June 30, 2010

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

Mr. Steven Ostlund  
Chair, Accident & Health Working Group

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, Mr. Ostlund, and Subgroup members:

Asthma Allies is a 501c3 non-profit asthma education and management organization based in Albuquerque, NM. It was founded by two women, Gerri Rivers and Romelia Rodriguez Walters, who joined forces to centralize asthma resources and focus on collaboration and education and their trusted colleague, Robert Sapien, MD. Our founders bring decades of combined experience in asthma education, program development, patient care and support services.

The mission of Asthma Allies is to provide education and resources to improve the quality of life for individuals with asthma. Our vision is that Asthma Allies will serve as a model of innovation in applied research and educational excellence with the goal of bringing this life-threatening illness under control.

Our service goals include:

- To serve as the primary local asthma resource.
- To educate those caring for individuals with asthma – physicians, nurses, school and daycare personnel, parents and children, adults and their families – using National Institutes of Health (NIH) materials.
- To case manage children and adults with moderate to severe asthma.
- To meet the needs of low-income families with asthma.
- To research asthma education methods, and interventions that work best within the New Mexican population.

Through the years, our relationship with Blue Cross and Blue Shield of New Mexico has aided the implementation of several asthma services for our New Mexican population. These services have allowed New Mexicans with asthma to learn to self-manage their asthma, family members to support the improved asthma management of their loved ones, healthcare providers to better help their patients and created better access for these patients for their asthma care.

I am writing 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. I want to make sure that health insurers will continue their critical participation in these efforts.

It is my 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 support of my organization’s program and similar community-based programs across the nation would not be wise public policy.

I 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 for consideration on this important issue.

Sincerely,

Gerri Rivers, AE-C
Co-Founder
Asthma Allies