

Cooper, Teresa

From: Palagi, Riccardo <Riccardo.Palagi@regence.com>
Sent: Thursday, August 18, 2022 10:28 AM
To: Cooper, Teresa
Cc: Aime, Sue; Foxley, Stephen
Subject: MCAS Reporting date

Ms. Cooper,

Thank you for the opportunity to submit comments on the return of the reporting date to April 30. Regence understands that the June 30 reporting date was always meant to be temporary, with the eventual return to April 30. With that in mind we would like to submit the following comments concerning the upcoming August 24 vote to move the MCAS reporting date from June 30 to April 30.

Broadly, our concerns involve the following:

- Health MCAS Data is More Complex Than Other Lines
- Process to Compile Health MCAS Data is Less Automated than Other Lines
- Volume of health MCAS data is significantly larger than other lines

Generally speaking, April-May is the time of year that the Individual and Small Group Pricing teams are extraordinarily busy preparing and finalizing the rate filings for each of our states. Overall, we develop rates for and submit 15 ACA medical rate filings during this timeframe. The rates for these filings are finalized in min-April, and the actual rate filings start getting built in the second half of the month through the end of May. Alongside the state filings, there is SMS Part C Data Validation which is due at the end of February, upon which work is started in January. This current workflow would end up overlapping if the MCAS date were to be moved up to April 30. There will also be a new Consolidated Appropriations Act (CAA) mandate for Air Ambulance report, due March 31, that has not yet been performed as it is newly mandated. Thank you again for the opportunity to submit these comments.

Sincerely,

Riccardo Palagi, J.D.
Regulatory Affairs
Regence BlueShield of Idaho
Regence BlueCross BlueShield of Utah
(208) 395-7761