MASSACHUSETTS
HEALTH POLICY COMMISSION

2015 ANNUAL REPORT

Office of Patient Protection

Released March 2017

ABOUT THE HEALTH POLICY COMMISSION

Established through the Commonwealth of Massachusetts' landmark cost containment law, Chapter 224 of the Acts of 2012, the Health Policy Commission (HPC) is an independent state agency governed by an 11-member board with diverse experience in health care. The HPC is leading efforts to advance Chapter 224's ambitious goal of health care cost containment. The HPC's mission is to advance a more transparent, accountable, and innovative health care system through independent policy leadership and programs. Our goal is better health and better care at a lower cost across the Commonwealth. The HPC's various policy committees engage in health care market research through publication of the Annual Cost Trends Reports; market monitoring through Notices of Material Change and Cost and Market Impact Reviews; analysis of structure of the delivery system through the creation of criteria for Accountable Care Organizations and the Registration of Provider Organizations Program; and investment through the CHART and Health Care Innovation Investment Programs. Through these and other policy initiatives, the HPC strives to promote and incentivize the development of a high-value health care system in the Commonwealth.

HISTORY OF THE OFFICE OF PATIENT PROTECTION

Prior to 1990, only two states had programs of external review. In 1998, former Governor Paul Cellucci signed Executive Order No. 405 to establish managed care protections for consumers. A section of this executive order created an Office of the Managed Care Ombudsman. Two years later, the Office of Patient Protection was established through Chapter 141 of the Acts of 2000, a law that created new protections for health insurance consumers. During January 2001, the Office of the Managed Care Ombudsman merged with OPP. OPP operated within the Department of Public Health from 2000 until Chapter 224 of the Acts of 2012 created the Health Policy Commission and transferred the Office of Patient Protection from the Department of Public Health to the Health Policy Commission, effective April 20, 2013.

INTRODUCTION

Entering its fifteenth year of operation, the Office of Patient Protection (OPP), a program within the Massachusetts Health Policy Commission (HPC), is responsible for regulating and administering certain health insurance consumer protections. It is a resource for individuals who want to become more informed and empowered health care consumers. This annual report provides a comprehensive overview of activities of the Office.

KEY RESPONSIBILITIES OF THE OFFICE OF PATIENT PROTECTION

OPP safeguards the rights of health insurance consumers by regulating the internal grievance process and administering external reviews for consumers with fully-insured Massachusetts health plans, administering health insurance enrollment waivers, and providing information and education about health insurance concerns to the public. The core responsibilities of the OPP are:

- Regulating the internal review process for consumers who wish to challenge denials of coverage by their health insurance companies
- Regulating and administering the external review process for consumers who seek an independent appeal to challenge denials of coverage by their insurance companies
- Administering an enrollment waiver process for consumers who want to buy non-group health insurance
- Regulating appeals processes for patients of Risk Bearing Provider Organizations and HPC-certified accountable care organizations
- Examining, analyzing, and reporting on certain information received annually from Massachusetts health plans
- Providing training, education and information to consumers about health insurance appeal rights, waivers, and other issues related to health coverage and services

NOTABLE UPDATES AND CHANGES IN 2015

Updated Regulations: During 2015, OPP issued updated regulations to implement a new law providing for transparency of medical necessity criteria. Additionally, OPP issued updated regulations to conform its open enrollment waiver process to the Affordable Care Act and related Massachusetts law.

Issued Guidance: OPP released two memoranda advising External Review Agencies (ERAs) on changes to Massachusetts law related to infertility treatment as well as treatment for gender dysphoria. In August, OPP released a Bulletin outlining a new statutory protection afforded to consumers appealing a health plan denial of coverage. Earlier in the year, Massachusetts General Laws Chapter 176O § 14(f) was amended to prevent health care providers and their agents from reporting a patient's medical debt to a consumer credit reporting agency while an internal or external review of an insurance health plan's denial of coverage for the service or treatment is pending.

OPP Operations: OPP staff continues to implement operational improvements while enhancing statewide stakeholder relations. OPP provides a "no wrong door" approach for consumers and other stakeholders requesting assistance with health care and coverage concerns. Throughout the year, the team responded to over 3,000 calls and e-mail inquiries from consumers in a timely manner. At the end of 2015, OPP experienced a transition in leadership, with a new Director, Steven Belec, joining OPP in March 2016.

