to withdraw this

proposed rule until it adequately protects patients and consumers, as well as any rules that do not increase stability, improve affordability, and secure access to quality coverage in our insurance markets.

Sincerely,

AARP	Epilepsy Foundation
Adrenal Insufficiency United	Family Voices
Adult Congenital Heart Association	Fibrolamellar Cancer Foundation
Adult Polyglucosan Body Disease Research Foundation	Fight Colorectal Cancer
Advocacy & Awareness for Immune Disorders Association (AAIDA)	FORCE: Facing Our Risk of Cancer Empowered
Alliance for Aging Research	GBS CIDP Foundation International
Alpha-1 Foundation	Global Colon Cancer Alliance
American Association of People with Disabilities	Hemophilia Federation of America
American Association on Health & Disability	Hyper IgM Foundation
American Cancer Society Cancer Action Network	Immune Deficiency Foundation
American Diabetes Association	Indian Organization for Rare Diseases
American Heart Association	International Myeloma Foundation
American Kidney Fund	International Pemphigus and Pemphigoid Foundation
American Liver Foundation	International Waldenstrom's
American Lung Association	Macroglobulinemia Foundation
American Multiple Endocrine Neoplasia Support	Interstitial Cystitis Association
American Physical Therapy Association	Jack McGovern Coats' Disease Foundation
American Therapeutic Recreation Association	Justice in Aging
Amyloidosis Support Groups	LAL Solace
Arthritis Foundation	Leukemia & Lymphoma Society
Association of Oncology Social Work	Lung Transplant Foundation
Autism Society	Lupus Foundation of America
Autism Speaks	Lutheran Services in America
Autistic Self Advocacy Network	Lymphangiomatosis & Gorham's Disease Alliance
Bazelon Center for Mental Health Law	Lymphatic Education & Research Network
Benign Essential Blepharospasm Research Foundation	M-CM Network
Brain Injury Association of America	Malecare Cancer Support
CancerCare	March of Dimes
Caregiver Action Network	Mended Little Hearts
Celiac Disease Foundation	Mental Health America
Children's PKU Network	METAvivor
Consortium of MS Centers	Muscular Dystrophy Association
Crohn's & Colitis Foundation	National Alliance on Mental Illness
Cutaneous Lymphoma Foundation	National Alopecia Areata Foundation
Cystic Fibrosis Foundation	National Association for Hearing and Speech Action
Disability Rights Legal Center	National Association of Councils on Developmental Disabilities
Dystonia Advocacy Network	National Association of State Head Injury Administrators
Dystonia Medical Research Foundation	National Comprehensive Cancer Network
Easterseals	

National Consumers League  
National Eosinophilia Myalgia Syndrome  
Network  
National Health Council  
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  
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 Cancer Foundation

PRP (Pityriasis Rubra Pilaris) Alliance  
Pulmonary Hypertension Association  
Rare and Undiagnosed Network (RUN)  
Restless Legs Syndrome Foundation  
Scleroderma Foundation  
Susan G. Komen  
Tarlov Cyst Disease Foundation  
TASH  
The American Liver Foundation  
The APS Type 1 Foundation, Inc.  
The Desmoid Tumor Research Foundation  
The Global Foundation for Peroxisomal  
Disorders  
The Guthy-Jackson Charitable Foundation  
The Lymphatic Malformation Institute  
The Marfan Foundation  
United Ostomy Associations of America  
US Hereditary Angioedema Association  
Vasculitis Foundation  
Worldwide Syringomyelia & Chiari Task Force

cc: U.S. House of Representatives Committee on Ways and Means  
U.S. House of Representatives Committee on Energy and Commerce  
U.S. House of Representatives Committee on Education and Work Force  
U.S. Senate Committee on Finance  
U.S. Senate Committee on Health, Education, Labor and Pensions