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May 6, 2010

Lou Felice
Chair, Health Care Reform Solvency Impact Subgroup

Steven Ostlund
Chair, Accident & Health Working Group

Re: Including Health and Wellness Coaching Services in the Medical Loss Ratio Numerator

Dear Mr. Felice and Mr. Ostlund:

American Specialty Health, Incorporated and its family of companies (ASH) is a leading provider of specialty network management, and prevention and wellness services. ASH provides specialty network management, prevention & health programs including health coaching and fitness programs to health plans, insurers, and employer groups. In its specialty network management programs, ASH provides complementary health care services including chiropractic, acupuncture, naturopathy, dietetic counseling, and occupational, physical and massage therapy. ASH provides evidence-based services in a cost-effective manner.

ASH believes that the NAIC recommendations on defining the medical loss ratio requirements (Public Health Service Act section 2718 as added by PPACA) should specify that expenditures for member health and wellness coaching services (e.g., smoking cessation, weight loss, stress management) should be included in the MLR numerator when the payments are made to health and wellness companies that are accredited, certified or recognized by NCQA and/or URAC for these services. These types of services unquestionably have a direct impact on the care provided to health plan members and thus should be included as either dollars expended for “clinical services” or “activities that improve health care quality”, as specified in section 2718.

If we can provide any further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "George DeVries".

George DeVries
Chairman and CEO