ENROLLMENT WAIVERS

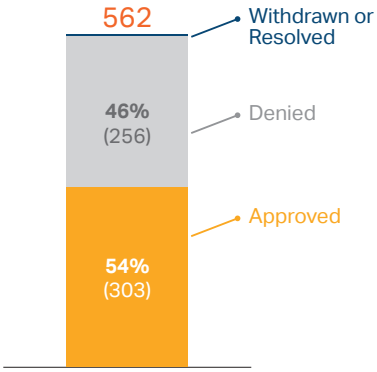
Federal and state law limit when individuals and families can buy certain health insurance plans. Most Massachusetts consumers must buy insurance during a designated open enrollment period. Massachusetts residents who missed the previous open enrollment period, and have not experienced a qualifying life event, might qualify for a waiver of the open enrollment period if they meet certain criteria. The Office of Patient Protection reviews waiver requests and typically grants open enrollment waivers to individuals and families who:

- Are uninsured and did not intentionally forgo enrollment in health insurance, or
- Lost insurance coverage but did not find out until after 60 days had passed

2015 ENROLLMENT WAIVER DATA

During 2015, the Office of Patient Protection received 562 requests for waivers from Massachusetts residents seeking to buy insurance from the Health Connector or directly from an insurance company or insurance agent. Upon review, OPP issued 303 waivers to eligible applicants. OPP also provided guidance to consumers who had difficulty enrolling in a health plan. Since the waiver process cannot resolve all health plan enrollment issues for uninsured consumers, OPP staff triaged concerns and provided information and referrals to other agencies or organizations as needed.

FIGURE 1



Year	Total Waiver Applications
2011	276
2012	576
2013	416
2014	316
2015	562

Source: 2011-2015 Office of Patient Protection Waiver Data

HEALTH INSURANCE APPEALS

Under Massachusetts law,[i] health care consumers have the right to appeal certain decisions by their health plans. This essential consumer protection provides an economical and fair process to resolve disputes between insureds and their health plan. These laws apply to individuals with "fully-insured" Massachusetts health plans (see Glossary for definitions). Consumers with other types of health plans, including self-insured plans, MassHealth (Medicaid), or Medicare, have different appeal rights under other state or federal laws. This external review process protects can lead to health care cost savings by identifying instances where health care services should not be covered under a plan's benefit package when they are not medically necessary.

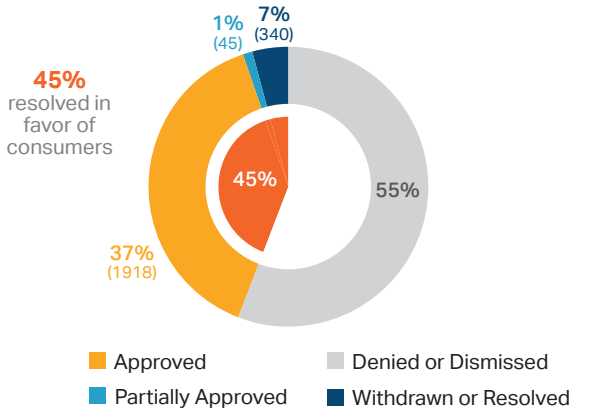
INTERNAL REVIEW

When an insurer informs a consumer that the health plan will not pay for or cover the consumer's medical or behavioral health treatment, the consumer may appeal that decision by first contacting the health plan. This first appeal, often called a member grievance, is an internal review by the health plan. The consumer may seek an expedited internal review for urgent matters. Otherwise, the health plan must respond to the consumer within 30 business days, unless both parties agree, in writing, to an extension. The health plan may uphold the original decision, or it may change its decision and cover all or part of the insured's treatment.

2015 INTERNAL REVIEW DATA

During 2015, Massachusetts health insurance companies reported 12,429 member grievances (**Figure 2**). These grievances include many different types of member complaints, such as disputes over coverage for treatment or cost-sharing.

