

ALLIANCE FOR  
ADVANCING  
NONPROFIT HEALTH CARE



[www.nonprofithealthcare.org](http://www.nonprofithealthcare.org)

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October 14, 2011

Centers for Medicare & Medicaid Services  
Department of Health and Human Services

Attention: CMS-9982-NC

These comments are in response to 45 FR Part 147, request for public comments on the proposed document, Summary of Benefits and Coverage and Uniform Glossary--Templates, Instructions, and Related Materials and proposed regulations under the Patient Protection and Affordable Care Act, to implement and disclose for group health plans and health insurance issuers the summary of benefits and coverage (SBC) and the uniform glossary.

The Alliance is a unique blend of no-for-profit health plan and provider organizations, all dedicated to preserving a vibrant nonprofit health sector while improving its performance in serving communities.

The **Alliance for Advancing Nonprofit Health Care** strongly supports the need for transparency of relevant information in health exchanges so that consumers can make informed choices about their health plans.

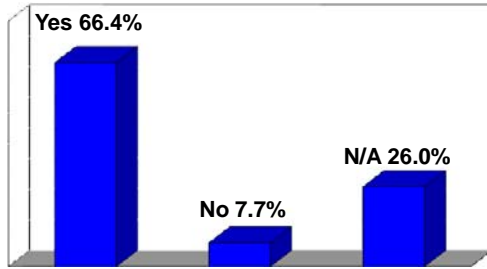
In order for consumers to participate in State Health Insurance Exchanges scheduled to open in 2014, HHS is currently developing health plan disclosure requirements on providing relevant information so that consumers can make meaningful choices.

The Alliance urges that the Centers for Medicare & Medicaid services and the other involved federal agencies specify ownership status of the health plan (the parent company)—“not-for-profit” (i.e., non-investor-owned, such as state-chartered nonprofit plans or co-op or mutual plans owned by their members) or “for-profit” (i.e., investor-owned, such as publicly traded plans)--as one of the details required to be reported on the SBC because it is one of the most significant indicators of health plan performance and community benefit. Moreover, for that very same reason, we further urge that ownership status be required to be reported on the first page of the SBC.

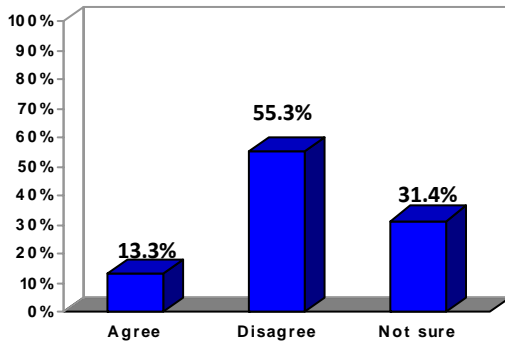
A nationwide Zogby telephone survey conducted in August 2010 queried consumers about ownership status of health plans. The key findings were as follows:

1. **A significant portion of consumers do not know whether their current health insurance is provided by a not-for-profit or a for-profit plan (one-third).**
2. **Yet, most think there is a difference between not-for-profit and for-profit plans (by a 4-1 margin).**
3. **And they think that that the difference is important (by a 4-1 margin).**

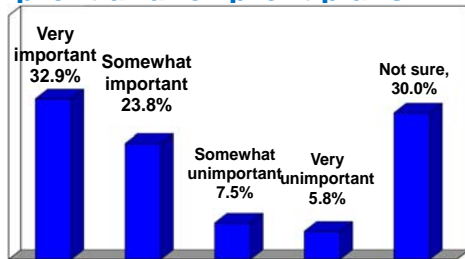
**Do you know if your current health insurance is through a not-for-profit or a for-profit?**



**Do you agree or disagree that there is no difference between for-profit and not-for-profit plans**



**How important are the differences between not-for-profit and for-profit plans?**



Furthermore, of those that didn't know the ownership status of their plan, many were low-income individuals and families who will be purchasing individual or small group coverage through their state health insurance exchanges (with or without subsidies) and whose needs have always been a special concern and focus of not-for-profit health plans.

These consumer beliefs are on target. For every year that the National Committee on Quality Assurance has issued quality rankings of health plans, and for every year that J.D. Power and Associates has issued member-satisfaction rankings of health plans, the Alliance has conducted and publicly released analyses demonstrating superior performance by not-for-profit health plans.

Please let us know if you would like more details about the above studies.

The Alliance is eager to assist in any way it can on this or other matters related to private health insurance market reform.

Questions and requests should be directed to me at 877-299-6497 or [mcpersonbruce@aol.com](mailto:mcpersonbruce@aol.com).

Thank you.

Sincerely,

A handwritten signature in black ink that reads "Bruce McPherson". The signature is written in a cursive style with a long, sweeping tail on the letter "n".

Bruce McPherson  
President and CEO