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Eric Carlisle  
Regulatory Coordinator  
Pennsylvania Insurance Department  
1341 Strawberry Square  
Harrisburg, PA 17120  
Email: [ercarlisle@pa.gov](mailto:ercarlisle@pa.gov)

**Re: Comment re proposed amendment to § 89.12 – Preparation of Forms and Collection of Demographic Information**

Dear Mr. Carlisle:

Independence Blue Cross (Independence) appreciates the opportunity to comment on the Pennsylvania Insurance Department's (Department) proposed amendment to Chapter 89. As the leading health insurance organization in southeastern Pennsylvania for more than 80 years, Independence strives to provide not only affordable but equitable coverage to all members we serve in the Commonwealth. As such, we applaud the Department's proposal permitting insurers to collect demographic data on application forms. Information such as age, gender, race and ethnicity provide valuable insight about our membership and enables us to better monitor access and utilization, track changes in health outcomes, design tailored programs, and respond accordingly to reduce disparities.

Independence has had great success leveraging demographic information sourced from CMS enrollment data and census data to develop new programs to reduce racial inequities. The following two examples demonstrate where data has served as the basis for solutions improving the health of our members:

- **Severe Maternal Morbidity (SMM):** By analyzing demographic data, we identified that Black members face a disproportionately higher burden of SMM during delivery and post-partum. As the result of this research, our Health Equity team has partnered with a new vendor called Cayaba Care that provides maternity navigators who can advocate for members along their pregnancy journey. This program is focused on supporting mothers at risk for SMM and provides support services to reduce SMM risks.
- **Diabetes Control:** By analyzing demographic data, we learned that our Black and Latino members on whole develop diabetes from pre-diabetes at a faster rate and have lower rates of Hemoglobin A1c control than members of other race groups. In response, our Health Equity team has developed a goal to reduce this racial



inequity and have begun to target the issue by adding new questions to our diabetes control vendor selection process. Examples of such questions are:

- 1) How are you assessing the social risk of members? How are health disparities identified and prioritized through data?
- 2) What are the health equity gaps you intend to address by implementing this program?
- 3) Does your program have or are you considering cultural competency across the mechanisms of your program?
- 4) How will you evaluate program success for improving health equity?
- 5) Does your organization require training for front-line CSRs, care managers, etc. on unconscious bias and cultural sensitivity? If so, how frequent are the trainings?

The Department's proposed rule will help us to build upon initiatives like the two mentioned above by also allowing us to utilize self-reported demographic data gleaned from member applications – such a direct source (rather than more general census data) will help us to better understand our membership's needs as we strive to achieve equitable health outcomes.

As the Department notes in its proposed rulemaking, updating Chapter 89 will align the state rules with the federal rules taking effect for the 2025 year. Additionally, the proposed rulemaking will enable insurers to pursue the National Committee for Quality Assurance's (NCQA) Healthy Equity Accreditation. The Health Equity Accreditation recognizes plans who are advancing equity initiatives and requires insurers to collect data, offer language services and identify opportunities to reduce health inequities and improve care. As recent applicants for the Accreditation, we ask that the Department remain in alignment with NCQA's required data collection elements.

Independence believes that everyone deserves access to high-quality insurance regardless of demographic factors. Our ability to collect additional data will allow us to gain valuable insight about the people we serve and ultimately provide equitable coverage best suited for our diverse membership. We look forward to working closely with the Department to fulfill the goals of this important rule.

Sincerely,

DocuSigned by:

Kaitlin Cavanaugh

SVP and Chief Marketing Officer