FIGURE 2

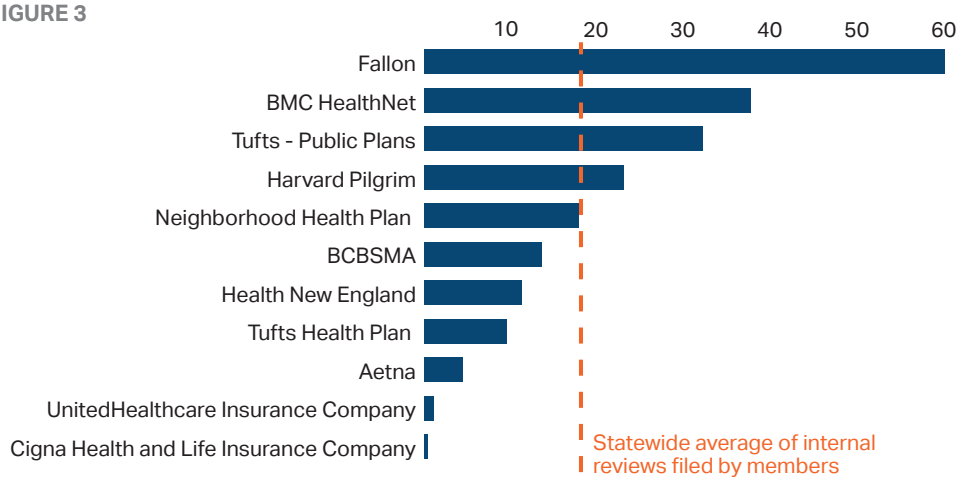


Source: 2015 Insurance carrier reports to the Office of Patient Protection, pursuant to 958 CMR 3.600

Figure 3 (reference next page) shows the member grievances reported by each health insurance company that provided fully-insured coverage in Massachusetts during 2015. As in past years, insurers with more members have more appeals. In order to compare health insurance company practices, OPP also analyzed the number of grievances filed per number of health plan members, to come up with a "weighted average"

i M.G.L. c. 176O §§ 13-14

FIGURE 3



Source: 2015 Insurance carrier reports to the Office of Patient Protection, pursuant to 958 CMR 3.600.

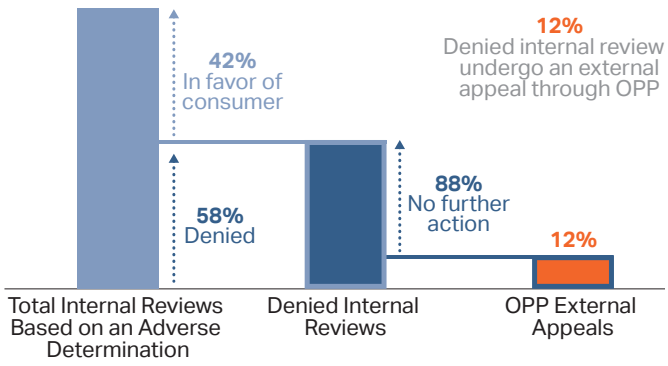
Weighted by dividing number of internal reviews by most recent health plan reported member month data. Center for Health Information and Analysis, 2013

that gives a better indication of which insurers have the highest numbers of grievances relative to their total membership.

Under current OPP regulations, health plans report detailed information about the types and outcomes of member grievances received. For 2015, health plans reported the following figures:

- **Member grievances:** Health insurers resolved 45%, or 2,303, of all member grievances fully or partly in favor of the member
- **Medical necessity denials:** 5,115 or 41% of member grievances resulted from adverse determinations, which are denials of coverage based on health plan medical necessity decisions.
- **Behavioral Health:** Of the 5,115 grievances based on adverse determinations, 22% or 1,125, involved behavioral health treatment.
- **Pursuing external review:** About 12% of patients or consumers sought an independent external review of the health insurer's adverse determination. See **Figure 4**. While this number may seem low, it does indicate that a significant portion of consumers are aware of their appeal rights and choose to exercise them, and yet some opportunities for engagement remain. OPP plans to increase outreach and education to bolster awareness of patient appeal rights and inform stakeholders of the resources available through this office.

