



May 25, 2022

Ms. Chiquita Brooks-LaSure
 Administrator, Centers for Medicare and Medicaid Services
 Department of Health and Human Services
 P.O. Box 8010
 Baltimore, MD 21244-8010

Dear Administrator Brooks- LaSure,

Our 23 organizations represent millions of patients and consumers who face serious, acute, and chronic health conditions. We have a unique perspective on what individuals and families need to prevent disease, cure illness, and manage chronic health conditions. The diversity of our organizations and the populations we serve enable us to draw upon a wealth of knowledge and expertise that is an invaluable resource in this discussion. We write to request a meeting with Administrator Brooks-LaSure regarding regulations limiting the sale and availability of short-term, limited-duration (“STLD”) health insurance.

In January of this year, 29 of our organizations sent the Departments of Health and Human Services (HHS), Labor, and Treasury a letter urging you to take swift action to limit the availability of these dangerous products and provided recommendations for how the Departments could better protect patients. Non-compliant insurance offerings, including – but not limited to -- STLDI, have disproportionately harmed patients with pre-existing conditions and continue to jeopardize the health and wellbeing of both people and the integrity of our coverage system. In the coming months, it will be critical that HHS and CMS take steps to issue meaningful regulations that go beyond those issued in 2016. In addition to restoring the 3-month duration limit, the Administration should move to limit renewability and stacking, ban sales during Open Enrollment, limit internet and phone sales, establish a prohibition on plan rescissions, and improve disclosures.

As you know, STLD insurance is not required to adhere to important standards, including prohibitions on discrimination against people with pre-existing conditions, coverage for the 10 essential health benefit (EHB) categories, limitation on age rating of premiums, annual out of pocket maximums, prohibitions on gender rating, annual benefit limits, and lifetime coverage limits, and many other critical patient and consumer protections. These standards are critical to the care needed by the people our organizations represent.

Our organizations eagerly await formal rulemaking on STLD plans and are available to assist you in efforts to protect patients from these and other non-ACA-compliant plans. We welcome the opportunity to meet and discuss these issues with you further. To arrange a meeting, please contact Katie Berge, Leukemia & Lymphoma Society Director of Federal Government Affairs at Katie.Berge@lls.org. We thank you for your attention to this important matter and look forward to working with you on behalf of patients.

Sincerely,

American Cancer Society Cancer Action
Network
American Heart Association
American Kidney Fund
American Lung Association
Asthma and Allergy Foundation of America
Cystic Fibrosis Foundation
Epilepsy Foundation
Hemophilia Federation of America
Lupus Foundation of America
National Alliance on Mental Illness
National Coalition for Cancer Survivorship

National Eczema Association
National Health Council
National Hemophilia Foundation
National Kidney Foundation
National MS Society
National Organization for Rare Disorders
National Patient Advocate Foundation
National Psoriasis Foundation
Pulmonary Hypertension Association
Susan G. Komen
The AIDS Institute
The Leukemia & Lymphoma Society

Cc: The Honorable Xavier Becerra, Secretary, Department of Health and Human Services