



Oscar Health, Inc.
75 Varick St, 5th Floor
New York, NY 10013



May 15, 2023

Eric Carlisle
Regulatory Coordinator
Pennsylvania Insurance Department
1341 Strawberry Square
Harrisburg, PA 17120

Re: Proposed Amended Regulation 31 Pa. Code Chapter 89 Concerning Preparation of Forms

Dear Mr. Carlisle:

Thank you for the opportunity to provide written comments in support of proposed amendments to 31 Pa. Code 89, which would permit the collection of demographic data through voluntary questions related to race and ethnicity on insurance applications. Oscar Health, Inc. (“Oscar”) is a direct-to-consumer health insurer dedicated to member engagement and connecting our diverse membership to care using our in-house developed technology. We strive to advance equitable care and make a healthier life accessible in the communities we serve. Oscar Health Plan of Pennsylvania, Inc. has been serving members in the Commonwealth since 2020.

Health insurers that elect to collect demographic data through this regulation will have additional tools to inform the cultural and social preferences of the members that we serve, enabling us to improve upon existing culturally competent care initiatives and to innovate new programs to meet the health equity needs of our members. For example, at Oscar, we allow our members to voluntarily disclose demographic data elements, including race/ethnicity, language, gender, sexual orientation, and preferred names and pronouns, through their online account leveraging our “MyIdentity” functionality in our member web application. This application helps our members connect with providers who may share an identity or cultural background. Studies suggest that having a health care provider of the same race or who speaks the same language has been associated with a greater likelihood of patients agreeing to and receiving preventive care, better patient experience ratings, and high ratings on patient-reported measures of care quality.¹

¹ Gonzalez, D., Kenney, Genevieve M., McDaniel, Marla, and O’Brien, Claire. [Racial, Ethnic, and Language Concordance between Patients and Their Usual Health Care Providers](#), The Urban Institute and Robert Wood Johnson Foundation (March 2022).

Oscar commends the Department's proposal to permit insurers to have greater access to voluntarily provided member demographic data. We also applaud the Department's inclusion of consumer-protective provisions to limit the insurer's use of such data to support efforts to provide equitable coverage.

Please do not hesitate to contact me at 443-454-4985 or cgrason@hioscar.com if you have any questions or require additional information.

Sincerely,

Cathy Grason
Senior Counsel (Northeast Region) & Head of Government Affairs