FIGURE 4



Source: 2015 Office of Patient Protection external review data; 2015 Insurance carrier reports to the Office of Patient Protection, pursuant to 958 CMR 3.600

In Favor of Consumer includes Approved, Partially Approved, and Withdrawn or Resolved

WHAT IS MEDICAL NECESSITY? Health insurance companies that are licensed to do business in Massachusetts must pay for medical services and treatments that are covered benefits under the health plan and that are medically necessary. Health insurers may develop their own standards for deciding when care is medically necessary. Massachusetts law defines medical necessity in the following way:

Medical Necessity or *Medically Necessary* means health care services that are consistent with generally accepted principles of professional medical practice as determined by whether the service:

a) is the most appropriate available supply or level of service for the insured in question considering potential benefits and harms to the individual;

b) is known to be effective, based on scientific evidence, professional standards and expert opinion, in improving health outcomes; or

c) for services and interventions not in widespread use, is based on scientific evidence.[ii]

ii 958 CMR 3.020.

EXTERNAL REVIEW

After a health plan's internal appeals process is exhausted, the insurance provider is required by law to allow an external appeal. The process offers health care consumers the opportunity to obtain an independent review when a health plan denies coverage as not medically necessary or as experimental or investigational, often referred to as an adverse determination. An external review is a second level of appeal, conducted by an organization independent from the consumer's health plan. If a consumer, or authorized representative, pursues an internal review and the health insurer upholds its original decision, the consumer may have the right to pursue an external review. Health insurance companies may deny services prospectively (like prior authorizations), retrospectively, or concurrently (during the course of treatment). External review is available when the health plan's decision was based on a determination of whether the specific treatment or service at issue was medically necessary.

ELIGIBILITY FOR EXTERNAL REVIEW THROUGH THE OFFICE OF PATIENT PROTECTION

Requests must be eligible for external review. An insurance dispute is usually eligible for external review through OPP if the following are all met:

- The health insurance company is licensed or otherwise authorized to cover Massachusetts residents
- The insurance is a fully-insured health insurance plan
- The patient's request for external review includes one of these:
  - A final adverse determination, OR
  - An adverse determination, if the patient is seeking an expedited internal review and expedited external review at the same time, OR
  - A written confirmation that insurance company has waived internal review
- The final adverse determination or adverse determination is based on medical necessity
- Request for external review filed with OPP within four (4) months of the date when the patient received the final adverse determination (final denial by health plan).
- Request for external review is in writing and on the external review request form issued by OPP

OPP makes every effort to assist consumers in finalizing applications that are missing necessary information. A request is considered incomplete if requisite application components are missing like attestations or signatures. The most common reasons an application request is ineligible are: the applicant is a member of a self-insured plan; the dispute involves a benefit that is specifically excluded from coverage; and the application was not submitted to OPP in a timely manner.

EXTERNAL REVIEW PROCESS

The Office of Patient Protection administers the Massachusetts external review process for consumers with fully insured health plans. In most cases, a consumer must pursue an internal review or member grievance first. A consumer seeking an external review must file an external review request with OPP within four months after receiving this second denial, or the "final adverse determination," from the insurance company.

When OPP receives an eligible request for external review, the request is randomly assigned to one of three external review agencies, also known as independent review organizations, which have agreed to avoid conflicts of interest. The Health Policy Commission contracts with these three nationally accredited, independent external review agencies. These external review agencies are not government agencies. They are private companies with panels of doctors and medical experts who work in different fields and are located throughout the country. During 2015, the HPC contracted with:

- Independent Medical Experts Consulting Services, Inc. (IMEDECS), based in Lansdale, Pennsylvania
- Island Peer Review Organization (IPRO), based in Lake Success, New York
- ProPeer Resources, Inc., based in Centerville, Utah

After receiving the OPP case file (which includes the external review request form, denial notices from the insurer, and any additional information submitted by the patient), the external review agency assigns it to one or more of its medical experts who practice in the same or similar specialty as the service in dispute. The medical expert then reviews the information submitted by the insurance company and the patient, and reaches an independent conclusion about whether the treatment or service is medically necessary for the patient.

In accordance with state law, the external review agency issues its decision within 45 days for standard external reviews and within 72 hours for expedited external reviews. The decision of the external review agency is final and binding, though other legal rights apart from OPP's external review process may be available.

The consumer who requests external review usually pays a $25 fee toward the cost of the review. Upon request, OPP may waive the $25 fee due to financial hardship, and no consumer is required to pay more than $75 in fees per year. If a consumer prevails on external review and the decision is overturned, OPP refunds the $25 fee to the consumer. The insurer pays the external review agency for most or all of the external review, a cost which can range from about $475 to $2,000 depending on the time frame for the review, type of review and the number of reviewers needed.

