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I am writing to you as a professional benefit specialist with 36 years experience, to urge you to support medical loss ratio definitions that take a broad and flexible view on the many health insurance activities which will serve to further the goals of health care reform.

Medical loss ration (MLR) requirements created by the Patient Protection and Affordability Act (PPACA) should not discourage insurance companies from developing activities aimed at improving quality and containing costs, such as wellness programs, disease management, prevention, and health IT investments, all activities that some may consider administrative costs.

When drafting the definitions and methodologies associated with MLR, it is important that you and your fellow insurance commissioners aim to improve quality and affordability. The definition of clinical services and activities must be inclusive and comprehensive to allow insurance carriers to provide a wide spectrum of activities that contribute to better health outcomes for consumers. Activities by health insurance carriers, such as information sharing on quality providers and work to reduce medical errors, ultimately lead to better outcomes, higher quality and lower premiums.

Similarly, the well established role of agents and brokers in disseminating vital information and performing services which help to reduce costs and improve quality must also be considered.

The goal of PPACA was to provide affordable and quality health care to all Americans, and we must keep these goals in mind as we develop important MLR guidelines. It is important to spend time clearly defining clinical services and administrative costs to allow insurance carriers to provide an array of services that will improve the health of Americans and provide them the health care they deserve. Insurance carriers have an important responsibility to American consumers, to not simply pay claims, but to provide services and systems that help keep them healthy and help keep their insurance affordable. I very much appreciate your efforts in carefully drafting MLR requirements that keep this responsibility in mind and that do not hinder the efforts of health care reform.

Thank you for your consideration on this issue.

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