

January 23, 2012

The President  
The White House  
Washington, D.C.

Dear Mr. President:

As leaders of organizations that represent millions of consumers and patients, we are writing to express our strong interest in ensuring that the pending rule on the Summary of Benefits and Coverage (SBC) is promptly, effectively and fully implemented.

A common interest among our organizations is the recognition that meaningful, long-term reform to the current health care system cannot be achieved without much greater consumer knowledge and awareness of their coverage and what it means for them if they develop a serious medical condition. In enacting the SBC provision, Congress adopted this key provision of the Affordable Care Act (ACA) because it concluded that the information available to Americans today is wholly inadequate for consumers to choose and understand the insurance coverage options available to them.

As the Administration approaches its final decisions on the SBC rule, we want to strongly encourage you to adhere to the letter and intent of the Affordable Care Act. Specifically, we believe:

- **The rule should be implemented as soon as possible.** We recognize that meeting the March 23 statutory deadline may not be feasible, but a delay of more than a few months would be unnecessary and unacceptable. It is especially important to have the rule in force well in advance of the open enrollment periods that most group plans will have later this year.
- **The rule should apply to all plans in all markets.** The law requires all plans, including self-insured and grandfathered plans, to provide the SBC. A concise document as is envisioned for the SBC will assist virtually all consumers, regardless of their particular needs or circumstances, to make a more informed choice than they can today with the paucity of clear information. The lengthy and impenetrable plan descriptions or contracts that are provided today are simply not a viable substitute for the SBC.
- **Multiple coverage examples are essential to an effective SBC.** The law requires more than one coverage example because of the enormous array of needs and concerns among consumers. Moreover, testing has shown that the coverage examples allow consumers for the first time to see how the plan or plans available to them actually work in terms of covering specific health issues.
- **Premium information is essential to consumer understanding of their options and should be included in an SBC.** Although the ACA does not explicitly require its

disclosure in the SBC, it is intuitively obvious that premium information greatly increases a consumer's understanding of his or her options and its inclusion does not represent an additional burden on insurers to disclose it.


To date, the SBC has been the focus of extraordinarily collaborative efforts among the various stakeholders, ranging from consumer and patient groups, to insurers and regulators. We all recognize that a better-informed consumer is essential to achieving a truly competitive marketplace that can both contain spiraling costs and improve health outcomes. It is not surprising that a recent Kaiser Family Foundation poll found that the SBC is the single most popular provision of the ACA.

There are enormous challenges remaining as we work together to implement fully the essential and far-reaching reforms embodied in the Affordable Care Act. An overarching key to achieving successfully many of these changes is the need for much greater transparency and consumer awareness. The SBC is one of the singularly most important reforms in achieving these goals. We strongly urge you to act expeditiously to capitalize on the extraordinary work that has been done by the Administration and others to establish a robust SBC requirement on all plans that can begin to serve all consumers later this year.

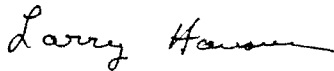
Sincerely,



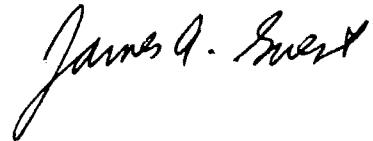
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cc: Nancy Ann Min DeParle  
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