



September 10, 2020

Director Ray Farmer, Co-Chair
Commissioner David Altmaier, Co-Chair
National Association of Insurance Commissioners
444 North Capitol Street NW, Suite 700
Washington, D.C. 20001-1512

Forwarded via email to Andy Beal (abeal@naic.org)

RE: AHIP Preliminary Comments on NAIC Special Committee on Race and Insurance

Dear Director Farmer and Commissioner Altmaier:

This year, the nation has witnessed the disproportionate impact of COVID-19 on communities of color followed by the tragic murder of George Floyd along with a series of devastating acts of violence against other African Americans and subsequent protests across the country. These events are the latest flashpoint in the country's long history with systemic racism and discrimination. One key difference in 2020, however, is the widespread embrace and sense of urgency around the national need and imperative for change. Consistent with America's Health Insurance Plans (AHIP)¹ and our members' missions, we believe this is a seminal moment in our nation's history for racial justice and greater diversity, equity, and inclusion.

We appreciate the opportunity to provide initial comments on the NAIC's Special Committee on Race and Insurance – the charges, the workstreams and the areas of focus identified in the August 27 Notice of Meeting. AHIP supports this critically important work and would like to provide some detail on our and our industry's efforts where we have taken continued, accelerated, and measurable action.

AHIP Members Are Taking Action. AHIP member plans are taking action to improve health equity across our communities and among the more than 200 million Americans they serve. Key actions taken by our member companies include:

- Communication and listening sessions with internal and external stakeholders
- Increasing company commitments to hiring and promoting diverse candidates, including the C-Suite level
- Expanding and growing supplier diversity in all business verticals and across their entire enterprise

¹ America's Health Insurance Plans is the national association whose members provide insurance coverage for health care and related services. Through these offerings, we improve and protect the health and financial security of consumers, families, businesses, communities, and the nation. We are committed to market-based solutions and public-private partnerships that improve affordability, value, access, and well-being for consumers.

- Deploying unconscious bias and conscious inclusion training
- Enhancing efforts to reduce health disparities and improve health equity
- Making significant community-based financial investments to address systematic racism and health inequities

AHIP's Health Equity Workgroup. In advance of this spring and summer's tragic events, AHIP's Board of Directors identified addressing the impact of social determinants of health on health care as a strategic priority. In 2018, AHIP launched Project Link, which is an industry learning collaborative that brings together health plans to share and encourage the best thinking and practices among health plans, providers, health sciences researchers and policy organizations on the most effective ways to address social barriers for the people we serve and to work together to create new solutions to other existing challenges. As a direct response to the disproportionate impact that COVID-19 and police misconduct have had on communities of color, AHIP launched a Health Equity Workgroup within Project Link. That group has been meeting since early June and set out the following initial areas of focus:

- *Improving the accuracy and comprehensiveness of information about the people we serve to identify and address health disparities.* In order to improve health equity, we must effectively measure the quality of care received by patients based on racial, ethnic, language, socio-economic status, disability, and sexual orientation and gender identity status. Much can be done to improve data collection and data sharing to better identify disparities and use this information to develop more appropriate and effective outreach, communication, interventions, and programs. AHIP and our Health Equity Workgroup are currently developing strategies to improve data standardization and data collection while leveraging other existing data sources to measurably improve this work. We intend all of this work to be done within the framework of current laws and regulations that impose standards to promote and protect the privacy, security and confidentiality of data and preclude unlawful discrimination.
- *Assisting in creating more diverse provider networks to help the people we serve find providers that meet their needs and preferences.* Health insurance providers are committed to having diverse provider networks that reflect the communities they serve. Many health insurance providers have loan repayment programs to encourage diverse people to enter the health care field and serve in their networks. AHIP and the Health Equity Workgroup are also exploring new federal policies to support this objective and help facilitate and encourage participation by people of diverse backgrounds in health care professions. At the same time, we are identifying and examining strategies to obtain providers' demographic data to assist our members in finding providers that meet their needs and preferences and to ensure every patient feels comfortable and receives culturally-competent and linguistically-appropriate care. Again, all of this is intended to be done within the framework of current laws and regulations that impose standards to promote and protect the privacy, security, and confidentiality of data and preclude unlawful discrimination.
- *Developing training programs to address anti-racism and implicit bias for insurers' workforce and providers.* AHIP and the Health Equity Workgroup are collaborating on an industry approach to promote implicit bias and anti-racism- training to assure that every health plan

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member receives culturally-competent and equitable care and treatment whether it is delivered by a plan employee, a health care provider, or an insurance agent working on behalf of a plan. The Workgroup is currently developing a set of consensus-driven components that are necessary to include in any effective implicit bias and anti-racism training. The Workgroup is also identifying select minority-owned firms with whom to partner in developing and delivering these trainings.

Moving Forward. Again, we applaud the NAIC's efforts on this critical work. We stand ready to work with the NAIC Special Committee on Race and Insurance to share insights and best practices to build and sustain industry action to create real change moving forward.

Sincerely,



Matthew Eyles
President and Chief Executive Officer
America's Health Insurance Plans