

SECTION 6: SUMMARY OF ALL PUBLIC COMMENTS

## Cook, Beth

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**From:** Cook, Beth  
**Sent:** Monday, March 19, 2012 1:30 PM  
**To:** 'Cudgma, Anna'  
**Subject:** RE: PROPOSED REGULATIONS CONCERNING UTILIZATION REVIEW, GRIEVANCES AND EXTERNAL REVIEW  
**Attachments:** UR-GR-EA Regulation and Certification 031212.doc

Anna:  
I have amended the regulations as you have requested. Please see attached.

*Beth Cook*  
*Counsel | State of Connecticut Insurance Department*  
*Mail address: P.O. Box 816 | Hartford, CT 06142-0816 |*  
*Location and Overnite Address: 153 Market Street, 7th Floor | Hartford, CT 06103*  
*☎ 860.297.3812 | Fax: 860.566.7410 | ✉ Beth.Cook@ct.gov | [www.ct.gov/cid](http://www.ct.gov/cid)*

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**From:** Cudgma, Anna [<mailto:Anna.Cudgma@anthem.com>]  
**Sent:** Thursday, March 08, 2012 2:42 PM  
**To:** Cook, Beth  
**Subject:** RE: PROPOSED REGULATIONS CONCERNING UTILIZATION REVIEW, GRIEVANCES AND EXTERNAL REVIEW

Hi Beth,

Yes, correct, we are asking for deletion of time received and not date received. If you have any other questions, let me know. Thanks, Anna

Anna Cudgma  
Regulatory Compliance Director  
Anthem Blue Cross and Blue Shield of Connecticut

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**From:** Cook, Beth [<mailto:Beth.Cook@ct.gov>]  
**Sent:** Thursday, March 08, 2012 2:37 PM  
**To:** Cudgma, Anna  
**Subject:** RE: PROPOSED REGULATIONS CONCERNING UTILIZATION REVIEW, GRIEVANCES AND EXTERNAL REVIEW

Anna:  
Just so I understand – are you asking that we delete the reference to time received – not date received?

Thanks..

*Beth Cook*  
*Counsel | State of Connecticut Insurance Department*  
*Mail address: P.O. Box 816 | Hartford, CT 06142-0816 |*  
*Location and Overnite Address: 153 Market Street, 7th Floor | Hartford, CT 06103*  
*☎ 860.297.3812 | Fax: 860.566.7410 | ✉ Beth.Cook@ct.gov | [www.ct.gov/cid](http://www.ct.gov/cid)*

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**From:** Cudgma, Anna [<mailto:Anna.Cudgma@anthem.com>]  
**Sent:** Wednesday, March 07, 2012 7:18 PM

**To:** Cook, Beth

**Subject:** PROPOSED REGULATIONS CONCERNING UTILIZATION REVIEW, GRIEVANCES AND EXTERNAL REVIEW

Hi Beth,

Attached are Anthem's comments to the proposed regulations. Let me know if you have any questions. Thanks, Anna

Anna Cudgma  
Regulatory Compliance Director  
Anthem Blue Cross and Blue Shield of Connecticut

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March 7, 2012

Attorney Beth Cook  
Counsel  
State of Connecticut  
Insurance Department  
P.O. Box 816  
Hartford, CT 06142-0816

**RE: PROPOSED REGULATIONS CONCERNING UTILIZATION REVIEW, GRIEVANCES  
AND EXTERNAL REVIEW**

Dear Attorney Cook,

Thank you for the opportunity to submit comments on the above mentioned proposed regulations. Anthem Health Plans Inc. d/b/a Anthem Blue Cross and Shield of Connecticut believes that the majority of the proposed rules are consistent with the statute. However, we do have one concern with Sec. 38a-XXX-4, *Recordkeeping*.

Based on our review of PA 11-58 for certain actions and activities, it is appropriate to track the expiration of the statutory timeframe from the date and time of receipt. We agree that the use of date and time are evident under PA 11-58 for urgent and expedited requests. However, for non-urgent and non-expedited requests, we read PA 11-58 to indicate that the trigger for the passage of the statutory timeframes is the date of receipt. Because of the manner in which urgent and expedited requests (i.e. hours) are presented to the company, we are able to administratively record the time and date of receipt. For non-urgent and non-expedited requests, due to the various methods by which these are presented to and received by the company, it would be a manual process and administratively complex to record the actual time of receipt.

