

Comment on: The Centers for Medicare Medicaid Services (CMS) Proposed Rule: Short-Term, Limited-Duration Insurance CMS-9924-P

Dear Administrator Verma,

On behalf of the Union for Reform Judaism, whose 900 congregations across North America include 1.5 million Reform Jews, and the Central Conference of American Rabbis, whose membership includes more than 2,000 Reform rabbis, I write to express our strong opposition to the proposed rule on short-term, limited-duration health insurance. The Reform Movement is actively working toward a health care system that enables all Americans to access high quality, affordable care. Expanding the scope of short-term insurance plans will damage our country's progress toward that goal.

The Affordable Care Act made many laudable changes to the health care system to protect consumers. At the same time, the law is imperfect. Too many families who use the individual marketplace cannot access the choice and affordability they deserve. However, short-term plans are the wrong solution. These plans are [notoriously difficult to understand](#), leaving consumers without the coverage they think they will receive and vulnerable to financial calamity. Furthermore, these plans will bifurcate the health insurance risk pools between people who use short-term insurance and those who remain in the private marketplace. Those who stay in the individual market are likely to be the sickest and most in need of comprehensive care—and will likely face higher costs as healthy people leave their risk pool. [President Trump has promised to protect people with preexisting conditions](#), but this rule would renege on that promise.

Our Jewish tradition teaches that God did not divide creation between the sick and the well, between those who can afford health care and those who cannot, between those who are entitled to health care and those who are not. God created all of us, endowed us with equal rights, and charged us with the responsibility to be partners in the act of healing. These beliefs inspire our conviction that a person's health should not determine the type of care they receive. We believe that at a time when 30 million Americans still lack insurance, and millions more struggle to afford the insurance they do have, government should seek solutions that will

allow all people, including those with preexisting conditions, to receive comprehensive, affordable, and quality care.

Opening up access to short-term health plans will do little to strengthen our health care system for consumers, instead making insurance costlier and less comprehensive for many. Expanding reinsurance, widening eligibility for premium tax credits, and reinstating enrollment support funding would be more effective mechanisms for cost-containment in the individual market. We oppose the proposed rule and urge the administration to enact policies that will benefit people most in need of assistance.

Sincerely,

Rabbi Jonah Pesner
Director, Religious Action Center of Reform Judaism