



**To:** National Association of Insurance Commissioners (NAIC) Special Committee on Race and Insurance – Workstream 5 (Health)

**From:** Community Catalyst

**Date:** August 17, 2021

**Re:** Comments on NAIC Draft Principles for Data Collection

Community Catalyst appreciates the opportunity to comment on the draft Principles for Data Collection for the Special (EX) Committee on Race and Insurance – Workstream Five.

Community Catalyst is a leading non-profit national health advocacy organization dedicated to advancing a movement for health equity and justice. We partner with local, state and national advocates to leverage and build power so all people can influence decisions that affect their health. It is our belief that health systems will not be accountable to people without a fully engaged and organized community voice. That's why we work every day to ensure people's interests are represented wherever important decisions about health and health care are made: in communities, state houses and on Capitol Hill.

We fully support these draft Principles and reiterate the need for systemic collection of demographic data by insurers and insurance regulators.

The COVID-19 pandemic has laid bare the structural inequities in our health care system. During this pandemic, it has become blatantly clear that the lack of comprehensive and accurate data has exposed the country's challenges in identifying those most impacted and developing targeted and appropriate interventions. The collection of high quality data, including on smaller populations and populations with multiple identities, is a critical first step in understanding and eliminating disparities in healthcare access and health outcomes and ensuring compliance with nondiscrimination requirements.

There are certain types of data that we feel are particularly effective in demonstrating how underserved populations experience injustice from the health care system. Collecting race, ethnicity and language (REL) and sexual orientation/gender identity (SOGI) data is an important step towards better understanding structural racism and its impacts, as well as better identify health disparities and work towards addressing them. Further, the inclusion and accuracy of disability data remains important and would allow for a more accurate intersectional analysis of disaggregated data that would assist in designing effective health policy and targeting of resources that address multiple types of barriers people face.

Given the lack of standardized data collection practices across states and insurers, the NAIC plays a key coordination role in these efforts. We applaud Workstream Five for identifying best practices on how to better ask and improve the collection of demographic data on race, ethnicity, preferred language, sex (including gender identity), sexual orientation, and disability. We acknowledge that some insurers may face some operational barriers to data collection. To make meaningful progress and advance racial

justice, however, insurers and regulators must be willing to undertake long-term, sustained action on data collection.

Specific to the Principles, we suggest the following:

- Ensure a category that allows for the option to self-identify, such as “choose not to answer”
- Develop and implement trainings on how to ask questions about REL and SOGI, including training on how to maintain privacy
- Address the inequity of the five categories currently used that conceal ongoing health disparities among subgroups and entire communities such as Middle Eastern and Northern Africans (MENA) by way of example. The limiting design of the Black, White, American Indian/Alaska Native, Latinx, and Asian American/ Pacific Islander categories reinforce structural racism and lead to funding and resource exclusions for some communities
- Collect data about providers participating in their networks to ensure network adequacy requirement are being met, this could also help in ensuring networks are meeting member needs

Thank you for the opportunity to submit these above recommendations. Please do not hesitate to contact Eva Marie Stahl, Director of Policy and Partnerships at [emstahl@communitycatalyst.org](mailto:emstahl@communitycatalyst.org) if you have any questions or if you would like additional information.

Respectfully submitted,