



July 23, 2014

Commissioner Marguerite Salazar
Colorado Division of Insurance
1560 Broadway, Suite 850
Denver, Colorado 80202

Comments on All Savers Filing UHLC-129554702

Dear Commissioner Salazar:

The Colorado Consumer Health Initiative (CCHI) has prepared the following comments on proposed filing UHLC-129554702 from All Savers Insurance Company, a subsidiary of UnitedHealthcare. This filing is for new individual products that will be sold on Connect for Health Colorado.

Our primary concern with this filing is the lack of supporting documentation provided for All Savers' quality improvement expenses. In both the claims and after-tax income projections in this rate filing, All Savers Insurance Company indicates that 0.2% of premiums will go toward quality improvement. However, All Savers Insurance Company has provided no justification for this 0.2% estimate. We urge the Division of Insurance to require a report from All Savers Insurance Company on their quality improvement efforts before approving additional premiums for this plan based on quality improvement costs. These premiums for quality improvements are dollars that would otherwise go directly toward consumers' care. It is especially important to ensure that these projections are properly justified as quality improvement costs can be taken into account when determining medical loss ratio calculations.

As part of a 2015 rate filing in Oregon, Oregon's rate review process offers an example of what health insurance companies are doing to document their quality improvement costs. In a 2015 small group filing in Oregon, UnitedHealthcare (UHLC-129570725) highlighted several of their quality improvement efforts including:

- Data-sharing programs;
- eSync technology used for electronic health records;
- The ALERT online system used to monitor treatment and outcomes of patients with behavioral conditions; and
- Sleep testing technology that allows in home testing instead of testing at a sleep lab.

This filing with the Oregon Division of Insurance offers an example of the documentation that UnitedHealthcare could provide to the Colorado Division of Insurance to ensure that their quality improvement costs are justified.

CCHI generally supports efforts by Colorado carriers to structure plans that will improve quality as well as reduce overall costs. Considering quality improvement information in

this process is an opportunity to ensure that premium costs are justified and promote the development of better quality health insurance plans in Colorado. Under CRS Section 10-16-107(1.6)(a)(III) and 10-16-111(4)(a)(IX), The Division of Insurance may consider quality improvement expenses in determining whether a proposed rate is excessive or inadequate. We therefore urge the Division of Insurance to require that All Savers document their quality improvement efforts and evaluate whether the premium percentage based on quality improvement is properly justified.

Sincerely,

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CC: Tom Abel- Supervisor, Life, Accident and Health, Rates and Forms Section