



Texas  
Association of Health  
Underwriters

The mission of the Texas Association of Health Underwriters is to inform and protect the consumer by enhancing the professional growth of its members.

Dec. 7, 2011

The Honorable Steve Larsen  
Deputy Administrator and Director  
Center for Consumer Information and Oversight  
Department of Health and Human Services  
7500 Security Boulevard, Mail Stop C2-21-15  
Baltimore, MD 21244-1850

Re: Texas Request To Phase In MLR Requirements /  
Sent via electronic submission to MLRAdjustments@hhs.gov

Dear Deputy Administrator Larsen:

The Texas Association of Health Underwriters supports the request by the Texas Department of Insurance for a waiver from the Accountable Care Act to permit the requirements for medical loss ratios to be phased in.

Whatever one may think of such requirements, there is no doubt that consumers will be the first to be hurt by imposing them in one fell swoop. Rates encompass a variety of factors that span several years – premium, losses, demographics of a group that changes, the rising cost of health care, and many others. Imposing such requirements all at once will result in more chaos in the health insurance marketplace.

We have already seen a severe shrinkage of individual health coverage availability in Texas as insurance companies and health plans work to comply. Without an adjustment in the current requirements, consumers will be irreparably harmed.

TAHU members across Texas work every day to bring Texas health insurance consumers the most knowledgeable expertise of all facets of the market. As the people who steer the process so that consumers end up with the best plan to serve their needs, it is clear that imposing the additional requirements as they have been proposed will only increase the cost of and difficulty in even finding health insurance.

TAHU believes in consumers and their ability to make wise decisions if they are given thorough and accurate information. Phasing in the MLR requirements will promote their understanding of what's really happening and allow them to choose the best way to respond to their individual situations.

On behalf of Texas health insurance consumers, TAHU respectfully asks that you approve this request by the Texas Department of Insurance.

Sincerely,

*Joanna Antongiovanni*

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