



Lee Saunders
President

Elissa McBride
Secretary-Treasurer

Vice Presidents

Michael Avant Jr.
Oakland, CA

Jody Barr
New Britain, CT

Mark Bernard
Boston, MA

Ron Briggs
Latham, NY

Lester Crockett
New York, NY

Connie Derr
Albuquerque, NM

Shannon S. Douvier
St. Cloud, MN

Craig A. Ford
Newark, NJ

Henry A. Garrido
New York, NY

R. Sean Grayson
Worthington, OH

Veronica L. Gunn
Vernon, CA

Johanna Puno Hester
San Diego, CA

Kelly Indish
Flint, MI

Corey Hope Leaffer
Portland, OR

Roberta Lynch
Chicago, IL

Christopher Mabe
Westerville, OH

Jessica Martinez Santos
San Juan, PR

Sue McCormick
Duncansville, PA

Douglas Moore Jr.
San Diego, CA

Charmaine S. Morales
San Dimas, CA

Patrick Moran
Baltimore, MD

Michael Newman
Chicago, IL

Jeff Ormsby
Lexington, TX

Debbie Parks
Hamilton, NJ

Lloyd Permaul
Baton Rouge, LA

Randy Perreira
Honolulu, HI

Michael Rivera
Rochester, NY

Joseph P. Rugola
Columbus, OH

Paul Spink
Milwaukee, WI

Mary E. Sullivan
Albany, NY

Tom Tosti
Plymouth Meeting, PA

Anthony Wells
New York, NY

Mike Yestranski
Olympia, WA

April 1, 2025

The Honorable Rick Allen, Chair
The Honorable Mark DeSaulnier, Ranking Member
Subcommittee on Health, Employment, Labor, and Pensions
Committee on Education and the Workforce
U.S. House of Representatives
Washington, D.C. 20515

Dear Chairman Allen and Ranking Member DeSaulnier:

On behalf of the 1.4 million members of the American Federation of State, County and Municipal Employees (AFSCME), I write to express our strong concern over efforts to expand the availability of health plans that are exempt from key consumer protections under the Affordable Care Act (ACA). This undermines access to comprehensive health coverage.

Specifically, proposals advanced in Project 2025 and the Republican Study Committee's FY 2025 budget seek to expand substandard coverage, including Association Health Plans (AHPs) and short-term, limited-duration insurance (STLDI). These plans lack many of the ACA's most essential safeguards—such as coverage for preexisting conditions and essential health benefits. As a result, such proposals risk siphoning younger, healthier individuals away from the ACA marketplaces and threaten to destabilize the insurance risk pool and drive up premiums for those who rely on comprehensive coverage.

We supported rescinding the deeply flawed 2018 AHP rule. At this time we urge Congress to stay the course. AFSCME strongly opposes H.J. Res. 181, which would use the Congressional Review Act to roll back the U.S. Department of Labor's April 2024 final rule restoring critical protections. Rescinding that rule would reinstate a regulatory framework that allowed “junk” plans with inadequate coverage and high out-of-pocket costs to proliferate—placing workers and families at significant financial and health risk.

AFSCME represents nearly 200,000 members working in the private sector, many of whom are employed by small businesses and would be directly impacted by the erosion of ACA protections. We cannot afford to return to a system that allows insurers to offer bare bones plans that fail to cover vital services like mental health care, maternity services or prescription drugs.

American Federation of State, County and Municipal Employees, AFL-CIO

TEL (202) 429-1000 FAX (202) 429-1293 TDD (202) 659-0446 WEB www.afscme.org 1625 L Street, NW, Washington, DC 20036-5687

We urge you to reject H.J. Res. 181 and any legislation that expands AHPs or similar substandard plans. Instead, we call on Congress to protect and build upon the ACA's foundation and ensure all Americans have access to high-quality, affordable health care.

Sincerely,

A handwritten signature in black ink, appearing to read "Edwin S. Jayne". The signature is fluid and cursive, with a large initial "E" and a stylized "J".

Edwin S. Jayne
Director of Federal Government Affairs

ESJ/DH:lm

cc: U.S. House of Representative Education and the Workforce Subcommittee on Health,
Education, Labor and Pensions