



IMF

August 27, 2010

Office of Health Plan Standards and Compliance Assistance
Employee Benefits Security Administration
Room N-5653
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210
Attention: RIN 1210-AB43

Office of Consumer Information and Insurance Oversight
Department of Health and Human Services
Attention: OCIO-9994-IFC
P.O. Box 8016
Baltimore, MD 21244-1850

Internal Revenue Service
CC:PA:LPD:PR (REG-120399-10)
Room 5205
P.O. Box 7604
Ben Franklin Station
Washington, DC 20004

RE: Draft comments on interim final rules on preexisting condition protections, rescissions, annual limits, and patient protections

To Whom It May Concern:

On behalf of the International Myeloma Foundation (IMF), the oldest and largest myeloma foundation dedicated to improving the quality of life of myeloma patients while working toward prevention and a cure, I am writing to submit comments on the interim final rules on preexisting condition protections, rescissions, annual limits, and patient protections. The IMF commends the Departments of Health and Human Services, Labor, and Treasury for the interim final rules as myeloma patients need adequate insurance coverage so that they can obtain timely and appropriate access to quality cancer care.

Myeloma is a cancer in the bone marrow affecting production of red cells, white cells, and stem cells. It is also called "multiple myeloma" because multiple areas of bone marrow may be involved. Myeloma is the second most common blood cancer after lymphomas. Each year, approximately 20,000 Americans are diagnosed with myeloma and 10,000 lose their battle with this disease. At any one time there are over 100,000 myeloma patients undergoing treatment for their disease in the U.S. Although incidence of many of cancers are decreasing, myeloma cases are increasing in incidence. Once a disease of the elderly, it is now being found in increasing numbers in people under 65 and it is not uncommon to find patients in their thirties. Even while they live with the disease, myeloma patients can suffer debilitating fractures and other bone

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disorders, severe side effects of their treatment, and other problems that profoundly affect their quality of life, and significantly impact the cost of their health care.

According to a National Survey of Households Affected by Cancer conducted *USA Today*; the Kaiser Family Foundation; and the Harvard School of Public Health; one in ten reached the limit of what their insurance would pay for cancer treatment; and one in twelve were turned away or unable to get a specific type of treatment because of insurance issues. Additionally, cancer can also be an issue that makes it difficult for people to get and keep insurance. This survey also found that one in ten say they were unable to buy health insurance because of having cancer, and 6% say they lost their health insurance as a result of having cancer.

These interim rules will go a long way, when fully implemented in 2014, to help myeloma patients obtain high quality cancer care without fear of forgoing treatment due to reaching coverage limits or worse losing or being unable to obtain insurance coverage entirely. We do, however, remain concerned that many myeloma patients could potentially forgo or postpone treatment due to reaching the annual limit of what their insurance covers prior to 2014.

Additionally, IMF would like to propose that the agencies put together an aggressive and targeted public awareness and educational campaign which would provide consumers with detailed information about the protections that are included in the final rules. IMF has received many questions and requests for more information about the specific provisions related to health care reform. Due to the complexity of health reform and confusion of the general public about provisions in the new law, we remain concerned that myeloma patients will not know how these final rules could benefit them. We strongly advise the agencies to provide information to consumers in a wide range of formats. IMF stands ready to work with you to promote awareness of these important provisions, which will improve access to insurance and health care.

We applaud your efforts and thank you for the opportunity to provide comments. Please do not hesitate to contact us should you have any questions or need more information.

Sincerely,

A handwritten signature in blue ink, appearing to read "David Girard".

David Girard
Executive Director