



Anthem, Inc.
Legal Department
N17 W24340 Riverwood Drive
(Waukesha, WI 53188)

April 29, 2015

Via E-mail (jcook@naic.org)

Ms. Angela Nelson
Chair, Consumer Information (B) Subgroup
c/o National Association of Insurance Commissioners
444 North Capitol Street, N.W., Suite 701
Washington, D.C. 20001
Attention: Jennifer Cook, Esq., Life and Health Counsel (NAIC)

Re: Comments on Consumer Information Subgroup's review of Summary of Benefits and Coverage

Dear Ms. Nelson:

Thank you again for including Anthem, Inc. ("Anthem") as a member of the Consumer Information Subgroup. Enclosed with this letter is a listing of initial changes that Anthem is recommending to the SBC. They should apply whether we are using the current template or the template CMS included in the proposed regulation earlier this year.

One of our biggest concerns, however, is ensuring that we get a finalized template from CMS as soon as possible. It will take us several months in order to program our systems for the updated template, which will make it extremely difficult to submit SBCs to the State Insurance Departments, some of which require submission of the documents in April with our other plan filings.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Karen E. Geiger".

Karen E. Geiger
Senior Associate General Counsel
(262) 523-3368 (Telephone)
(262) 523-4772 (Facsimile)
karen.geiger@anthem.com

Enclosure

antheminc.com

Anthem, Inc. SBC Recommendations

- **Coverage Period**-List only the beginning date such as, '1/1/2015 and after'. This would eliminate the need for replication for the 1st and 15th of every month. Alternatively, instead of listing the plan year, allow the coverage period to reflect the period that the deductible and out-of-pocket maximums accumulate.
- **Delete coverage examples**- Financial calculations are too generic to reflect a member's true cost. Adds to member confusion. Maternity can be particularly confusing due to global billing.
- **Alternatively, add different coverage examples**- Coverage examples can be useful if perhaps, more every day scenarios were added such as office visit, sinus infection or childhood immunizations. Examples should illustrate how plan components work for services people are most likely to use. If the SBC is going to define a deductible, then use a simple example of how a deductible works. However, example needs to be very clear that it is just an illustration and the amount the member may actual pay will be different.
- **Overall deductible**- A lot of information is placed in this section such as the amount for member and family, in and out of network designations, as well as what doesn't apply to the deductible. Can we reduce verbiage here as this section takes up a lot of space?
- **Mental Health/Substance Abuse**- The breakout of place of service can be confusing as some cost shares are asked to reflect facility and some to reflect professional fees. Need to simplify.
- **Spacing of pages** – There should be as much flexibility as possible with respect to how the pages and information on the pages are spaced.
- **Chiropractic & Acupuncture**- How important are Chiropractic and Acupuncture benefits to list? Since PCP & SPC are already listed, these would be covered under the office visit cost share for either.
- **L&E section**- Information in the L&E field is often repeated in multiple sections. For example, the Guidelines require us to list limitations in both the L&E field and in the Services Your Plan Does or Does Not Cover section. If we show it in one spot it should not need to be repeated again.
- **Other Covered/Not covered**- Suggest deleting both Other Covered and Not Covered sections since we are not allowed to give any benefit information for these services, it serves little purpose to the member to just list the benefit without any details. Infertility is a good example. A plan might cover treatment to arrive at a diagnosis of infertility, but not cover any actual infertility treatment. So, is it considered a covered service or a not covered service. Identifying the specifics around these required to be listed services is complicated and can be lengthy.