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September 10, 2020

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

sent via email: abeal@naic.org

Dear Commissioner Altmaier and Director Farmer:

Thank you for the opportunity to provide feedback on the NAIC's Special Committee on Race and Insurance, its charges and its workstreams. CareFirst BlueCross BlueShield (CareFirst) applauds the NAIC's initiation of critical regulatory discussions concerning race and insurance through its Special Committee, and stands ready to participate, contribute to and assist in these discussions and in driving further action in our industry and in the communities that we serve.

In its 83rd year of service, CareFirst, an independent licensee of the Blue Cross and Blue Shield Association, is a not-for-profit healthcare company which, through its affiliates and subsidiaries, offers a comprehensive portfolio of health insurance products and administrative services to 3.3 million individuals and employers in Maryland, the District of Columbia and Northern Virginia.

CareFirst is deeply committed to equity, inclusion, and belonging both within our organization and in the communities we serve. In our own organization, a number of efforts are underway to ensure that we are continuously curating and enhancing a culture of equity, inclusion, and belonging as a reality across our associates, our leadership team, and on our boards of directors.

In addition to our commitment to excellence within the CareFirst organization, we are equally committed to advancing equity, inclusion and belonging for our members and the communities that we serve. These principles are built into our business plan as well as our philanthropic efforts to address the social determinants of health.

CareFirst supports the tracks of work that NAIC has identified for this important effort. In addition, we recommend that a suggested area of focus is improving access to race and ethnicity health data. There are privacy and operational challenges and concerns to overcome in collecting such data, however a uniform approach endorsed by the NAIC would be incredibly impactful in aiding carriers, regulators, and

consumer facing organizations to better address health care disparities and drive equity. We suggest a transparent, multi-stakeholder NAIC workgroup to inform this effort.

CareFirst looks forward to following the work of this Special Committee, and to providing further insight as this work progresses. Please don't hesitate to reach out to cathy.grason@carefirst.com if we may be a resource to the NAIC in this critical initiative.

Sincerely,

A handwritten signature in black ink, appearing to read 'Maria Tildon', with a long horizontal flourish extending to the right.

Maria Tildon
Executive Vice President
Marketing & Government Affairs