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October 20, 2011

Donald Berwick, MD
Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Room 445-G, Hubert H. Humphrey Building
200 Independence Avenue, SW
Washington, DC 20201

Re: CMS-9982-P, (76 Federal Register 52442), CMS-9982-NC (76 Federal Register 52475); August 22, 2011

Dear Administrator Berwick:

On behalf of the American Medical Association (AMA) and our physician and medical student members, I am writing to offer our support for the proposed regulations regarding disclosure of the summary of benefits and coverage (SBC) and the uniform glossary for group health plans and health insurance coverage in the group and individual markets as well as the proposed SBC template, instructions, sample language, guide, and uniform glossary that would satisfy the disclosure requirements under the Patient Protection and Affordable Care Act (ACA). The proposed regulations and templates/instructions implement the disclosure requirements under Section 2715 of the Public Health Service Act to help plans and individuals better understand and evaluate their health coverage, as well as other health coverage options.

The AMA was appointed to the National Association of Insurance Commissioners (NAIC) Consumer Information Subgroup in 2010. The AMA actively participated in developing the final NAIC recommendations to the U.S. Department of Health and Human Services (HHS), which were published in the August 22, 2011 Federal Register. The subgroup met for over a year, and spent many hours in meetings and conference calls drafting the detailed language for the Summary of Benefits and Coverage documents, and the Uniform Glossary. While the Subgroup's final recommendations reflect compromise among physicians, insurers, consumers, and regulators, the final product will dramatically improve consumer understandability of health care benefits. The AMA applauds HHS for supporting the final recommendations of the Subgroup, and we strongly support the proposed rules.

Donald Berwick, MD

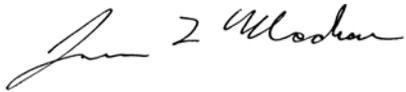
October 20, 2011

Page 2

The AMA has long supported the importance of providing consumers with clear, consistent, and understandable information about their health plan benefits and coverage. In response to our commitment to transparency, the AMA developed an entire legislative campaign entitled, "Campaign to Secure Meaningful and Transparent Benefits." This campaign includes many model bills consistent with the proposed rules, including language that promotes transparency of health insurance premiums, and clear and understandable language defining what "usual, customary and reasonable" means and the cost implications for consumers and physicians, as well as model language allowing consumers to assign their health benefits as they wish, to ensure appropriate payment for health care.

Thank you for supporting the NAIC final recommendations. We urge you to finalize these rules, which reflect significant compromise among key stakeholders. Please contact Debra Cohn, Washington Counsel, at debra.cohn@ama-assn.org or (202) 789-7423 for further information.

Sincerely,

A handwritten signature in cursive script, appearing to read "James L. Madara".

James L. Madara, MD