



June 9, 2010

Mr. Lou Felice
Chair, Health Care Reform Solvency Impact Subgroup
National Association of Insurance Commissioners
2301 McGee Street, Suite 800
Kansas City, Missouri 64108-2662

Re: Calculation of Medical Loss Ratio Recommendations

Dear Mr. Felice and Subgroup members:

The Tulsa Health Department (THD) has partnered with Blue Cross Blue Shield and the Oklahoma Caring Van program to augment our pediatric immunization efforts in northeastern Oklahoma for more than a decade. The Caring Van program reimburses direct costs of our nurses' salary and fringe while public health provides all indirect costs such as vaccines, vaccine storage/refrigeration, technical supervision and consultation, syringes and supplies.

We would like to urge the National Association of Insurance Commissioners (NAIC) to consider and recommend to the Department of Health and Human Services (HHS) a definition of medical loss ratio (MLR) that will encourage health plans to continue their tremendous support of community-based public health initiatives and programs.

The membership of NAIC is state-based and so should understand well the important contributions that local organizations make to the overall health of communities and populations. We want to ensure that health insurers will continue their critical participation in these efforts.

It is our understanding that if the definitions around MLR are too narrow, health insurers will not be encouraged to support community-based health initiatives and could, in fact, be penalized for such support if their contributions are counted as administrative expenses. Penalizing Blue Cross Blue Shield of Oklahoma's support of the Oklahoma Caring Van Program and similar community-based programs across the nation would not be wise public policy.

We strongly urge the NAIC to recommend to HHS that for the purpose of calculating MLR, quality initiatives include health insurers' involvement and investments in public health initiatives.

Thank you in advance for any consideration on this important issue!

Sincerely,

A handwritten signature in cursive script that reads "Doug Ressler".

Doug Ressler, R.N., M.P.H.
Associate Director