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August 11, 2010

Office of Consumer Information
And Insurance Oversight
Department of Health and Human Services
Attention: OCIO-4150-IFC
PO Box 8016
Baltimore, MD 21244-1850

RE: OCIO- 4150-IFC

Dear Sir or Madam:

The Cystic Fibrosis Foundation is pleased to submit these comments regarding the Interim Final Rules for Group Health Plans and Health Insurance Issuers Related to Dependent Coverage of Children to Age 26. We applaud your efforts to set forth straightforward regulations to implement the provisions of the Patient Protection and Affordable Care Act related to coverage of dependents to age 26, as well as your aggressive encouragement of voluntary action by insurers to offer dependent coverage in advance of the effective date of September 23, 2010. Both efforts are critically important to young adults with cystic fibrosis (CF), who all too often find themselves with limited or no options for health insurance coverage.

Cystic fibrosis is a rare genetic disease affecting approximately 30,000 Americans. Infants diagnosed with the disease 30 years ago were not expected to live to start school. Improvements in available treatments and the management of the disease have contributed to an increase in the mean age of survival to the mid-30's. Obtaining health insurance coverage is a struggle for families from the birth of their children with CF, and for young adults with CF the challenges of finding and purchasing health insurance are often overwhelming. Although some young adults with CF have employer-sponsored insurance, Medicaid, or coverage through a state-high-risk pool, others are left with no insurance coverage and as a result must make difficult choices about their CF treatment.

For many young adults, the ability to retain coverage through a parent's health insurance plan will help them receive and pay for the health care they need on a daily basis. By addressing the following issues with clarity, the new rules will ensure smooth implementation of dependent coverage beginning September 23, 2010.

- By preventing plans and issuers from considering whether an adult child is a dependent on the parents' tax return, is no longer a student, or lives with his or her

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parents, the rules will guarantee that eligible adult children obtain coverage without delay that might have been caused by eligibility determination.

- Requiring that plans provide young adult children with the same benefits provided to similarly situated individuals at the same price will increase the likelihood that young adults will have adequate insurance coverage.
- Implementing a requirement that insurers and employers notify young adults of their continued eligibility and provide them 30 days to take advantage of the coverage opportunity will ensure that young adults have an adequate time to enroll.

Although an analysis of the dependent coverage provision found that family premiums would increase by a limited percentage, the potential increase in cost could be much greater for those families that are purchasing coverage in the individual market. We realize that it is beyond the scope of the rule to address that situation. We also note that the availability of any insurance – even at high rates in the individual market – will provide relief to some adult children with CF and their families. However, it is important to recognize the heavy financial burden that health care creates for those with CF and their families, a burden that is of course not addressed by the extension of dependent coverage.

Young adults with CF often face serious job lock and encounter barriers to their professional development as they make work and life choices that are dictated by their ability to secure and pay for their health care. The dependent coverage provision, as implemented by the interim final rule, helps to address that situation for those with CF.

We applaud the Obama Administration for seeking the early implementation of dependent coverage and many insurers for accepting the challenge of early implementation. We also commend the efforts to simplify the process for full implementation of this Affordable Care Act provision on September 23, 2010.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert J. Beall". The signature is fluid and cursive, with a prominent initial "R".

Robert J. Beall, Ph.D.
President and Chief Executive Officer