Thank you for your attention to our concerns. We request your consideration in making this change to the statute. Should you have any questions, please call me to discuss.

Sincerely,

*Anna Cudgma*

Anna Cudgma  
Regulatory Compliance Director  
Anthem Blue Cross and Blue Shield

## Cook, Beth

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**From:** Cook, Beth  
**Sent:** Monday, March 19, 2012 1:32 PM  
**To:** 'Flaherty, Melanie'  
**Cc:** Stover, Keith; Halpin, Susan; Blackston, Brynna; MeyerT@Aetna.com; Christine.Cappiello@anthem.com; katharine.wade@CIGNA.com; jperkins@connecticare.com; kcwirka@connecticare.com; Jason C Martiesian (jason\_martiesian@uhc.com); Randy Wojnarowicz (Randolph.Wojnarowicz@wellcare.com)  
**Subject:** RE: CTAHP Comments RE: Proposed Regulations Concerning Utilization Review, Grievances and External Review  
**Attachments:** UR-GR-EA Regulation and Certification 031212.doc

I have amended the proposed regulations as requested. Please see attached.

*Beth Cook*

*Counsel | State of Connecticut Insurance Department*

*Mail address: P.O. Box 816 | Hartford, CT 06142-0816 |*

*Location and Overnite Address: 153 Market Street, 7th Floor | Hartford, CT 06103*

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**From:** Flaherty, Melanie [<mailto:mflaherty@rc.com>]  
**Sent:** Thursday, March 01, 2012 10:18 AM  
**To:** Cook, Beth  
**Cc:** Stover, Keith; Halpin, Susan; Blackston, Brynna; MeyerT@Aetna.com; Christine.Cappiello@anthem.com; katharine.wade@CIGNA.com; jperkins@connecticare.com; kcwirka@connecticare.com; Jason C Martiesian (jason\_martiesian@uhc.com); Randy Wojnarowicz (Randolph.Wojnarowicz@wellcare.com)  
**Subject:** CTAHP Comments RE: Proposed Regulations Concerning Utilization Review, Grievances and External Review

Beth,

Attached are comments submitted on behalf of the CT Association of Health Plans on the above mentioned proposed regulations. Please feel free to contact us with any questions. A hard copy of the letter is in the mail to you as well. Thank you.

Melanie Flaherty

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### Melanie M. Flaherty

Government Relations Operations Manager

### Robinson & Cole LLP

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Hartford, CT 06103-3597

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Contact Card

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*Quality is Our Bottom Line*

March 1, 2012

Ms. N. Beth Cook  
State of Connecticut  
Insurance Department  
P.O. Box 816  
Hartford, CT 06142-0816

**RE: PROPOSED REGULATIONS CONCERNING UTILIZATION REVIEW,  
GRIEVANCES AND EXTERNAL REVIEW**

Dear Ms. Cook,

Thank you for the opportunity to submit comments on the above mentioned proposed regulations. The Connecticut Association of Health Plans (CTAHP) generally believes that these proposed rules are consistent with the statute. However, we do have one concern with the proposed rules, specifically the statistical reporting section: (New) Sec. 38a-XXX-5 Statistical reporting to the Commissioner.

Subsection (c) states that nationwide data must be reported. We don't believe that provision is specifically required by PA 11-58 and given the administrative burdens to produce such data we don't believe it is warranted.

As you know, the federal minimum medical loss ratio rules place restrictions on the amount of premium income that health insurers may spend on administrative expenses. Asking carriers to incur additional administrative expenses, such as those in (New) Sec.38a-XXX-5 of the above mentioned proposed regulations, would unnecessarily increase administrative costs at a time when everyone is concerned about the cost of coverage. Therefore we respectfully request that subsection (c) be struck from the final rule.

Thank you for your attention to our concerns. Do not hesitate to contact me with any questions.

Sincerely,

Keith J. Stover  
Lobbyist