



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](mailto: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