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Via Email

March 17, 2021

Mr. John Ha worth  
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](mailto:RHelder@naic.org)

RE: Health Industry Interested Parties Comments on MCAS Attestation

Dear Mr. Ha worth 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 our continued support for the proposed changes to MCAS attestations.

For companies that write multiple business lines and/or in multiple states, and therefore, are required to submit multiple MCAS reports, having the ability to use different attestors for each MCAS report is particularly important for internal governance purposes. It also is helpful in that it provides regulators with more appropriate individual(s) contact information.

We support the current MAPWG proposal to eliminate the attestation page and replace it with new interrogatory questions to incorporate the attesor information within each MCAS filing. We also support continuing to allow for two attestors for each MCAS filing, with the determination of individual attestors being at the insurer’s discretion. When possible, the insurer should consider one attesor with operational responsibility for the source data and one attesor with IT responsibility in the creation of the data. We agree this will significantly 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 to accommodate the proposed changes and ensure consistent application, we continue to recommend that the proposed changes become effective for the April and June 2022 filing due date year.

On behalf of the Health Industry Interested Parties group, we would like to thank you for 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