

May 14, 2010

Mr. Steven Ostlund, Chair,
Accident & Health Working Group

Mr. Lou Felice, Chair
Health Care Reform Solvency Impact Subgroup

National Association of Insurance Commissioners
2301 McGee Street, Suite 800
Kansas City, MO 64108-2662

Dear Mr. Ostlund and Mr. Felice:

I am writing on behalf of Western New York Clinical Information Exchange, Inc. d.b.a. HEALTHeLINK. We are writing to comment on the National Association of Insurance Commissioners' ("NAIC") development of recommendations related to the calculation of medical loss ratios ("MLR") in section 2718 of the Public Health Service Act ("PHSA") as added by the Patient Protection and Affordable Care Act ("PPACA"). In particular, we have a strong interest in encouraging activities that improve the quality and appropriateness of the health benefits they offer. We, therefore, urge that your guidance on the calculation of medical loss ratios continue to recognize the importance of these value-added services.

HEALTHeLINK is the Regional Health Information Organization for Western New York (WNY) and a recent recipient of a Beacon award from ONC (ARRA stimulus initiative) for the collaborative work we have done in WNY in advancing health information technology. We ask that the MLR calculation include investment in community efforts related to health information technology. Effective health information technology tools help to reduce costs for employers and employees and, by allowing clinical information to be shared among providers on the patients they are treating help to avoid adverse consequences to patients caused by duplicative tests, treatments, and prescribing errors. These positive results help to mitigate premium increases and improve the quality of care.

We appreciate your consideration of our views and encourage you to develop an MLR calculation methodology that will help to ensure that these vital quality improvement efforts are able to continue to meet the needs of patients and the communities we serve.

Sincerely,



Daniel E. Porreca
Executive Director

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