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December 14, 2020

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

Submitted electronically to: Andy Beal, Chief Operating Officer (abeal@naic.org)

Dear Director Farmer and Commissioner Altmaier:

The Blue Cross Blue Shield Association (“BCBSA” or “Association”) believes that everyone should have access to high-quality health care regardless of race, ethnicity, national origin, sex, gender identity, sexual orientation, religion, education level, age, geography or disability. We applaud the efforts of the NAIC’s Special Committee on Race and Insurance to engage on issues related to race, equity and access to assess practices or barriers in the insurance sector that potentially disadvantage people of color and/or historically underrepresented groups.

BCBSA is a national federation of 36 independent, community-based and locally operated Blue Cross and Blue Shield (BCBS) companies that collectively provide health care coverage for one in three Americans. For more than 90 years, BCBS companies have offered quality health care coverage in all markets across America – serving those who purchase coverage on their own, as well as those who obtain coverage through an employer, Medicare and Medicaid.

2020 has been a year of unprecedented tumult wherein the COVID-19 pandemic magnified long-standing disparities and inequities in health care faced by people of color, and the senseless killing of George Floyd and countless other victims of racial violence sparked deep reflection on the racial injustice that exists in our nation. The NAIC’s effort to engage stakeholders on critical race, diversity and inclusion issues provides a vital opportunity to work together to ensure equitable access to care and improved health outcomes.

BCBS companies across the country are actively engaged in hundreds of initiatives to address inequities, with every BCBS Plan operating at least one local initiative. BCBS initiatives address health disparities within a specific health condition, including diabetes, heart disease, behavioral health and maternal health – areas of health impact that adversely affect black and brown communities in America. Examples of some of these initiatives can be found [here](#). In addition, BCBS companies have developed key initiatives

The Blue Cross Blue Shield Association is a national federation of 36 independent, community-based and locally-operated Blue Cross and Blue Shield companies that collectively provide healthcare coverage for more than 105 million members – one-in-three Americans. For more information on the Blue Cross and Blue Shield Association and its member companies, please visit www.BCBS.com.

focused on addressing social determinants of health across crucial areas like food insecurity, housing and transportation.

As the nation continues to confront the COVID-19 pandemic and the disproportionate impact it has had on people of color, BCBS companies are supporting patients, health care partners and communities with more than \$5.5 billion committed to the fight. BCBS companies have also made significant [efforts](#) to ensure members have access to care while also providing flexibility in paying premiums and providing premium credits so that those who have coverage do not lose it.

As part of our commitment to putting an end to inequities in health care, BCBSA continues to support efforts to expand the number of people with insurance coverage. The Affordable Care Act (ACA) took critical steps to improve access to health insurance – notably ensuring everyone, regardless of pre-existing conditions can obtain health coverage and enhancing protections against discrimination. While about 20 million people have gained coverage under the ACA – resulting in [improved](#) access for people of color – about half of the 30 million uninsured individuals today are people of color. As we emerge from the pandemic, we recommend state and federal policymakers take steps to [build on the ACA to ensure everyone can have access to coverage and care no matter who they are or where they live](#), and make health care more affordable.

The development of industry standards around the collection and incorporation of standardized demographic data, including race, ethnicity and language (R/E/L) across the health care industry, is critically important in order to measure and support efforts to move the needle. To achieve these goals, NAIC should support industry-led efforts, such as the [HL7 Gravity Project](#) – a multi-industry effort to reduce current barriers to the integration of social risk data into clinical decision-making to improve health outcomes, while supporting appropriate safeguards and privacy protections for the use of sensitive consumer information.

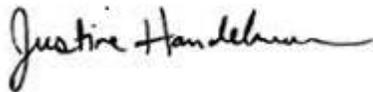
BCBSA also believes it is imperative for companies to recognize and acknowledge the existence of systemic racism in society as a whole and that corporate culture is not immune to, or void of, these injustices. We have doubled down on our efforts to combat racism in our communities and in our workplaces and have taken multiple actions to enhance support for our internal diversity, equity and inclusion (DEI) efforts. Some of these actions include:

- Formation of a DEI Advisory Committee to oversee BCBSA's holistic DEI strategy and consult directly with BCBSA's CEO.
- Establishment of a new People of Color Employee Resource Group to act as a resource and partner in support of the Association's efforts to cultivate an environment of DEI.
- New educational trainings and resources for our employees to promote greater understanding and self-awareness, including sessions focused on unconscious bias, micro-inequities and micro-aggressions.
- A \$100,000 annual matching fund to ensure our commitments are reflected in our corporate giving.
- Ensuring our vendor partners reflect our commitment.

Again, we commend the NAIC's leadership in taking important steps to recognize and address the impact of racial disparities, inequities and discrimination within the insurance industry. We stand with you in fighting racism in all its forms and commit to being an effective part of the solution to end inequities and racial injustice. We look forward to working with the NAIC Special Committee on Race and Insurance to address issues of racial and ethnic disparities and inequities in health care.

If you have any questions or want additional information, please contact Randi Chapman at randi.chapman@bcbsa.com or 202.826.5156.

Sincerely,

A handwritten signature in black ink that reads "Justine Handelman". The signature is written in a cursive, flowing style.

Justine Handelman
Senior Vice President
Office of Policy and Representation
Blue Cross Blue Shield Association