



**Independent  
Insurance  
Agents of Texas**

Dec. 8, 2011

The Honorable Kathleen Sebelius  
Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, DC 20201

Submitted Via Electronic Mail: [MLRAdjustments@hhs.gov](mailto:MLRAdjustments@hhs.gov)

Dear Secretary Sebelius:

The Independent Insurance Agents of Texas (IIAT) would like to strongly support the State of Texas request to phase in Minimum Loss Ratios (MLR) over a six-year period. The MLR regulation, as it stands, has the potential to cause market disruptions that will affect consumers in the state. We have already seen a reduction in the number of carriers writing individual health policies.

IIAT agents work diligently to provide professional advice to consumers navigating the complex world of health insurance. We aid consumers in finding the best plan that meets their family budget and their insurance needs. MLR restrictions have the potential to limit their options and their access to professional assistance.

These rules have had a detrimental effect on the private insurance market, creating a tremendous squeeze on agent compensation. IIAT believes that ultimately the MLR regulations will push many small insurers out of business and decrease competition in the marketplace, leading to less consumer choice. The ratios also fail to take into account the role that agents play in the health care marketplace after the sale of the policy, such as guiding consumers through the claims process and preventing fraud.

On behalf of IIAT's members and the consumers we serve, we respectfully ask that you approve the request for a phase in of these restrictions by the Texas Department of Insurance.

Respectfully submitted,

David VanDelinder  
Executive Director

cc: IIAT Board of Directors