In making its decision, the external reviewer considers the determination of the health plan, medical records of the patient, comments from a treating provider, and other pertinent documents to determine medical necessity. An external appeal decision is issued to all parties in writing and is subject to the terms and conditions of the insured's coverage with the health plan, such as cost sharing requirements, or maximum benefit limits.

2015 EXTERNAL REVIEW DATA

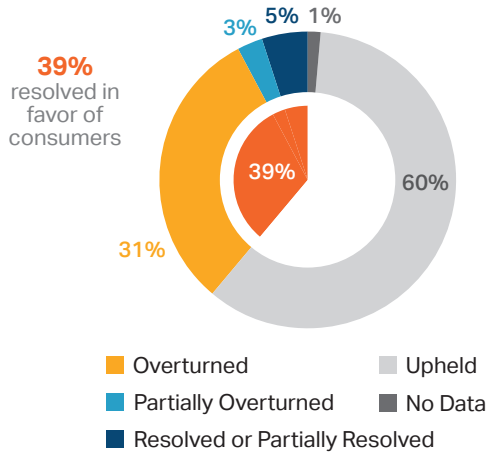
For each calendar year, the HPC analyzes overall external review data, medical/surgical data, and behavioral health data. The Chart Book for this report, which contains data for the last five years, is available on the OPP website.

EXTERNAL REVIEW CASES AND RESULTS FOR 2015

During 2015, OPP received 330 external review requests, and 250 of these were eligible for external review. Of the eligible cases, 34% were overturned in whole or in part or modified by the external review agency in favor of the patient. Approximately 4.7% of the cases that would have been eligible were resolved between the patient and the insurer or were withdrawn before a final determination was issued. The external review agencies upheld the remainder of the cases, which accounted for 60% of cases eligible for review. Comparable with prior years, the vast majority of external reviews have involved disputes between consumers and their health plans over whether treatments were medically necessary. A small number of requests involved denials of coverage by health plans on the grounds that the treatments were experimental or investigational.

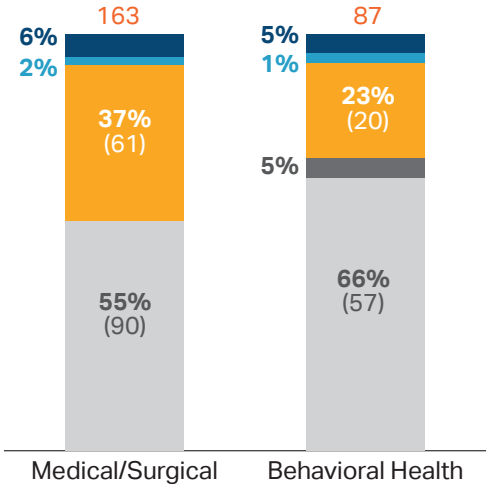
Figure 5 lists the dispositions or results for all eligible external reviews filed during 2015. **Figure 6** breaks down the total number of reviews into two categories: medical or surgical care and behavioral health.

FIGURE 5



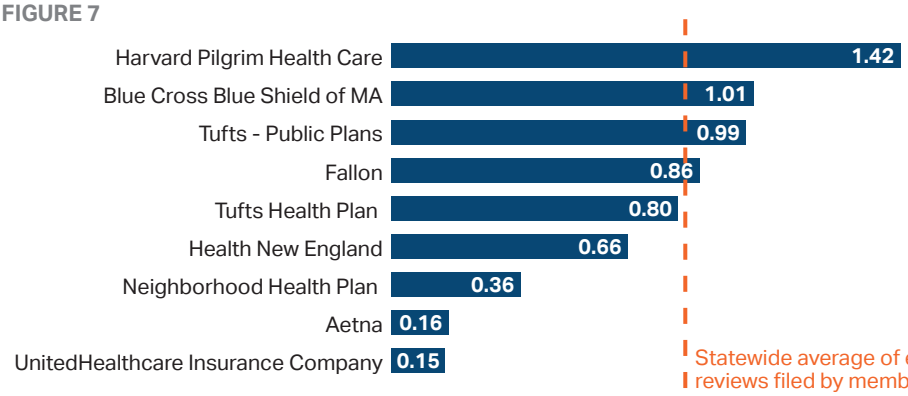
Source: 2015 Office of Patient Protection external review data

FIGURE 6



Source: 2015 Office of Patient Protection external review data

FIGURE 7



Note: Weighted by dividing number of external reviews by most recent health plan reported member month data. Center for Health Information and Analysis, 2015

Source: 2015 Office of Patient Protection external review data, Member months from Center for Health Information and Analysis, 2015

Figure 7 compares the frequency of eligible external reviews for each health plan. This number is calculated by adjusting the total number of external reviews for each plan by the number of members reported by each health plan in 2015, the most recent information publicly available.

