



Academy of
Managed Care
Pharmacy®

May 13, 2010

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Health Reform Solvency Impact (E) Subgroup
National Association of Insurance Commissioners
2301 McGee Street, Suite 800
Kansas City, Missouri 64108-2662

c/o Todd Sells @ tsells@naic.org

Request for Comments Regarding Section 2718 of the Public Health Services Act (Medical Loss Ratios)

The Academy of Managed Care Pharmacy (AMCP) requests that this addendum to our comments submitted on May 6, 2010 be considered by the National Association of Insurance Commissioners (NAIC) as it considers implementation of Section 2718 of the Public Health Services Act relating to medical loss ratios (MLR). Specifically, we respectfully request that MLR allowable expenses under the Improving Health Care Quality category include Utilization Review.

AMCP is a national professional association of pharmacists and other health care practitioners who serve society by the application of sound medication management principles and strategies to achieve positive patient outcomes. The Academy's 6,000 members develop and provide a diversified range of clinical, educational and business management services and strategies on behalf of the more than 200 million Americans covered by a managed care pharmacy benefit. They are responsible for a broad and diversified range of clinical, quality-oriented services, programs and strategies including the development and implementation of drug formulary systems.

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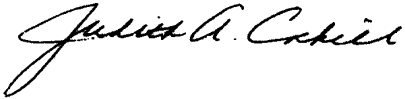
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Appropriate medication therapy for patients is dependent on utilization review. Good patient care practices demands that an individual patient's medication profile be examined to eliminate the potential for adverse drug reactions when a newly prescribed medication is added to a patient's regimen. The utilization review protocol allows both the prescriber and the dispensing pharmacist to assess whether a drug being added to a patient's therapy will create contra-indications with existing drug therapy, be needlessly redundant, or introduce allergic reactions. We believe it is essential to prudent patient care that utilization review be considered a legitimate MLR expense.

AMCP appreciates the opportunity to add these comments to our prior May 6, 2010 letter. If you have any questions, please contact me at (703) 683-8416 or at jcahill@amcp.org.

Sincerely,

A handwritten signature in cursive script that reads "Judith A. Cahill".

Judith A. Cahill
Executive Director