



February 23, 2026

Frank Bisignano

CEO, Internal Revenue Service
Department of the Treasury

Daniel Aronowitz

Assistant Secretary of Labor for Employee Benefits Security
Department of Labor

Dr. Mehmet Oz

Administrator, Centers for Medicare & Medicaid Services
Department of Health and Human Services

Submitted via [regulations.gov](https://www.regulations.gov).

RE: Transparency in Coverage (CMS-9882-P)

Dear Mr. Bisignano, Assistant Secretary Aronowitz, and Administrator Oz,

United States of Care (USofCare) is pleased to submit comments in response to the 2026 Transparency in Coverage (TiC) proposed rule issued by the Internal Revenue Service (IRS), Employee Benefits Security Administration (EBSA), and the Department of Health and Human Services (HHS).

USofCare is a nonpartisan, nonprofit organization working to ensure that everyone has access to quality, affordable health care regardless of health status, social need, or income. Importantly, we are committed to improving the health of everyday people and are eager to engage in solutions that do just that. We advocate for [new solutions](#) to tackle our shared health care challenges – solutions that people of every demographic tell us will bring them peace of mind and make a positive impact on their lives. Through our [work in the states](#) and [listening to people's experiences](#) with the health care system, we are able to identify unique insights from patients on the ground to amplify for uptake at the [federal level](#).

From our [listening work](#), we know that affordability and ease of understanding [top the list](#) of people's concerns when it comes to health care. The United States spends [considerably more](#) on health care than peer nations despite [no improvement](#) in outcomes, saddling everyday people and families with the high cost of care. Regardless of partisan affiliation, 75% of people [rate](#) the cost of health care in the U.S. as "only fair" or "poor." Moreover, half of Americans report skipping or delaying care due to cost. Even when they are able to access needed care, many people [do not understand](#) the health care system. Confusing billing practices and insurance benefit designs and a lack of transparency around pricing also contribute to the unpredictability and frustrations that people face with the health care system.

The TiC final rules from 2020 took an important step in the direction of improved transparency for non-grandfathered group health plans and health insurance issuers offering non-grandfathered group and individual health insurance coverage. We appreciate the Departments revisiting these rules and proposing new policies to improve the usability of TiC files through changes to reduce the size and number of files, as well as to provide additional



context to the data in these files will help make the data easier to analyze. While the TiC files in and of themselves are not directly used by consumers, we believe they can have value in helping to drive policy changes that make health care more transparent and affordable for people. Improving the usability of this information for researchers that can help identify the scope and magnitude of specific affordability challenges to help inform policy change – which is a priority for USofCare.

To this end, last year, USofCare, in partnership with the Brown University Center for Advancing Health Policy through Research, released a report, “[Reining in Hospital Prices: Modeling Reforms in Indiana, Massachusetts, and North Carolina](#)” that evaluated the impact three different policies would have on consumer premiums and out-of-pocket costs in three states (Indiana, Massachusetts, and North Carolina). Using TiC data in part, this report analyzed cost savings in those states related to site-neutral payments, bans on facility fees, and caps on commercial hospital payments. We found that people could experience lower out-of-pocket costs and lower premiums across all three of the policies we analyzed, and were able to quantify those consumer savings in dollar amounts to help demonstrate the value of these policies for consumers.

USofCare will continue to work to improve health care affordability for people across the country. We agree that transparency, if leveraged appropriately, can help pave the way for needed reforms and appreciate the Departments’ efforts to build on efforts in this area.

Thank you for the opportunity to respond to the proposed rule. Please reach out to Alyssa Penna, Director of Federal Policy, at apenna@usofcare.org with any questions.

Sincerely,

A handwritten signature in black ink that reads "Lisa Hunter". The signature is written in a cursive, slightly slanted style.

Lisa Hunter
Senior Director for Federal Policy & Advocacy
United States of Care