This analysis identifies a statewide average for the number of external reviews filed by all fully-insured health plan members. Of the large health plans identified in **Figure 7**, three had a rate of external review above the statewide average, with Harvard Pilgrim Health Care reporting the highest proportion.

MEDICAL/SURGICAL DATA

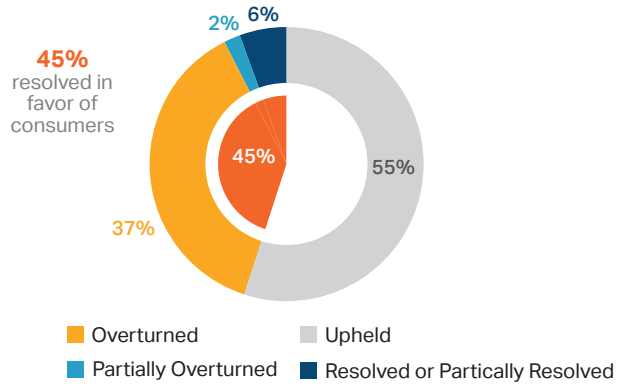
OPP received 163 eligible external review requests involving medical or surgical services. This category encompasses appeals involving a broad range of medical care, including imaging, lab testing, pharmacy requests and infertility treatment. External review data for behavioral health services are explored further below.

In 2015, 55% of external reviews involving medical or surgical treatment upheld the decision of the health insurer, and the remaining 36.6% of these cases were resolved either fully or partially in favor of the patient (**Figure 8**). The remaining matters were resolved prior to an issued decision. This is consistent with data from previous years.

The most common medical/surgical review requests were in the categories of outpatient care and pharmacy. OPP received 55 external review requests regarding outpatient medical/surgical care including surgeries and medical visits, 43 of which were eligible for external review. Additionally, 49 requests were received for pharmacy services, 39 of which were eligible for external review.

During 2015, OPP received 14 eligible external review requests involving infertility treatment. Out of the eligible cases, 7 were upheld by the external review agency, 6 were overturned, and 1 was partially overturned.

FIGURE 8



Outcomes of eligible external reviews for medical/surgical service requests in 2015.

Source: 2015 Office of Patient Protection external review data

EXPERIMENTAL AND INVESTIGATIONAL SERVICES

OPP provides consumers with the right to obtain an independent review by clinical experts when health plans consider services to be experimental or investigational. In 2015, OPP received approximately 21 eligible external review requests involving services deemed to be experimental or investigational by the insurance companies. These types of requests included, for example, diagnostic procedures, off-label medication requests and non-standard surgical procedures or treatments. In 2015, 5 of these requests were overturned in favor of the patient, and 15 were upheld. Provided that the absolute number of OPP cases is small, it is difficult to draw comparisons based on such a small sample size.

OUT OF NETWORK COVERAGE REQUESTS

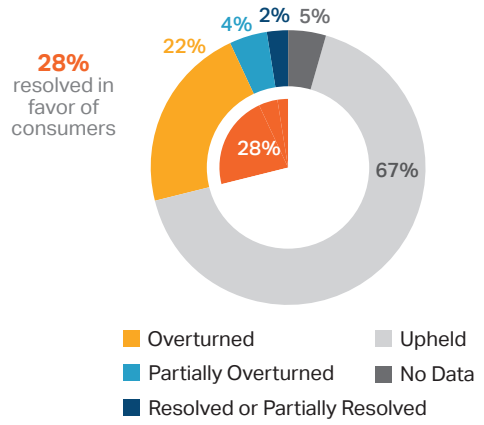
In some instances, a consumer has the right to appeal a denial of coverage for treatment by a provider who is outside of the insurer's network. If the treatment is a covered service, and if the insurer denied coverage because it was not medically necessary to receive the services from an out of network provider, then the consumer may request external review. OPP determines whether such matters are eligible for review on a case-by-case basis. If eligible, the reviewer then decides whether the treatment is medically necessary and if so, could any in-network provider perform the procedure or provide the service at issue.

