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October 11, 2019

Robin Wheeler Feane
Department of Financial Services
One Commerce Plaza
Albany, NY 12257

Submitted electronically: robin.wheelerfeane@dfs.ny.gov

Dear Ms. Wheeler Feane:

The Healthcare Association of New York State, on behalf of our member nonprofit and public hospitals, nursing homes, home health agencies and other healthcare providers, appreciates the opportunity to comment on the Department of Financial Services' proposed addition of Section 52.69 to Title 11 NYCRR, *Rules relating to the content of health insurance identification cards*.

HANYYS fully supports these revisions, which would standardize the information available on health insurance identification cards and require more information to be included on the cards. We appreciate the requirement to include a statement identifying whether the coverage is fully insured or administered by the insurer through a self-funded arrangement.

HANYYS has been a longstanding advocate for streamlining the administrative processes behind health insurance plans and healthcare providers. When health insurance identification cards do not contain complete product information, it causes delays for providers in the claims payment and appeals process. If healthcare providers cannot readily discern what insurance product a patient has, they cannot easily identify which rules and regulations govern the product and the patient's resulting claim. Requiring all the information to be readily available on the identification cards would eliminate time consuming administrative work for both the provider and the plan.

However, we recognize that as technology has changed, so have the internal processes at healthcare provider offices. We therefore recommend that all of the newly required information for identification cards also be available in the electronic eligibility response.

Our members have expressed that much of the patient registration process is done electronically, sometimes by the patients themselves. Patients often present in emergency departments without any insurance identification on them. Most information is both gathered and stored electronically. For this regulation to be practical, it needs to include appropriate electronic requirements.

We thank the agency for proposing this regulation and moving to simplify the interactions between providers and health plans. While we are in full support of the additional information requirements on identification cards, we urge the agency to include electronic capabilities as well to best capitalize on the technology of today and evolving electronic systems.

HANYS appreciates the opportunity to provide feedback on the proposed regulations. If you have questions regarding our comments, please contact me at (518) 431-7730 or at jgold@hanys.org or Stefanie Pawluk, director, insurance and managed care, at (518) 431-7827 or spawluk@hanys.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey Gold". The signature is written in a cursive style with some flourishes.

Jeffrey Gold
Senior Vice President and Special Counsel, Managed Care and Insurance