



Communicating for America
112 East Lincoln Avenue
Fergus Falls, MN 56537

Department of Health and Human Services
Attn: Secretary Thomas Price
200 Independence Avenue, SW
Washington, DC 20201

RE: Delay Enforcement of HHS Short Term Regulation (81 FR 75316 issued Oct. 31, 2016).

Dear Secretary Price:

Congratulations on becoming the first doctor to serve as Secretary of the Department of Health and Human Services (HHS) since 1993. Your health care expertise will be a great asset to Americans, and to the department.

Communicating for America (CA) is a national nonprofit advocacy organization that supports affordable health care for all Americans. Since 1972, our members – mostly self-employed and small business owners in rural communities -- have trusted CA to advocate on their behalf and help them find affordable health insurance that meets their needs.

On behalf of CA's members we ask that you delay the enforcement of **HHS Short Term Regulation** (81 FR 75316) that restricts all short-term medical plans to a 90-day duration. Prior to this regulation, short-term medical plans have solely been governed by state insurance regulations. In many states consumers can buy short-term medical plans for up to 364 days.

Our association – and hundreds of others – disagreed with the proposed rule during the comment period in 2016. Although we believe the regulation is unnecessary, harmful to consumers and adds further instability to an already fragile individual insurance market, we were heartened that the previous administration chose to delay enforcement until April 1, 2017. We are asking – at a minimum – that you build on that precedent by further extending the enforcement deadline to no sooner than July 1, 2017.

CA has helped establish most of the 38 high-risk pools that were in existence before the Affordable Care Act became law, and have testified many times about ways to help consumers – especially those in isolated counties – find affordable health care options. We believe that it our responsibility to find remedy ... not fault.

Short term medical insurance is a remedy for individuals who are:

- Uninsured because they are between jobs
- A recent graduate who hasn't found employment
- Going through a life transition, like divorce or early retirement
- Being removed from their parent's plan because they turned 26 years old
- Visiting the United States under approved J1 visas
- Did not enroll in a plan during the Open Enrollment (OEP) for a variety of reasons, including affordability of a plan.
- Living in an area where there are few choices for an ACA plans, or restrictive provider networks.

The words and actions of leaders in the House and Senate, and that of President Trump, have made it clear that the ACA will be repealed, replaced and repaired. Health insurance premiums have soared, and the number of options for consumers has declined. Consumers are scared and confused. Further limiting choices until there is some clarity and a viable legislative timeline for an ACA replacement is not in the best interest of individuals and families.

CA urges you to use your authority to – at a minimum -- delay the enforcement of short term insurance duration limits from going into until July 1, or later, as Congress and the Trump administration determine the legislative path and timing to repeal, replace or repair the ACA.

We would like to thank you for this opportunity to share our comments, and look forward to working with you and HHS in the future.

Regards,



Jeffrey Smedsrud
Chairman and CEO
Communicating for America