During 2015, OPP received 35 requests for external review involving coverage for an out of network provider. Only 27 of these were eligible for external review. Medical reviewers upheld the original decision of the health plan in 16 of these 27 external reviews.

BEHAVIORAL HEALTH

Behavioral health cases, which include treatment for mental health conditions, substance use disorders, and some developmental disabilities, represented a significant proportion of external review cases received by OPP during 2015. See **Figure 9**.

FIGURE 9



Eligible external reviews related to behavioral health treatment by outcome, 2015

Source: 2015 Office of Patient Protection external review data

OPP received 103 requests for external review of behavioral health services during 2015, and 88 of these were eligible for external review.

- **Eligible behavioral health cases:** Of all eligible behavioral health cases received during 2015, 21 cases, were fully or partially overturned in favor of the patient, and 1 other case was resolved in favor of the patient.
- **Mental health treatment:** Of the eligible cases, OPP received 48 requests for mental health treatment. Inpatient mental health care represents the largest subcategory, with 21 eligible requests for external review.
- **Substance use disorder treatment:** OPP received 29 eligible requests for substance use treatment, 21 of which were for residential substance use disorder treatment.

While close to one-third of the eligible behavioral health cases were resolved in the patient's favor, the majority of substance use disorder cases were upheld in favor of the health plan. Of the 29 eligible substance use disorder cases, 18 were upheld by an independent medical reviewer because care was not found to be medically necessary.

HEALTH INSURANCE APPEALS OVERVIEW

In general, a consumer who receives an adverse determination from an insurance company, denying coverage based on medical necessity grounds, has a significant chance of modifying or overturning the decision through the appeals process. According to figures reported to OPP by health plans, 22% of members who received adverse determinations from their health plans were able to have their disputes partially or fully resolved in their favor through the internal review or external review process.

The numbers of external review requests filed during 2015, and the numbers of eligible external reviews received, were broadly consistent with recent years. Of note, a slightly lower percentage of behavioral health external reviews resulted in full or partial coverage of the disputed treatment. In 2015, 28% of behavioral health external reviews were overturned, partially overturned, resolved or partly resolved in favor of the consumer; compared to 52% in the prior year.

HEALTH CARE CONSUMER PROTECTIONS

HEALTH PLAN REPORTING

Massachusetts fully-insured health plans submit annual reports to the Office of Patient Protection, providing information about the following:

- Internal reviews
- External reviews
- Sources of information about consumer satisfaction
- Rates of provider disenrollment and reasons for disenrollment
- Medical loss ratio
- Other health plan information

Health insurance companies must report information on grievances received, including the outcomes of those grievances. The OPP website provides further detail on data compiled from the 2015 health plan reports.

OPP works with other agencies and seeks input from stakeholders, like health insurance companies and consumer groups, to implement Massachusetts health insurance laws. Where inter-agency questions or concerns arise, OPP works closely with the Massachusetts Division of Insurance, the Office of the Attorney General, the Health Connector, and other state and federal agencies to address concerns and work with insurance companies to ensure compliance.

CONSUMER INFORMATION AND ASSISTANCE

The Office of Patient Protection serves as a resource for consumers, through our hotline, website, and informational guides, assisting with questions about health insurance appeals, enrollment waivers, and other health insurance problems. While OPP does not represent individual consumers, we provide consumer education and assistance through our hotline, at 800-436-7757. Telephone translation services are available for callers who speak non-English languages or for those who are hearing impaired; staff is also accessible by email or by fax.

OPP also provides information about health insurance appeals, enrollment waivers, and other health-related resources on our website at www.mass.gov/hpc/opp. On our website, consumers can find relevant forms in English and Spanish, instructions for pursuing an external review or requesting an enrollment waiver, data, reports, and a comprehensive list of resources to assist with matters related to health care coverage and access.

TRAINING & OUTREACH

OPP welcomes requests for informational presentations from consumer organizations, health care providers, government agencies and other interested groups. Staff is available to provide trainings and to answer questions.

