

April 23, 2018

Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
7500 Security Boulevard
Baltimore, MD 21244-1850

ATTN: Short-Term, Limited Duration Insurance [CMS-9924-P; RIN 0938-T48]

Dear Sir/Madam:

As the voice of more than 72,000 clinical nurse specialists (CNS), the National Association of Clinical Nurse Specialists (NACNS) exists to enhance and promote the unique, high value contribution of the CNS to the health and well-being of individuals, families, groups, and communities, and to promote and advance the practice of nursing. NACNS advocates universal access to a standard package of essential health care services for all citizens and residents. We, therefore, appreciate the opportunity to comment on the Centers for Medicare & Medicaid Services (CMS) proposed rule regarding the provision of short-term, limited-duration health insurance plans.

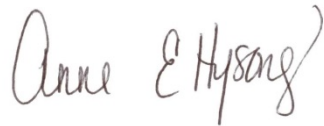
As you may know, CNSs are licensed Advanced Practice Registered Nurses who have graduate preparation in nursing (master's or doctorate) as a clinical nurse specialist. They have unique and advanced level competencies that meet the increased needs of improving quality and reducing costs in our healthcare system. The CNS has a scope of practice that ranges from wellness to illness and acute to chronic care. An individual CNS will have a depth of expertise in a specific patient population's clinical care. For example, one CNS may specialize in diabetes care another in cardiopulmonary care. Unlike other primary care providers who have expertise in a wide-range of primary care conditions, the CNS will have in-depth knowledge in a specific clinical population. This expertise provides cost-effective, high-quality services to patients.

NACNS believes that the CMS proposal would have adverse impacts on patients with chronic and complex health conditions. Consequently, we urge the Departments of the Treasury, Labor, and Health and Human Services to withdraw the proposed rule and instead work with Congress to enact lasting solutions to stabilize our healthcare system.

We are concerned that the proposed rule, combined with the repeal of the individual mandate, will result in a higher rate of uninsured Americans, increased individual health insurance premiums in the marketplace, and a divided individual insurance market which will make it more difficult for individuals with complex and chronic health conditions to access affordable health care coverage.

If you have any questions or require additional information about our position, please feel free to contact Melinda Mercer Ray, MSN, RN, NACNS Executive Director, at 703-929-8995 or via email at mray@nacns.org.

Sincerely yours,

A handwritten signature in cursive script that reads "Anne E. Hysong". The signature is written in black ink and is positioned to the right of the "Sincerely yours," text.

Anne Hysong, MSN, APRN, CCNS, ACNS-BC
President