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.
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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