APPEALS PROCESS FOR PATIENTS OF RISK-BEARING PROVIDER ORGANIZATIONS (RBPO) AND ACCOUNTABLE CARE ORGANIZATIONS (ACO)

OPP also has authority to administer a new consumer protection included in Chapter 224 of the Acts of 2012 for patients of RBPOs and HPC-certified ACOs. This new consumer protection provides an opportunity for patients attributed to a RBPO or ACO to appeal provider determinations about referrals restrictions or other potential limitations of care. During 2015, OPP engaged with stakeholders to gather information in support of regulatory development, resulting in an Interim Guidance bulletin released in May, 2016 (HPC-OPP-2016-1).

✦ ✦ ✦

Since its inception, the Office of Patient Protection has worked effectively to safeguard health care consumer protections in the Commonwealth. OPP has continued to solicit and act on feedback and promote awareness of external appeal and waiver rights. OPP strives to address each inquiry, waiver, and appeal in a fair and consistent manner. OPP's efforts contribute to the provision of high quality patient care while advancing a more transparent, accountable, and innovative health care system.

GLOSSARY

FULLY-INSURED

A health insurance plan purchased by an individual, a family, an employer, or another entity. The purchaser of the health insurance plan pays premiums to the insurance company, and the insurance company then pays the claims for health care services. Fully-insured plans can be regulated by the state government. This is also referred to as fully-funded.

INDEPENDENT REVIEW ORGANIZATION

An independent third-party medical review resource that provides objective medical determinations based on evidence that includes medical reports, health plan guidelines and evidence-based criteria. Each review organization offers a panel of clinical providers to review appeals fairly and impartially. IROs are required to be accredited by URAC or other nationally recognized accrediting entity.

HEALTH PLAN

In this report, a "health plan" refers to an insurance product or insurance plan offered by a health insurance company.

MEDICAL NECESSITY OR MEDICALLY NECESSARY

Refers to health care services that are consistent with generally accepted principles of professional medical practice as determined by whether the service:

- is the most appropriate available supply or level of service for the insured in question considering potential benefits and harms to the individual
- is known to be effective, based on scientific evidence, professional standards and expert opinion, in improving health outcomes
- for services and interventions not in widespread use, is based on scientific evidence

NON-GROUP INSURANCE

Non-group insurance means health insurance that you buy for yourself or your family from the Health Connector or from an insurance company or insurance agent.

OPEN ENROLLMENT

Under Massachusetts and federal law there are only certain times during the year when individuals and families may buy non-group health insurance coverage. The time when individuals and families can apply – the time when health insurers open plans to new members – is called "open enrollment." This is similar to the process employers use to allow their employees to sign up or change plans during specific times.

SELF-INSURED/ SELF-FUNDED

Under a self-insured or self-funded plan, your employer pays the costs for its employees' health care directly instead of paying premiums to buy health insurance. Some self-insured employers hire insurance companies to process the paperwork, so it is not always easy to tell if you are in a self-funded plan. Contact your employer to find out if your plan is self-insured. Self-insured plans are usually regulated by the federal government and governed by ERISA.

ACKNOWLEDGMENTS

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EXECUTIVE DIRECTOR

David Seltz

A special thank you to Jenifer Bosco who served as Director of the Office of Patient Protection through November of 2015; Steven Belec joined the program as Director in early 2016. We would also like to acknowledge Stephanie Carter, OPP Program Coordinator, and Eric Rollins, OPP Program Associate, who assisted with this report under the guidance of Executive Director David Seltz.

Commission staff made significant contributions to the preparation of this report. Kelly Mercer and Andrew Carleen prepared content and analyses for this report. Megan Wulff and Rebecca Balder assisted with data analysis. Coleen Elstermeyer, Lois Johnson, and Nancy Ryan reviewed the contents and provided comments.

The Commission acknowledges the efforts of other government agencies in the development of this report, including the Center for Health Information and Analysis and the Department of Public Health.

The Commission would like to thank the insurance companies that submitted information included in this report. The Commission acknowledges the input of consumers and stakeholders, and we hope that this report provides useful information for navigating health insurance consumer protections in Massachusetts.

MASSACHUSETTS
HEALTH POLICY COMMISSION
50 Milk Street, 8th Floor
Boston, MA 02109
www.mass.gov/HPC