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Via Email

February 18, 2021

Mr. John Haworth
Chair, Market Analysis Procedures Working Group
National Association of Insurance Commissioners

Ms. Rebecca Rebholz
Vice Chair, Market Analysis Procedures Working Group
National Association of Insurance Commissioners

c/o RHelder@naic.org

RE: Health Industry Interested Parties Comments on Recent MAPWG Issues

Dear Mr. Haworth and Ms. Rebholz:

The Health Industry Interested Parties ("HIIP") group is comprised of single and multi-state licensed health insurers and administrators representing comprehensive major medical and managed care health insurance carriers of all sizes located throughout the United States. On behalf of the HIIP group, we would like to offer comments on two issues currently exposed for comments by MAPWG during a Jan. 27 conference call and raise a new issue for resolution.

MCAS 14-Day Extension Limitation

We recommend clarifying the MCAS Best Practices Guide proposal to indicate that extension requests are limited to 14 business days.

MCAS Attestation

We want to express our appreciation to the working group for the ongoing dialogue and consideration of our request to allow for more MCAS attestors. For carriers who write multiple business lines in multiple states, having more than one attestor is particularly helpful so that regulators have the appropriate individual(s) contact information.

We support the current NAIC staff proposal to eliminate the attestation page and replace it with new interrogatory questions that incorporate the attestor information. We believe this is a positive change that will improve the effectiveness, relevance, and governance of the attestation function.

Given the programming changes that carriers, as well as the NAIC, would need to expeditiously make in order to accommodate the proposed changes and ensure consistent application, we recommend that the proposed changes become effective for the April and June 2022 filing due date year.

CSV File Capacity

The HIIP group has identified capacity issues with the current NAIC MCAS filing system used by carriers to upload CSV files. CSV file sizes are currently limited to one megabyte, which requires carriers to break a filing for a single NAIC code into multiple files. For large multi-state carriers, this could be hundreds of additional files. We would appreciate the working group's consideration of a feasible solution, and stand ready to work with you to achieve a workable solution.

On behalf of the Health Industry Interested Parties group, we would like to thank you for considering our comments and the continued collaborative process to improve MCAS. Please contact us if you have any questions.

Sincerely,

Joseph E. Zolecki
BCBSA

Samantha Burns
AHIP

Cc: Demetria Tittle, BCBSA