



March 1, 2021

VIA E-MAIL

Jennifer Miner
Market Conduct Division
Connecticut Insurance Department
153 Market Street
Hartford, CT 06103

Re: Harvard Pilgrim Health Care, Inc. Market Conduct Exam

Dear Ms. Miner,

As required by the Stipulation and Consent Order entered into between Harvard Pilgrim Health Care, Inc. ("Harvard Pilgrim") and the State of Connecticut Insurance Department ("CID"), Harvard Pilgrim hereby submit its report of finding and summary of corrective actions taken to address the violations uncovered during the market conduct exam.

I. Introduction

The CID conducted a market conduct exam of Harvard Pilgrim from March 16, 2020 through October 2, 2020. The examination covered the utilization review practices of Harvard Pilgrim from January 1, 2018 through December 31, 2018. The results of this examination were detailed in the December 31, 2020 *Market Conduct Report* of Harvard Pilgrim Health Care, Inc. ("Harvard Pilgrim Report"). In the Harvard Pilgrim Report, the CID issued one finding for \$2,000 in fines.

II. Findings and Corrective Actions for Harvard Pilgrim Health Care

A. Failure to provide a toll-free number for utilization review

1. Findings

During the course of the examination, the examiner verified that the member identification cards in 7 determinations not to certify care failed to provide a toll-free number for utilization review and benefit determinations. While the toll-free number appeared on HPHC Insurance Company's PPO ID cards, it did not appear on Harvard

Pilgrim's HMO ID cards. This was due to the different nature of the products. By plan design, HMO members can only receive services from plan providers within the service area, and plan providers seek approval on behalf of the member. While the direct number for utilization review and benefit determinations was not on the HMO cards, Harvard Pilgrim noted that the telephone number for Member Services, who can transfer members to the correct department/numbers to have their utilization review and benefit determination inquiries addressed, was included on the ID cards. The examiner determined that this did not satisfy the requirements of C.G.S. 38a-591b(d)(7).

2. Corrective Actions Taken

To ensure compliance with the statute, Harvard Pilgrim added the toll-free telephone number for utilization review and benefit determinations to its HMO ID cards in January 2021. All Harvard Pilgrim ID cards issued after mid-January reflect the telephone number and are in compliance with the requirements under C.G.S. 38a-591b(d)(7).

III. Conclusion

Harvard Pilgrim has taken corrective steps related to the findings of the CID's market conduct exam. Harvard Pilgrim is confident that these steps will ensure future compliance. Please feel free to contact me with any additional questions you have.

Sincerely,



Gillian Rattray Carcia
Associate General Counsel
Harvard Pilgrim Health Care, Inc.