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August 17, 2015

Commissioner Daniel R. Judson  
Massachusetts Division of Insurance  
1000 Washington Street, 10th Floor  
Boston, MA 02118-6400

*Via E-mail:* [DOIregreview2015@state.ma.us](mailto:DOIregreview2015@state.ma.us)

Dear Commissioner Judson,

Steward Health Care System LLC (Steward) appreciates the opportunity to comment on the Division of Insurance's regulatory review in accordance with Governor Baker's Executive Order to ensure state rules are clear, concise, consistent, and promote a more efficient and competitive environment for residents and businesses alike. Steward is New England's largest community-based accountable care organization, encompassing ten hospital campuses and over 2,700 physicians and specialists, as well as nurses, home health, behavioral health and allied services professionals. As the largest corporate taxpayer in Massachusetts, Steward employs 17,000 individuals and supports the Commonwealth and each of the communities in Eastern Massachusetts where we deliver health care services.

As the Division updates its regulations, Steward respectfully encourages the Division to improve public access to data collected under the Division's regulatory authority governing health insurance carriers and related organizations.

As part of its ongoing regulation and monitoring of the health insurance market, the Division's regulations outline regular reporting requirements for health insurance carriers and related organizations. These financial, operational, and membership reports provide the Division and the public with valuable data regarding health insurance costs and trends that may impact overall health care market spending and consumer affordability of health insurance products.

Consumers, employers, policymakers and the community stand to benefit from real-time access to this data collected by Division. Immediately following collection, the Division should publish at least the following data elements online in a format that is easy for consumers, employers and researchers to navigate and analyze:

- Quarterly and annual rate filings, including health insurance premiums, cost sharing, and rate factors by insurer and by product, respectively;

- Quarterly and annual insurer financial statements detailing at a minimum: reserves, profit, administration, producer fees, and medical expense by insurer and by product, including self-insured business where feasible;
- A comprehensive and regularly published Division of Insurance Annual Report detailing the Division's work and major activities from the prior year (the last such report publicly available was published in 2010).

Steward recommends the Division improve transparency and public access of all data collected by the Division through its regulatory oversight of health insurance carriers and related organizations.

Thank you for the opportunity to provide comments as the Division reviews and updates its regulations.

Sincerely,

A handwritten signature in black ink, appearing to read "Angela Sherwin". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Angela Sherwin, MPH  
Vice President, Public Policy and Strategic Analysis

CC: Kevin Beagan, Deputy Commissioner, Health Care Access Bureau  
Robert Whitney, Deputy Commissioner and General Counsel